

TITLE V APPLICATION REVIEW

Facility Name: Printpack, Inc.
City: Villa Rica
County: Carroll
AIRS #: 04-13-045-00039

Application #: TV- 9639

Date Application December 20, 1996 (Updated December 10, 1997)
Date Application Deemed Administratively Complete: February 20, 1997
Date of Draft April 28, 1998
Permit No: 2759-045-0039-V-01-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Title V operating permit. 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 proposed pursuant to: (1) Section 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 primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to **Printpack, Inc.** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the methods for determining compliance with those applicable requirements. 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 process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name: Printpack, Inc.
2. Parent/Holding Company Name: Printpack, Inc.
3. Previous and/or Other Name(s): No previous names identified.
4. Facility Location: 297 Andrew Way, Villa Rica, Carroll County, Georgia 30180

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5. Attainment or Non-attainment Area Location

Carroll County is in attainment for all criteria pollutants.

6. Class I Area Impacts

This facility is not located within 100 km of a Class I area.

B. Site Determination

There are no applicable issues with regard to site determination. There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current permits (including Part 71 permits), as amended, issued to the facility. Based on a comparative review of Item 19 in Section 1.10 of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office, there are no comments.

Table 1: List of Current Permits, as Amended

Permit Number and/or Purpose of Issuance	Date of Issuance and Date of Amendments (if any)	Comments	
		Yes	No
2759-045-0039-E-01-0	October 1, 1997		X

D. Process Description

1. SIC Code(s): Major - 2759
Other - none

2. Description of Product(s) - Printpack manufacturers flexible packaging material.

3. Overall Facility Process Description

Flexographic Printing Press:

Printpack, Inc. (referred to as "Printpack") operates four 8-color flexographic presses. The process description for each of these presses is the same and therefore the description will be for the process in general without specifying source codes. Raw material is introduced in the form of unprinted rolls of plastic. A continuous web of material is fed into the printing section of the press, which consists of eight printing stations mounted about the periphery of a central impression drum. Each printing station prints a single color of the design being produced, by transferring an ink impression to the web as it passes the station. Inks are circulated to each printing station from an enclosed reservoir by means of an air operated or electric pump.

Between each printing station, high velocity jets of heated air from a dryer box impinge the moving web, and dry the ink. Volatiles evaporated during the drying process are captured in the dryer box and are exhausted to a VOC control device. A direct-fired, natural gas burner, supply fan, and exhaust fan support this process for each press. All of the dryers operate

under negative pressure, to minimize fugitive emissions.

Final drying takes place, after all of the colors have been printed, in an overhead dryer. Here, as in the between color dryer, high velocity heated air is used to insure that the inks are completely dry. Any volatiles evaporated in this final drying process are captured in the dryer and exhausted to the VOC control device.

The printed film is then rewound into rolls.

Flexographic Printing Press/Laminator

Printpack operates four 8-color flexographic presses/laminators. The steps involved in the flexographic printing sequence follow the description above. The product from the flexographic printing operation is referred to as a printed film web. Next, a coated film web is produced. The laminate film, or backstock, is introduced in the form of unprinted rolls of plastic. A continuous web of material is fed into the coating station where a thin film of adhesive is applied to the moving web. Adhesive is circulated to the coating station from an enclosed reservoir, by means of an air-operated or electric pump.

The coated film travels through a two-zone dryer where high-velocity jets of heated air impinge the web and dry the coating. Two separate dryer zones, each with its associated burner and supply fan, are utilized for more precise temperature control and drying. Volatiles evaporated during the drying process are captured in the dryers and exhausted by a common exhaust fan. Any volatiles evaporated in this final drying process are captured in the dryer and exhausted to the VOC control device.

The printed film web and coated film web are brought together at the laminating station, where they pass through the laminating nip. As the films pass between two rollers, one being heated steel, the second being rubber, a combination of heat and pressure forms the bond between the separate webs, producing the finished, laminated product. The printed, laminated film is then rewound into rolls.

Lamination:

Printpack operates three extrusion laminators. Raw material in the form of two continuous sheets of film, one having been previously printed, are laminated or joined together with an extruded thermoplastic material (i.e., polyethylene). The extrudate also serves as an integral part of the composite structure.

Extrusion lamination requires a primer on a limited number of structures. If priming is required, one continuous web of material is fed into a primer station where a thin film of primer is applied to the moving web. Primer is circulated to the primer station from an enclosed reservoir, by means of an air operated or electric pump.

The primed film travels through a dryer where high-velocity jets of heated air impinge the web and dry the primer. Volatiles evaporated during the drying process are captured in the dryer and exhausted by a common exhaust fan.

The printed and primed web is then joined to a second web at the laminating station, where they pass through the laminating nip. As the films pass between the rollers, a curtain of

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extruded polyethylene falls between the webs. Pressure and temperature facilitate bonding.

The new three-layer structure may then pass through a second or post coat station where a narrow thermal strip is applied. If thermal strip is applied, the laminated web travels through a single zone dryer where high velocity jets of heated air impinge the web and dry the thermal strip. An alternative product path would result in a second application of extruded polyethylene.

4. Overall Process Flow Diagram (optional) - Not included.

E. Regulatory Status

1. PSD/NSR: Printpack is a major source for VOCs under the PSD regulations.

2. Title V Major Source Status by Pollutant

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's Title V status?		
		Major Source Status	Major Source requesting SM Status	Non-Major Source Status
PM	Yes	no	no	yes
PM ₁₀	Yes	no	no	yes
SO ₂	Yes	no	no	yes
VOC	Yes	yes	no	no
NO _x	Yes	no	no	yes
CO	Yes	no	no	yes
TRS	Yes	no	no	yes
H ₂ S	Yes	no	no	yes
Individual HAP	Yes	no	no	yes
Total HAPs	Yes	no	no	yes

3. MACT Standards:

This facility is classified as an area source under 40 CFR Part 63 Subpart KK - "National Emission Standards for the Printing and Publishing Industry". Therefore they are subject only to the provisions of §63.829(d) [recordkeeping requirements] and §63.830(b)(1) [initial notification requirement].

4. Program Applicability

Program Code 6 - PSD: yes
Program Code 8 - Part 61 NESHAP: no
Program Code 9 - NSPS: no
Program Code M - Part 63 NESHAP: yes

TITLE V APPLICATION REVIEW**B. Equipment List for the Process**

Emission Unit ID No.	Pollutant(s) Emitted	Emission Unit Description	Air Pollution Control Device ID No.(s)	Air Pollution Control Device Description
P002	VOCs HAPs	8-color flexographic printing press/laminator	RT01/ RT02	Tandem thermal oxidizer
P003	VOCs HAPs	8-color flexographic printing press/laminator	RT01/RT02	Tandem thermal oxidizer
P004	VOCs HAPs	8-color flexographic printing press	RT01/RT02	Tandem thermal oxidizer
P005	VOCs HAPs	8-color flexographic printing press	RT01/RT02	Tandem thermal oxidizer
P006	VOCs HAPs	8-color flexographic printing press	RT01/RT02	Tandem thermal oxidizer
P007	VOCs HAPs	8-color flexographic printing press/laminator	RT01/RT02	Tandem thermal oxidizer
P008	VOCs HAPs	8-color flexographic printing press	RT01/RT02	Tandem thermal oxidizer
P009	VOCs HAPs	8-color flexographic printing press/laminator	RT01/RT02	Tandem thermal oxidizer
L031	VOCs HAPs	Laminator	RT01/RT02	None
L033	VOCs HAPs	Laminator	RT01/RT02	None
L035	VOCs HAPs	Laminator	RT01/RT02	None
PW01	VOCs HAPs	Manual parts washer	RT01/RT02	Tandem thermal oxidizer
PW02	VOCs HAPs	Automatic parts washer	RT01/RT02	Tandem thermal oxidizer

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B. Equipment List for the Process - continued

Emission Unit ID No.	Applicable Rules/Regulations	Is Rule or Regulation Federally Enforceable?
P002	Press - Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Laminator - Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) - "VOC Emissions from Paper Coating" [referred to as Georgia Rule (w)]; Press - Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes Yes
P003	Press - Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Laminator - Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) - "VOC Emissions from Paper Coating" [referred to as Georgia Rule (w)]; Press - Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes Yes
P004	Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes
P005	Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes
P006	Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes
P007	Press - Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Laminator - Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) - "VOC Emissions from Paper Coating" [referred to as Georgia Rule (w)]; Press - Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes Yes

B. Equipment List for the Process - continued

Emission Unit ID No.	Emission Unit Description	Is Rule or Regulation Federally Enforceable?
P008	Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes
P009	Press - Georgia Rule for Air Quality Control 391-3-1-.02(2)(mm) - "VOC Emissions from Graphic Arts Systems" [referred to as Georgia Rule (mm)]; Laminator - Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) - "VOC Emissions from Paper Coating" [referred to as Georgia Rule (w)]; Press - Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes Yes
L031	Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) - "VOC Emissions from Paper Coating" [referred to as Georgia Rule (w)]; Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes
L033	Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) - "VOC Emissions from Paper Coating" [referred to as Georgia Rule (w)]; Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes
L035	Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) - "VOC Emissions from Paper Coating" [referred to as Georgia Rule (w)]; Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes Yes
PW01	Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes
PW02	Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	Yes

C. Equipment & Rule Applicability

- Emission and Operating Caps - A separate VOC emissions cap exists for each facility modification as shown in the following table:

Emission Unit ID No.(s)	Applicable Rule(s)/Regulation(s)	Emissions Cap	Basis for Emissions Cap
P002 + P003 + L031 + PW01	Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	VOC ≤ 574.7 tpy	PSD determination dated 1988.
P004 + P005 + P006 + P007 + P008 + P009 + PW02	Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	VOC ≤ 325 tpy	PSD determination dated 1988.
L033	Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	VOC < 40 tpy	PSD determination dated 1988; this value represents allowable emissions after BACT
L035	Georgia Rule 391-3-1-.02(7) - PSD - Employ Best Available Control Technology [referred to as BACT]	VOC < 40 tpy	PSD determination dated 1988; this value represents allowable emissions after BACT

- Applicable Rules and Regulations -

Rules and Regulations Assessment - Presses P002-P009 are subject to Georgia Rule (mm) because actual uncontrolled VOC emissions from these units combined are greater than or equal to 100 tons per year. Laminator L031, L033 and L035 and the laminating stations on presses P002, P003, P007 and P009 are subject to Georgia Rule (w) because potential uncontrolled VOC emissions from these units combined are greater than or equal to 100 tons per year. While the active permits for Printpack do not specify Georgia Rule (w) as an applicable requirement for the laminators on the press/laminators, the PSD permit applications for these units do state that this rule is an applicable requirement. Presses P002-P009 and laminator L031 are subject to PSD because the annual allowable VOC emissions rate is greater than 250 tons per year. BACT for the presses and laminators is more stringent than the requirements imposed by the applicable Georgia Rules.

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Emission and Operating Standards -

Equipment Source Code	Applicable Rule(s) Regulation(s)	Emission and Operating Caps	Emission and Operating Standards
P002	Press-Georgia Rule (mm) PSD [employ BACT] Laminator - Georgia Rule (w) & PSD	Press- VOC Capture Efficiency $\geq 75\%$ VOC Destruction Efficiency $\geq 95\%$ VOC Capture Efficiency $\geq 75\%$ VOC Destruction Efficiency $\geq 95\%$ Use compliant coatings or meet the solids equivalent limit after controls.	Press- VOC Capture Efficiency $\geq 60\%$ VOC Destruction Efficiency $\geq 90\%$ Case by case approved BACT. Use compliant coatings or meet the solids equivalent limit after controls.
P003	Press-Georgia Rule (mm) PSD [employ BACT] Laminator - Georgia Rule (w) & PSD	VOC Capture Efficiency $\geq 75\%$ VOC Destruction Efficiency $\geq 95\%$ VOC Capture Efficiency $\geq 75\%$ VOC Destruction Efficiency $\geq 95\%$ Use compliant coatings or meet the solids equivalent limit after controls.	VOC Capture Efficiency $\geq 60\%$ VOC Destruction Efficiency $\geq 90\%$ Case by case approved BACT. Use compliant coatings or meet the solids equivalent limit after controls.
P004	Georgia Rule (mm) PSD [employ BACT]	VOC Capture Efficiency $\geq 85\%$ VOC Destruction Efficiency $\geq 95\%$ VOC Capture Efficiency $\geq 85\%$ VOC Destruction Efficiency $\geq 95\%$	VOC Capture Efficiency $\geq 60\%$ VOC Destruction Efficiency $\geq 90\%$ Case by case approved BACT.
P005	Georgia Rule (mm) PSD [employ BACT]	VOC Capture Efficiency $\geq 85\%$ VOC Destruction Efficiency $\geq 95\%$ VOC Capture Efficiency $\geq 85\%$ VOC Destruction Efficiency $\geq 95\%$	VOC Capture Efficiency $\geq 60\%$ VOC Destruction Efficiency $\geq 90\%$ Case by case approved BACT.
P006	Georgia Rule (mm) PSD [employ BACT]	VOC Overall Control Efficiency $\geq 90.25\%$ VOC Overall Control Efficiency $\geq 90.25\%$	VOC Capture Efficiency $\geq 60\%$ VOC Destruction Efficiency $\geq 90\%$ Case by case approved BACT.
P007	Press-Georgia Rule (mm) PSD [employ BACT] Laminator - Georgia Rule (w) & PSD	VOC Overall Control Efficiency $\geq 95\%$ VOC Overall Control Efficiency $\geq 95\%$ Use compliant coatings or meet the solids equivalent limit after controls.	VOC Capture Efficiency $\geq 60\%$ VOC Destruction Efficiency $\geq 90\%$ Case by case approved BACT. Use compliant coatings or meet the solids equivalent limit after controls.
P008	Georgia Rule (mm) PSD [employ BACT]	VOC Overall Control Efficiency $\geq 95\%$ VOC Overall Control Efficiency $\geq 95\%$	VOC Capture Efficiency $\geq 60\%$ VOC Destruction Efficiency $\geq 90\%$ Case by case approved BACT.

Emission and Operating Standards - continued

Equipment Source Code	Applicable Rule(s) Regulation(s)	Emission and Operating Caps	Emission and Operating Standards
P009	Press-Georgia Rule (mm)	VOC Overall Control Efficiency \geq 95%	VOC Capture Efficiency \geq 60% VOC Destruction Efficiency \geq 90%
	PSD [employ BACT]	VOC Overall Control Efficiency \geq 95%	Case by case approved BACT.
	Laminator - Georgia Rule (w) & PSD	Use compliant coatings or meet the solids equivalent limit after controls.	Use compliant coatings or meet the solids equivalent limit after controls.
L031	Georgia Rule (w)	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.79 lbs VOC per gallon of coating solids.
	PSD [employ BACT]	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.
L033	Georgia Rule (w)	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.79 lbs VOC per gallon of coating solids.
	PSD [employ BACT]	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.
L035	Georgia Rule (w)	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.79 lbs VOC per gallon of coating solids.
	PSD [employ BACT]	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.	24-hour weighted average of all coatings on a single coating line meets the solids equivalent limit of 4.20 lbs VOC per gallon of coating solids.
PW01	PSD [employ BACT]	- PW01 shall be vented to the VOC control device at all times. - PW01 is vented to tandem oxidizer RT01 and RT02 that achieves the minimum required VOC destruction efficiency.	VOC Capture Efficiency \geq 100% VOC Destruction Efficiency \geq 95%

Emission and Operating Standards - continued

Equipment Source Code	Applicable Rule(s) Regulation(s)	Emission and Operating Caps	Emission and Operating Standards
PW02	PSD [employ BACT]	<p>- PW02 shall be vented to the VOC control device at all times.</p> <p>- PW02 is vented to tandem oxidizer RT01 and RT02 that achieves the minimum required VOC destruction efficiency.</p>	<p>VOC Capture Efficiency \geq 100%</p> <p>VOC Destruction Efficiency \geq 95%</p>

- D. Compliance Status - See Section VII.F.
- E. Operational Flexibility - See Section VII.A.
- F. Permit Conditions

Condition 3.3.1 - The Permittee shall not discharge, nor cause the discharge, into the atmosphere from emission units P002, P003, L031 and PW01 combined, VOCs in amount greater than 574.7 tons during any twelve consecutive months.
[40 CFR 52.21]

Condition 3.3.2 - The Permittee shall not discharge, nor cause the discharge, into the atmosphere from emission units P004, P005, P006, P007, P008, P009, and PW02 combined, VOCs in amount greater than 325 tons during any twelve consecutive months.
[40 CFR 52.21]

Condition 3.3.3 - The Permittee shall not discharge, nor cause the discharge, into the atmosphere from each laminator, L033 and L035, VOC emissions in excess of 39 tons during any twelve consecutive months.
[40 CFR 52.21]

Condition 3.3.4 - The 24 hour weighted average VOC content of all adhesives used by the Permittee on each extrusion laminator, L031, L033 and L035, shall be equal to or less than 4.2 pounds of VOC per gallon of solids delivered to the coating applicators using calculation methods approved by the Division.
[40 CFR 52.21]

Condition 3.3.5 - Parts washing machines, PW01 and PW02, shall be vented to the VOC control device at all times.
[40 CFR 52.21]

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Condition 3.3.6 - The Permittee shall operate and maintain the VOC capture systems of emission units P002, P003, P004 and P005 such that the following VOC capture efficiencies are obtained during their operation: [40 CFR 52.21]

Source Code	Minimum Capture Efficiency
P002 (press only)	75%
P003 (press only)	75%
P004	85%
P005	85%

Condition 3.3.7 - The VOC destruction efficiency of oxidizers RT01 and RT02 shall each equal or exceed 95% whenever said oxidizer is used for VOC control for presses P002, P003, P004 and P005. [40 CFR 52.21]

Condition 3.3.8 - The Permittee shall operate and maintain the VOC capture and control systems for presses P006, P007, P008, and P009 such that the overall control efficiencies are obtained: [40 CFR 52.21]

Source Code	Minimum Overall Control Efficiency
P006	90.25%
P007 (press only)	95%
P008	95%
P009 (press only)	95%

Condition 3.4.1 - The 24 hour weighted average VOC content of all adhesives used by the Permittee on the laminating stations on presses P002, P003, P007 and P009 shall be equal to or less than 4.79 pounds of VOC per gallon of solids delivered to the coating applications using calculation methods approved by the Division.
[391-3-1-.02(2)(w)]

Condition 3.5.1 - The ink mixing room shall be maintained and operated at all times utilizing the following work practices to minimize fugitive emissions: [391-3-1-.03(2)]

- a. Lids shall remain secure at all times on drums, containers and "tote" tanks, during periods of storage and transport with the exception of transfer, pouring, and mixing activities.
- b. Transfer shall be accomplished utilizing transfer pumps in lieu of manual pouring, except while toning and final adjustment.
- c. Mixing shall be accomplished while a slotted lid is in place on top of drum or other such container.

- d. General housekeeping and maintenance shall be undertaken at all times to ensure fugitive emissions be kept to a minimum.
- e. Spills shall be addressed immediately and residue placed in securely closed containers.

IV. Testing Requirements (with Associated Recordkeeping and Reporting)

A. General Testing Requirements

None of the regulations applicable to presses P002 - P009 and laminators L031, L033, and L035 require periodic performance testing, therefore the Permit does not contain Conditions to require specific testing. The Permit does specify in Condition 4.1.1 that a performance test may be required at anytime upon request by EPD to determine compliance with emissions limits contained in section 2.0 and 3.0 of this narrative. Condition 4.1.2 requires a thirty day written notice prior to any testing, and that a Method 204 test be performed to verify the permanent total enclosure requirements for presses P007, P008 and P009. The test methods for measuring emissions are listed in Condition 4.1.3.

- 1. Exceptions to General Testing Requirements - None

B. Specific Testing Requirements

- 1. Individual Equipment - None
- 2. Equipment Groups (all subject to the same test requirements) - None

V. Monitoring Requirements (with Associated Recordkeeping and Reporting)

A. General Monitoring Requirements

Condition 5.1.1 requires that all monitors be operated continuously except during breakdowns, repairs, and quality assurance activities. Any repairs or maintenance should be completed in an expeditious manner so downtime is minimized. All data should also be recorded during any calibration activity to help verify that the calibration was performed and completed properly. Condition 5.1.2 requires the implementation of a leak detection and correction program to help ensure a proper capture efficiency is maintained. This program applies to the VOC capture systems of the presses and laminator and the associated ductwork to the incinerator. A sufficient spare parts inventory must be maintained as per Condition 5.1.3.

B. Specific Monitoring Requirements

- 1. Individual Equipment -

The combustion zone temperatures of oxidizers RT01 and RT02 shall be continuously monitored at a location before any significant temperature drop occurs. The temperature

measurement serves as a surrogate parameter for determination of an acceptable destruction efficiency ($\geq 90\%$). During performance tests conducted on November 4-5, 1997, an operating temperature of 1500°F was maintained for each oxidizer to demonstrate the required VOC destruction efficiency. An average temperature of 1450°F is set as the trigger value for determining deviations from the applicable requirement of 1500°F. Deviations to indicate operational problems and potential emissions exceedances are required to be identified and reported. The temperature measurements must be kept in a permanent form for a period of five years as required by Condition 6.1.1.

The monitoring of the fan operation from the parts washers PW01 and PW02 and the plenum pressure from the flexographic presses P002, P003, P004, P005 and P006 is necessary to ensure that each piece of equipment is maintaining its respectively permitted capture efficiency level. A trigger value will be submitted by the Permittee for which the hour average pressure exceeds the minimum level established to maintain the required capture level for presses P002, P003, P004, P005 and P006.

2. Equipment Groups (all subject to the same monitoring requirements) - None

C. Recordkeeping and Reporting Requirements

Condition 5.3.1 requires the submittal of a semiannual report which will provide the Division a periodic update to help indicate the compliance status of the facility. The contents of the report are specified by the Division's **Procedures for Testing and Monitoring of Air Pollutants** and paragraphs a-f of this condition denote the specific contents of the report.

1. This section should include monitoring deviations and downtime for determination of adequate monitor operation prepared in accordance with Section 1.5(c) and (d) of those procedures. The specific form to be used by Star Packaging is **Summary Report - Gaseous and Opacity Excess Emission and Monitoring System Performance**.
2. The total process operating time during each reporting period.
3. The magnitude of all deviations computed in accordance with the applicable definition of such deviations as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of such deviation.
4. Each deviation which occurs during a startup, shutdown, or malfunction must be identified. If the cause of the deviation is known then this cause must be identified along with the corrective action(s) taken. Some reporting periods may not contain any monitoring deviations. In these cases the report shall state that no deviations occurred during the reporting period.
5. The date and time of any period of monitor downtime must be included in the report. The cause and corrective action(s) for each downtime event must be given. If there were no periods of monitor downtime then the report shall state such.
6. Finally, the report must be signed by a responsible company official to certify the report's

completeness.

Condition 5.3.2 requires the maintenance of several records as listed below:

1. Date, time, and place of any sampling or measurement;
2. The date that the appropriate analysis was performed;
3. The company name which performed the analysis should also be kept.
4. The methods used to perform the analysis such as Method 24 of Georgia's Procedures.
5. The results of the analysis should be permanently recorded.
6. The records should also contain the operating parameters at the time of sampling or measurement such as a number of ink stations operable, percent web coverage, volume of each ink and thinner used, and feet of printed web.

The Permittee should also keep records of all calibrations, tests, or checks performed on any monitoring system in the plant according to Condition 5.3.3.

VI. Other Recordkeeping and Reporting Requirements

A. General Recordkeeping and Reporting Requirements:

Condition 6.1.1 stipulates that all records required by the Permit be kept for a five year period. The Permittee is required in Condition 6.1.2 to report, within seven days, deviations from either of the two following occurrences:

1. Any process malfunction or pollution control malfunction which results in excess emissions for **four** or more hours; or
2. Any maintenance which causes a deviation.

The report should include the cause of the deviation and the corrective action taken to remedy the cause of the deviation.

B. Specific Recordkeeping and Reporting Requirements

1. Plant wide

Condition 6.2.1 - The Permittee shall maintain ink structures (formulas), mass or volume of each type of VOC and HAP consumed and the VOC and HAP content of each material on file in the Permittee's Computerized Information Management System. In addition, the Permittee shall make available to the Division, upon request, copies of records which support the VOC and HAP emission calculations. Said records may include such items as computer look up tables for solvent densities, ink and coating formula databases, solvent usage summaries for

individual CAS numbers and press run hours. These records shall be kept available for inspection or submittal for five years from the date of record.

[391-3-1-.03(2) and 40 CFR 63.829(d)]

Condition 6.2.2 - The Permittee shall use the Computerized Information Management System, required in Condition No. 6.2.1, to calculate total monthly HAP emissions. The Permittee shall notify the Division in writing if emissions of any individual HAP exceeds 0.83 tons, or if emissions of all listed HAPs combined exceed 2.08 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the emission limit in Condition No. 2.1.1.

[40 CFR 63.829(d)]

Condition 6.2.3 - The Permittee shall use the usage records required in Conditions 6.2.2 to calculate the 12 month rolling total emissions of total HAPs and individual HAPs for each month in the reporting period. Each 12 month rolling total shall be included in the semiannual report specified in condition 5.3.1. [40 CFR 63.829(d)]

2. Individual Equipment

Condition 6.2.4 - The Permittee shall use the Computerized Information Management System, required in Condition No. 6.2.1, to calculate total monthly VOC emissions. The Permittee shall notify the Division in writing if VOC emissions exceed any of the following thresholds in a calendar month:

- a. $P002 + P003 + L031 + PW01 = 47.9$ tons;
- b. $P004 + P005 + P006 + P007 + P008 + P009 + PW02 = 27.1$ tons;
- c. $L033 = 3.25$ tons; and
- d. $L035 = 3.25$ tons.

Notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to maintain compliance with the applicable emissions limits in Condition No.'s 3.2.1, 3.2.2, and 3.2.3.

[391-3-1-.03(2)]

Condition 6.2.5 - The Permittee shall use the usage records required in Conditions 6.2.1 to calculate the 12 month rolling total of VOC emissions for each group of emission units specified in (a) - (d) of Condition No. 6.2.4 for each month in the reporting period. Each 12 month rolling total shall be included in the semiannual report specified in condition 5.3.1. [391-3-1-.03(2)]

Condition 6.2.6- The Permittee shall determine and record the 24-hour average VOC content of all adhesives used in each laminator, L031, L033 and L035, and for each laminating station on presses P002, P003, P007 and P009. Determination of VOC content shall be made using methods and procedures acceptable to the Division. Said records shall be maintained in a form suitable for inspection and submittal for five years after the date of record. The Permittee shall notify the Division in writing if the 24-hour weighted average VOC content of all adhesives used on each laminator exceeds the following:

- a. 4.2 pound per gallon of solids delivered to the coating applicators for laminators L031, L033 and L035; and
- b. 4.79 pounds per gallon of solids delivered to the coating applicators for laminating stations on presses P002, P003, P007 and P009.

Such notification shall be postmarked within seven days of the exceedance and shall include an explanation of how the Permittee intends to maintain compliance with the limit on VOC content in Condition No. 3.3.1 and/or 3.4.1, whichever is applicable.
[391-3-1-.03(2)]

- 3. Equipment Groups - This is not applicable for Printpack.

VII. Specific Requirements

A. Operational Flexibility

Operational flexibility does not need to be incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Application.

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V Permit.

C. Insignificant Activities

Refer to §4.10 of the Title V permit application.

D. Temporary Sources

Printpack has not requested to operate any temporary sources.

E. Short-Term Activities

Printpack did not report any short-term activities.

F. Compliance Schedule/Progress Reports

The facility is in compliance with all Air Quality Regulations. Therefore, no compliance schedule or progress reports are necessary.

G. Emissions Trading

The facility is not involved in any emission trading program.

H. Acid Rain Requirements

TITLE V APPLICATION REVIEW

This facility is not subject to any requirements in Title IV of the Clean Air Act.

I. Prevention of Accidental Releases

This facility is subject to the Accidental Release Prevention Program because they store more than 10,000 lbs of propane.

J. Stratospheric Ozone Protection Requirements

The standard permit conditions pursuant to 40 CFR Part 82 Subpart F have been included in Printpack's Title V Permit. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source. Since Printpack has at least some air conditioners, chillers and refrigerators, Subpart F is an applicable requirement.

K. Pollution Prevention

There are no pollution prevention provisions incorporated into this Title V Permit.

L. Specific Conditions - None

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Closing Block: We have reviewed and recommend issuance of draft Permit No. 2759-045-00039-V-01-0.

Program	Review Engineers	Dates	Review Managers	Dates
SSPP/ASU				
SSCP/ASU				
ISMP				
TOXICS				

Stationary Source Permitting Program Manager

Date

ADDENDUM TO TITLE V APPLICATION REVIEW

October 9, 1998

The comment periods for proposed Title V permit 2759-045-00390-V-01-0 ended August 29, 1998, for the public and company, and September 13, 1998 for EPA. No comments were received from the public. Printpack submitted comments on August 28, 1998, and EPA submitted comments on August 28, 1998. A meeting was held between EPA and EPD on September 30, 1998 to resolve EPA's issues. EPA provided written comments to that meeting on October 8, 1998.

Printpack's Comments

1. Printpack corrected the name of their Parent/Holding Company in the draft permit and they submitted an updated Section 1.10 form stating the correct name.
2. Minor wording changes and additions were requested for Condition 1.3, Overall Facility Process Description. I recommend that these minor changes be incorporated into their Title V permit in order to clarify their overall facility process description.
3. Printpack requested that the description in Condition 3.1 for P002 be revised to read 8-color flexographic press. While this description matches the Title V emission unit description for this press, it does not match the emission unit description found in Permit No. 2759-045-0039-E-01-0. The description for this unit in their current permit is incorrect, based on a letter from the company dated September 9, 1998. I recommend that the emission unit description for P002 in Condition 3.1 be revised to read 8-color flexographic press.

Printpack requested that the description in Condition 3.1 for P008 be revised to read 8-color flexographic press/laminator. While this description matches the Title V emission unit description for this press, it does not match the emission unit description found in Permit No. 2759-045-0039-E-01-0. The description for this unit in their current permit is incorrect, based on a letter from the company dated September 9, 1998. I recommend that the emission unit description for P008 in Condition 3.1 be revised to read as requested by the company.

4. Printpack requested that the phrase "press only" be removed from the source codes for P002 and P003 in Condition 3.3.6. The phrase "press only" was included because these presses were originally permitted as flexographic press/laminators under the PSD program. Based upon my review of the PSD preliminary determination for these units, BACT was only established for the press and not the laminators. Upon further review of the PSD permit narrative, which was written in addition to the PSD preliminary determination, Printpack's BACT proposal included the laminator. However, this language was never included in the official preliminary or final determination or PSD permit. Consequently, I recommend that the phrase "press only" be removed from these source codes in Condition 3.3.6.
5. Printpack requested that the phrase "press only" be removed from the source codes for P007 and P008 in Condition 3.3.8. The phrase "press only" was included because these presses were originally permitted as flexographic presses under the PSD program. BACT for these units was

revised in 1995 because more than 18 months had elapsed since construction of press P006, meanwhile presses P007-P009 and incinerator I02 had not been constructed. In addition, presses P007 and P008 had been equipped with solvent-less laminators since they were originally permitted in 1995. The revised BACT analysis did not discuss the required VOC control for the laminators, thus I determined that the phrase "press only" was appropriate. I will assume that the BACT proposal from Printpack included the laminators. Consequently, I recommend that the phrase "press only" be removed from these source codes in Condition 3.3.8.

6. Printpack objected to the wording in Condition 3.4.1 since the technical requirements of this condition were more stringent than the applicable rule, Georgia Rule (w). Upon review, I agree with the facility. I recommend that the phrase "delivered to the coating applications, after controls" be removed.
7. Printpack's request for test result submittal time frame in Condition 4.1.1 being changed from 30 to 45 days is acceptable.
8. Condition 4.1.3(f) shall remain Method 25. Method 25 is the reference method, however, in cases where Method 25 is not applicable, alternative methodology may be applied. Method 25A, when applicable, is an acceptable alternative when Method 25 does not apply.
9. Printpack's request that P007 be deleted from Condition 4.2.1.a.i is acceptable as the verification of Permanent Total Enclosure (PTE) requirements have been completed for this particular press. However, should any structural change with regard to natural draft openings (NDO's) in the building occur, or the location of an application point or emission point of the press P007 be moved in relation to any NDO, re-verification of applicable PTE requirements may be necessary.
10. Condition 5.1.1 is a template condition, not subject to re-wording. The monitoring and data recording shall be continuous except during periods of continuous monitoring system breakdown, maintenance, or repair. These breakdown periods shall be periods of monitoring downtime. During calibration checks and zero and span checks, the data recorded shall be the calibration or span data.
11. Condition 5.2.1 is a template condition and not subject to change. The referenced **Georgia Rules for Air Quality Control**, 391-3-1-.02(6)(b)1, contain the monitoring provision for continuous monitoring.
12. Printpack requested that Condition 5.2.1.b be deleted from the permit because verification of the flow of the exhaust from the parts washers to the RTO is accomplished by Condition 5.2.1.c. Please refer to question number 12 under EPA's Significant Comments.
13. Printpack's request for the addition of the phrase "according to manufacturer's instructions" in Condition 5.2.1.c is acceptable. In addition, the phrase "to ensure maintenance of a minimum of negative one inch of water column pressure at that location" is deleted upon recommendation of the ISMP. A monitoring range for this pressure reading that satisfactorily demonstrates the capture efficiencies of the permit will need to be included in Condition 5.3.3.c.

14. Printpack's request to extend from 30 days to 60 days the period for review of the pressure monitoring system of 5.2.1.e is acceptable.
15. The Condition 5.2.1(f) should be a good work practice for all the presses, P002, P003, P004, P005, P006, P007, P008, and P009. The last three shall be added to this condition. This, in conjunction with the continuous monitoring of the pressure of 5.2.1.c, will verify maintenance of the PTE. The first four presses have minimum required capture efficiencies established in Condition 3.3.6. Leaving entryways wide open would be detrimental to capture efficiencies of these presses. Good work practices would include reducing the total area of any draft openings for any press room at all times.
16. Condition 5.3.3.b contains appropriate language for the continuous monitoring required by 5.2.1.b for the parts washers, and this condition shall remain.
17. The word "log" will be replaced by the word "record" in Condition 5.3.3.c. I also replaced the word "log" with the word "record" in Conditions 5.3.3.a for consistency.
18. Printpack requested that Condition 6.2.2 be removed from the permit because the reporting requirements in Condition Nos. 6.2.2 and 6.2.3 are redundant. Air Branch management decided that it is not necessary for companies that are required to submit semiannual emissions reports to submit the monthly notification report. Thus, the proposed language in Condition 6.2.2 is removed.
19. Printpack requested that Condition 6.2.4 be removed from the permit because the reporting requirements in Condition Nos. 6.2.4 and 6.2.5 are redundant. Air Branch management decided that it is not necessary for companies that are required to submit semiannual emissions reports to submit the monthly notification report. Thus, the proposed language in Condition 6.2.4 is removed.
20. Printpack requests that all references to P002, P007, and P009 as adhesive lamination be removed from Condition 6.2.6 since the laminators on these pieces of equipment do not perform adhesive lamination. The laminators on these pieces of equipment are extruders. In addition, Printpack asserts that the Georgia Rule (w) limit for the extruders on P002, P007, and P009 is not applicable.

Based on the information supplied in item number 3 of this addendum, the reference to P002 should be removed from Condition 6.2.6 since it does not include the operation of a laminator.

The original PSD permit for P007 indicated that this unit was an 8-color flexographic press. I asked Printpack about the appearance of a laminator on this unit in 1997. Their response was that an extruder, not laminator, was added which utilized solvent-less materials. Therefore it does not use materials which are subject to Georgia Rule (w) and the reference to P007 should be removed from Condition 6.2.6.

P009 is listed in the Title V permit application as containing a laminator. Based on information supplied by Printpack on September 9, 1998, the laminator is an extruder laminator and is not subject to Georgia Rule (w). Based on that information, I recommend that the reference to P009 be removed from Condition 6.2.6.

21. Printpack requested that Condition 8.1.2 be revised unless Conditions 3.4.1 and 6.2.6 are revised as requested. Conditions 3.4.1 and 6.2.6 were revised to meet the requirements of Georgia Rule (w). Thus no changes are recommended to Condition 8.1.2.
22. Printpack requested an addition to the insignificant activities checklist in Attachment B. The photopolymer plate-making process was included; however, I recommend that additional wording be included in the table for this activity.

Printpack listed storage tanks in Section 5.20; however, in reviewing the draft Title V permit, these tanks were neither mentioned as emission units nor as insignificant sources in Attachment B. In a letter to the Division dated September 9, 1998, Printpack indicated that they felt that each of the storage tanks be treated as an insignificant source since their capacity is less than or equal to 5,000 gallons. There are no applicable rules for these tanks, therefore I support including them in Attachment B.

23. Printpack requested that the number of ozone generators be changed from one to four in Attachment B, Insignificant Activities Based on Emission Levels. The most recent update of Section 4.50 lists no ozone generators and 5 corona treaters. I requested that Printpack update Section 4.50 and list the correct number of ozone generators and corona treaters.

EPA's Significant Comments

1. EPA required that Condition 2.1.1 be revised to be consistent with the requirements of 40 CFR 63.820(a)(2). Condition 2.1.1 contains standard language limiting the emissions of individual and total HAPs. First, I mistakenly noted that the reason for this condition was 40 CFR 63.820(a)(3) instead of 391-3-1-.03(2)(c). I also mistakenly noted that Printpack was subject to 40 CFR 63 Subpart KK in the application summary that was submitted to EPA. Printpack is not subject to 40 CFR 63 Subpart KK, thus the requirements of 40 CFR 63.820(a)(2) do not apply. Printpack is not subject to this NESHAP because controlled HAP emissions are below the applicable thresholds.
2. In the 1988 PSD Preliminary Determination for Printpack, I discovered that the facility intended to only burn natural gas in the dryers and auxiliary burner for the controls. In a letter to the Division dated September 9, 1998 Printpack indicated that it is not correct to say that the press dryers and auxiliary burners on the RTO's only use natural gas. These equipment will burn natural gas and propane as a fuel back-up. In the meeting on September 30, 1998, EPA and EPD discussed which PM state rule was applicable to the press dryers and auxiliary burners on the RTO's. EPD indicated that Georgia Rule for Air Quality Control 391-3-1-.02(2)(d) was not an applicable requirement because they did not meet the definition of fuel burning equipment under Georgia Rule for Air Quality Control 391-3-1-.01(cc). In an EPD Georgia Rule (d) guidance document, it is stated that equipment whose fuel combustion gases mix with the process materials are defined as process equipment and therefore not subject to Georgia Rule (d).

The combustion gas from the press dryers is directly blown onto the flexographic press substrate. The combustion gas from the RTO auxiliary burners is directly blown into the RTO. Thus the press

dryers and RTO auxiliary burners are not subject to Georgia Rule (d). Negligible PM emissions result from the combustion of natural gas or propane in either of the devices at question. Potential PM emissions are less than 25 tons per year from each set of press dryers and from the RTO auxiliary burners. Thus, they have been included in question number 2 in Section 4.20 - Generic Emissions Grouping.

3. EPA required that Section 3.3 include a condition which limits the VOC emissions from laminator L031 since Condition No. 8 of PSD Permit No. 2759-022-9820 limits VOC emissions from this laminator. The Division approved the removal of Condition No.8 in an amendment to said permit on July 26, 1991 as noted below. The following discussion is taken from EPD's permit narrative dated July 9, 1991 for Printpack - Villa Rica.

Printpack requested that the VOC emissions cap for L031 be removed in a letter to the Division dated June 19, 1991. Condition No. 5 of said permit caps VOC emissions from P001, P002, P003 and L031 combined. An additional limitation was placed on laminator L031, capping its VOC emissions at 24.59 tons per 12 consecutive months. The reason for this "cap within a cap" was to insure that the product mix was the same as Printpack estimated in their application, that is, mostly low-solvent adhesive packaging. This requirement is stated as Condition 8 of the Permit.

When the draft permit was issued for public comment, EPA asserted that a short term (24 hour) compliance requirement for the laminator L031 would be necessary for BACT, that monthly rolling total was unacceptable. The final permit resolved this by establishing what is now Condition 6 (Permit No. 2759-022-9820), limiting the 24-hour average of all laminating adhesives to 4.2 lbs VOC/gal solids which was in line with BACT requirements for laminators permitted at that time. The permit (2759-022-9820) retained Condition No. 8 although Printpack at that time voiced concern that the limit was no longer necessary and would have to be revisited if their original estimate of product mix changed in the future.

As of 1991, the product mixed changed significantly as a result of making large quantities of vendor-sized chip bags which have thermal adhesive strips. Printpack continues to comply with the BACT requirement of 4.2 lbs VOC/gallon of solids for this laminator. Thus, the Division deleted Condition 8 in an amendment to Permit No. 2759-022-9820 on July 26, 1991.

4. EPA required that Condition 3.3.2 be revised to include source codes L033 and L035 to be consistent with Condition No. 35 of Amendment to PSD Permit No. 2759-022-9820. The original version of Condition 3.3.2 does include these source codes. EPA is referring to a revised version of this Condition that they received from me via e-mail subsequent to their receipt of the initial version of the permit. The subsequent version of this Condition is not an official response from the Division as I did not follow established procedures for making revisions to the permit. Thus, these sources codes are already included in Condition 3.3.2.
5. EPA requests that the phrase "using methods approved by the Division" needs to be removed from Conditions 3.3.4, 3.4.1, and 6.2.6. These phrases were included because of the historical variations in methods used by Printpack to comply (note these historical variations were approved by the Division). In light of the more stringent requirements in Part 70, that phrase has been removed from

these conditions. In EPA's letter dated October 8, 1998, they indicated that Condition 3.3.4 was not corrected; however, it should be noted that EPA was basing this comment on an unofficial draft of the permit, and not the one that EPD will submit as the official draft to their comments.

6. EPA requests that a condition be included in Section 3.3 which requires that VOC emissions resulting from the operation of source codes P002 through P009 be continuously controlled by oxidizers RT01 and RT02. EPA concluded that such a condition provides reasonable assurance that VOC emissions are properly controlled as specified by BACT. Such a request was inherently included in Printpack's earlier PSD permits, and this assurance was already in place based on the proposed wording in Condition Nos. 3.3.7 and 3.3.8.
7. EPA requests that Condition 3.3.7 be revised to be consistent with the PSD/BACT requirement that the thermal oxidizers have a minimum destruction efficiency of 95 percent at all times. Condition 3.3.7 states that the VOC destruction efficiency of oxidizers RT01 and RT02 shall equal or exceed 95% for presses P002-P005. I recommend that this condition be revised to require such a VOC destruction efficiency for presses P002-P005 only when they are operating and not at all times as requested by EPA. The phrase "at all times" can be interpreted to include down time of presses P002-P005, and therefore no VOC destruction is required.
8. EPA requests that the disclaimer "press only" contained in Condition 3.3.8 be removed. I recommend this change as noted in item number 5 under Printpack Comments.
9. EPA requests that Section 3.4 include a condition which incorporates the appropriate emission control practices specified in applicable Georgia Rule 391-3-1-.02(2)(ff). EPD does not agree that this rule is an applicable requirement because the potential VOC emissions from the parts washers do not equal or exceed 100 tpy, as required by Georgia Rule for Air Quality Control 391-3-1-.02(2)(a)6.(i)(I). EPA indicated in their October 8, 1998 response to EPD that they did not agree with the Division's interpretation of Georgia Rule 391-3-1-.02(2)(a)6.(i)(I). EPA's interpretation of that rule is that if the potential emissions from the facility exceed 100 tpy, the parts washers are subject to Georgia Rule (ff).

EPD believes that it is correct in its interpretation of "source" is not being equivalent to "facility" in all cases because, in part, of Georgia Rule 391-3-1-.02(2)(a)6.(i)(II)(I). That rule implies that a "source" can be a part of the production process. EPD believes that it is correct because Georgia Rule (ff) was not listed as an applicable requirement in Printpack's original PSD permit, that included the operation of the parts washers.

The parts washers were originally permitted in PSD Permit No. 2759-022-9820 issued January 14, 1998 and in a PSD Amendment issued November 2, 1989. EPA submitted comments, under the PSD regulations, for the original and amended version of this permit on February 9, 1988 and on September 15, 1989. In both instances EPA did not require EPD to include Georgia Rule 391-3-1-.02(2)(ff) as an applicable requirement in Printpack's PSD permit. Thus, the Division assumed that EPA and EPD agreed that this rule was not an applicable requirement at the time of issuance of the original PSD permit and PSD permit amendment.

Further, the Division believes that the existing BACT requirements for the parts washers are more stringent than Georgia Rule (ff). Therefore, this applicability issue does not affect air emissions from the parts washers.

10. Based on discussions between ISMP and the SSPP, Methods 5 and 9 do not need to be added to Condition 4.1.3, as requested by EPA. This is because Printpack does not operate any equipment subject to Georgia Rule for Air Quality Control 391-3-1-.02(2)(d), "Fuel-Burning Equipment."
11. P007 shall be deleted from Condition 4.2.1.a.i to avoid confusion since PTE measurements have already been completed for this press. Any relocation of any emissions point, VOC collection point, or NDO may require reverification of the PTE measurements. Continuous monitoring of the pressure differential in the duct will be used to verify the PTE, with appropriate operating ranges submitted, as required by Condition 5.3.3.c. In EPA's letter dated October 8, 1998, they indicated that Condition 4.2.1.a.i was not corrected; however, it should be noted that EPA was basing this comment on an unofficial draft of the permit, and not the one that EPD submitted as the official draft to their comments.
12. Condition 5.2.1.b defines periodic monitoring which verifies that the two parts washers are being vented to the oxidizers when they are operating. The proposed frequency of monitoring in the draft Title V permit was once per shift. Printpack requested that Condition 5.2.1.b be removed since they must measure the pressure at the inlet to the oxidizer to verify the capture efficiency of the presses and the parts washers. EPA requested that the required observations of "once per shift" did not provide reasonable assurance that parts washing machines PW01 and PW02 will always be exhausted during use, unless they are used only once per shift and at the times of observation. EPA requested that whenever the lid of the manual parts washer is opened or the automatic parts washer is activated, the exhaust system is electronically tripped.

Based on the Division's subsequent discussions with the facility, it was learned that there the exhaust system is electronically triggered when the manual parts washer PW01 is opened and when the drying cycle on the automatic parts washer is activated. Thus, the language in Condition 5.2.1b was modified to incorporate these features of the exhaust system for the parts washers. With this change to Condition 5.2.1.b, the proposed language in Condition 5.3.3.b was deleted. A new Condition 5.2.1.c was inserted to request that Printpack submit a plan which specifies the type and frequency of monitoring of the parts washers to the oxidizers. Once the appropriate monitoring and frequency of monitoring have been established, it will be used to identify deviations as defined in Condition 5.3.3.c.

13. The phrase ". . . all periods in excess of three hours . . ." was revised to read ". . . any three hour period . . ." in Condition 5.3.3.a as requested by EPA. EPA also requested that an appropriate monitoring interval be specified for the continuous measurement of temperature (Condition 5.3.3.a) and pressure (Condition 5.3.3.c). The appropriate monitoring interval for these parameters is defined in 40 CFR 60.13(c)(2), definition of "continuous"; thus, it does not need to be redefined in Printpack's Title V permit.
14. EPA requests clarification as to what VOC destruction efficiency correlates to an RTO combustion

zone temperature of 1500⁰ F. This question arises because in Part 5.0 B 1. of the Title V permit narrative, the language seems to indicate that a VOC destruction efficiency of greater than or equal to 90% correlates to 1500⁰F, and not 95% as required in various permit conditions. I mistakenly correlated a combustion zone temperature of 1500⁰F to a 90% or greater VOC destruction efficiency instead of 95% or greater. I verified that this mistake occurred by reviewing the Division's Source Test Report for the most recent performance test of the RTO's. I recommend that the Title V permit narrative be revised to read, "The temperature measurement serves as a surrogate parameter for determination of an acceptable destruction efficiency (\geq 95%)."

15. EPA requests that Condition 6.2.1 require Printpack to maintain records of the VOC and HAP contents and amount on a weight and volume bases. EPA made this request because they are under the impression that Printpack is subject to 40 CFR 63 Subpart KK. Printpack is not subject to 40 CFR 63 Subpart KK. The proposed language in Condition 6.2.1 is sufficient to provide a practical enforcement mechanism to verify that they are maintaining the appropriate records to verify actual VOC and HAP emissions. EPA indicated in their October 8, 1998 comments, that if the original language in this condition is retained, the word "ink" needs to be deleted from the first sentence because not all of the HAP and VOC-containing materials used will be ink.
16. EPA required that Condition 6.2.4 be revised to include source codes L033 and L035 to be consistent with PSD Permit No. 2759-022-9820, in both their August 28, 1998 and October 8, 1998. The original version of Condition 6.2.4 does include these source codes. EPA is referring to a revised version of this Condition that they received from me via e-mail subsequent to their receipt of the initial version of the permit, and an unofficial draft that they received on September 29, 1998. The subsequent versions of this Condition is not an official response from the Division as I did not follow established procedures for making revisions to the permit.

The original language for Condition 6.2.4 has been removed, as requested by Printpack in their comments. EPD agreed to deleting this language because Printpack will be notifying the state about the rolling annual emissions on a semiannual basis. Thus, the Division does not need for Printpack to notify the Division whenever the facility exceeds one-twelfth of its emissions limits.

EPA General Comments

1. EPA requests that Condition 3.4.1 be revised to exclude source code P008 from applicability because of the description provided for this unit. I recommend that the reference to P008 be removed from Condition 3.4.1 since this press/laminator does not apply adhesives or any other coating which could be subject to Georgia Rule (w). In their October 8, 1998 comments, they indicated that the authority for this condition was incorrectly cited. That change to the original draft permit has been changed.
2. EPA requested that Condition 5.2.1.e include language which stated that once the appropriate indicator range has been established, it will become an enforceable part of the permit. This condition was modified as requested. EPA also requested that Condition 5.2.1(e) require the facility to submit a copy of the test report in case there are any questions or concerns regarding the testing protocol or the test results. That change was not included in Condition 5.2.1.e because the

submittal of such a testing protocol is required in Conditions 4.1.1 and 4.1.2.

3. EPA requests that the phrase "for each group of source codes listed in Condition 6.2.4" be added to the end of the first sentence of Condition 6.2.5. This change has been incorporated.

EPA Comment Made October 8, 1998

Comment Number 6.

EPA requested that the word "ink" be removed from Condition 6.2.1 since the facility must maintain VOC and HAP usage records for all materials at the plant. This request has not been incorporated into the permit for several reasons. First, the phrase "ink structure" includes solids, solvent, and water, and this phrase is used in the flexible packaging industry. Thus, EPA's assertion that the condition does not require Printpack to maintain solvent usage records is incorrect and a misinterpretation of the language in that condition. Second, this language was proposed by Printpack in 1997 and adopted by EPD in Printpack's most recent state permit. The Stationary Source Compliance Program within the Air Branch has had no problem practically enforcing the monthly VOC usage recordkeeping requirement.

Correction Made October 8, 1998

Page 8 of permit narrative with respect to Emission Unit ID No. P008 - Georgia Rule for Air Quality Control 391-3-1-.02(2)(w) as an applicable requirement as well as those listed.

EPA Comments Made November 18, 1998

EPA was informed, by telephone on November 17, 1998, that the burners of the press dryers and the thermal oxidizers are limited by design to combust only natural gas and propane. EPA indicated that they would accept the inclusion of that information in the statement of basis in lieu of conditions that would limit the source to burning only natural gas and propane in said units and require recordkeeping necessary to demonstrate compliance with such a limit.

The table in Section 3.1 was revised to no longer list Georgia Rule 391-3-1-.02(2)(w) as an applicable requirement for emission units P002, P007, P008, and P009.

The authority cited for Condition 3.4.1 was revised to read "391-3-1-.02(2)(w)".