

WESTERN NORTH CAROLINA REGIONAL AIR QUALITY AGENCY

AIR QUALITY PERMIT

Until such time as this permit expires or is modified or revoked, the below named Permittee 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 within this permit. This permit is issued under the provisions of the Western North Carolina Regional Air Quality Agency Air Quality Code (WNCRAQA Code) and is subject to all requirements therein.

Pursuant to the WNCRAQA Code Chapter 17, 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 Western North Carolina Regional Air Quality Agency and received an Air Quality Permit, except as provided in this permit.

Permittee:	Amcor Flexibles LLC
Facility ID:	11-539
Facility Site Location:	3055 Sweeten Creek Road
City, State, Zip:	Asheville, North Carolina 28813
Facility Mailing Address:	3055 Sweeten Creek Road
City, State, Zip:	Asheville, North Carolina 28813
Permit Number:	11-539-20
Replaces Permit Number:	11-539-14
Issue Date:	July 13, 2020
Effective Date:	July 13, 2020
Renewal Application Due Date:	January 13, 2025
Expiration Date:	July 13, 2025



Ashley J. Featherstone, Director

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PART I - AIR QUALITY TITLE V OPERATION PERMIT

The Western North Carolina Regional Air Quality Agency (WNCRAQA), the United States Environmental Protection Agency (EPA), and citizens as defined under the Federal Clean Air Act have the authority to enforce the terms, conditions, and limitations contained in Part I of this permit unless otherwise specified.

Under the WNCRAQA Code Chapter 17, the operation of emission source(s) and associated air pollution control device(s) listed in Part I of this permit is based on plans, specifications, operating parameters, and other information as submitted in the Air Quality Permit Application.

SECTION 1 - PERMITTED EMISSION SOURCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices:

Emission Source ID	Emission Source Description	Control Device ID	Control Device Description
ES-C2	One (1) Tandem Extrusion Coating Laminator with a maximum operating speed of 1,000 feet per minute with a natural gas-fired dryer (2.8 million Btu per hour maximum heat input capacity)	NA	NA
ES-L1	One (1) 2-station Adhesive Coating Laminator with a maximum operating speed of 660 feet per minute with two natural gas-fired dryers (7.1 million Btu per hour maximum heat input capacity combined) with two permanent total enclosures	CD-I2 and CD-I4 ²	One (1) natural gas-fired catalytic oxidizer (Reference No. CD-I2), rated at 30,000 scfm (13 million Btu per hour maximum heat input capacity); and One (1) natural gas-fired regenerative thermal oxidizer (Reference No. CD-I4), rated at 60,000 scfm, (12 million Btu per hour maximum heat input capacity) which have minimum required destruction efficiencies of 95%. This emission source will meet the requirements of a Permanent Total Enclosure (PTE), such that 100% of all VOCs are sent to the control device. Total minimum required capture and control efficiency is 95%.
ES-L2	One (1) Adhesive Coating Laminator with a maximum operating speed of 600 feet per minute with a natural gas-fired dryer (4.8 million Btu per hour maximum heat input capacity).	CD-I2 and CD-I4 ²	One (1) natural gas-fired catalytic oxidizer (Reference No. CD-I2), rated at 30,000 scfm (13 million Btu per hour maximum heat input capacity); and One (1) natural gas-fired regenerative thermal oxidizer (Reference No. CD-I4), rated at 60,000 scfm, (12 million Btu per hour maximum heat input capacity) which have minimum required destruction efficiencies of 95%. This emission source will meet the requirements of a PTE, such that 100% of all VOCs are sent to the control device. Total minimum required capture and control efficiency is 95%. ¹

Emission Source ID	Emission Source Description	Control Device ID	Control Device Description
ES-R1	One (1) 6-station 50 inch Rotogravure Printing Press with a maximum operating speed of 820 feet per minute with natural gas-fired dryers (4.57 million Btu per hour maximum heat input capacity combined).	CD-I2 and CD-I4 ²	One (1) natural gas-fired catalytic oxidizer (Reference No. CD-I2), rated at 30,000 scfm (13 million Btu per hour maximum heat input capacity); and One (1) natural gas-fired regenerative thermal oxidizer (Reference No. CD-I4), rated at 60,000 scfm, (12 million Btu per hour maximum heat input capacity), which have minimum required destruction efficiencies of 95%. This emission source will have a minimum required capture efficiency of 90%. Total minimum required capture and control efficiency is 85.5%. ¹
ES-PW	One (1) Parts Washer	NA	NA

¹The presses and laminators may be operated without the control equipment when low VOC materials are in use per the Alternative Operating Scenario (AOS) included in the permit application for the 2019 permit renewal.

²CD-I4 is replacing an existing natural gas-fired catalytic oxidizer CD-I3, which is identical to CD-I2. Any permit conditions that apply to CD-I2 will also apply to CD-I3 until such time that CD-I4 becomes operational.

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

The emission sources listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

- A. Extrusion Coating Laminator (Emission Source ID ES-C2)**
- Adhesive Coating Laminators (Emission Source IDs ES-L1 and ES-L2)**
- Rotogravure Printing Press (Emission Source ID ES-R1)**
- Parts Washer (Emission Source IDs ES-PW)**

The following table provides a summary of limits and standards for the emission source(s) referenced above:

<i>Regulated Pollutant</i>	<i>Limits / Standards</i>	<i>Applicable Regulation</i>
Volatile organic compounds	<p>ES-L1 and ES-R1: The combined VOC emissions from this equipment shall not exceed 135 tons per year as determined on a 12 month rolling average basis.</p> <p>ES-C2, ES-L2, and ES-PW: The combined VOC emissions from this equipment shall not exceed 144 tons per year as determined on a 12 month rolling average basis.</p> <p>ES-C2: The VOC emissions from C2 shall not exceed 100 tons per year as determined on a 12 month rolling average basis. Under the POS, the VOC material input calculated monthly as the average of each consecutive 12 month period shall not exceed 16,667 pounds per month.</p> <p>ES-L1: The VOC emissions from L1 shall not exceed 62.5 tons per year as determined on a 12 month rolling average basis. Under the POS, the VOC material input calculated monthly as the average of each consecutive 12 month period shall not exceed 208,333 pounds per month.</p> <p>ES-L2: The VOC emissions from L2 shall not exceed 35 tons per year as determined on a 12 month rolling average basis. Under the POS, the VOC material input calculated monthly as the average of each consecutive 12 month period shall not exceed 116,667 pounds per month.</p> <p>ES-R1: The VOC emissions from R1 shall not exceed 72.5 tons per year as determined on a 12 month rolling average basis. Under the POS, the VOC material input calculated monthly as the average of each consecutive 12 month period shall not exceed 83,333 pounds per month.</p> <p>ES-PW: The VOC emissions from PW shall not exceed 9 tons per year as determined on a 12 month rolling average basis. Under the POS, the VOC material input calculated monthly as the average of each consecutive 12 month period shall not exceed 1,500 pounds per month.</p>	<p>WNCRAQA Code 4.0530 and 17.0317 – POS and AOS*</p>

Volatile organic compounds	ES-L1, ES-L2, and ES-R1, are subject to 40 CFR Part 64, Compliance Assurance Monitoring.	WNCRAQA Code 4.0614 POS and AOS*
Hazardous Air Pollutants	Pursuant to 40 CFR 63.820(a)(2)(i) and (a)(2)(ii), this facility shall have the following limits to be considered an area source of HAP and avoid being subject to 40 CFR Part 63 Subpart KK: <ul style="list-style-type: none"> Emit less than 10 tons per each rolling 12-month period of each HAP at the facility. Emit less than 25 tons per each rolling 12-month period of any combination of HAP at the facility. 	WNCRAQA Code 4.1111 – POS and AOS*
Particulate matter	$E = 4.10(P)^{0.67}$, where E = allowable emission rate in pounds per hour and P = process weight rate in tons per hour	WNCRAQA Code 4.0515 – POS and AOS*
Sulfur dioxide	2.3 pounds per million BTU heat input	WNCRAQA Code 4.0516 – POS and AOS*
Visible emissions	20 percent opacity	WNCRAQA Code 4.0521 – POS and AOS*
Alternative Operating Scenario	Primary Operating Scenario (POS)-CD-I2 and CD-I4 Alternative Operating Scenario (AOS) Record in a logbook (written or electronic format) the scenario under which ES-L2 and ES-R1 are operating	WNCRAQA Code 17.0508 – POS and AOS*
Odorous Emissions	Local-enforceable only Operational Practices	WNCRAQA Code 4.1806 – POS and AOS*
Toxic Air Pollutants	Local-enforceable only Ambient concentrations of TAPs shall not exceed corresponding acceptable ambient levels (AALs) in Chapter 4.1100 of the WNCRAQA Code.	WNCRAQA Code 17.0700 – POS and AOS*

*Primary Operating Scenario (POS) utilizes solvent based materials and control devices CD-I2 and CD-I4. Alternative Operating Scenario (AOS) utilizes low VOC materials on ES-L2 and ES-R1 with CD-I2 and CD-I4 bypassed.

1. WNCRAQA CODE 4.0530 – Prevention of Significant Deterioration

Emission Limitation/Standard [WNCRAQA Code 17.0317& 17.0508(b)]

- a. In 2001, Pechiney Plastic Packaging, Inc. (now Amcor Flexibles LLC) became a major source for PSD purposes as the result of an expansion at the facility. By requesting a revised PSD avoidance limitation of 248 tons per year of VOCs for existing equipment (ES-R1, ES-F8, ES-C1, ES-L1), and a limit of 245.4 tons/year for proposed new equipment (ES-L2, ES-R2, ES-C2, ES-PW), the facility avoided the applicability of PSD for that modification. The individual limits for the equipment (ES-R2, ES-C1, ES-F8) that is no longer located at the facility have been removed from the permit.
- b. VOC emissions from ES-L1 and ES-R1 shall not exceed 135 tons per year as determined on a 12 month rolling average basis, and
 - i. 62.5 tons per year, calculated monthly as the sum of each consecutive twelve month period for ES-L-1, and
 - ii. 72.5 tons per year, calculated monthly as the sum of each consecutive twelve month period for ES-R1.

- c. VOC emissions from ES-C2, ES-L2, and ES-PW shall not exceed 144 tons per year as determined on a 12 month rolling average basis, and
 - i. 100 tons per year, calculated monthly as the sum of each consecutive twelve month period for ES-C2,
 - ii. 35 tons per year, calculated monthly as the sum of each consecutive twelve month period for ES-L2, and
 - iii. 9 tons per year, calculated monthly as the sum of each consecutive twelve month period for ES-PW.
- d. Under the POS, compliance shall be demonstrated by limiting VOC material input, as calculated monthly as the average of each consecutive twelve month period, to the following:
 - i. 208,333 pounds per month for ES-L1,
 - ii. 83,333 pounds per month for ES-R1,
 - iii. 16,667 pounds per month for ES-C2,
 - iv. 116,667 pounds per month for ES-L2, and
 - v. 1,500 pounds per month for ES-PW.
- e. Under the POS, emissions from ES-R1 shall be ducted to the oxidizers (CD-I2, and CD-I4), which will operate in duplex. In no case shall the destruction efficiencies of CD-I2 or CD-I4 be less than 95% each. ES-R1 shall be maintained such that a combined VOC capture and reduction efficiency of at least 85.5% is achieved. The combined capture and control efficiency shall be determined using the following equation: $\text{Total Capture and Control Efficiency} = \text{Capture Efficiency} * \text{Oxidizer Destruction Efficiency}$; where Capture Efficiency is the capture efficiency of R-1, as determined by the procedures stated in Section 2.1.g, and Oxidizer Destruction Efficiency is the efficiency of the least efficient oxidizer, as determined by the procedures stated in Section 2.1.g.
- f. Under the POS, the Adhesive Laminators shall be maintained such that 100% of all VOCs from the processes are captured and directed to one of the two oxidizers (CD-I2 or CD-I4). Compliance with this requirement shall be demonstrated by satisfying the U.S. EPA criteria for Permanent Total Enclosures, set forth in Appendix M of 40 CFR Subpart 51. Total capture and control efficiency shall be 95%. The total capture and control efficiency shall be determined using the following equation: $\text{Total Capture and Control Efficiency} = \text{Capture Efficiency} * \text{Oxidizer Destruction Efficiency}$.

Testing [WNCRAQA Code 4.2614]

- g. Performance testing of the VOC destruction efficiency of CD-I2 and CD-I4, each, shall be performed once every permit cycle. These tests shall be performed in accordance with WNCRAQA Code 4.2614 - "Determination of VOC Emission Control System Efficiency" and General Condition JJ. The efficiency of the least efficient oxidizer shall be used to demonstrate compliance with Section 2.A.1. If the results of this test are outside of the parameters listed in Section 2.A.1 above, the Permittee shall be deemed in noncompliance with the WNCRAQA Code 17.0317
- h. Initial performance testing of the VOC destruction efficiency of CD-I4 shall be performed within six months of the initial startup of the oxidizer. This test shall be performed in accordance with WNCRAQA Code 4.2614 - "Determination of VOC Emission Control System Efficiency" and General Condition JJ. After completions of the test, the efficiency of the least efficient oxidizer shall be used to demonstrate compliance with Section 2.A.1. If the results of this test are outside of the parameters listed in Section 2.A.1 above, the Permittee shall be deemed in noncompliance with the WNCRAQA Code 17.0317

Monitoring [WNCRAQA Code 4.0614 and 17.0508(f)]

- i. The CD-I2 catalyst bed inlet temperature shall be no more than 50 degrees Fahrenheit less than the

- average catalyst bed inlet temperature demonstrated during the most recent compliance demonstration. The CD-I4 regenerative thermal oxidizer combustion zone temperature shall be no more than 50 degrees Fahrenheit less than the average combustion zone temperature demonstrated during the most recent compliance demonstration. The combustion zone temperature shall be defined as the highest temperature of any part of the combustion zone, including the combustion chamber temperature and the temperature of the media. Operating outside of this temperature range for either CD-I2 or CD-I4 constitutes an excursion under the compliance assurance monitoring plan requirements. The Permittee shall assume no emissions control for any period during which the minimum temperature is not met.
- j. A continuous monitoring system for the catalyst bed inlet temperature of CD-I2 and the combustion zone temperature of CD-I4 (continuous parametric monitoring system - CPMS) shall be operated according to the following:
- i. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period and a minimum of four successive cycles of operation must be present to have a valid hour of data,
 - ii. valid data from at least 90 percent of the hours during which the process operated on an annual basis must be obtained, and
 - iii. Catalyst bed inlet temperature for CD-I2, combustion zone temperature for CD-I4, chart recorder functionality, and main duct pressure shall be recorded daily in a logbook.
 - iv. Temperature monitoring device requirements are as follows:
 - A. locate the temperature sensor in the inlet of the catalyst bed for CD-I2 and in the combustion zone for CD-I4,
 - B. use a temperature sensor with a minimum tolerance of 2.5 degrees Celsius or 0.75 % of the temperature value, whichever is larger,
 - C. shield the temperature sensor system from electromagnetic interference and chemical contaminants,
 - D. if a chart recorder is used, it must have a sensitivity in the minor division of at least 20 degrees Fahrenheit,
 - E. calibration must be verified annually according to manufacturer's recommendations, and
 - F. chart recorder temperature shall be checked weekly against the digital readouts of the thermocouples to ensure that they are accurate within 20 degrees, results shall be recorded in a logbook.
- k. Under the POS, to ensure that the capture efficiencies of ES-R1, ES-L1, and ES-L2 meet the requirements listed above, the Permittee shall comply with following:
- i. The unenclosed press ES-R1 shall meet the following requirements:
 - A. Vacuum pressure in the exhaust duct shall be set to 30 millimeters of water.
 - B. An interlock shall prevent the system from operating after one minute of reaching a vacuum pressure of less than 25 millimeters of water.
 - C. Vacuum pressure readings shall be collected and logged once daily.
 - ii. Permanent Total Enclosures for ES-L1 and ES-L2 will meet the following requirements, as specified in EPA's Method 204 of 40 CFR 52:

- A. VOC sources shall be at least four equivalent opening diameters from natural draft openings. Maximum openings in the room shall be less than 5 percent of total PTE surface area.
 - B. All access doors and windows shall be closed during routine operation.
 - C. All press exhaust and enclosure ventilation points must be directed to each oxidizer (CD-I2 and CD-I4).
 - D. Differential pressure sensors are required to be installed and operated within 90 days after the issuance of this permit. Feedback from the sensors shall be collected and logged on a chart or electronic media. Differential pressure readings from each sensor shall be logged every minute. The pressure differential shall not be less than 0.007 inches for five consecutive minutes while in operation, unless such differential can be demonstrated as adequate to qualify the permanent total enclosure with Method 204 criteria.
 - E. Based on general ventilation standards, a differential pressure of 0.007 inches water column shall equate to a minimum air velocity of 200 feet per minute into the total enclosure.
 - F. Differential pressure sensors shall be calibrated semiannually.
- l. Under the AOS, the Permittee shall monitor intermittently-controllable work stations for each dryer associated with such a work station according to the following procedures:
- iii. Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that provides a record indicating whether the exhaust stream from the dryer was directed to the control device or was diverted from the control device (0 = bypass, 1 = control device).
 - iv. The time and flow control position must be recorded at least once per hour, as well as every time the flow direction is changed.
 - v. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.
 - vi. The Permittee shall make a record of process operations to demonstrate that only low VOC or water-based coatings are used during an AOS control device bypass condition.
- m. The Permittee shall inspect the operational condition of the press and laminator exhaust flow control (oxidizer/atmosphere) dampers, the integrity of the ductwork between the presses and laminators and CD-I2 and CD-I4, and PTE integrity monthly.
- n. The Permittee shall inspect the operational condition of the control device bypass damper and operational condition of bypass interlocks semiannually.
- o. The Permittee shall inspect the operational condition of PTE door interlocks and press interlocks annually.
- p. The Permittee shall conduct an annual inspection of the internal and a monthly inspection of the external structural integrity of CD-I2 and CD-I4. Burners should be inspected annually and tuned as necessary. Internal inspection of CD-I2 must include catalyst sampling and testing to determine catalyst activity level. Internal inspection of CD-I4 must include inspection of the valves for leakage.
- q. CD-I2 and CD-I4 operating temperature readings are not required during periods when the control devices are not being used to achieve the required destruction efficiencies for regulatory compliance. However, the Permittee shall record each period (times and dates) that the affected equipment is operating using low VOC coatings for which the control equipment is not required to achieve regulatory compliance.

- r. If the limit for a given operating parameter is exceeded six times in any semiannual reporting period, then any subsequent exceedance in that reporting period is a violation. For the purpose of determining the number of exceedances, no more than one exceedance shall be attributed in any given 24-hour period. [40 CFR 64.7]
- s. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- t. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused all or in part by poor maintenance or careless operation are not malfunctions.
- u. Response to excursions or exceedances:
 - i. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - ii. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process (40 CFR 64.7(d)(2)).
- v. Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters (40 CFR 64.8).
- w. Based on the results of a determination made pursuant to 2.A.1.u.ii, the Agency may require the Permittee to develop and implement a Quality Improvement Plan (QIP) if an accumulation of exceedances of any permitted operating parameter exceeds 10 percent duration of the control device operating time for a reporting period (40 CFR 64.3).
 - i. If required, the Permittee shall maintain a written QIP, and have it available for inspection.
 - ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

- A. improved preventive maintenance practices,
 - B. process operation changes,
 - C. appropriate improvements to control methods
 - D. other steps appropriate to correct control performance, and/or
 - E. more frequent or improved monitoring.
- iii. If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the WNCRAQA if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- iv. Following implementation of a QIP, upon any subsequent determination pursuant to 2.A.1.u.ii, the WNCRAQA may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:
- A. failed to address the cause of the control device performance problems; or
 - B. failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- v. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

Recordkeeping and Reporting [WNCRAQA Code 4.0614, 17.0508(f) and 40 CFR 70.6(a)(3)]

- x. The Permittee shall keep records of the VOC material input to ES-C2, ES-L1, ES-L2, ES-R1, and ES-PW in pounds per month, calculated each month as a twelve month rolling average. Records (written or electronic format) of the above monitoring shall be maintained onsite and be made available to an authorized WNCRAQA representative upon request. The Permittee shall be deemed in noncompliance with the WNCRAQA Code 17.0317 if these records are not maintained.
- y. The Permittee shall maintain the following information on-site for a period of at least five years:
- i. Monthly inspection records of press/adhesive laminator exhaust flow control (oxidizer/atmosphere) dampers, and ductwork and PTE integrity,
 - ii. Daily temperature, duct pressure readings, and vacuum pressure readings,
 - iii. Weekly chart recorder accuracy verifications,
 - iv. CD-I2 and CD-I4 operational temperature records,
 - v. Pressure differential records for the PTE, including all monitoring data and calibrations,
 - vi. Records required by the AOS procedure including control device bypass indicator records and associated process operations related to low VOC or water based coating usage,
 - vii. All required annual and semi-annual inspection records,
 - viii. Corrective actions for any excursions, and
 - ix. QIP documentation, if such a plan becomes necessary.

- z. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The semiannual report shall include the following additional information:
 - i. Monthly VOC emissions for the previous 12 months and the consecutive 12 month sum for each of the six-month periods during the previous 12 months,
 - ii. Number, duration, cause (including unknown, if applicable) of any excursion and the corrective action taken,
 - iii. Number, duration, and cause (including unknown, if applicable) of any oxidizer temperature chart recorder or data logger downtime incidents, and
 - iv. QIP documentation, for reporting periods as necessary.

2. WNCRAQA CODE 4.1111 – Maximum Achievable Control Technology

- a. The Permittee has chosen to commit to, and meet the criteria of 40 CFR 63 .820(a)(2)(i) and (a)(2)(ii) for the purposes of establishing the facility to be an area source with respect to 40 CFR Part 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry. In order to remain classified a minor source for hazardous air pollutants, facility emissions shall be less than:
 - i. 10 tons per each rolling 12-month period of each HAP, and
 - ii. 25 tons per rolling 12-month period of any combination of HAP, including materials used for source categories or purposes other than printing and publishing. The Permittee shall be deemed in noncompliance of WNCRAQA Code 4.1111 if HAP emissions exceed this limit.

Monitoring/Recordkeeping [WNCRAQA Code 4.1111]

- b. Pursuant to 40 CFR 63 .829(d), the Permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance with paragraph (a) above, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis. The Permittee shall be deemed in noncompliance with WNCRAQA Code 4.1111 if these records are not maintained.
- c. Calculations of the total amount of each HAP and any combination of HAP used shall be recorded monthly in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The Permittee shall be deemed in noncompliance with WNCRAQA Code 4.1111 if these records are not maintained.

Reporting [WNCRAQA Code 17.0508(f) and 40 CFR 63.830]

- d. The Permittee shall submit a semiannual summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the monthly total of HAP used at the facility for the previous 17 months for each HAP and any combination of HAPs. The HAP usage shall be calculated for each of the 12-month periods over the previous 17 months.

3. WNCRAQA Code 4.0521 – Particulates from Miscellaneous Industrial Processes

Emission Limitation/Standard [WNCRAQA Code 4.0515(a) & 17.0508(b)]

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10(P)^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

P = process weight in tons per hour.

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [WNCRAQA Code 4.2609 & 17.0508(f)]

- b. If emission testing is required, the testing shall be performed in accordance with the WNCRAQA Code 4.2609 and General Condition JJ. If the results of this test are above the limitation(s) given in Section 2.A.3.a, above, the Permittee shall be deemed in noncompliance with WNCRAQA Code 4.0515.

Monitoring, Recordkeeping, and Reporting [WNCRAQA Code 17.0508(f)]

- c. No monitoring, recordkeeping, or reporting is required.

4. WNCRAQA Code 4.0516 – Sulfur Dioxide Emissions from Combustion Sources

Emission Limitation/Standard [WNCRAQA Code 4.0516 & 17.0508(b)]

- a. Emissions of sulfur dioxide from these sources shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

Testing [WNCRAQA Code 4.2611 & 17.0508(f)]

- b. If emission testing is required, the testing shall be performed in accordance with the WNCRAQA Code 4.2611 and General Condition JJ. If the results of this test are above the limitation(s) given in Section 2.A.4.a, above, the Permittee shall be deemed in noncompliance with WNCRAQA Code 4.0516.

Monitoring, Recordkeeping, and Reporting [WNCRAQA Code 17.0508(f)]

- c. No monitoring, recordkeeping, or reporting is required for sulfur dioxide emissions from natural gas combustion for these sources.

5. WNCRAQA Code 4.0521 – Control of Visible Emissions

Emission Limitation/Standard [WNCRAQA Code 4.0521(d) & 17.0508(b)]

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [WNCRAQA Code 4.2610]

- b. No testing is required at this time, however, the WNCRAQA reserves the right to require testing if such testing is deemed necessary at a later date. If emission testing is required, the testing shall be performed in accordance with the WNCRAQA Code 4.2610 and General Condition JJ. If the results of this test are above the limitation(s) given in Section 2.A.5.a, above, the Permittee shall be deemed in noncompliance with WNCRAQA Code 4.0521.

Monitoring, Recordkeeping, and Reporting [WNCRAQA Code 17.0508(f)]

- c. No monitoring, recordkeeping, or reporting is required for visible emissions from the combustion of natural gas in these sources..

6. WNCRAQA Code 17.0508(j) - Alternative Operating Scenarios [WNCRAQA Code 17.0508(f)]

- a. The Permittee, contemporaneously with making a change from one alternate operating scenario to

another, while operating the oxidizers (**ID Nos. CD-12 and CD-14**) shall record in a logbook (written or electronic format) the scenario under which it is operating.

Local-Only Requirements

7. WNCRAQA Code 4.1806 – Control and Prohibition of Odorous Emissions

- a. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility’s boundary.

8. WNCRAQA Code 4.1100 - Control of Toxic Air Pollutants

- a. This facility has triggered a toxics review, and has been found to be in compliance with WNCRAQA Code 4.1100 - “Control of Toxic Air Pollutants.” The compliance demonstration is listed in the tables on the two following pages. Upon written request from the WNCRAQA, the facility shall verify compliance with the parameters used in the air dispersion modeling demonstration. Before making any changes to these parameters, the facility must demonstrate compliance with WNCRAQA Code 4.1100.

Reviewed Toxic Air Pollutant	CAS No.	Compliance Demonstration Method	
		Actual Emission Rate Below Toxics Permitting Emission Rate (TPER)?	Air Dispersion Modeling Conducted?
Methyl Ethyl Ketone	78-93-3	No	Yes
Ethyl Acetate	141-78-6	No	Yes
Toluene	108-88-3	No	Yes
Xylene	1330-20-7	No	Yes
Methyl Isobutyl Ketone	108-10-1	No	Yes
Hexane	110-54-3	No	Yes
Ammonia	7664-41-7	No	Yes

For reference, the air dispersion modeling parameters are shown on the following page.

- b. The toxic air pollutant compliance demonstration was updated as part of this permit renewal. The emission rates used in the dispersion modeling discussed above were higher than current emission rates and as such, no further evaluation was required. The updated compliance demonstration for two pollutants not previously evaluated is detailed in the table below.

Reviewed Toxic Air Pollutant (TAP)	CAS No.	Toxic Permitting Emission Rate (TPER)	Compliance Demonstration Method	
			Actual Emission Rate Below TPER?	Air Dispersion Modeling Conducted?
Benzene	71-43-2	8.1 lb/yr	Yes	No
Formaldehyde	50-0-0	0.04 lb/hr	Yes	No

The Permittee shall be deemed in noncompliance with WNCRAQA Code 4.1111 if the TAP emissions exceed these limits.

	Reeco Stack	C-1 Stack	506	507	508
X (m)	362,480	362,396	362,408.5	362,408.2	362,425.5
Y (m)	3,929,518	3,929,478	3,929,530.6	3,929,512	3,929,480.4
Stack Height (m)	17.4	14.6	14.6	14.6	14.6
Temperature (°K)	422	339	293	293	293
Exit Velocity (m/s)	16.05	15.24	4.57	4.57	4.57
Diameter (m)	1.72	0.66	1.24	1.24	1.24
Toluene (lb/hr)	7.9	22	9	9	9
MIBK (lb/hr)	2.2	0	0	0	0
MEK (lb/hr)	20.9	22	12.2	12.2	12.2
Ethyl Acetate (lb/hr)	41.8	66.7	49.5	49.5	49.5
Hexane (lb/hr)	2.2	0	0	0	0
Ammonia (lb/hr)	10.4	0	0.9	0.9	0.9
Xylene (lb/hr)	2.1	0	2.7	2.7	2.7

	509	Megtec 1 Stack	Megtec 2 Stack	C-2A	C-2B
X (m)	362,397.1	362,481.4	362,484	362,402.1	362,417.7
Y (m)	3,929,480.7	3,929,513.2	3,929,514.7	3,929,451	3,929,451
Stack Height (m)	14.6	10.7	10.7	14.6	14.6
Temperature (°K)	293	477.6	477.6	339	339
Exit Velocity (m/s)	4.57	19.8	16.9	15.2	15.2
Diameter (m)	1.24	1.22	1.32	0.58	0.58
Toluene (lb/hr)	9	4.1	4.1	22	22
MIBK (lb/hr)	0	1.2	1.2	0	0
MEK (lb/hr)	12.2	11	11	22	22
Ethyl Acetate (lb/hr)	49.5	21.7	21.7	66.7	66.7
Hexane (lb/hr)	0	1.2	1.2	0	0
Ammonia (lb/hr)	0.9	5.4	5.4	0	0
Xylene (lb/hr)	2.7	1.1	1.1	0	0

Pursuant to WNCRAQA Code 4.1100 and in accordance with the approved application for an air toxic compliance demonstration, the permit limits above shall not be exceeded.

SECTION 3 - GENERAL CONDITIONS AND LIMITATIONS

This section describes terms and conditions applicable to this Title V facility.

(A) **General Provisions** [NCGS 143-215 and WNCRAQA Code 17.0508(i)(16)]

- (1) Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in WNCRAQA Code Chapters 4 and 17.
- (2) The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by WNCRAQA.
- (3) 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.
- (4) 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, nor does it allow the Permittee to cause pollution in contravention of local laws or rules, unless specifically authorized by an order from WNCRAQA.
- (5) Except as identified as local-only requirements in this permit, all terms and conditions contained herein shall be enforceable by WNCRAQA, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
- (6) Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by WNCRAQA, unless the source is exempted by rule. WNCRAQA may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

(B) **Permit Availability** [WNCRAQA Code 17.0507(k) and 17.0508 (i)(9)(B)]

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 WNCRAQA upon request.

(C) **Severability Clause** [WNCRAQA Code 17.0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

(D) **Submissions** [WNCRAQA Code 17.0507(e) and 17.0508(i)(16)]

Except as otherwise specified herein, one copy of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to WNCRAQA.

(E) **Duty to Comply** [WNCRAQA Code 17.0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as local-only requirements constitutes a violation of the Federal Clean Air Act. 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.

(F) **Circumvention** - LOCAL ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

(G) **Permit Modifications**

- (1) Administrative Permit Amendments [WNCRAQA Code 17.0514]
The Permittee shall submit an application for an administrative permit amendment in accordance with WNCRAQA Code 17.0514.
- (2) Transfer of Ownership or Operation [WNCRAQA Code 17.0524 and 17.0505]
The Permittee shall submit an application for an ownership change in accordance with WNCRAQA Code 17.0524 and 17.0505.
- (3) Minor Permit Modifications [WNCRAQA Code 17.0515]
The Permittee shall submit an application for a minor permit modification in accordance with WNCRAQA Code 17.0515.
- (4) Significant Permit Modifications [WNCRAQA Code 17.0516]
The Permittee shall submit an application for a significant permit modification in accordance with WNCRAQA Code 17.0516.
- (5) Reopening for Cause [WNCRAQA Code 17.0517]
The Permittee shall submit an application for reopening for cause in accordance with WNCRAQA Code 17.0517.

(H) **Changes Not Requiring Permit Modifications**

- (1) Reporting Requirements
Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the WNCRAQA:
 - (a) Changes in the information submitted in the application;
 - (b) Changes that modify equipment or processes; or
 - (c) Changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the WNCRAQA to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

- (2) Section 502(b)(10) Changes [WNCRAQA Code 17.0523(a)]
 - (a) "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

- (b) The Permittee may make Section 502(b)(10) changes without having the permit revised if:
 - (i) The changes are not a modification under Title I of the Federal Clean Air Act;
 - (ii) The changes do not cause the allowable emissions under the permit to be exceeded;
 - (iii) The Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
 - (iv) The Permittee shall attach the notice to the relevant permit.
- (c) The written notification shall include:
 - (i) A description of the change;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.
- (d) Section 502(b)(10) changes shall be made in the permit the next time the permit is revised or renewed, whichever comes first.

(3) Off Permit Changes [WNCRAQA Code 17.0523(b)]

The Permittee may make changes in the operation or emissions without revising the permit if:

- (a) The change affects only insignificant activities and the activities remain insignificant after the change;
or
- (b) The change is not covered under any applicable requirement.

(4) Emissions Trading [WNCRAQA Code 17.0523(c)]

To the extent that emissions trading is allowed under WNCRAQA Code Chapter 4, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to WNCRAQA Code 17.0523(c).

(I.A) **Reporting Requirements for Excess Emissions and Permit Deviations** [WNCRAQA Code 4.0535(f) and 17.0508(f)(2)]

“Excess Emissions” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Chapter 4; or by a permit condition; or that exceeds an emission limit established in a permit issued under WNCRAQA Code 17.0700. (*Note: Definitions of excess emissions under 4.1110 and 4.1111 shall apply where defined by rule.*)

“Deviations” - for the purpose of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions, as well as excess emissions as defined above lasting less than four hours.

Excess Emissions

- (1) If a source is required to report excess emissions under NSPS (WNCRAQA Code 4.0524), NESHAPs (WNCRAQA Code 4.1110 or 4.1111), or the operating permit provides for periodic (e.g., quarterly)

reporting of excess emissions, reporting shall be performed as prescribed therein.

- (2) If the source is not subject to NSPS (WNCRAQA Code 4.0524), NESHAPs (WNCRAQA Code 4.1110 or 4.1111), or these rules do NOT define “excess emissions,” the Permittee shall report excess emissions in accordance with WNCRAQA Code 4.0535 as follows:
 - (a) Pursuant to WNCRAQA Code 4.0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
 - (i) Notify the Director of any such occurrence by 9:00 a.m. Eastern Time of the Agency’s next business day of becoming aware of the occurrence and provide:
 - Name and location of the facility;
 - Nature and cause of the malfunction or breakdown;
 - Time when the malfunction or breakdown is first observed;
 - Expected duration; and
 - Estimated rate of emissions;
 - (ii) Notify the Director immediately when corrective measures have been accomplished; and
 - (iii) Submit to the Director within 15 days a written report as described in WNCRAQA Code 4.0535(f)(3);

Permit Deviations

- (3) Pursuant to WNCRAQA Code 17.0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
 - (a) Notify the Director of all other deviations from permit requirements not covered under WNCRAQA Code 4.0535 quarterly. A written report to the Director shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

(I.B) Other Requirements under WNCRAQA Code 4.0535

The Permittee shall comply with all other applicable requirements contained in WNCRAQA Code 4.0535, including 4.0535(c), as follows:

- (1) Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in WNCRAQA Code 4.0535(c)(1) through (7).
- (2) WNCRAQA Code 4.0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

(J) Emergency Provisions [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

- (1) 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.
 - (2) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (3) below are met.
 - (3) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
 - (a) An emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - (b) The permitted facility was at the time being properly operated;
 - (c) 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
 - (d) The Permittee submitted notice of the emergency to WNCRAQA 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, steps taken to mitigate emissions, and corrective actions taken.
 - (4) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (5) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.
- (K) **Permit Renewal** [WNCRAQA Code 17.0508(e) and 17.0513(b)]
This permit is issued for a fixed term not to exceed five years and 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 six months before the date of permit expiration. If the Permittee or applicant has complied with WNCRAQA Code 17.0512(b)(1), this WNCRAQA Code 17.0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under WNCRAQA Code 17.0400 terminates the facility's right to operate unless a complete WNCRAQA Code 17.0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 2Q .0400 requirements. In either of these events, all terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.
- (L) **Need to Halt or Reduce Activity Not a Defense** [WNCRAQA Code 17.0508(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.
- (M) **Duty to Provide Information (submittal of information)** [WNCRAQA Code 17.0508(i)(9)]
- (1) The Permittee shall furnish to WNCRAQA, 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.
 - (2) The Permittee shall furnish WNCRAQA copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish

such records directly to the EPA upon request along with a claim of confidentiality.

(N) **Duty to Supplement** [WNCRAQA Code 17.0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to WNCRAQA. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

(O) **Retention of Records** [WNCRAQA Code 17.0508(f) and 17.0508(l)]

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. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to an authorized WNCRAQA representative for inspection upon request.

(P) **Compliance Certification** [WNCRAQA Code 17.0508(n)]

The Permittee shall submit to WNCRAQA and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street, Atlanta, GA 30303) postmarked on or before **January 30** a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions limitations, standards, or work practices. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. 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 specify:

1. The identification of each term or condition of the permit that is the basis of the certification;
2. The compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. Whether compliance was continuous or intermittent; and
4. The method(s) used for determining the compliance status of the source during the certification period.

(Q) **Certification by Responsible Official** [WNCRAQA Code 17.0520]

A responsible official 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 statements and information in the document are true, accurate, and complete.

(R) **Permit Shield for Applicable Requirements** [WNCRAQA Code 17.0512]

- (1) 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.
- (2) A permit shield shall not alter or affect:
 - (a) The power of the Director under WNCRAQA Code 1.0102(a)(12), or EPA under Section 303 of the Federal Clean Air Act;

- (b) 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;
 - (c) The applicable requirements under Title IV; or
 - (d) The ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
- (3) A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under WNCRAQA Code 17.0523.
- (4) A permit shield does not extend to minor permit modifications made under WNCRAQA Code 17.0515.
- (S) **Termination, Modification, and Revocation of the Permit** [WNCRAQA Code 17.0519]
The Director may terminate, modify, or revoke and reissue this permit if:
- 1. The information contained in the application or presented in support thereof is determined to be incorrect;
 - 2. The conditions under which the permit or permit renewal was granted have changed;
 - 3. Violations of conditions contained in the permit have occurred;
 - 4. The EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
 - 5. The Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.
- (T) **Insignificant Activities** [WNCRAQA Code 17.0503]
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 WNCRAQA representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.
- (U) **Property Rights** [WNCRAQA Code 17.0508(i)(8)]
This permit does not convey any property rights in either real or personal property or any exclusive privileges.
- (V) **Inspection and Entry** [WNCRAQA Code 17.0508(l) and 1.0104(d)]
- (1) Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow WNCRAQA, or an authorized representative, to perform the following:
 - (a) Enter 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;
 - (b) Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - (c) 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
 - (d) Sample or monitor substances or parameters, using reasonable safety practices, for the purpose of

assuring compliance with the permit or applicable requirements at reasonable times.

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

- (2) No person shall refuse entry or access to any authorized representative of WNCRAQA who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his or her official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

(W) **Annual Fee Payment** [WNCRAQA Code 17.0508(i)(10)]

- (1) The Permittee shall pay all fees in accordance with WNCRAQA Code 17.0200.
- (2) Payment of fees may be by check or money order made payable to the Western North Carolina Regional Air Quality Agency. Annual permit fee payments shall refer to the permit number.
- (3) If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under WNCRAQA Code 17.0519.

(X) **Annual Emission Inventory Requirements** [WNCRAQA Code 17.0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in WNCRAQA Code 17.0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such forms as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

(Y) **Confidential Information** [WNCRAQA Code 17.0107 and 17.0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to WNCRAQA Code 17.0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with WNCRAQA Code 17.0107.

(Z) **Construction and Operation Permits** [WNCRAQA Code 17.0100 and 17.0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source that is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of WNCRAQA Code 17.0100 and 17.0300.

(AA) **Standard Application Form and Required Information** [WNCRAQA Code 17.0505 and 17.0507]

The Permittee shall submit applications and required information in accordance with the provisions of WNCRAQA Code 17.0505 and 17.0507.

(BB) **Financial Responsibility and Compliance History** [WNCRAQA Code 17.0507(d)(4)]

WNCRAQA may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

(CC) **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [WNCRAQA Code 17.0501(e)]

- (1) 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 Part 82, Subpart A, Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F.

- (2) 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 Part 82, Subpart F.
- (3) The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

(DD) Prevention of Accidental Releases - Section 112(r) [WNCRAQA Code 17.0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

(EE) Prevention of Accidental Releases “General Duty” Clause - Section 112(r)(1) - FEDERALLY ENFORCEABLE ONLY

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

(FF) Title IV Allowances [WNCRAQA Code 17.0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

(GG) Air Pollution Emergency Episode [WNCRAQA Code 4.0300]

Should the Director declare an Air Pollution Emergency Episode, 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 WNCRAQA Code 4.0300.

(HH) Registration of Air Pollution Sources [WNCRAQA Code 4.0202]

The Director 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 will be in accordance with WNCRAQA Code 4.0202(b).

(II) Ambient Air Quality Standards [WNCRAQA Code 4.0501(c)]

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 WNCRAQA Code 4.0400 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.

(JJ) General Emissions Testing and Reporting Requirements [WNCRAQA Code 17.0508(i)(16)]

Emission compliance testing shall be by the procedures of WNCRAQA Code 4.2600, except as may be otherwise required in WNCRAQA Code 4.0524, 4.0912, 4.1110, 4.1111, or 4.1415. If emissions testing is required by this permit or WNCRAQA or if the Permittee submits emissions testing to WNCRAQA to demonstrate compliance, the Permittee shall perform such testing in accordance with WNCRAQA Code 4.2600 and follow the procedures outlined below:

- (1) The owner or operator of the source 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 by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.

- (2) Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
- (3) The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
- (4) One copy of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
 - (a) The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
 - (i) Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
 - (ii) Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
 - (iii) Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in this Section if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
 - (b) The Director may authorize the WNCRAQA to conduct independent tests of any source subject to a rule in this Subchapter to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the WNCRAQA using the appropriate testing procedures described in WNCRAQA Code 4.2600 has precedence over all other tests.

(KK) **Reopening for Cause** [WNCRAQA Code 17.0517]

- (1) A permit shall be reopened and revised under the following circumstances:
 - (a) Additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
 - (b) Additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
 - (c) The Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - (d) The Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (2) Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the

expiration of the permit term unless the term of the permit was extended pursuant to WNCRAQA Code 17.0513(c).

- (3) Except for the local enforceable only portion of the permit, the procedures set out in WNCRAQA Code 17.0507, 17.0521, or 17.0522 shall be followed to reissue the permit. If the local enforceable only portion of the permit is reopened, the procedures in WNCRAQA Code 17.0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
 - (4) The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
 - (5) Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.
- (LL) **Reporting Requirements for Non-Operating Equipment** [WNCRAQA Code 17.0508(i)(16)]
The Permittee shall maintain a record of operation for permitted equipment, noting whenever the equipment is taken from and placed into operation. When permitted equipment is not in operation, the requirements for testing, monitoring, and recordkeeping are suspended until operation resumes.
- (MM) **Fugitive Dust Control Requirement** [WNCRAQA Code 4.0540] - LOCAL ENFORCEABLE ONLY
As required by WNCRAQA Code 4.0540 "Particulates from Fugitive Non-Process Dust Emission Sources," 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, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in WNCRAQA Code 4.0540(g). "Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).
- (NN) **Specific Permit Modifications** [WNCRAQA Code 17.0501 and 17.0523]
- (1) For modifications made pursuant to WNCRAQA Code 17.0501(c)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
 - (2) For modifications made pursuant to WNCRAQA Code 17.0501(d)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of WNCRAQA Code 17.0500 (except for WNCRAQA Code 17.0504) is obtained.
 - (3) For modifications made pursuant to 502(b)(10), in accordance with WNCRAQA Code 17.0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA Region 4 - Air Planning Branch, 61 Forsyth St., Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:
 - (a) A description of the change at the facility;
 - (b) The date on which the change will occur;
 - (c) Any change in emissions; and

(d) Any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements

(OO) **Third Party Participation and EPA Review** [WNCRAQA Code 17.0521, 17.0522 and 17.0525(7)]
For permits modifications subject to 45-day review by the federal Environmental Protection Agency (EPA), EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 2Q .0518 begins at the end of the 45-day EPA review period.

ATTACHMENT 1

List of Insignificant Activities

The following sources are subject to locally enforceable rules and regulations.

TANK-03	One (1) 5,200 gallon solvent storage tank containing normal propyl acetate
TANK-04	One (1) 5,200 gallon solvent storage tank containing reclaimed flammable solvent The reclaimed solvent is used for press and parts cleaning
TANK-09	One (1) 5,200 gallon solvent storage tank containing normal propyl acetate
WASH-01	One (1) solvent wash tank
WASH-L1	One (1) laminator wash tank
WASH-L2	One (1) laminator wash tank
DIST-03	One (1) 500 gallon non-flammable solvent distillation unit
DSLX-02	One (1) 750 gallon dirty solvent tank serving one non-flammable solvent distillation unit
TANK-13	One (1) 10,000 gallon vertical fixed roof tank containing ethyl acetate
WHCS-01	One (1) 40 gallon tank used to store HCS solution
INK-MIX	One (1) ink and adhesive mixing room
SILOS-1-4	Four (4) bulk resin storage silos
TR-CYC	One (1) trim removal system with emissions controlled by one (1) cyclone
CYLINDER	One (1) cylinder cleaning area
ANILOX	One (1) Anilox Roll Cleaner
WG	One (1) wet goods receiving area
HW	One (1) hazardous waste storage area
CT	One (1) cooling tower serving a primary chiller and one back up chiller
PUMP	One (1) pump cleaning station
LATHE	One (1) Leblond Makino lathe
VAC	One (1) central vacuum system
DIST-04	One (1) Clean Planet distillation unit with a maximum capacity of 50 gallons
EXTR	One (1) low density polyethylene (LDPE) and linear low density polyethylene (LLDPE) extrusion process
BALER	One (1) trim waste baler

ATTACHMENT 2

List of Acronyms

AOS	Alternate Operating Scenario
BACT	Best Available Control Technology
BTU	British Thermal Unit
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CAA	Clean Air Act
EPA	Environmental Protection Agency
FR	Federal Register
GACT	Generally Available Control Technology
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
NCGS	North Carolina General Statutes
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
PM	Particulate Matter
PM₁₀	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
PM_{2.5}	Particulate Matter with Nominal Aerodynamic Diameter of 2.5 Micrometers or Less
POS	Primary Operating Scenario
PSD	Prevention of Significant Deterioration
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
TPY	Tons Per Year
VOC	Volatile Organic Compound
WNCRAQA	Western North Carolina Regional Air Quality Agency