ROY COOPER

ELIZABETH S. BISER Secretary

MICHAEL A. ABRACZINSKAS



Month XX, 2023

Mr. Michael Beckman President Pregis PolyMask, Inc. 615 Enterprise Street Aurora, IL 60504

Subject: Air Permit No. 10767R00

Pregis PloyMask, Inc.

Conover, Catawba County, North Carolina

Permit Class: Title V Facility ID# 1800556

Dear Mr. Beckman:

In accordance with your completed application received October 18, 2022, we are forwarding herewith Permit No. 10767R00 to Pregis PolyMask, Inc., Conover, Catawba County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Additionally, any emissions activities determined from your air permit application as meeting the exemption requirements contained in 15A NCAC 02Q .0503 have been listed for information purposes as an "ATTACHMENT" to the enclosed air permit.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to file a petition for contested case hearing in the North Carolina Office of Administrative Hearings. Information regarding the right, procedure, and time limit for permittees and other persons aggrieved to file such a petition is contained in the attached "Notice Regarding the Right to Contest a Division of Air Quality Permit Decision."

Unless exempted by a condition of this permit or the regulations, construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices described in this permit must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B.

This permit shall be effective from XXXX XX, 202X until XXXX XX, 202X, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.



Michael Beckman Month XX, 2023 Page 2

The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Should you have any questions concerning this matter, please contact David B. Hughes at 919-707-8411.

Sincerely,

Mark J. Cuilla, EIT, CPM, Chief, Permitting Section Division of Air Quality, NC DEQ

MRF Enclosures

c: Laserfiche

# NOTICE REGARDING THE RIGHT TO CONTEST A DIVISION OF AIR QUALITY PERMIT DECISION

**Right of the Permit Applicant or Permittee to File a Contested Case:** Pursuant to NCGS 143-215.108(e), a permit applicant or permittee who is dissatisfied with the Division of Air Quality's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 in the Office of Administrative Hearings within 30 days after the Division notifies the applicant or permittee of its decision. If the applicant or permittee does not file a petition within the required time, the Division's decision on the application is final and is not subject to review. The filing of a petition will stay the Division's decision until resolution of the contested case.

**Right of Other Persons Aggrieved to File a Contested Case:** Pursuant to NCGS 143-215.108(e1), a person other than an applicant or permittee who is a person aggrieved by the Division's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 within 30 days after the Division provides notice of its decision on a permit application, as provided in NCGS 150B-23(f), or by posting the decision on a publicly available Web site. The filing of a petition under this subsection does not stay the Division's decision except as ordered by the administrative law judge under NCGS 150B-33(b).

General Filing Instructions: A petition for contested case hearing must be in the form of a written petition, conforming to NCGS 150B-23, and filed with the Office of Administrative Hearings, 1711 New Hope Church Road, Raleigh NC, 27609, along with a fee in an amount provided in NCGS 150B-23.2. A petition for contested case hearing form may be obtained upon request from the Office of Administrative Hearings or on its website at https://www.oah.nc.gov/hearings-division/filing/hearing-forms. Additional specific instructions for filing a petition are set forth at 26 NCAC Chapter 03.

**Service Instructions:** A party filing a contested case is required to serve a copy of the petition, by any means authorized under 26 NCAC 03 .0102, on the process agent for the Department of Environmental Quality:

William F. Lane, General Counsel North Carolina Department of Environmental Quality 1601 Mail Service Center Raleigh, North Carolina 27699-1601

If the party filing the petition is a person aggrieved other than the permittee or permit applicant, the party **must also** serve the permittee in accordance with NCGS 150B-23(a).

\* \* \*

Additional information is available at <a href="https://www.oah.nc.gov/hearings-division/hearing-process/filing-contested-case">https://www.oah.nc.gov/hearings-division/hearing-process/filing-contested-case</a>. Please contact the OAH at 984-236-1850 or oah.postmaster@oah.nc.gov with all questions regarding the filing fee and/or the details of the filing process.



#### NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

### DEPARTMENT OF ENVIRONMENTAL QUALITY

#### DIVISION OF AIR QUALITY

#### **AIR PERMIT NO. 10767R00**

Issue Date: XXXX XX, 2023 Effective Date: XXXX XX, 2023

Expiration Date: XXXX XX, 202X Replaces Permit: NA

To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere in accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

Pregis PolyMask, Inc. 500 Thornburg Drive SE Conover, Catawba County, North Carolina Permit Class: Title V Facility ID# 1800556

(the Permittee) is hereby authorized to construct and operate the air emissions sources and/or air cleaning devices and appurtenances described below:

Emission Source ID	Emission Source Description	Control System ID	Control System Description
ES-SL (NSPS RR)	Solvent Coating Line	CD-RTO	Regenerative Thermal Oxidizer
ES-Oven SL (NSPS RR)	Solvent Coating Line Oven	CD-RTO	Regenerative Thermal Oxidizer
ES-P	Printer	CD-RTO	Regenerative Thermal Oxidizer

in accordance with the completed application 1800556.22A received October 18, 2022 including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environmental Quality, Division of Air Quality (DAQ) and are incorporated as part of this permit.

This permit is subject to the following specified conditions and limitations including any <u>TESTING</u>, <u>REPORTING</u>, <u>OR MONITORING REQUIREMENTS</u>:

#### A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission

Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 02D .0202, 02D .0515, 02D .0516, 02D .0521, 02D .0524 (40 CFR 60, Subpart RR), 02D .0535, 02D .0540, 02D .0605, 02D .1806, and 02Q .0504.

- 2. PERMIT RENEWAL AND EMISSION INVENTORY REQUIREMENT The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 02Q .0304(d) and (f). Pursuant to 15A NCAC 02Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with application Form A) should be submitted to the Regional Supervisor, DAQ.
- 3. <u>ANNUAL EMISSION INVENTORY REQUIREMENTS</u> As required by 15A NCAC 02Q "Annual Emissions Reporting", the Permittee shall report by June 30 of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.
- 4. PARTICULATE CONTROL REQUIREMENT As required by 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes," particulate matter emissions from the emission sources shall not exceed allowable emission rates. The allowable emission rates are, as defined in 15A NCAC 02D .0515, a function of the process weight rate and shall be determined by the following equation(s), where P is the process throughput rate in tons per hour (tons/hr) and E is the allowable emission rate in pounds per hour (lbs/hr).

$$E = 4.10 * (P)^{0.67}$$
 for  $P \le 30$  tons/hr, or  $E = 55 * (P)^{0.11} - 40$  for  $P > 30$  tons/hr

- 5. <u>SULFUR DIOXIDE CONTROL REQUIREMENT</u> As required by 15A NCAC 02D .0516 "Sulfur Dioxide Emissions from Combustion Sources," sulfur dioxide emissions from the combustion sources shall not exceed 2.3 pounds per million Btu heat input.
- 6. <u>VISIBLE EMISSIONS CONTROL REQUIREMENT</u> As required by 15A NCAC 02D .0521 "Control of Visible Emissions," visible emissions from the emission sources, manufactured after July 1, 1971, shall not be more than 20 percent opacity when averaged over a six-minute period, except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. However, sources which must comply with a visible emissions standard in 15A NCAC 02D .0524 "New Source Performance Standards" or .1110 "National Emission Standards for Hazardous Air Pollutants" shall meet that standard instead of the 02D .0521 visible emissions standard.
- 7. <u>15A NCAC 02D .0524 "NEW SOURCE PERFORMANCE STANDARDS"</u> For the emission sources (ID Nos. ES-SL, ES-Oven SL, I-Ovens B, and I-Ovens F), the Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart RR, "Standards of Performance for

Pressure Sensitive Tape and Label Surface Coating Operations," including Subpart A, "General Provisions."

- a. <u>Emission Limits</u> If the amount of VOC input exceeds 45 Mg (50 tons) per 12 month period, the coating line shall become subject to the emission limits in 40 CFR 60.442(a), and on and after the date on which the performance test required by 40 CFR 60.8 has been completed, the Permittee shall:
  - i. cause the discharge into the atmosphere from an affected facility to not be more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or
  - ii. demonstrate for each affected facility a 90 percent overall VOC emission reduction as calculated over a calendar month; or
  - iii. demonstrate the percent overall VOC emission reduction specified in 40 CFR 60.443(b) as calculated over a calendar month.
- b. <u>Compliance Requirements</u> To determine compliance with 40 CFR 60.442, the Permittee shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:
  - i. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulations data, and compute the weighted average by the equation found in 40 CFR 60.443(a)(2).

For each affected facility where the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month (G) is less than or equal to 0.20 kg VOC per kg of coating solids applied, the affected facility is in compliance with 40 CFR 60.442(a)(1). If G is greater than 0.20 kg VOC per kg of coating solids applied, compliance must be documented with 40 CFR 60.442(a)(2).

- ii. To determine compliance with 40 CFR 60.442 through the use of a solvent destruction device, facility is required to do the following:
  - A. Calculate the required overall VOC emission reduction (Rq) according to the equation found in 40 CFR 60.443(b). If Rq less than or equal to 90 percent, then the required overall VOC emission reduction is Rq. If Rq is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

- B. Determine calendar monthly compliance by comparing the Rq value as specified above to the overall VOC emission reduction demonstrated in the most recent performance test that complied with 40 CFR 60.442(a)(2). If the Rq value is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with 40 CFR 60.442(a)(2).
- C. Continuously record the destruction device combustion temperature during coating operations for thermal incineration destructions devices. For Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28°C (50°F) below the average temperature of the device during the most recent performance test complying with 40 CFR 60.442(a)(2).
- iii. After the initial performance test required for all affected facilities under 40 CFR 60.8, compliance with VOC emission limitation and percentage reduction requirements under 40 CFR 60.442 is based on the average emission reduction for one calendar month. A separate compliance check is completed at the end of each calendar month after the initial performance test, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

Emissions from startups and shutdowns are to be included when determining if the standard specified at 40 CFR 60.442(a)(2) is being attained.

#### c. Monitoring and Recordkeeping

- i. The permittee shall maintain a calendar month record of all coatings applied as well as calculations to demonstrate compliance with the emission limits in 40 CFR 60.442.
- ii. The Permittee shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the regenerative thermal oxidizer's (ID No. CD-RTO) exhaust gases. The monitoring device shall have an accuracy of the greater of  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 2.5$  °C.
- iii. The records of measurements required in 40 CFR 60.443 and 40 CFR 60.445 shall be maintained in a logbook (written or electronic form) on site and made available to an authorized representative upon request. The Permittee shall maintain copies of the records for at least two years following the date of the measurements.
- d. <u>Reporting Requirements</u> In addition to any other notification requirements to the Environmental Protection Agency (EPA), the Permittee is required to NOTIFY the Regional Supervisor, DAQ, in <u>WRITING</u>, of the following:

- i. The date construction (40 CFR 60.7) or reconstruction (40 CFR 60.15) of an affected source is commenced, postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form; and
- ii. The actual date of initial start-up of an affected source, postmarked within 15 days after such date.
- iii. For each calendar year quarter in which the facility <u>is not</u> in compliance with the applicable emission limits in 40 CFR 60.442, the facility must submit an exceedance report. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the DAQ semi-annually instead.
- iv. The Permittee shall also submit semiannual reports for excess emissions as specified in 40 CFR 60.7(c) when the incinerator temperature drops as defined in 40 CFR 60.443(e). If no such periods occur, the Permittee shall state this in the report. This reporting is not required for adhering to the compliance option listed in 40 CFR 60.442(a)(1).
- e. <u>NSPS Performance Testing</u> As required by 15A NCAC 02D .0524, the following performance tests shall be conducted:

Affected Source(s)	Pollutant	Target Parameter	Test Method
Solvent Coating Line (ID No. ES-L), Solvent Coating Line Oven (ID No. ES-Oven SL), I-Ovens B (4 Ovens for Coating Line B), and I-Ovens F (6 Ovens for Coating Line F)	VOC	Percent destruction for regenerative thermal oxidizer (ID No. CD-RTO)	Method 25

- i. All performance tests shall be conducted in accordance with EPA Reference Methods, contained in 40 CFR 60, Appendix A.
- ii. The EPA Administrator retains the exclusive right to approve equivalent and alternative test methods, continuous monitoring procedures, and reporting requirements.
- iii. Within 60 days after achieving the maximum production rate at which the equipment will be operated, but not later than 180 days after the initial start-up of the equipment, the Permittee shall conduct the required performance test(s) and submit two copies of a written report of the test(s) to the Regional Supervisor, DAQ.

- iv. The Permittee shall be responsible for ensuring, within the limits of practicality, that the equipment or process being tested is operated at or near its maximum normal production rate or at a lesser rate if specified by the Director or his delegate.
- v. All associated testing costs are the responsibility of the Permittee.
- vi. At least 45 days prior to performing any required emissions testing, the Permittee must submit two copies of a testing protocol to the Regional Supervisor, DAQ for review and approval. All testing protocols must be approved by the DAQ prior to performing tests.
- vii. To afford the Regional Supervisor, DAQ, the opportunity to have an observer present, the Permittee shall <u>PROVIDE</u> the Regional Office, in <u>WRITING</u>, at least 30 days notice of any required performance test(s).
- 8. <u>NOTIFICATION REQUIREMENT</u> As required by 15A NCAC 02D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:
  - a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
    - i. the name and location of the facility,
    - ii. the nature and cause of the malfunction or breakdown.
    - iii. the time when the malfunction or breakdown is first observed,
    - iv. the expected duration, and
    - v. an estimated rate of emissions.
    - b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

Pursuant to 15A NCAC 02D .0535 (b) which states that this rule does not apply to sources to which 15A NCAC 02D .0524 applies, emission sources (ID Nos. ES-SL, ES-Oven SL, I-Ovens B, and I-Ovens F) are subject to 40 CFR 60, Subpart RR. Therefore, they are not subject to 15A NCAC 02D .0535. Emission sources (ID No. ES-P, I-Ovens P, I-Coating B, I-Coating F, I-CT B, and I-CT F) are not subject to an NSPS, therefore are subject to 15A NCAC 02D .0535.

9. FUGITIVE DUST CONTROL REQUIREMENT - As required by 15A NCAC 02D .0540 "Particulates from Fugitive 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 are received 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 02D .0540(f).

"Fugitive dust emissions" means particulate matter 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).

10. <u>CONTROL AND PROHIBITION OF ODOROUS EMISSIONS</u> (State-enforceable only)-As required by 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions" 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.

# 11. <u>15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT</u>

- a. <u>Permitting</u> Pursuant to 15A NCAC 02Q .0501(b)(2) or (c)(2), for completion of the two-step significant modification process initiated by Application No. 4100772.22A, the Permittee shall file an amended application following the procedures of Section 15A NCAC 02Q .0500 no later than Month XX, 2023.
  - b. <u>Reporting Requirement</u> The Permittee shall notify the Regional Office in writing of the date of beginning operation of any of these source(s) (ID Nos. ES-SL, ES-Oven, and EP-P), postmarked no later than 30 days after such date.

#### **B. GENERAL CONDITIONS AND LIMITATIONS**

1. In accordance with G.S. 143-215.108(c)(1), <u>TWO COPIES OF ALL DOCUMENTS</u>, <u>REPORTS</u>, <u>TEST DATA</u>, <u>MONITORING DATA</u>, <u>NOTIFICATIONS</u>, <u>REQUESTS FOR RENEWAL</u>, <u>AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT</u> shall be submitted to the:

Regional Supervisor North Carolina Division of Air Quality Mooresville Regional Office 610 East Center Avenue, Suite 301 Mooresville, NC 28115 704-663-1699

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

- 2. <u>RECORDS RETENTION REQUIREMENT</u> In accordance with 15A NCAC 02D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
- 3. <u>ANNUAL FEE PAYMENT</u> Pursuant to 15A NCAC 02Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
- 4. <u>EQUIPMENT RELOCATION</u> In accordance with 15A NCAC 02Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
- 5. <u>REPORTING REQUIREMENT</u> In accordance with 15A NCAC 02Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application regarding facility emissions;
  - b. changes that modify equipment or processes of existing permitted facilities; or
  - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ 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.

- 6. In accordance with 15A NCAC 02Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effectuate 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 cleaning device(s) and appurtenances.
- 7. CHANGES NOT REQUIRING PERMIT REVISIONS Pursuant to 15A NCAC 02Q .0318, changes to the facility that are not exempt pursuant to 15A NCAC 02Q .0102 may be allowed without first modifying an applicable air permit if the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5) and the owner or operator notifies the Director in writing, using forms provided by the Division, seven calendar days before the change is made. Within 10 business days of receipt of the notice, the Division shall notify the owner or operator of its determination of whether the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5).
- 8. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.

- 9. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
- 10. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
- 11. In accordance with 15A NCAC 02D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
- 12. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
- 13. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
- 14. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
- 15. <u>PERMIT RETENTION REQUIREMENT</u> In accordance with 15A NCAC 02Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
- 16. <u>CLEAN AIR ACT SECTION 112(r) REQUIREMENTS</u> Pursuant to 15A NCAC 02D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.
- 17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval. Additionally, in accordance with 15A NCAC 02D .0605, the Permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the XX<sup>th</sup> of Month, 2023.

# NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

Mark J. Cuilla, EIT, CPM, Chief, Permitting Section Regional Supervisor By Authority of the Environmental Management Commission

Air Permit No. 10767R00

## ATTACHMENT to Permit No. 10767R00, Month XX, 2023

## **Insignificant / Exempt Activities**

Source	Exemption Regulation	Source of TAPs?	Source of Title V Pollutants?
I-Ovens B (4 Ovens for Coating Line B) (NSPS RR)	02Q .0503(8)	No	Yes
I-Ovens F (6 Ovens for Coating Line F) (NSPS RR)	02Q .0503(8)	No	Yes
I-Ovens P (ovens for Printer ES-P)	02Q .0503(8)	No	Yes
I-Coating B (water-based coating line)	02Q .0503(8)	No	Yes
I-Coating F (water-based coating line)	02Q .0503(8)	No	Yes
I-CT B (corona treater)	02Q .0503(8)	No	Yes
I-CT F (corona treater)	02Q .0503(8)	No	Yes

- 1. Because an activity is exempted from being required to have a permit or permit modification does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
- 2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."