



Louisville Metro Air Pollution Control District  
 850 Barret Avenue  
 Louisville, Kentucky 40204-1745



**Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: O-1668-14-F

Plant ID: 1668

Effective Date: xx/xx/2014

Expiration Date: xx/xx/2019

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

**Sealed Air Corporation**  
 7665 National Turnpike  
 Louisville, KY 40214

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: VOC  
 Tons/year: <100

Application No. 27917  
 62457  
 67389

Application Received: 5/8/2009  
 2/13/2014  
 9/26/2014

Permit Writer: Shannon Hosey

Public Notice Date: 10/22/2014

{manager1}  
 Air Pollution Control Officer  
 {date1}

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**FEDOOP Permit Revisions/Changes**

<b>Revision No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Page No.</b>	<b>Description</b>
27917-12-F	08/30/2012	07/25/2012	Initial	Entire Permit	Initial Permit Issuance and Incorporate Construction Permits 285-08-C, 286-08-C, 287-08-C, 288-08-C, 289-08-C, 290-08-C and 177-09-C
O-1668-14-F	Xx/xx/2014	10/22/2014	Revision	Entire Permit	Significant revision to allow product to be stored in the uncontrolled warehouse

<b>Application</b>	<b>Receipt Date</b>	<b>Application Number</b>
Construction Permit – 285-08-C – Extruders	03/24/2008	30786
Construction Permit – 286-08-C – “Curing” Warehouse	03/24/2008	30787
Construction Permit – 287-08-C – Thermal Oxidizer	03/24/2008	30788
Construction Permit – 288-08-C – Conveyor	03/24/2008	30789
Construction Permit – 289-08-C – Silos	03/24/2008	30790
Construction Permit – 290-08-C – Cross Saw, Perforator, and Edge Trim	03/24/2008	30791
FEDOOP Initial Application	05/08/2009	27917
Construction Permit – 177-09-C - Extruder	07/09/2009	30792
RO Change	09/01/2010	28749
Revision to FEDOOP Permit	02/13/2014 and 09/26/14	62457 and 67389

### Acronyms and Abbreviations

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

### General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District [Form 9440-0](#).
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides, lead, gaseous fluorides, or Volatile Organic Compounds (VOC) as listed in District Regulation 3.04; any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO<sub>2</sub>-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)).

Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

- 11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- 12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
- 13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- 14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.01	General Provisions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption of Federal New Source Performance Standards

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745***

**Emission Unit U1****U1 Unit Description:**

Four (4) electric extruders for processing polyolefin including one extruder by Davis-Standard (Model Tandem) rated at 4000 lb/hr, one extruder by Bandera (Model 168mm Twin Screw) rated at 2300 lb/hr, one extruder by Moi (Model E150 Twin Screw) rated at 700 lb/hr, one reclaim extruder rated at 1500 lb/hr and associated accumulation system, and a conveyor system with one (1) cross saw, one (1) perforator and one (1) edge trim for plank polyethylene foam to cool and cut the material before winding or stacking the material. One (1) “curing” warehouse for finished goods that is vented to the RTO. One (1) warehouse for storing finished goods that is uncontrolled. All processes are controlled by a thermal oxidizer besides the uncontrolled warehouse for storing finished goods.

**U1 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for new Process Operations	1 through 4
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U1 Equipment<sup>1</sup>:**

<b>Emission Process</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E1	Electric Plank Extruder, Davis Standard 4000 lb/hr, with a raw material feed cyclone	7.08 and 7.25	C1 and C2
E2	Electric Foam Extruder, Bandera 2300 lb/hr	7.25	C1
E3	Electric Foam Extruder, Moi 700 lb/hr		
E4	Foam Reprocessing Extruder, Sterling/Davis Standard 1500 lb/hr, with three (3) fluff bins and a Gaylord box loading and unloading station	7.08 and 7.25	C1 and C3
E5	Cure Warehouse	7.25	C1
E6	Conveyor system including edge trimming, perforating, stacking, and cutting	7.08 7.25	
E7	Warehouse for storing finished goods	7.25	N/A

**U1 Control Devices:**

<b>Control Device ID</b>	<b>Description Make/Model</b>	<b>Performance Indicator</b>	<b>Stack ID</b>
C1	Regenerative Thermal Oxidizer (RTO)	Temperature	S1
C2	Bag Filters	NA	N/A
C3	Bag Filters	NA	N/A

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<sup>1</sup> This equipment was previously permitted under Permit 285-08-C, 286-08-C, 287-08-C and 288-08-C.

## U1 Specific Conditions

### S1. Standards (Regulation 2.17, section 5.2)

#### a. VOC

- i. For Emission Processes E1, E2, E3, E4, E5, and E6, the owner or operator shall not allow or cause the controlled VOC emissions, including, but not limited to, all coatings, additives, catalysts, solvents, thinners and cleaners, from emission units subject to Regulation 7.25 to equal or exceed twenty-seven (27) tons during any calendar year. (BACT)(Regulation 7.25, sections 2.1 and 3.1)
- ii. For Emission Process E7, the owner or operator shall not allow or cause the uncontrolled VOC emissions, including, but not limited to, all coatings, additives, catalysts, solvents, thinners and cleaners, from emission units subject to Regulation 7.25 to equal or exceed thirty-three (33) tons during any calendar year<sup>2</sup>. (Regulation 7.25, sections 2.1 and 3.1)
- iii. The owner or operator shall only store Cell-Air foam and Stratocell foam in the uncontrolled warehouse. (Regulation 7.25, sections 2.1 and 3.1.)
- iv. The owner or operator shall not allow or cause the *plant-wide* emissions of VOC to equal or exceed hundred (100) tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)
- v. For Emission Processes E1, E2, E3, E4, E5, and E6, the owner or operator shall operate and maintain the control device equipment at all time the process is in operation.

#### b. PM

- i. For Emission Process E6, the owner or operator shall not allow PM emissions to exceed 8.80 lb/hr per each piece of equipment.<sup>3</sup> (Regulation 7.08, section 3.1.2)

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<sup>2</sup> The company submitted a BACT analysis on 9/26/14 and the District has determined that controls are not feasible for the uncontrolled warehouse. The original BACT analysis submitted on 05/22/2008 was a thermal oxidizer, resulting in potential (controlled) emissions of 60 tpy. The new product cannot be stored in the controlled warehouse due to product integrity, therefore resulting in (uncontrolled) potential emissions of 33 tpy. The (controlled) potential emissions of 27 tpy is what remains from the original 60 tpy limit from the BACT analysis.

<sup>3</sup> The District has performed a one-time PM compliance demonstration for this equipment on 4/18/2008 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

- ii. For Emission Processes E1 and E4, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per each piece of equipment. (Regulation 7.08, section 3.1.2)

c. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

d. **TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*.<sup>4</sup> (Regulations 5.01 and 5.21)

**S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

a. **VOC**

- i. The owner or operator shall, monthly, record the total amount of product processed during the month.
- ii. For Emission Processes E1, E2, E3, E4, E5, and E6, the owner or operator shall monthly calculate and record the consecutive 12-month total Regulation 7.25 VOC emissions to demonstrate compliance with the twenty-seven (27) ton per year limit.
- iii. For Emission Process E7, the owner or operator shall monthly calculate and record the consecutive 12-month total Regulation 7.25 VOC emissions to demonstrate compliance with the thirty-three (33) ton per year limit.
- iv. The owner or operator shall monthly calculate and record the consecutive 12-month total *plant-wide* VOC emissions to demonstrate compliance with the hundred (100) ton per year limit.
- v. The owner or operator shall maintain continuous combustion temperature records of the Regenerative Thermal Oxidizer.
- vi. The owner or operator shall maintain daily records of any periods of time where the process was operating and the control device was not operating

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<sup>4</sup> There were no HAPs or TACs identified in the initial permit application.

or a declaration that the control device operated at all times that day when the process was operating.

- vii. If there is any time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:

- 1) Date;
- 2) Start time and stop time;
- 3) Identification of the control device and process equipment;
- 4) VOC emissions for each hour during the bypass in lb/hr;
- 5) Summary of the cause or reason for each bypass event;
- 6) Corrective action taken to minimize the extent or duration of the bypass event; and
- 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

**b. PM**

The owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

**c. Opacity**

- i. For Emission Processes E1 and E4, there are no monitoring or record keeping requirements for this pollutant for this equipment.<sup>5</sup>
- ii. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission processes. No more than four emission processes shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- iii. At emission processes where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with [40 CFR Part 60, Appendix A](#), within 24 hours of the initial observation.

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<sup>5</sup> The District has determined that no periodic visible emissions surveys are required for this equipment.

- iv. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission process is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

d. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis*.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **VOC**

- i. The owner or operator shall report the 12-consecutive month VOC emissions for each month in the report period to demonstrate compliance with Regulation 7.25 for the controlled and uncontrolled emissions.
- ii. The owner or operator shall report the *plant-wide* 12-consecutive month VOC emission for each month in the report period to demonstrate compliance with Regulation 2.17
- iii. Daily average values of the combustion temperature for all operating days when the daily average values recorded were below the minimum combustion temperature of 1548 °F established by the performance test on November 12, 2009. If no deviations occurred during the reporting period, then the owner or operator shall report a negative declaration.
- iv. Identification of all periods of exceedances of the plant-wide VOC limit including the quantity of excess emissions;
- v. Reasons for excess emissions; and
- vi. Description of corrective action taken to prevent future exceedance.

vii. A negative declaration if there were no exceedances.

b. **PM**

See Specific Condition S3.c.

c. **Opacity**

- i. Emission Unit number and Emission Process number for each exceedance;
- ii. The beginning and ending date of the reporting period;
- iii. The number of surveys where visible emissions were observed;
- iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- v. Description of any corrective action taken for each exceedance.

d. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

**Emission Unit U2****U2 Unit Description:**

Six (6) pneumatically conveyed silos each equipped with a bin vent for the storage of polyethylene.

**U2 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for new Process Operations	1 through 4

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U2 Equipment<sup>6</sup>:**

<b>Emission Process</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E8	Six (6) pneumatically conveyed silos 7000 lb/hr	7.08	N/A

**U2 Control Devices:**

There are no control devices for this emissions unit, but the Silos do have bin vents.

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<sup>6</sup> This permit replaces construction permit 289-08-C and 290-08-C.

**U2 Specific Conditions****S1. Standards (Regulation 2.17, section 5.2)****a. PM**

For the Silos:

The owner or operator shall not allow PM emissions to exceed 7.80 lb/hr per each piece of equipment.<sup>7</sup> (Regulation 7.08, section 3.1.2)

**b. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

**c. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.<sup>8</sup> (Regulations 5.01 and 5.21)

**S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. PM**

There are no monitoring or record keeping requirements for this pollutant for this emission unit.

**b. Opacity**

i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the emission processes. No more than four emission processes shall be

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<sup>7</sup> The District has performed a one-time PM compliance demonstration for this equipment on 4/18/2008 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

<sup>8</sup> There were no HAPs or TACs identified in the initial permit application.

observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

- ii. At emission processes where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with [40 CFR Part 60, Appendix A](#), within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission process is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis*.

**S3. Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **PM**

See Specific Condition S3.b.

b. **Opacity**

- i. Emission Unit number and Emission Process number for each exceedance;
- ii. The beginning and ending date of the reporting period;
- iii. The number of surveys where visible emissions were observed;
- iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- v. Description of any corrective action taken for each exceedance.

c. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.c.ii.

**Emission Unit U3**

**U3 Unit Description:**

Three (3) Egan Extruders for manufacturing bubble wrap, rated at 1,000 lb/hr total capacity

**U3 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for new Process Operations	1 through 4
7.25	Standards of Performance for New Sources Using Volatile Organic Compounds	1 through 5

<b>District Only Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.01	General Provisions	1 through 4
5.21	Environmental Acceptability for Toxic Air Contaminants	1 through 5
5.23	Categories of Toxic Air Contaminants	1 through 6

**U3 Equipment:<sup>9</sup>**

<b>Emission Process</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E9	Bubble Wrap Extruders, Egan 1000 lb/hr with a raw material feed cyclone and two (2) day bins	7.08	C1
		7.25	

**U3 Control Devices:**

<b>Control Device ID</b>	<b>Description Make/Model</b>	<b>Performance Indicator</b>	<b>Stack ID</b>
C1	Regenerative Thermal Oxidizer (RTO)	Temperature	S1

<sup>9</sup> This equipment was previously permitted under Permit 177-09-C.

### U3 Specific Conditions

#### S1. Standards (Regulation 2.17, section 5.2)

##### a. VOC

- i. For Emission Processes E1, E2, E3, E4, E5, E6 and E9, the owner or operator shall not allow or cause the controlled VOC emissions, including, but not limited to, all coatings, additives, catalysts, solvents, thinners and cleaners, from emission units subject to Regulation 7.25 to equal or exceed twenty-seven (27) tons during any calendar year. (BACT)(Regulation 7.25, sections 2.1 and 3.1)
- ii. The owner or operator shall not allow or cause the *plant-wide* emissions of VOC to equal or exceed hundred (100) tons during any consecutive 12-month period. (Regulation 2.17, section 5.1)

##### b. PM

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per each piece of equipment.<sup>10</sup> (Regulation 7.08, section 3.1.2)

##### c. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

##### d. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis.<sup>11</sup> (Regulations 5.01 and 5.21)

#### S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

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<sup>10</sup> The District has performed a one-time PM compliance demonstration for this equipment on 7/29/2009 and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.

<sup>11</sup> There were no HAPs or TACs identified in the initial permit application.

a. **VOC**

- i. The owner or operator shall, monthly, record the total amount of product processed during the month.
- ii. For Emission Processes E1, E2, E3, E4, E5, E6 and E9, the owner or operator shall monthly calculate and record the consecutive 12-month total Regulation 7.25 VOC emissions to demonstrate compliance with the twenty-seven (27) ton per year limit.
- iii. The owner or operator shall monthly calculate and record the consecutive 12-month total *plant-wide* VOC emissions to demonstrate compliance with the hundred (100) ton per year limit.

b. **PM**

See Specific Condition S2.c.

c. **Opacity**

There are no monitoring or record keeping requirements for this pollutant for this emission unit.<sup>12</sup>

d. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis*.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall submit annual compliance reports in accordance with General Condition 12.

a. **VOC**

- i. For Emission Processes E1, E2, E3, E4, E5, E6 and E9, the owner or operator shall report the 12-consecutive month VOC emissions for each

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<sup>12</sup> The District has determined that no periodic visible emissions surveys are required for this emission unit.

month in the report period to demonstrate compliance with Regulation 7.25 for the controlled emissions.

- ii. The owner or operator shall report the *plant-wide* 12-consecutive month VOC emission for each month in the report period to demonstrate compliance with Regulation 2.17

b. **PM**

See Specific Condition S3.c.

c. **Opacity**

There are no reporting requirements for this pollutant for this emission unit.

d. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

**Insignificant Activities**

- 1) Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
- 3) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE) quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment, since the emissions from the source’s Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 7) The owner or operator shall annually submit an updated list of Insignificant Activities, including an identification of the additions and removals of Insignificant Activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.

Description	Quantity	Basis
Pressurized VOC storage vessels – 18,000 gallon propane tank and 30,000 gallon butane tank	2	Regulation 2.02, section 2.3.26.