

Facility Name: **Packaging Products Corporation**  
 City: Rome  
 County: Floyd  
 AIRS #: 04-13-115-00095

Application #: TV-13155  
 Date Application Received: July 03, 2001  
 Date Application Deemed Administratively Complete: July 03, 2001  
 Date of Draft Permit:  
 Permit No: 2759-115-0095-V-03-0

Program	Review Engineers	Review Managers
SSPP	Wei-Wei Qiu	Matt Page
ISMP	Roses Winne	Jac Capp
SSCP	Travis Harris & Brian Koehler	James Eason
Toxics	N/A	N/A

## Introduction

This narrative is being provided to assist the reader in understanding the content of the attached draft Part 70 operating permit. Complex issues and unusual items are explained herein simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act Amendments of 1990. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Chapter I of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The primary purpose of this permit is to consolidate and identify existing state and federal air requirements applicable to Packaging Products Corporation 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, the applicable requirements and their significance, and the methods for determining compliance with those applicable requirements. This narrative is intended as an adjunct for the reviewer and to provide information only. It 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

The Facility Description may be presented in outline or narrative form. It must contain the information contained in each of the following subsections, preferably in a similar order.

### A. Facility Identification

1. Facility Name: Packaging Products Corporation
2. Parent/Holding Company Name: Packaging Products Corporation
3. Previous and/or Other Name(s): None known.
4. Facility Location: 2 Superior Drive, S.E.  
Rome, Georgia 30161
5. Attainment or Non-attainment Area Location

The facility is located in an attainment area for all criteria pollutants.

6. Class I Area Impacts

This facility is located within 100 km of a Class I area (Chattahoochee National Forest).

### B. 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, comments are listed in Table 2 below.

**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
2759-115-0095-E-02-0	September 18, 2000		v

**Table 2: Comments on Specific Permits**

Permit Number	Comments
N/A	None

## D. Process Description

1. SIC Codes(s): 2759

2. Description of Product(s)

This facility produces flexible packaging materials using a variety of plastic films for various food manufacturers

3. Overall Facility Process Description

Packaging Products Corporation (Packaging Products) produces flexible packaging for various food manufacturers located throughout the United States. The flexographic printing presses apply various colored and white inks to plastic film. The inks are then dried using high velocity dryers. After the film is printed, it is either laminated to another plastic film or taken directly to a finishing department where it is slit and wound into small rolls for shipment.

4. Overall Process Flow Diagram (optional): Refer to the Title V permit application.

## E. Regulatory Status

1. PSD/NSR

This facility is potentially a major source under PSD regulations because it has potential emissions of VOC compounds greater than 250 tons per year (it is not one of the 28 named source categories under PSD regulations), but has taken a facility-wide VOC emission limit of 249 tons per year to remain a non-major source under PSD/NSR regulations.

2. Title V Major Source Status by Pollutant

Table 3: 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	✓			✓
PM <sub>10</sub>	✓			✓
SO <sub>2</sub>	✓			✓
VOC	✓	✓		
NO <sub>x</sub>	✓			✓
CO	✓			✓
TRS	N/A			
H <sub>2</sub> S	N/A			

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 HAP	✓			✓
Total HAPs	✓			✓

### 3. MACT Standards

This facility is a minor source for individual HAP and combined HAPs emissions and is not subject to any NESHAP MACT requirements authorized by Section 112 of the Clean Air Act (CAA).

### 4. Program Applicability

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

## Regulatory Analysis

### II. Facility Wide Requirements

#### A. Emission and Operating Caps:

Facility-wide VOC emissions are limited to no more than 249 tons per any 12 consecutive months by Condition 2.1.1. This limit allows the entire facility to remain as a non-major source under PSD/NSR regulations. Since the PSD applicability test is based on the total VOC emissions from all the sources within the facility, the 249 tpy VOC emission cap also applies to VOC emissions from sources classified as “insignificant activities” under Title V regulations. Packaging Products currently complies with this emission limit via the use of the existing catalytic VOC oxidizer, but keeps the other compliance options open, including the use of low VOC inks and/or coatings.

#### B. Applicable Rules and Regulations

None applicable.

#### C. Compliance Status: See Section V.II.F.

#### D. Operational Flexibility: See Section V.II.A.

#### E. Permit Conditions

Condition 2.1.1 is incorporated from existing SIP permit No. 2759-115-0095-E-02-0 issued on September 18, 2000. The condition limits the facility-wide VOC emissions, including those from “insignificant activities” under Title V rules, to no more than 249 tons during any period of 12 consecutive months. This emission limit makes the facility a non-major source under PSD/NSR rules. The PSD/NSR applicability test, i.e., whether the annual VOC emissions from the entire facility equals or exceeds 250 tons per year, requires the totaling of VOC emissions from all sources/processes listed in both Sections 4 and 5 of the Title V permit application. [PSD Avoidance - 40 CFR Part 52.21]

### III. Regulated Equipment Requirements

#### A. Brief Process Description

Packaging Products Corporation produces flexible packaging for various food manufacturers located throughout the United States. The Flexographic printing presses apply various colored and white inks to a plastic film. The inks are then dried using high velocity dryers. After the film is printed, it is either laminated to another plastic film via laminators or taken directly to a finishing department where it is slit and wound into small rolls for shipment.

#### B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P001	Schiavi Sirio (6-color) Flexographic Press with two 0.8 mmBTU/hr natural gas burners	391-3-1-.02(2)(b), 391-3-1-.02(2)(e), 391-3-1-.02(2)(g), 391-3-1-.02(2)(mm), 391-3-1-.03(2)(c)	2.1.1, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.4.5, 3.4.6, 3.4.7, 3.4.8, 3.5.1, 3.5.2, 3.5.3, 5.2.1, 5.2.2, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5 & 6.2.6	CO01	Catalytic VOC oxidizer
P002	Schiavi Sirio (6-color) Flexographic Press with two 1.2 mmBTU/hr natural gas burners				
P006	PCMC (8-color) Flexographic Press				
P007	Comexi Flexostar (6-color) Flexographic Press with two 0.85 mmBTU/hr natural gas burners				
L001	Dritec Water Based laminator (56.75 inch web)	391-3-1-.02(2)(b), 391-3-1-.02(2)(e)	2.1.1, 3.4.2, 3.4.3, 3.4.4, 3.4.6, 3.5.1, 3.5.2, 5.2.2, 6.2.1, 6.2.2, 6.2.3 & 6.2.6	N/A	N/A
L002	Dritec Water Based laminator (52 inch web)				

\* Generally applicable requirements contained in this permit may also apply to emission units listed above.

#### C. Equipment & Rule Applicability

##### Emission and Operating Caps –

None.

##### Applicable Rules and Regulations -

- Georgia Rule (e) “Particulate Emission from Manufacturing Processes” applies to all process units that are not covered by a more specific rule or regulation. This rule establishes a PM emission rate limit for each of the process units according to its process weight input rate. Owing to their low levels of PM emissions, all the process units with PM emissions at this facility should have little difficulty in complying with the applicable PM emission limits under this Rule.

- Georgia Rule (b) "Visible Emissions" applies to all process units which do not have a more stringent limit. Visible emissions are limited by this rule to less than 40% opacity. This standard applies to all process units at this facility, including the catalytic oxidizer. Owing to their low level of PM emissions, all the process units with PM emissions at this facility should have little difficulty in complying with the visible emission limit.
- Because the packaging flexographic printing operation at this facility has the potential to emit more than 100 tons per year of VOC, the operation is subject to Georgia Rules for Air Quality Control 391-3-1-.02(2)(mm) - *VOC Emissions from Graphic Arts Systems*. Subparagraph 1(i) of the Rule limits the VOC emissions from each of the flexographic printing presses/lines to: (a) 25% by volume of volatiles in the ink, or (b) 40% by volume of the ink (less water), or (c) 0.5 lbs of VOC per pound of coating solids. Rule (mm) allows the use of a Division-approved VOC control system(s) as an alternative to comply with the applicable VOC emission rate limit as long as the system(s) can reduce the VOC emissions by 90.0%. Currently the Permittee complies with this Rule by utilizing the existing catalytic oxidizer (CO01) coupled with Division-approved ventilation/VOC capture systems to control VOC emissions from all the flexographic presses. However, the facility keeps the other compliance options open, including the use of compliant inks and/or coatings and the 24-hour in line averaging of VOC materials.
- Rule 391-3-1-.02(2)(g) regulates the sulfur content(s) of the fuel(s) used by all the fuel combustion units at this facility, including natural gas-fired press dryers and the catalytic oxidizer. Since all the fuel units can only burn natural gas and the sulfur content in commercially available natural gas is well below the Rule (g) limit, the facility is for all time in compliance with Rule (g). Therefore, it is not necessary to keep fuel sulfur content records. Any incidence of use of fuel(s) other than natural gas and propane at this facility shall be deemed as noncompliance with Condition 3.4.5 and reported as an "exceedance" required by Condition 6.1.7b.(iii) of this Permit.

#### D. Compliance Status

The company did not submit any Section 11.10 forms which would identify if any new emission unit(s) was installed or any existing emission unit(s) was modified without obtaining a construction and operating permit(s).

#### E. Operational Flexibility

There are no operational flexibility requirements that need to be incorporated into this Title V Permit.

#### F. Permit Conditions

Conditions 3.4.1 and 3.4.2 are incorporated from existing permit No. 2759-115-0095-E-02-0 to subject the packaging flexographic printing at this facility to Rule 391-3-1-.02(2)(mm) - *"VOC Emissions from Graphic Arts Systems"*. Currently the Permittee complies with this Rule by utilizing the existing catalytic oxidizer (CO01) coupled with Division-approved ventilation/VOC capture systems to control VOC emissions from all the flexographic presses. However, the

facility keeps the other compliance options open, including the use of compliant inks and/or coatings and the 24-hour in line averaging of VOC materials. [391-3-1-.02(2)(mm)]

Condition 3.4.3 is incorporated from existing permit No. 2759-115-0095-E-02-0. This condition establishes SIP emission limits for process units with PM emissions pursuant to Rule 391-3-1-.02(2)(e) - "*Particulate Emission from Manufacturing Processes*". The direct heating dryers/ovens, air heaters and the catalytic oxidizer do not qualify as "fuel burning equipment". They are considered as process emission units (exhaust systems) and subject to this rule. Owing to the nature of the operations at this facility, all the PM emission sources should have little difficulty complying with their respective PM emission limits. [391-3-1-.02(2)(e)]

Condition 3.4.4 is incorporated from existing permit No. 2759-115-0095-E-02-0. This condition establishes a SIP visible emission limit for the process emission units which also have SIP PM emission limits. [391-3-1-.02(2)(b)].

Condition 3.4.5 is incorporated from current SIP permit No. 2759-115-0095-E-02-0. This condition establishes a SIP operating limitation which requires the facility to use only "clean" fuels (natural gas and propane). This condition ensures all the fuel burning sources at this facility to comply with the applicable SIP limits for sulfur, PM and visible emissions at all times, and thus make any additional monitoring or record keeping unnecessary. [391-3-1-.03(2)(c)]

Condition 3.4.6 is incorporated from the current SIP permit No. 2759-115-0095-E-02-0 as one of the operating standards for complying with the VOC emission standards in Rule (mm). It establishes the Division approved minimum bed inlet temperature for the existing catalytic oxidizer CO01 to maintain when controlling the VOC emissions. This temperature shall be sufficiently high in order to trigger and then sustain the desired oxidation process at the inlet side of the catalyst bed in the oxidizer. The bed inlet temperature utilized in the most recent Division-approved performance test conducted in July, 2002 was 600°F. [391-3-1-.03(2)(c) and 391-3-1-.02(2)(mm)]

Condition 3.4.7 is derived from current SIP permit No. 2759-115-0095-E-02-0 to establish requirements for appropriate atmospheric dispersion of toxic air pollutants from the facility. This condition ensures that the ambient impacts of the toxic air pollutants emitted from the facility would be acceptable with regard to short and long term human exposures. [391-3-1.02(2)(a)3.(ii)]

Condition 3.4.8 is added to subject all the fuel burning sources at this facility, including press dryers and the catalytic oxidizer, to the SIP fuel sulfur limit under Rule (g). Since Condition 3.4.5 requires the facility to use only "clean" fuels (natural gas and propane) and thus ensures all the fuel burning sources at this facility to comply with the applicable SIP limits for sulfur under Rule (g) at all times. No additional monitoring or record keeping is unnecessary. [391-3-1-.02(2)(g)]

Conditions 3.5.1 and 3.5.2 are derived from current SIP permit conditions to establish good work practice requirements for reducing unintended VOC emissions. [391-3-1-.02(2)(a)10.]

Condition 3.5.3 is incorporated from current SIP permit to ensure the proper operation of control equipment and to minimize its down time. [391-3-1-.02(2)(a)10.]

Some of current SIP permit conditions such as specific performance testing and notification of source startup have been fulfilled and thus are eliminated from this Title V permit. Other SIP conditions such as those for good air pollution control practice, permit supersedure, compliance schedule, general record keeping and reporting, performance/compliance testing, equipment malfunction or breakdown, fugitive emissions, circumvention, future additional emission control, and notification and reporting have been replaced by same or similar conditions in Part 8.0 of this Title V permit. To avoid unnecessary amendment to this Permit in the future, certain process specific VOC emission factors vulnerable to change or update were not mentioned in corresponding conditions. Nonetheless, the absence of these factors does not preclude the Permittee from using them in the emission calculations provided that such use has been accepted by the Division.

**IV. Testing Requirements (with Associated Record Keeping and Reporting)**

A. General Testing Requirements

The standard general requirements are included in the permit.

B. Specific Testing Requirements

None applicable.

**V. Monitoring Requirements (with Associated Record Keeping and Reporting)****A. General Monitoring Requirements**

The standard general requirements are included in the permit.

**B. Specific Monitoring Requirements**

Condition 5.2.1 requires the continuous monitoring and recording of specific operating parameters of the following emission control systems:

- a. The bed inlet and outlet temperature of the catalytic oxidizer CO01 when its VOC emission reduction is credited for compliance demonstration with any applicable VOC emission limit(s) and/or standard(s). This current monitoring requirement ensures the proper destruction of VOC and thus is critical when the Permittee relies on the proper function of the oxidizer to comply with any the VOC emission limits/standards in this permit.

Owing to the nature of the operation, the PM and visible emissions from the process units at this facility are sufficiently below their corresponding emission limits under Rules (b) and(e). Therefore, these sources should have little difficulty complying with the pertinent PM and visible emission limits. Consequently, no monitoring for PM or opacity is specified.

Since the facility is allowed to use only natural gas and the sulfur content of commercially available natural gas in Georgia is insignificant; no monitoring is required.

## VI. Other Record Keeping and Reporting Requirements

### A. General Record Keeping and Reporting Requirements

The standard general requirements are included in the permit. Conditions 6.1.1 through 6.1.6 contain general requirements for record keeping and reporting other than those related to specific monitoring and data collection. In brief, these conditions require the Permittee to record all the data and/or information in permanent forms suitable for inspection and submission, to report excessive emissions due to source malfunction or breakdown and the corrective actions taken, to report any violation of an emission limitation or standard or any noncompliance of a work practice requirement or standard, to report any excess emissions, exceedances and/or excursions, to keep sampling or measurement documentation, and to maintain files of all measurements from continuous monitoring systems and performance tests. Condition 6.1.7 defines source specific excess emissions, exceedances and/or excursions which should be reported to the Division by the Permittee as required by Condition 6.1.4. It also requires the Permittee to submit some other emission data which are considered important for emission compliance monitoring and/or analysis. [391-3-1-.02(6)(b)1, 391-3-1-.03(10)(d)1.(i), 40 CFR 70.6(a)(3)(ii)(A) & (B) and 40 CFR 70.6(a)(3)(iii)(A) & (B)]

### B. Specific Record Keeping and Reporting Requirements

Conditions 6.2.1, 6.2.2, 6.2.3, and 6.2.4 are derived from the current SIP permit No. 2759-115-0095-E-02-0. These conditions contain detailed record keeping, compliance calculations and reporting requirements for the VOC emissions from the entire facility and from the printing operation. Condition 6.2.1 specifically requires the Permittee to generate and maintain monthly records of all VOC materials used and/or disposed of at this facility. Such record shall include, but not to be limited to, the quantities of the materials used and/or disposed of, the VOC contents of the materials, and the Division-approved emission factors and/or control efficiencies utilize in the emission determinations. Condition 6.2.1 also requires the Permittee to generate separate monthly and/or daily records appropriately for each of the flexographic presses for demonstration of compliance with Rule (mm) when deemed necessary. The Permittee shall use those records to calculate respectively the monthly and the 12-month rolling total of the VOC emissions from the entire facility each calendar month, as required by Conditions 6.2.2 and 6.2.3, and to demonstrate compliance with Condition 3.4.1, as required by Condition 6.2.4. Specific equations are included with Conditions 6.2.2 and 6.2.4 to facilitate the determination of appropriate VOC emission rates and compliance demonstration. In these VOC emission calculations, the Permittee shall only use Division-approved calculation procedures, emission factors and/or control efficiencies and keep them as part of the records. The record keeping, emission determination, and reporting requirements in these conditions are essential to demonstrate compliance with Conditions 2.1.1 and 3.4.1. [391-3-1-.02(2)(mm) & Avoidance of NSR/PSD]

Condition 6.2.5 is incorporated from current SIP permit No. 2759-115-0095-E-02-0. This condition intends to accomplish necessary documentation when the Permittee opts for a different VOC emission limit/standard and/or compliance method as allowed by Rule (mm). [391-3-1-.02(2)(mm)]

Condition 6.2.6 is added to ensure that the stack(s) emitting toxic air pollutants at this facility to be built and/or maintained in such a way that the toxic air pollutant emissions meet the ambient impact requirements determined following “Guideline for the Ambient Impact of Toxic Air Pollutant Emissions” pursuant to 391-3-1-.02(2)(a)3.(ii) of the Georgia Rules of Air Quality Control. [391-3-1-.02(2)(a)3.(ii)]

**VII. Specific Requirements****A. Operational Flexibility**

There are no operational flexibility requirements that need to be incorporated into this Title V Permit.

**B. Alternative Requirements**

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

**C. Insignificant Activities**

Because it is subject to at least Rule (mm), the catalytic oxidizer (Air Pollution Control Device ID No. OC01) cannot be listed in Section 4.50 as one of the “insignificant activities based on emission levels”. Please refer to §4.10 of the Title V permit application and/or Attachment B of the Title V permit for other “insignificant activities” identified.

**D. Temporary Sources**

The Permittee has not requested to operate any temporary sources.

**E. Short-Term Activities**

The Permittee has not reported short-term activities.

**F. Compliance Schedule/Progress Reports**

The Permittee did not include any Section 11.10 forms in the Title V permit application.

**G. Emissions Trading**

The facility is not involved in any emission trading program.

**H. Acid Rain Requirements**

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

**I. Prevention of Accidental Releases**

None applicable.

**J. Stratospheric Ozone Protection Requirements**

This facility operates air conditioners or refrigeration equipment that use CFC's or other stratospheric ozone-depleting substances listed in 40 CFR Part 82, Subpart A, Appendices A and B. A number of the equipment contain a refrigerant charge of greater than 50 pounds.

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.

---

**Addendum to Narrative**

EPD issued draft Title V Permit 2759-115-0095-V-03-0 for Packaging Products Corporation (PPC) in Rome, Georgia on December 17, 2003. The public notice for this permit was published in *The Rome News Tribune* on February 10, 2004. The 30-day public review started on February 10, 2004 and ended on March 13, 2004. Comments were received from the Georgia Chapter of Sierra Club (The Sierra Club) on March 11, 2004, and from PPC on March 09, 2004. No comments were received from US EPA or other parties. The PPC's and the Sierra Club's comments are reproduced one by one below followed by EPD's response to the comment including any changes made to the permit as a result.

**PPC'S COMMENTS & EPD'S RESPONSES**

**Comment No 1:**                    **Condition 3.1, Emission Units.** The table in 3.1 lists 391-3-1-.03(2)(c) as applicable to units P001, P002, P006 and P007. This rule details when an operating permit will be issued to a facility. Although generally applicable to the facility, PPC believes that the permit was meant to list Rule 391-3-1-.02(2)(c). However, Rule 391-3-1-.02(2)(c), *Incinerators*, specifically exempts "any vent gas incineration devices that are used as air pollution control equipment...". As the catalytic oxidizer falls under this exemption, no unit at this facility is subject to **Rule (c)**. Therefore, neither 391-3-1-.03(2)(c) nor 391-3-1-.02(2)(c) should be listed under Condition 3.1.

**EPD Response:**                    The citation in Condition 3.4.4 referring to 391-3-1-.03(2)(c) is used because this condition incorporates an existing condition from the current permit. Because Condition 3.4.4 prohibits the burning of any fuels other than natural gas or propane at the facility, it effectively subsumes Georgia Rule (g) "Sulfur Dioxide" by requiring that only low-sulfur fuels be burned. To avoid confusion, the citation of Georgia Rule 391-3-1-.03(2)(c) will be removed from Table 3.1. Additionally, the citation for Condition 3.4.4 will include Georgia Rule (g) as subsumed, and Condition 3.4.8 establishing Georgia Rule (g) will be removed from the permit because Condition 3.4.4 will subsume Georgia Rule (g).

In addition, Subpart 3.1 in the draft Title V permit has been modified to update the equipment unit list and/or description, and rule and/or condition citation as certain necessary changes have been made in response to the comments.

**Comment No 2:**                    **Conditions 3.4.1 and 3.4.2.** These conditions list requirements based on Georgia Rule (mm), *VOC Emissions from Graphic Arts systems*. While these conditions accurately reflect Rule (mm), based on the alternative compliance method that PPC uses to meet Rule (mm), they will always be out of compliance with Condition 3.4.1. PPC requests that the conditions be combined into a single condition, such that the alternative compliance methods are listed within the same condition.

**EPD Response:** The comment is reasonable. Condition 3.4.2 in the draft permit has been merged into Condition 3.4.1. Conditions 3.4.2 through 3.4.7 have been renumbered accordingly.

**Comment No 3:** **Condition 3.4.7.** Condition 3.4.7 requires construction (or reconstruction) of vents to provide an unobstructed vertical flow to meet Toxic Air Pollutant modeling requirements. As **PPC** has not been required to submit toxic air pollutant modeling due to low levels of toxic air pollutant emissions, **PPC** requests that this condition be removed. **PPC** also requests that Condition 6.2.6, associated with Condition 3.4.7 also be removed.

**EPD Response:** Condition 3.4.7 of the draft permit incorporates Condition 33 in Air Quality Permit No. 2759-115-0095-E-02-0, which is the basis of this draft Title V permit. EPD's records indicate that **PPC** did submit a toxic air pollutant modeling with Air Quality Permit Application No. 12327 on Jun 06, 2000, and Air Quality Permit No. 2759-115-0095-E-02-0 was issued based on this application. Condition 33 of this permit required that all the stacks emitting toxic air pollutants were constructed in such a way that each of the stacks should provide a larger-than-zero vertical gas velocity as assumed in the ambient dispersion model used in the modeling. Because the annual inspections conducted by EPD indicate that these stacks have been constructed in accordance with Condition 33, this condition has been fulfilled, and no longer needed. Therefore, both conditions referred in this comment have been removed from this permit.

**Comment No 4:** **Condition 8.24.** Condition 8.24 lists requirements for Rule (c), *Incinerators*. As discussed under Condition 3.1, the facility has no units that are subject to this rule and **PPC** requests that the condition be removed.

**EPD Response:** Condition 6.1.2 is one of the general provisions/standard conditions in the Georgia Title V permit template, per an agreement with US EPA Region IV, which reviewed and approved the wording of the template. This condition only applies to sources which Georgia Rule (c) applies. The permit has not been changed in response to this comment.

**Comment No 5:** **Insignificant Activities Based on Emission Levels.** Please update the number of solvent storage tanks from one to two.

**EPD Response:** The comment is reasonable. Changes have been made to the draft permit accordingly.

**Comment No 6:** **Georgia Rule (w), *VOC Emissions from paper Coating*.** The facility operates two laminators which are used to combine printed materials and unprinted films using adhesive. Georgia Rule (w) applies to “Paper Coating” which is defined as:

*The application of a coating on paper and pressure sensitive tapes, including plastic film and metallic foil, regardless of substrate, in which the coating is distributed uniformly across the web.*

The laminators meet the definition of paper coating and are therefore subject to this rule. Please add conditions for Rule (w) to the Title V permit. Note that **PPC** uses adhesives with volatile organic compounds well below the Rule (w) limit of 2.9 pounds/gallon.

**EPD Response:** Georgia Rule (w) is source/process specific, and it only regulates VOC emissions from a paper coating operation(s) itself rather than the whole production facility/manufacturing plant. This Rule applies to a paper coating operation located outside the Atlanta ozone none-attainment area when the potential VOC emissions from the paper coating operation exceed 100 tons per year. Because the VOC PTE of the paper coating operation at this facility is less than 100 tons per year, the paper coating operation is not subject to Georgia Rule (w). The permit has not been changed in response to this comment.

**Comment No 7:** **Georgia Rule (ff), *Solvent Metal Cleaning*.** The facility operates a solvent cleaner approximately nine square feet in size which is subject to Georgia Rule (ff). The cold cleaner is listed as an insignificant source in the Title V as it is less than 10 square feet. Please add conditions for Rule (ff) to the Title V permit. Note that the colder cleaner meets the operating requirements specified in Rule (ff).

**EPD Response:** Georgia Rule (ff) is source/process specific, and it only regulates VOC emissions from a solvent metal cleaning operation(s) itself rather than the whole production facility/manufacturing plant. This Rule applies to a solvent metal cleaning operation located outside the Atlanta ozone none-attainment area when the potential VOC emissions from the cleaning operation exceed 100 tons per year. Because the VOC PTE of the solvent metal cleaning operation at this facility is less than 100 tons per year, the solvent metal cleaning operation is not subject to Georgia Rule (ff). The permit has not been changed in response to this comment.

**Comment No 8:** **Naming Convention:** Please revise the name of P002 from ‘Schiavi Sirio’ to “Schiavi Zodiac”.

**EPD Response:** The comment is acceptable. Subpart 3.1 has been modified in response to the comment.

---

**THE SIREEA CLUB'S COMMENTS & EPD'S RESPONSES****1. GENERAL COMMENTS**

**Comment No. 1.1** THE FULL REPORT ON MALFUNCTIONS SHOULD BE SUBMITTED WITHIN 7 DAYS.

Condition 6.1.2 does not represent 391-3-1-.02(6)(b)1(iv) accurately. It can therefore be interpreted as requiring two reports: the first to inform the Division of a malfunction within 7 days of the occurrence; the second to discuss probable causes and corrective actions, to be submitted any time after the occurrence of the malfunction at the facility's discretion. There is no deadline for the facility to submit the latter report.

The US EPA Region IV must have overlooked the ambiguity of this condition when it approved the template. We do recommend that the condition be corrected in the template to make it clear that the full report is due within 7 days, as required by the cited regulation.

**EPD Response:** EPD disagrees with this comment. Condition 6.1.2 is one of the standard conditions in the Georgia Title V permit template, per an agreement with US EPA Region IV, which reviewed and approved the wording of the template. EPD believes the condition is clear and that it requires a single report to be submitted within 7 days and shall contain information specified in the second sentence. The permit has not been changed in response to this comment.

**Comment No. 1.2** CONDITION 6.1.4 MUST NOT RELY ON DISCRETIONARY DECISIONS.

Section (c) under 6.1.4 seems to rely on off-permit definitions determined by the Director:

The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions 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 occurrence.

According to this paragraph, the Director is granted sole discretion in determining the applicable definitions for non-compliance. We suggest 'as determined by this permit' instead.

**EPD Response:** EPD disagrees with this comment. Condition 6.1.4 is one of the standard conditions in the Georgia Title V permit template, per an agreement with US EPA Region IV, which reviewed and approved the wording of the template. EPD believes the condition is clear and that it requires the facility to "... submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit [emphasis added] and any monitor malfunctions for the semiannual period ...". The permit has not been changed in response to this comment.

**Comment No. 1.3** COMPLIANCE RECORDS MUST BE SUBMITTED TO THE DIVISION.

Title V is supposed to make it possible for the public to determine the degree to which facilities comply with air pollution laws and regulations. Hence the Division should aim to provide open access to all compliance records.

The Permittee is instructed to maintain all compliance records in a form suitable for inspection or submittal. Requiring submittal will allow members of the public to track the facility's actual emission levels and the steps it has taken to minimize the harm it does to the quality of the air we breathe.

**EPD Response:** The permit has not been changed in response to this comment. This comment has previously been made by the Sierra Club and has been rejected by EPA Region IV. 40 CFR §70.6(a)(3)(iii)(A) does require the submittal of monitoring reports every 6 months, but not the submittal of all monitoring data. Condition 6.1.4 of the permit complies with this requirement. In a letter from Winston Smith, Director of Air, Pesticide and Toxics Management Division of Region 4 EPA to Robert Ukeiley, Counsel for the Sierra Club, dated March 29, 2002, Mr. Smith noted that "EPD has reasonably interpreted 40 CFR§70.6(a)(3)(iii)(A)" in EPA's review of condition 6.1.4.

**Comment No. 1.4** SECTION 112(r) PROBLEM.

Condition 7.10.1 is to apply "when and if" the requirements of 40 CFR Part 68 become applicable. At the very least, the permit must state explicitly whether the requirements are applicable at the time the permit is issued.

**EPD Response:** The applicability of 112(r) is triggered by a facility storing certain specific chemicals or flammable materials in amounts above their corresponding threshold quantities. Different sections of 112(r) apply, depending on the chemical or substance being stored. A facility may increase or decrease the amount of a material stored, or start or cease storing a particular material, all without triggering any air quality permitting activity. The applicability of 112(r) to a facility may change several times during the lifetime of their Title V permit, therefore, this permit condition is included in all of Georgia's Title V permits, whether applicable to the facility at the time of permit issuance or not.

**2. SPECIFIC COMMENTS****Comment No. 2.1 PSD AVOIDANCE NOT PRACTICABLY ENFORCEABLE.**

For PSD avoidance, Condition 2.1.1 caps discharges of volatile organic compounds from the facility at 249 tons during any twelve consecutive months. Condition 6.2.2 requires the Permittee to report VOC discharges in excess of 20.75 tons in any calendar month, and Conditions 6.1.7 and 6.2.3 require reporting VOC emissions in excess of 249 tons in any twelve consecutive months.

Since PSD becomes applicable at 250 tons in any twelve consecutive months, the permit must set the PSD-avoidance cap at a level that ensures 100% accuracy. Yet the Permittee is to report when it exceeds the cap of 249 tpy on the basis of calculations which involves a large number of variables, any one of which may be inaccurate [see Conditions 6.2.1 and 6.2.2].

If excess emissions are to be determined as indicated, the PSD-avoidance cap should be set at a level that assumes no more than 90% accuracy. Otherwise, Condition 2.1.1 is not enforceable as a practical matter.

**EPD Response:**

Because NSR/PSD rules do not specify any accuracy requirement/range for any emission caps established to avoid PSD requirements, EPD has no warrant under the NSR/PSD rules for establishing the 90% accuracy requirement as suggested. It is the responsibility of the company to perform the required emission/mass balance calculations following applicable statistic rules and/or common industrial practices, and report the results to EPD. In addition, EPD has been conducting its own emission calculations to verify the company data under certain circumstances, such as when the actual emissions approach the corresponding limits. Therefore, EPD deems that Condition 2.1.1, supported by relevant conditions in Parts 5.0 and 6.0 of this permit, is federally and practically enforceable. The permit has not been changed in response to this comment.

**Comment No. 2.2 CONDITION 6.1.7.b.ii IS NOT PRACTICABLY ENFORCEABLE.**

Condition 6.1.7.b.ii requires the Permittee to report “any instance that the VOC emissions from any of the flexographic printing presses/lines exceeds the applicable limit in Condition 3.4.1”.

Condition 3.4.1 sets limits on the VOC content of inks and coatings. It does not limit VOC emissions. Condition 6.1.7.b.ii is therefore vacuous and cannot be enforced as a practical matter.

**EPD Response:**

EPD disagrees with this comment. Condition 3.4.1 establishes the Georgia Rule (mm) VOC emission standards/limits applicable to the packaging printing processes at this facility. Like many other state emission standards and federal rules (NSPS and HESHAP/MACT), Georgia Rule (mm) limits the VOC emissions from the processes via limiting the VOC contents of the materials being

utilized. These standards are based on proven low emission technologies which have been deemed by the State and/or EPA at least as RACTs. By limiting the emissions per unit of VOC material used and thus per unit of product produced, such standards require the use of similar low emission technologies or emission control devices among business competitors, and therefore level the playground for the companies. Any instance of exceeding the applicable VOC emission limits in Condition 3.4.1, as determined via Condition 6.2.4, is defined by Condition 6.1.7b.ii as an exceedance, i.e. not meeting the emission limits or standards. The permit has not been changed in response to this comment.

**Comment No. 2.3**      **CONDITION 6.1.7.c.i IS NOT PRACTICABLY ENFORCEABLE.**

Condition 6.1.7.c.i requires the Permittee to report “any three-hour period during which the average gas stream temperature at the bed inlet of the catalytic oxidizer CO01 ... serving an on-going topcoat coating operation(s) is more than 2% below that as required by Condition 3.4.6, whenever the oxidizer VOC reduction efficiency is used for the determination of compliance with Condition 3.4.1 as specified in Condition 3.4.2c”.

In other words, an excursion is to be reported only if the catalytic oxidizer is used as an alternative to compliance with Condition 3.4.1, which sets limits on the VOC content of inks or coatings. This allows the Permittee to disregard temperature excursions, for they may have occurred when the VOC content of the topcoat coating in the ongoing operation was below the limit set in Condition 3.4.1.

**EPD Response:**      EPD agrees with this comment. Conditions 3.4.6 and Condition 6.1.7c.i. have been revised to require the report of the 3-hour excursion whenever the Permittee uses the oxidizer to comply with the applicable VOC emission standards in the permit.

**Comment No. 2.4**      **CONDITION 6.2.4 IS NOT PRACTICABLY ENFORCEABLE.**

Condition 6.2.4 provides the Permittee with a method “to demonstrate that the operation of each of the flexographic printing presses/lines is in compliance with the applicable VOC emission limit(s) in Condition 3.4.1”.

As noted in our Comment 2.2 above, Condition 3.4.1 sets limits on the VOC content of inks and coatings. It does not limit VOC emissions. Therefore, Condition 6.2.4 as formulated is vacuous. Furthermore, the condition states that “[t]he Permittee shall notify the Division in writing if the calculated VOC emissions from any of the printing presses/lines exceed the applicable limit(s) in Condition 3.4.1”. Since there are no applicable emission limits in Condition 3.4.1, this condition is not practicably enforceable. The rule it relies on – 391-3-1-.02(2)(mm) – has no emission limits either.

**EPD Response:**      (refer to response to Comment No. 2.2)

**Comment No. 2.5**    CONDITION 3.4.1 IS NOT MONITORED.

Condition 3.4.1 defines allowable VOC content of inks and coatings. There is no monitoring for this condition and no requirement to report exceedances.

**EPD Response:**    EPD disagrees with this comment. Conditions 5.2.1, 6.2.1, 6.2.4 and 6.1.7b.ii. contain the relevant monitoring, recordkeeping and/or reporting requirements for Condition 3.4.1. The permit has not been changed in response to this comment. Please also refer to EPD's response to Comment No. 2.2.

**Comment No. 2.6**    THE PERMIT LACKS WASTE DISPOSAL PROCEDURES.

The materials used by the Permittee may have a high VOC content. The permit controls storage of waste materials in Condition 3.5.2, but there are no specific procedures for the disposal of such materials. Condition 6.2.1 allows the Permittee to subtract material wastes from the monthly usage figures, so the quantity of such wastes is apparently not negligible and the permit should control their disposal.

**EPD Response:**    Condition 3.5.2 requires the Permittee to store waste or spent solvents or other VOC materials in covered containers to prevent VOC emissions due to excessive evaporation. One provision in Condition 6.2.1 allows the Permittee to subtract material wastes from the monthly usage figures. Both are general requirements which would be applicable when such circumstance exists at the facility. However, the conclusion in the comment that "the quantity of such wastes is apparently not negligible" is hasty because the Title V permit application provided no information about the quantity of such wastes. If there is any, such wastes should be disposed of in accordance with the applicable state and federal rules regulating industrial wastes. EPD always reminds companies applying for air quality permits that they should contact other state agencies to learn if they need permits regulating industrial wastes. Therefore, this permit is not the proper avenue to address such the issue. This permit has not been changed in response to this comment