

PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR QUALITY PERMIT

**FORSYTH COUNTY
OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION
WINSTON-SALEM, NORTH CAROLINA**

September 2, 2022

Notice is hereby given by the Forsyth County Office of Environmental Assistance and Protection (EAP) of an opportunity for the public to review and comment on a draft Title V air quality permit for:

**Classic Packaging Company
5355 Bethania-Tobaccoville Road
Pfafftown, NC
Permit #00794-TV-12**

This facility has requested a limitation to avoid the applicability of Major New Source Review preconstruction permitting. This facility has also applied for renewal of its Title V Air Quality operation permit. The draft permit meets the Title V requirements as specified in FCAQTC Section 3Q .0500.

EPA will process this draft permit as a proposed permit and perform its 45-day review provided by Rule 3Q .0522 *Review by EPA and Affected States* concurrently with the public notice period. If public comments are received that result in a change to the permit, EPA's 45-day review period will cease to be performed concurrently with the public notice period. The deadline for citizen's petitions to the EPA Administrator will be determined based on EPA's 45-day review period beginning after the public comment period has ended. The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address:

<https://www.epa.gov/caa-permitting/north-carolina-proposed-title-v-permits>

The EAP will issue a final Air Quality Permit, in accordance with the conditions of the draft/proposed Air Quality Permit, unless there are public comments which result in a different decision or significant change in the permit.

A copy of the draft permit and statement of basis is available at the EAP's website:

http://www.forsyth.cc/EAP/public_notices.aspx

Additional information regarding the draft permit may be obtained from the Office of Environmental Assistance and Protection, Forsyth County Government Center, 201 N. Chestnut Street, Winston-Salem, NC 27101-4120; telephone (336) 703-2440. The public may submit written comments on these proceedings to the address above or by e-mail to lloydpb@forsyth.cc on or before October 1, 2022, the close of the public comment period.



Peter B. Lloyd, Ph.D., P.E., Manager
Compliance Assistance & Permitting Division

**ENVIRONMENTAL AFFAIRS DEPARTMENT
537 N. SPRUCE STREET
WINSTON-SALEM, NC 27101-1362**

**PERMIT TO CONSTRUCT/OPERATE
AIR QUALITY CONTROL
CLASS: Title V**

PERMIT NUMBER	EFFECTIVE DATE	EXPIRATION DATE	RENEWAL DUE
00794-TV-12	Draft	June 16, 2027	March 18, 2027

**Facility Name: Classic Packaging Company
Mailing Address: P.O. Box 17109
City, State, ZIP Code: Winston-Salem, NC 27116**

**Facility Location: 5355 Bethania-Tobaccoville Road
City: Pfafftown, NC 27040**

In accordance with the provisions set forth in the Forsyth County Air Quality Technical Code and Chapter 3 of the Forsyth County Code, "Air Quality Control", the facility identified above is authorized to operate, as outlined in Part I, "Air Quality Title V Operation Permit", and to construct and operate, as outlined in Part II, "Air Quality Construction and Operation Permit", the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations contained within this permit.

The permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete air quality permit application to the Forsyth County Environmental Affairs Department and received an Air Quality Permit, except as provided in this permit or in accordance with applicable provisions of the Forsyth County Air Quality Technical Code.

This permit supercedes all previous permits issued to the permittee by the Forsyth County Environmental Affairs Department.

Peter B. Lloyd, Ph.D., P.E., Manager
Compliance Assistance & Permitting Division

DATE:

Classic Packaging Company
Air Quality Permit # 00794-TV-12
DRAFT, 2022

Table of Contents

PART I AIR QUALITY OPERATING PERMIT

SECTION 1	FACILITY-WIDE PERMITTED EQUIPMENT AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)	3
SECTION 2	FACILITY GENERAL ADMINISTRATIVE CONDITIONS.....	3
2.1	General Provisions	3
2.2	Permit Availability	4
2.3	Submissions.....	4
2.4	Severability Clause.....	4
2.5	Duty to Comply.....	5
2.6	Need to Halt or Reduce Activity Not a Defense	5
2.7	Permit Shield.....	5
2.8	Circumvention	5
2.9	Good Air Pollution Control Practice	5
2.10	Reporting Requirements for Excess Emissions and Permit Deviations.....	6
2.11	Emergency Provisions.....	7
2.12	Permit Fees.....	8
2.13	Annual Emission Inventory Requirements	8
2.14	Compliance Certification.....	8
2.15	Retention of Records.....	9
2.16	NESHAP - Recordkeeping Requirement for Applicability Determinations	9
2.17	Duty to Provide Information	10
2.18	Duty to Supplement or Correct Application	10
2.19	Certification by Responsible Official	10
2.20	Inspection and Entry.....	10
2.21	Averaging Times	11
2.22	Compliance Testing.....	11
2.23	General Emissions Testing and Reporting Requirements.....	11
2.24	Termination, Modification, and Revocation of the Permit	12
2.25	Permit Reopenings, Modifications, Revocations and Reissuances, or Terminations.....	13
2.26	Permit Renewal	13
2.27	Reopening for Cause.....	13

2.28	Construction and Operation Permits	14
2.29	Permit Modifications	14
2.30	Insignificant Activities	14
2.31	Standard Application Form and Required Information	15
2.32	Property Rights.....	15
2.33	Refrigerant Requirements (Stratospheric Ozone and Climate Protection)	15
2.34	Prevention of Accidental Releases - Section 112(r)	15
2.35	Title IV Allowances	15
2.36	Air Pollution Alert, Warning or Emergency	15
2.37	Registration of Air Pollution Sources	16
2.38	Ambient Air Quality Standards.....	16
2.39	Odor	16
2.40	Fugitive Dust Control Requirement.....	16
2.41	NESHAP - National Emission Standard for Asbestos	16
2.42	Air toxics – general	17
SECTION 3 SPECIFIC LIMITATIONS AND CONDITIONS.....		18
3.1	ES-3, PCMC Infinity NT Flexographic Printing Press; and.....	18
	ES-4, PCMC Fusion Flexographic Printing Press.....	18

PART I: AIR QUALITY OPERATING PERMIT

SECTION 1 FACILITY-WIDE PERMITTED EQUIPMENT AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)

Emission Source ID #	Emission Source Description	Control Device Description
ES-3	PCMC Infinity NT Flexographic Printing Press	None
ES-4	PCMC Fusion Flexographic Printing Press	None

SECTION 2 FACILITY GENERAL ADMINISTRATIVE CONDITIONS

2.1 General Provisions [Sections 3-0100, 3-0200 and Sec. 3Q-0508(i)(16)]

- A. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in Subchapters 3D and 3Q of the Forsyth County Air Quality Technical Code (FCAQTC).
- B. The terms, conditions, requirements, limitations and restrictions set forth in this permit are binding and enforceable pursuant to Sections 3-0100, 3-0200 of the Forsyth County Air Quality Ordinance (FCAQO), including assessment of civil and/or criminal penalties. This permit is valid only for the specific processes and operations applied for and indicated in the air quality permit application. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and enforcement action by this Office.
- C. This permit is not a waiver of or approval of any other permits that may be required for other aspects of the facility which are not addressed in this permit.
- D. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore. This permit does not allow the permittee to cause pollution in contravention of local laws or rules, unless specifically authorized by an order from the Director, or to cause pollution in contravention of state laws or rules.
- E. Terms and conditions contained herein shall be enforceable by this Office, the U.S. EPA and citizens of the United States as defined in the federal Clean Air Act, except those identified as **Locally Enforceable Only** requirements which are enforceable

by this Office.

- F. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained or modified without the appropriate and valid permits issued by this Office, unless the source is exempted by rule. This Office may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the applicable requirements.
- G. In addition to the authority found in Sec. 3D-0501 and 3Q-0508(i)(16), any deviation from the monitoring provisions of this permit may result in a request by this Office to submit data on rates of emissions in order to demonstrate compliance with any applicable regulation.

2.2 Permit Availability [Sec. 3Q-0507(k), 0508(i)(16), 0508(i)(9) and 0110]

The permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of this Office or the U.S. EPA upon request.

2.3 Submissions [Sec. 3Q-0507(c), 0508(i)(16) and 0104]

- A. All documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required to be sent to this Office by this permit shall be submitted to the Forsyth County Office of Environmental Assistance and Protection, Forsyth County Government Center, 201 N. Chestnut Street, Winston-Salem, NC 27101-4120.
- B. All documents, reports, test data, monitoring data, notifications, and any other information required to be sent to **U.S. EPA Region 4, Air Enforcement Branch** shall be submitted through EPA's Compliance and Emissions Data Reporting Interface, CEDRI, or submitted to U.S. EPA Region 4, Air Enforcement Branch, 61 Forsyth Street, S.W., Atlanta, GA 30303.
- C. All documents, reports, test data, monitoring data, notifications, and any other information required to be sent to U.S. EPA Region 4, Air Permits Section shall be submitted through EPA's Compliance and Emissions Data Reporting Interface, CEDRI, or submitted to U.S. EPA Region 4, Air Permits Section, 61 Forsyth Street, S.W., Atlanta, GA 30303.

2.4 Severability Clause [Sec. 3Q-0508(i)(2)]

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any specific circumstance, is challenged, the application of the provision in question to other circumstances, as well as the remainder of this permit's provisions, shall not be affected.

2.5 Duty to Comply [Sec. 3Q-0508(i)(3)]

The permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

2.6 Need to Halt or Reduce Activity Not a Defense [Sec. 3Q-0508(i)(4)]

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

2.7 Permit Shield [Sec. 3Q-0512(a)]

- A. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
- B. A permit shield shall not alter or affect:
 - 1. the power of the Forsyth County Board of Commissioners, Director, or Governor under NCGS 143-215.3(a)(12) or the U.S. EPA under Section 303 of the federal Clean Air Act;
 - 2. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
 - 3. the applicable requirements under Title IV of the Clean Air Act; or
 - 4. the ability of the Director or the U.S. EPA under Section 114 of the federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
- C. A permit shield shall not apply to any change made at a facility that does not require a permit or to any permit revision made under Sec. 3Q-0523.
- D. A permit shield shall not extend to minor permit modifications made under Sec. 3Q-0515.

2.8 Circumvention [Sec. 3D-0502 and 3Q-0508(i)(16)]

No person shall circumvent any permitted air pollution control device, or allow the emissions of regulated air pollutants without the applicable air pollution control device operating properly. Unless otherwise specified by this permit, no permitted emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

2.9 Good Air Pollution Control Practice [Sec. 3D-0502 and 3Q-0508(i)(16)]

At all times, the equipment listed in *Section 1* shall be operated and maintained in a manner consistent with the design and emissions control as applied for in the application.

2.10 Reporting Requirements for Excess Emissions and Permit Deviations [Sec. 3D-0535(f), 3Q-0508(f)(2), 3Q-0508(i)(16) and 3Q-0508(g)]

“Excess Emissions” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections 3D-0500, 0900, 1200 or 1400; or by a permit condition; or that exceeds a **Locally Enforceable Only** emission limit established in a permit issued under Section 3Q-0700. (*Note: This definition applies where the NSPS does not further define excess emissions for an affected NSPS emissions source.*)

“Deviation” - means any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions.

A. Sources subject to Sec. 3D-0524, 1110 or 1111
Excess Emissions and Permit Deviations

1. If the source specific NSPS (3D-0524) or NESHAP (3D-1110 or 1111) defines “excess emissions”, these shall be reported as prescribed in 3D-0524, 1110 or 1111.
2. If the source specific NSPS (3D-0524) or NESHAP (3D-1110 or 1111) does NOT define “excess emissions”, the permittee shall report excess emissions as deviations from permit requirements as prescribed in paragraph 3, below.
3. In addition to any specific NSPS or NESHAP reporting requirements the permittee shall upon becoming aware:
 - a. report to this Office any deviations from permit requirements by the next business day, unless an alternative reporting schedule is specifically provided in the permit, and
 - b. report in writing to this Office all deviations from permit requirements or any excess emissions within two business days, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such deviations and any corrective actions or preventative actions taken. Reports of all deviations from permit requirements shall be certified by a responsible official.

B. Sources NOT subject to Sec. 3D-0524, 1110 or 1111

1. Excess Emissions Greater than Four Hours in Duration [3D .0535(f)]
The permittee shall report excess emissions greater than four hours in duration as prescribed in Sec. 3D-0535(f) including, but not limited to the following:
 - a. Notify this Office of any such occurrence by 9:00 a.m. Eastern time of this

Office's next business day of becoming aware of the occurrence as described in Sec. 3D-0535(f)(1);

- b. Notify this Office immediately when corrective measures have been accomplished; and
- c. Submit, if requested, to this Office within 15 days after the request, a written report as described in Sec. 3D-0535(f)(3).

2. Excess Emissions Less than Four Hours in Duration and Deviations [3Q .0508(f)]

The permittee shall report excess emissions less than four hours in duration and deviations from permit requirements as follows:

- a. Report to this Office any excess emissions less than four hours in duration and any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit; and
- b. Report in writing to this Office any excess emission less than four hours in duration or any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such excess emissions and deviations and any corrective actions or preventative actions taken. All reports of excess emissions and deviations from permit requirements shall be certified by a responsible official.

C. Other Requirements under Sec. 3D-0535 (Sec. 3D-0535(g) is **Locally Enforceable Only.**)

The permittee shall comply with all other requirements contained in Sec. 3D-0535(c) for excess emissions that do not occur during startup or shutdown and Sec. 3D-0535(g) for excess emissions that occur during startup or shutdown.

2.11 Emergency Provisions <40 CFR 70.6(g)>

The permittee shall be subject to the following provision with regard to emergencies:

- A. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- B. An emergency constitutes an affirmative defense to an action brought for

noncompliance with such technology-based emission limitations if the conditions specified in paragraph C below are met.

- C. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
1. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 2. the permitted facility was at the time being properly operated;
 3. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the standards, or other requirements in the permit; and
 4. the permittee submitted notice of the emergency to this Office within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, and steps taken to mitigate emissions, and corrective actions taken.
- D. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- E. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

2.12 Permit Fees [Sec. 3Q-0206(b), 0508(i)(10)) and 0519(a)(4)]

If, within 30 days after being billed, the permittee fails to pay an annual permit fee required under Subchapter 3Q-0200 of the FCAQTC, the Director may initiate action to terminate this permit under Sec. 3Q-0519 of the FCAQTC.

2.13 Annual Emission Inventory Requirements [Sec. 3Q-0207]

The permittee shall report to the Director by June 30th of each year the actual emissions of each air pollutant listed in Sec. 3Q-0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form(s) as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

2.14 Compliance Certification <40 CFR 70.6(c)> [Sec. 3Q-0508(n) and 0508((i)(16))]

By March 1st unless another date is established by the Director, the permittee shall submit to this Office and the U.S. EPA (**U.S. EPA Region 4, Air Enforcement Section, Mail Code: 4APT-AEEB, 61 Forsyth Street, S.W., Atlanta, GA 30303**) a compliance certification by a responsible official with all terms and conditions in the permit, including emissions limitations, standards, or work practices. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the federal Clean Air Act. The compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference

the permit or previous reports as applicable):

- A. the identification of each term or condition of the permit that is the basis of the certification;
- B. the status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the methods or means designated in 40 CFR 70.6(c)(5)(iii)(B). The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;
- C. the identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include at a minimum, the methods and means required under 40 CFR 70.6(a)(3). If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- D. the status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph B above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- E. such other facts as the permitting authority may require to determine the compliance status of the source.

2.15 Retention of Records [Sec. 3Q-0508(f)]

The permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit.

2.16 NESHAP - Recordkeeping Requirement for Applicability Determinations <40 CFR 63.10(b)(3)> [Sec. 3D-1111]

If the permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR Part 63, the permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its

operations to become an affected source. This record shall include all of the information required under 40 CFR 63.10(b)(3).

2.17 Duty to Provide Information [Sec. 3Q-0508(i)(9)]

- A. The permittee shall furnish to this Office, in a timely manner, any reasonable information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
- B. The permittee shall furnish this Office copies of records required to be kept by the permit when such copies are requested by the Director.

2.18 Duty to Supplement or Correct Application [Sec. 3Q-0507(f)]

The permittee, upon becoming aware that any relevant facts were omitted from the application or that incorrect information was submitted with the application, shall promptly submit such supplementary facts or corrected information to this Office. The permittee shall also provide additional information necessary to address any requirements that become applicable to the source after the date a complete application was submitted but prior to release of the draft permit.

2.19 Certification by Responsible Official [Sec. 3Q-0520]

A responsible official (as defined in 40 CFR 70.2) shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statement and information in the document are true, accurate, and complete.

2.20 Inspection and Entry [Sec. 3Q-0508(l)]

- A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of this Office to perform the following:
 - 1. enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
 - 2. have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
 - 3. inspect, at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - 4. sample or monitor substances or parameters, at reasonable times and using

reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements.

Nothing in this condition shall limit the ability of the U.S. EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

- B. No person shall obstruct, hamper or interfere with any such authorized representative while in the process of carrying out his official duties.

2.21 Averaging Times <40 CFR 70.6(a)(3)> [Sec. 3Q-0508(f)]

Unless otherwise specified in *Section 3* of this permit for a specific emission standard or limitation, the applicable averaging period for determining compliance with an emission standard or limitation during compliance testing shall be based on the applicable U.S. EPA reference test method.

2.22 Compliance Testing [Sec. 3D-2602(e)]

When requested by this Office for determining compliance with emission control standards, the permittee shall provide sampling ports, pipes, lines, or appurtenances for the collection of samples and data required by the test procedure; scaffolding and safe access to the sample and data collection locations; and light, electricity, and other utilities required for sample and data collection

2.23 General Emissions Testing and Reporting Requirements [Sec. 3D-2602(e) and Sec. 3Q-0508(i)(16)]

Testing shall be conducted in accordance with FCAQTC Section 3D-2600 except as may be otherwise required in FCAQTC Sec. 3D-0524, 3D-0912, 3D-1110, 3D-1111, 3D-1415 or a permit condition specific to the emissions source. Requests to use an alternative test method or procedure must be made in writing at least 45 days prior to the test and approved by this Office. Alternatives to test methods or procedures specified for emissions sources subject to test requirements under 40 CFR 60, 40 CFR 61 or 40 CFR 63, may require approval by the U.S. EPA. When required to conduct emissions testing under the terms of the permit:

- A. The permittee shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved prior to air pollution testing. Emission testing protocols must be submitted at least 45 days before conducting the test for pre-approval prior to testing if requested by the permittee.
- B. The permittee shall notify this Office of the specific test dates at least 15 days prior to the scheduled test date in order to afford this Office the opportunity to have an observer on-site during the sampling program.
- C. During all sampling periods, the permittee shall operate the emission source(s) under

operating conditions that best fulfill the purpose of the test and are approved by the Director or his delegate.

- D. The permittee shall submit one copy of the test report to this Office not later than 30 days after sample collection. The permittee may request an extension to submit the final test report if the extension request is a result of actions beyond the control of the permittee. . The test report shall contain at a minimum the following information:
1. a certification of the test results by sampling team leader and facility representative;
 2. a summary of emissions results expressed in the same units as the emission limits given in the rule for which compliance is being determined and text detailing the objectives of the testing program, the applicable state and federal regulations, and conclusions about the testing and compliance status of the emission source(s) as appropriate;
 3. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics as necessary;
 4. all field, analytical and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
 5. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
 6. documentation of facility operating conditions during all testing periods and an explanation relating these operating conditions to maximum normal operation. If necessary, provide historical process data to verify maximum normal operation.
- E. This Office will review emission test results with respect to the specified testing objectives as proposed by the permittee and approved by this Office.

2.24 Termination, Modification, and Revocation of the Permit [Sec. 3Q-0519]

The Director may terminate, modify, or revoke and reissue this permit if:

- A. the information contained in the application or presented in support thereof is determined to be incorrect;
- B. the conditions under which the permit or permit renewal was granted have changed;
- C. violations of conditions contained in the permit have occurred;
- D. the permit holder fails to pay fees required under Section 3Q-0200 within 30 days after being billed;
- E. the permittee refuses to allow the Director or his authorized representative upon presentation of credentials:
 1. to enter, at reasonable times and using reasonable safety practices, the

- permittee's premises in which a source of emissions is located or in which any records are required to be kept under terms and conditions of the permit;
2. to have access, at reasonable times, to any copy or records required to be kept under terms and conditions of the permit;
 3. to inspect, at reasonable times and using reasonable safety practices, any source of emissions, control equipment, and any monitoring equipment or method required in the permit; or
 4. to sample, at reasonable times and using reasonable safety practices, any emission sources at the facility;
- F. the U.S. EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
- G. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of Chapter 3 of the Forsyth County Code.

2.25 Permit Reopenings, Modifications, Revocations and Reissuances, or Terminations [Sec. 3Q-0508(i)(5)]

The Director may reopen, modify, revoke and reissue, or terminate this permit for reasons specified in Sec. 3Q-0517 or .0519. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition in this permit.

2.26 Permit Renewal [Sec. 3Q-0508(e) and Sec. 3Q-0513]

This permit is issued for a term not to exceed five years. Permits issued under Title IV of the Clean Air Act shall be issued for a fixed period of five years. This permit shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete renewal application is submitted at least nine months before the date of permit expiration. If the permittee or applicant has complied with Sec. 3Q-0512(b)(1), this permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.

2.27 Reopening for Cause [Sec. 3Q-0517 and 0508(g)]

This permit shall be reopened and revised in accordance with Sec. 3Q-0517 prior to its expiration date, for any of the following reasons:

- A. Additional applicable requirements become applicable to the facility with remaining permit term of three or more years.

- B. Additional requirements, including excess emissions requirements, become applicable to this source under Title IV of the Clean Air Act. Excess emissions offset plans for this source shall become part of this permit upon approval by the U.S. EPA.
- C. The Director or the U.S. EPA finds that a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- D. The Director or the U.S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

2.28 Construction and Operation Permits [Sections 3Q-0100 and-0300]

A construction and operating permit shall be obtained by the permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in following the procedures under Sec. 3Q-0500 (except for Sec. 3Q-0504) or a construction and operation permit following the procedures under Sec. 3Q-0504 and filing a complete application to modify the construction and operation permit to meet the requirements of Section 3Q-0500. If the procedures under Sec. 3Q-0504 are followed, the application to meet the requirements of Section 3Q-0500 shall be submitted:

- A. within 12 months of beginning operation if the modification does not contravene or conflict with a condition in the existing permit, or
- B. before beginning operation if the significant modification contravenes or conflicts with a condition in the existing permit.

2.29 Permit Modifications [Sec. 3Q-0514, 0515, 0516, 0517, 0523 and 0524]

- A. Permit modifications may be subject to the requirements of Sec. 3Q-0514, 0515, 0516 and 0524.
- B. Changes made pursuant to Sec. 3Q-0523(a) and (b) do not require a permit modification.
- C. The permittee shall submit an application for reopening for cause in accordance with Sec. 3Q-0517 if notified by this Office.
- D. To the extent that emissions trading is allowed under FCAQTC Subchapter 3D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to Sec. 3Q-0523(c).

2.30 Insignificant Activities [Sec. 3Q-0503 and 0508(i)(15)]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or

operator of the source is exempted from demonstrating compliance with any applicable requirement. The permittee shall have available at the facility at all times and made available to an authorized representative of this Office upon request, documentation, including calculations if necessary, to demonstrate that an emission source or activity is insignificant.

2.31 Standard Application Form and Required Information [Sec. 3Q-0505 and 0507]

The permittee shall submit applications and required information in accordance with the provision of Sec. 3Q-0505 and 0507.

2.32 Property Rights [Sec. 3Q-0508(i)(8)]

This permit does not convey any property rights of any sort, or any exclusive privileges.

2.33 Refrigerant Requirements (Stratospheric Ozone and Climate Protection) <40 CFR Part 70> [Sec. 3Q-0508(b)]

- A. If the permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR 82 Subpart A, Appendices A and B, the permittee shall service, repair, and maintain such equipment according to the work practices and personnel certification requirements, and the permittee shall use certified recycling and recovery equipment specified in 40 CFR 82 Subpart F.
- B. The permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR 82 Subpart F.
- C. The permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the U.S. EPA or its designee as required.

2.34 Prevention of Accidental Releases - Section 112(r) Sec. 3Q-0508(h)]

If the permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the federal Clean Air Act, then the permittee is required to register this plan in accordance with 40 CFR Part 68.

2.35 Title IV Allowances [Sec. 3Q-0508(i)(1)]

The facility's emissions are prohibited from exceeding any allowances that the facility lawfully holds under Title IV of the Clean Air Act. This permit shall not limit the number of allowances held by the permittee, but the permittee may not use allowances as a defense to noncompliance with any other applicable requirement.

2.36 Air Pollution Alert, Warning or Emergency [Section 3D-0300]

Should the Director of this Office declare an Air Pollution Alert, Warning or Emergency, the permittee will be required to operate in accordance with the permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in Section 3D-0300.

2.37 Registration of Air Pollution Sources [Sec. 3D-0202]

The Director of this Office may require the permittee to register a source of air pollution. If the permittee is required to register a source of air pollution, this registration and required information shall be in accordance with Sec. 3D-0202(b).

2.38 Ambient Air Quality Standards [Sec. 3D-0501(e)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in Sec. 3D-0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

2.39 Odor [Sec. 3D-0522] *Locally Enforceable Only*

The permittee shall not cause or permit the emission of odors beyond the facility's property lines which are harmful, irritating or which unreasonably interfere with the use and enjoyment of any person's properties or living conditions, or any public properties or facilities. Such odors are prohibited by Sec. 3D-0522. No violation shall be cited, provided that the best practical treatment, maintenance, and control of odor(s) currently available is used. This requirement does not apply to normal agricultural practices, nor to accidental emissions of odors which are not normally produced during routine operations and activities as determined by the Director.

2.40 Fugitive Dust Control Requirement [Sec. 3D-0540]

The permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR 60, Appendix A), the owner or operator may be required to submit and implement a fugitive dust control plan as described in 3D .0540(f).

2.41 NESHAP - National Emission Standard for Asbestos <40 CFR Part 61, Subpart M> [Sec. 3D-1110]

The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M. The permittee

shall not be required to obtain a modification of this permit in order to perform the referenced activities.

2.42 Air toxics – general [Sec. 3Q-0712]] ***Locally Enforceable Only***

Upon the written request of the Director and in accordance with Section 3D-1100 ("Control of Toxic Air Pollutants") of the FCAQTC, the permittee shall demonstrate to the satisfaction of the Director that the facility's emissions of the toxic air pollutants listed in Section 3D-1100 do not cause or contribute to any significant ambient air concentration that may adversely affect human health. This demonstration shall be made in accordance with Sections 3D-1100 and 3Q-0700.

SECTION 3 SPECIFIC LIMITATIONS AND CONDITIONS

The emission source(s) and associated air pollution control device(s) listed below are subject to the following specific terms, conditions, and limitations, including the monitoring recordkeeping, and reporting requirements to which those requirements apply:

3.1 ES-3, PCMC Infinity NT Flexographic Printing Press; and ES-4, PCMC Fusion Flexographic Printing Press

The following provides a summary of the limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Applicable Standard	Applicable Regulation
Volatile Organic Chemicals	250 tons per year	Sec. 3Q-0317(1) and Sec. 3D-0530

A. Avoidance of Prevention of Significant Deterioration [Sec. 3D-0530 and 3Q-0317]

The facility consisting of emission sources ES-3 and ES-4 has requested federally enforceable limits in order to avoid provisions of Sec. 3D-0530.

1. Emission Limit [Sec. 3D-0530]

Emissions of volatile organic chemicals from the printing operations (ES1 and ES2) shall not exceed 250 tons per year.

2. Testing [Sec. 3D-0501(b)]

If emissions testing is required by this Office or US EPA, or the Permittee submits emissions testing to this Office in support of a permit application or other submittal, the Permittee shall perform such testing in accordance with the appropriate EPA reference method(s) as approved by this Office. The Permittee must request approval from this Office for an alternate test method or procedure in writing. Details of the emissions testing and reporting requirements can be found in General Condition **2.23**.

3. Monitoring/Recordkeeping [Sec. 3Q-0508(f)]

In order to demonstrate compliance with the emission limit the following monitoring and recordkeeping requirements apply:

- a. For each source, determine and maintain records of the sum of the weight of all inks and other solids containing material, W_{Bi} (lb), and the weight of all solvent and other diluents, W_{Bj} (lb), that are applied when emissions are directed to atmosphere.
- b. Maintain records of the VOC content of all materials used, C_{Bi} (lb/lb).
- c. The monthly VOC emissions, E (tons/month), shall be calculated according to:

$$E = 0.0005 \sum_{ES3,4} \left(\sum_{i=1}^p W_{Bi} C_{Bi} + \sum_{j=1}^q W_{Bj} \right)$$

- d. The monthly VOC emissions and the monthly-rolling 12-month totals shall be recorded at the end of each month.

The permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

4. **Reporting** [Sec. 3Q-0508(f)]

The permittee shall submit the VOC emissions from the printing operations semiannually to this Office. The report shall include the total VOC emissions for each month and the monthly-rolling 12-month totals for each month.

This report shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December.

**FORSYTH COUNTY OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION
TV PERMIT - STATEMENT OF BASIS**

Applicant: Classic Packaging Company		Site Location: 5355 Bethania-Tobaccoville Rd		New Permit No. 00794-TV-12	
Technical Contact: Kenneth Nocito		Phone: (336) 922-4224		Responsible Official: Kenneth Nocito, Operations Manager	
Agency Reviewer: Margie R. Ader		Signature:		Date: August 12, 2022	
Agency Q/A Manager:		Signature:		Primary/Secondary SIC Code(s) 2759	
Date Application received: 09/13/2021					

I. FACILITY DESCRIPTION

Classic Packaging Company is located at 5355 Bethania-Tobaccoville Road in Pfafftown, NC. Classic Packaging prints images onto thin clear plastic sheets which are used to package various products such as toilet paper and paper towels. They accomplish the printing using two flexographic presses: one PCMC Infinity NT flexographic printing press and one PCMC Fusion flexographic printing press. In addition to the VOCs the presses emit from the printing process, they emit VOCs, NO_x, carbon monoxide, and particulates plus minor amounts of HAPs and TAPs from natural gas combustion by the dryers the presses use to dry the inks. Permit 00794-TV-11 listed a Bielloni Axioma flexographic press (ES-1) as an emission source. ES-1 was shut down in 2016 and has since been sold and removed from the facility.

Classic Packaging Company is a major source with respect to Title V because the potential and actual emissions of volatile organic compounds (VOC) from the facility are greater than 100 tons per year.

II. STATEMENT OF COMPLIANCE

The EAP has reviewed the compliance status of this facility. Based on a review of this application and previous permits and Statements of Basis and knowledge of this facility based on our inspections, the facility was determined to not be in compliance with all applicable requirements. The SoBs accompanying 00794R10 and 00794-TV-11 list the potential VOC emissions for ES-3 and ES-4 as 297.48 tpy each, making them subject to 3D.0530 Prevention of Significant Deterioration since their potential emissions are greater than 250 tpy. This was not addressed in either permit, however actual VOC emissions never exceeded the PSD Major Source threshold. The facility was given the option of either completing a PSD application or requesting an emission limitation to avoid classification as a major source under PSD. Their greatest annual VOC emissions since becoming a Title V facility was 180.4 tons in 2019. The facility submitted a request on June 27, 2022 to limit facility-wide actual VOC emissions below 250 tpy to be classified as a PSD Minor Source.. The applicant has certified that the facility will be in compliance with all other applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with all subsequent applicable requirements taking effect during the term of this permit and will meet such requirements on a timely basis. The facility is classified as a Title

V facility. They are requesting renewal of their permit with no modifications other than addressing the PSD avoidance.

III. SUMMARY OF EMISSION SOURCES AND CONTROL DEVICES

The following table identifies all emission sources and associated control devices for which the Initial Title V Operating Permit is issued.

Emission Source ID #	Emission Source Description	Control Device Description
ES-3	PCMC Infinity NT Flexographic Printing Press	None
ES-4	PCMC Fusion Flexographic Printing Press	None

IV. EMISSION SOURCE-BY-SOURCE EVALUATION

1.0 ***PCMC Infinity NT Flexographic Printing Press; and PCMC Fusion Flexographic Printing Press***

1.0.1 Description:

ES-3 PCMC Infinity NT Flexographic Printing Press; and
ES-4 PCMC Fusion Flexographic Printing Press

ES-3 and ES-4 print solvent-based inks onto a continuous roll of plastic. ES-3 was manufactured in 2008 and has ten ink stations. ES-4 was manufactured in 2016 and has ten ink stations. Each station has a cylindrical anilox which picks up ink as it rolls through it, the doctor blade removes the excess ink, and the anilox applies the ink to the plastic substrate. The inks are dried by compressed air blown onto the freshly printed plastic which is then exhausted through a single vent. There is no control equipment associated with any of the presses. The application of the inks to plastic by the presses results in VOC emissions. These two presses do not have any dryers that combust natural gas to heat air to dry the inks.

The stations use differing amounts of ink based upon the size of their anilox. The amounts of ink that each station uses per hour were listed on the B5 forms of their previous permit application. The facility used these numbers to calculate their VOC emissions which they provided in a table attached to the permit. Their expected actual and potential operating hours per year were based upon what they viewed as typical for their facility. They print several small batches each day on each press. This requires a large amount of setup time. The table they supplied to our Office indicated that over an eleven day period, the average daily setup time was 12.36 hours, leaving 11.64 hours of printing. The smallest amount of time used in setup was 5 hours, leaving 19 hours of printing. These were the daily operating hours that our Office used to calculate their expected actual and potential operating hours per year.

Actual: 11.64 hours/day X 5 days/week X 50 weeks/year = 2910 operating hours/year

Potential: 19 hours/day X 365 days/year = 6935 operating hours/year

The following table shows the actual and potential VOC emissions for each press and for the entire facility that were calculated in the issuance of 00794 – TV – 11:

Press	deck	actual			potential			
		gal/hr	hr/yr	gal/yr	gal/hr	hr/yr	gal/yr	
ES-3	1	6.53	2915	19028.59	9.69	6935	67219.71	
	2	2.51	2915	7318.69	3.73	6935	25853.74	
	3	0.75	2915	2195.61	1.12	6935	7756.12	
	4	0.23	2915	658.68	0.34	6935	2326.84	
	5,6,7,8,9,10	1.36	2915	3952.09	2.01	6935	13961.03	
		Total		14575	33153.66		34675	117117.43
		X 5.08 lb VOC/gal ink			168420.57			594956.53
	Tons			84.21			297.48	
ES-4	1	6.53	2915	19028.59	9.69	6935	67219.71	
	2	2.51	2915	7318.69	3.73	6935	25853.74	
	3	0.75	2915	2195.61	1.12	6935	7756.12	
	4	0.23	2915	658.68	0.34	6935	2326.84	
	5,6,7,8,9,10	1.36	2915	3952.09	2.01	6935	13961.03	
		Total		14575	33153.66		34675	117117.43
		X 5.08 lb VOC/gal ink			168420.57			594956.53
	Tons			84.21			297.48	
	facility-wide total (tons)			168.42			594.96	

The following table lists the VOC emissions from their emission inventories from 2016 – 2020:

Pollutant	2016	2017	2018	2019	2020
VOC	127.1 tons	177.5 tons	167.6 tons	180.4 tons	158.1 tons

1.0.2 Applicable Regulatory Requirements

The following provides a summary of the limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Applicable Standard	ES-#	Applicable Regulation
Particulate Matter	1.49 lb/hr	ES-3, and ES-4	Sec. 3D-0515 - Particulates from Miscellaneous Industrial Processes
Sulfur Dioxide	2.3 lb SO ₂ /MMBtu		Sec. 3D-0516 - Sulfur Dioxide Emissions from Combustion Sources
Visible Emissions	20 percent opacity		Sec. 3D-0521(d) - Control of Visible Emissions
Volatile Organic Chemicals (VOCs)	250 tpy facility-wide		Sec. 3Q-0317 Avoidance Conditions
Local Air Toxics	SEE SECTION VI - 3D .1100 - CONTROL OF TOXIC AIR POLLUTANTS - <i>LOCAL ONLY ENFORCEMENT</i>		

1.1 Sec. 3D-0515 - Particulates from Miscellaneous Industrial Processes

This rule regulates the emissions of particulate matter from any stack, vent, or outlet of any industrial process for which no other emission control standards are applicable.

1.1.1 Regulatory Analysis

The allowable emission rate of PM is determined by the following equation:

$$E = 4.10(P)^{0.67}$$

where: E = the maximum allowable rate in lb/hour, and
P = the process rate in tons/hour.

Under Sec. 3D-0515 an allowable particulate emissions rate can be calculated based on the production rate of printed film. Sec. 3D-0515(b) states that liquid or gaseous fuel cannot be used to calculate the process weight. From previous applications the weight of the film processed is 9600 lbs / million ft². According to their CY2020 Emissions Inventory, ES-3 processed 350 million ft² while operating 7200 hours and ES-4 processed 450 million ft² while operating 8400 hours in 2020. The facility's throughput for 2020 was 800 million ft² with the presses operating a total of 15,600 hours. Based on this information, their allowable particulate emissions rate would be:

$$800 \text{ million ft}^2 \text{ film/year} \times 9600 \text{ lbs/million ft}^2 \text{ film} \div 15,600 \text{ hours/year} \div 2000 \text{ lb/ton} \\ = 0.246 \text{ tons/hr}$$

$$E = 4.10(P)^{0.67} = E = 4.10(0.246)^{0.67} = 1.60 \text{ lb/hr.}$$

The only source of particulate emissions the facility has had is the combustion of natural gas by the dryer associated with ES-1 press, which had been removed from the facility. The dryers associated with ES-3 and ES-4 use compressed air to dry the printed plastic. Their dryers do not use natural gas combustion to heat the air dry the plastic. The facility no longer has any particulate emission sources. This requirement will be removed from the permit.

1.2 Sec. 3D-0516 - Sulfur Dioxide Emissions from Combustion Sources

This rule regulates the emission of sulfur dioxide from any source of combustion that is discharged from any stack or chimney.

1.2.1 Regulatory Analysis

This rule limits the amount of sulfur dioxide emitted from each of these sources to no more than 2.3 lb SO₂/MMBtu heat input as per Sec. 3D-0516(a). The facility burns only natural gas to heat the facility and not to heat air for the dryers associated with ES-3 and ES-4.

Consequently this requirement will be removed from the permit. 1.2.2 Monitoring and Recordkeeping Requirements

1.3 Sec. 3D-0521- Control of Visible Emissions

This rule limits the amount of visible emissions generated from fuel burning operations and industrial processes.

1.3.1 Regulatory Analysis

This rule was promulgated for the prevention, abatement, and control of emissions generated from fuel burning operations and other industrial processes where emissions can be reasonably expected to occur, except during startups, shutdowns or malfunctions made in accordance with other conditions in the Title V permit. Visible emissions are not expected from this process because they do not burn any fuel and no heat is used in the process that could result in condensable organic compound emissions. Consequently this requirement is not applicable and will be removed from the permit.

1.4 Sec. 3Q-0317 – Avoidance Conditions, Sec. 3D-0530 Prevention of Significant Deterioration

This rule allows the owner/operator of a facility to request emission limits to avoid applicability of certain applicable requirements.

1.4.1 Regulatory Analysis

The PSD Major Source threshold for VOCs is 250 tpy. The facility has requested to avoid being subject to this rule by limiting their actual emissions below the PSD Major Source threshold. The largest amount of VOC emissions from the entire facility since they became a Title V facility was 180.4 tons in 2019. This is well below the 250 tpy PSD Major Source threshold. Therefore, our Office has determined that the facility is not subject to Sec. 3D-0530 Prevention of Significant Deterioration.

1.4.2 Monitoring and Recordkeeping Requirements

The facility will be required to maintain records of the quantities and VOC content of all inks and diluents. The facility will also be required to calculate the monthly VOC emissions and the monthly-rolling 12-month totals.

1.4.3 Reporting Requirements

All instances of deviations from the specific monitoring requirements must be reported semiannually. The facility shall report the monthly rolling total annual VOC emissions semi-annually to demonstrate compliance with Sec. 3Q-0317 to avoid the applicability of Sec. 3D-0530.

1.6 Alternative Operating Scenario

No AOS was proposed.

1.7 Other Specific Conditions

Excess emissions reporting and malfunctions will be reported in accordance with Rule 3D .0535 - *Excess Emissions Reporting and Malfunctions*.

3.0 Hazardous Air Pollutants Requirements for ES-3 and ES-4

There are no HAPs or TAPs being released from any of the presses at this facility. The only emission sources at the facility are ES-3 and ES-4, neither of which emit any HAPs or TAPs.

V. FACILITY-WIDE EMISSION SOURCE CONDITIONS

1.0. 3D .0958 - Work Practice Standards for Sources of Volatile Organic Compounds

This regulation is longer applicable to this facility and has been removed from the permit.

VI. LOCAL ONLY ENFORCEMENT

The requirements in this section are subject to local enforcement only and are not federally enforceable.

1.0 3D .1100 - Control of Toxic Air Pollutants

There are no Toxic Air Pollutants released from this facility. The only emission sources at this facility are ES-3 and ES-4, neither of which emit any TAPs. This requirement is addressed at General Condition 2.42

VII. MACT APPLICABILITY AND REQUIREMENTS

This facility is classified as a Title V facility due to VOC emissions being greater than 100 TPY. It does not emit any HAPs. Therefore, it is not subject to 40 CFR Part 63 Subpart KK.

VIII. PERMIT SHIELD (INCLUDING NON-APPLICABLE REQUIREMENTS)

In accordance with 3Q .0512, general condition **2.7** of the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

IX. GENERAL CONDITIONS

The "General Conditions" section of the Title V Operating Permit lists additional applicable rule requirements that the permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, submission of documents, inspections and entry procedures, reopen for cause, severability, etc. In addition, conditions in this section of the permit include the general conditions specific to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program and the general conditions for the CAM Rule. These conditions are not necessarily common to all Title V facilities,

only those subject to a MACT standard and CAM.

X. INSIGNIFICANT ACTIVITIES

There are no insignificant activities at this facility.

XI. PUBLIC NOTICE

This Draft permit will go through a 30 day public comment period and a concurrent 45 day review by the U.S. EPA prior to final approval. This dual process is known as parallel processing. If significant public comments are received the U.S. EPA review will revert to a sequential 45 day review period after the close of the public comment period.

XII. EAD COMMENTS/RECOMMENDATIONS

Comments:

Recommendations:

The Department recommends the renewed Title V permit (#00794-TV-12) be issued as written.