

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Winston-Salem Regional Office
County: Wilkes
NC Facility ID: 9700122
Inspector's Name: Dylan Wright
Date of Last Inspection: 03/09/2021
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Interflex Group - Carolina Plant</p> <p>Facility Address: Interflex Group - Carolina Plant 3200 West NC Highway 268 Wilkesboro, NC 28697</p> <p>SIC: 2759 / Commercial Printing, Nec NAICS: 323111 / Commercial Gravure Printing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 02D .0515, 02D .0516, 02D .521, 02D .1111, 02D .1806 NSPS: N/A NESHAP: Subpart KK PSD: N/A PSD Avoidance: 02Q .0317 NC Toxics: 02Q .0711 112(r): N/A Other: N/A</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 9700122.21A, 9700122.21B Date Received: 03/24/2021, 07/06/2021 Application Type: Modification, Renewal Application Schedule: TV-502(b)(10), TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 04613/T26 Existing Permit Issue Date: 02/08/2022 Existing Permit Expiration Date: 03/31/2022</p>
Jon Whalen Pre-Press Manager (336) 921-3505 3200 West NC Hwy 268 Wilkesboro, NC 28697	Rich Voisinet Plant Manager (336) 921-3505 3200 West NC Highway 268 Wilkesboro, NC 28697	Beverly Kershner Sr. Environmental Specialist (484) 431-5086 1350 Welsh Road, Suite 200 North Wales, PA 19454	

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	---	0.6000	167.70	0.5200	---	2.20	1.94 [Glycol Ethers, Unlisted - Spec]
2020	---	0.6300	28.97	0.5300	---	2.36	1.96 [Glycol Ethers, Unlisted - Spec]
2019	---	0.6700	44.08	0.5700	---	2.15	1.73 [Glycol Ethers, Unlisted - Spec]
2018	---	0.8100	47.55	0.6900	---	2.40	1.89 [Glycol Ethers, Unlisted - Spec]
2017	0.0046	0.7450	54.48	0.6280	0.0044	2.77	2.19 [Glycol Ethers, Unlisted - Spec]

<p>Review Engineer: Urva Patel</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 04613/T27 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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1. Purpose of Application:

This application review (“statement of basis”) is for two different applications. (**Application Nos. 9700122.21A and 9700122.21B**)

Application ID No. 9700122.21A

The Title V – 502(b)(10) permit application (**Application No. 9700122.21A**) was received on March 24, 2021. This Title V – 502(b)(10) modification application was submitted for replacement of an older model 10-color PCMC flexographic printing press (**ID No. ES-08**) with an all-electric drying system with a new 10-color PCMC flexographic printing press (**ID No. ES-17**) with an all-electric drying system. This application will be consolidated into the TV renewal (21B) described below.

Application ID No. 9700122.21B

Currently, Interflex Group Inc. – Carolina Plant (IFG) holds a Title V Permit 04613T26 with an expiration date of March 31, 2022. The Title V renewal application (**Application No. 9700122.21B**) was received on July 6, 2021, or at least nine months prior to the expiration date of the Title V permit (*04613T25 in effect at the time of the submittal of the TV renewal*). Therefore, Air Permit No. 04613T26 shall not expire until the renewal permit has been issued or denied, per the application shield in General Condition 3.K. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description:

The facility prints plastic wrapping for the food packaging industry, particularly chicken and turkey products. They also print on plastic wrapping for other industries such as pool chemicals.

Printing¹

Flexography is the major process used to print packaging materials. In the typical flexo printing sequence, the substrate is fed into the press from a roll. The image is printed as substrate is pulled through a series of stations or print units. Each print unit is printing a single color. The process of printing each color on a flexo press consists of a series of four rollers: ink roller, meter roller, plate cylinder, and impression cylinder. The first roller transfers the ink from an ink pan to the meter roller or Anilox Roll, which is the second roller. The Anilox roller meters the ink to a uniform thickness onto the plate cylinder. The substrate then moves between the plate cylinder and the impression cylinder, which is the fourth roller. The impression cylinder applies pressure to the plate cylinder, thereby transferring the image onto the substrate. The web, which by now has been printed, is fed into the overhead dryer so the ink is dry before it goes to the next print unit. After the substrate has been printed with all colors the web may be fed through an additional overhead tunnel dryer to remove most of the residual solvents or water. The finished product is then rewound onto a roll.

Hours of normal operation are 24 hours per day, 6 days per week, for 50 weeks per year.

3. History / Background / Application Chronology:

Permit History Since Last Permit Renewal

April 5, 2017	Title V Air Permit renewed. Air Permit No. 04613T25 issued with a permit expiration date of March 31, 2022.
February 8, 2022	Title V Air Permit issued. Air Permit No. 04613T26 issued with a permit expiration date of March 31, 2022. This modification included ownership change (Interflex Group, Inc. to InterFlex Acquisition Company, LLC).

Application Chronology

March 24, 2021	Received application for TV-502(b)(10) modification (Application No. 9700122.21A).
March 30, 2021	Sent acknowledgement notification indicating that TV-502(b)(10) modification permit application was received.
July 6, 2021	Received application for renewal of Title V permit (Application No. 9700122.21B).

¹ It is copied from the previous permit reviews.

July 6, 2021	Sent acknowledgement letter indicating that the permit renewal application was complete.
February 8, 2022	Ownership changed (9700122.21C). The permit T26 was issued by Ms. Connie.
February 21, 2022	Draft to supervisor (Heather Sands) for comments.
July 19, 2022	Draft to supervisor (Mark Cuilla) for comments
January 19, 2023	Send information request to review PTE for Storage tanks (ID No. ES-T1, ES-T2 and ES-T3)
February 1-3, 2023	Received information for PTE of storage tanks and confirmation to move these tanks to insignificant activity list.
March 8, 2023	Draft to regional office, SSCB, and applicant for comment.
TBD	Public comment period ends.
TBD	EPA comment period ends.

4. Summary of Changes to the Existing Permit (Permit No. 04613T26):

Page No.	Section	Description of Changes
Cover Letter	N/A	Updated cover letter for application and permit numbers, dates, PSD increment statement and Chief name.
Permit Cover	N/A	Inserted new issuance and complete application date and application number.
Permit	Entire Permit	<ul style="list-style-type: none"> Revised formatting as per the current permit shell.
1-21	Entire permit, where applicable	<ul style="list-style-type: none"> Replacement of ES-08 to ES-17.
4	Table	<ul style="list-style-type: none"> Moved storage tanks (ID No. ES-T1, ES-T2, and ES-T3) to insignificant activity list (Section 3) as per its PTE < 5 tons/year. Revised emission source IDs to IES-T1, IES-T2 and IES-T3.
5	2.1 A.1.a	<ul style="list-style-type: none"> Revised permit condition as per the permit shell TVCOND69.
6-7	2.1 A.3.c and e	<ul style="list-style-type: none"> Revised permit condition language as per the permit shell TVCOND69.
7	2.1 A.4	<ul style="list-style-type: none"> Revised permit condition language as per the permit shell TVCOND69 and separated two PSD avoidance conditions. Renumbered the remaining permit conditions accordingly.
9		<ul style="list-style-type: none"> Removed Section 2.2 heading and merged all the permit conditions in the Section 2.1 and renumbered all permit conditions.
10	2.1 A.5.d	<ul style="list-style-type: none"> Revised reporting permit condition language as per the permit shell TVCOND69.
13	Section 4	<ul style="list-style-type: none"> Revised General Conditions as per the current permit shell (version 6.0, 01/07/2022).

5. Compliance Status:

DAQ has reviewed the compliance status of this facility. During the most recent inspection conducted on February 23, 2022, Robert Barker of the Winston-Salem Regional Office indicated that the facility appeared to be in compliance with all applicable requirements except following.

Five-year Compliance History:

- During the compliance inspection on March 9, 2021, Mr. Dylan Wright observed that the facility has passed over 12-months between the dates of internal inspection of natural gas-fired regenerative thermal oxidizer (**ID No. CD-3**) (between January 28 and 29, 2020 and March 9, 2021). Therefore, the facility will be issued a notice of Deficiency (NOD) for failing to fulfill the requirements of permit condition 2.1 A.4.f.ii and 2.1 A.4.f.iii.
- On July 12, 2016, a Notice of Deficiency (NOD) was issued for failure to submit an Air Quality Emission Inventory certification page and supporting calculations as required by Air Quality Permit No. 04613T24. This document was due on June 30, 2016 and the Winston-Salem Regional Office (WSRO) received this documentation on July 8, 2016.
- On March 19, 2021, a Notice of Deficiency (NOD) was issued for failure to conduct maintenance within a 12-month period of natural gas-fired regenerative thermal oxidizer (**ID No. CD-3**). The Winston-Salem Regional

Office (WSRO) received response letter to NOD letter on March 26, 2021 stating that the control devices had been inspected. The facility appeared to be in compliance with all applicable requirements.

- Additionally, a signed Title V Compliance Certification (Form E5) indicating that the facility was in compliance with all applicable requirements was submitted with Application No. 9700122.21B on July 6, 2021.

6. New/Modified Equipment/Changes in Emissions:

Application ID No. 9700122.21A

The Title V – 502(b)(10) permit application (**Application No. 9700122.21A**) was received on March 24, 2021 for replacement of an older model 10-color PCMC flexographic printing press (**ID No. ES-08**) with an all-electric drying system with a new 10-color PCMC flexographic printing press (**ID No. ES-17**) with an all-electric drying system. The new press (**ID No. ES-17**) will exhaust to the existing RTO (**ID No. CD-02**) as the old press (**ID No. ES-08**). This replacement does not change the emissions allowed under the facility’s current permit.

Emission Summary of new Press (ID No. ES-17)

Air Pollutant	Expected Actual Emission, tpy	Potential Emissions, tpy (Before Control)	Potential Emissions, tpy (After Control)
Particulate Matter	0.00	0.00	0.00
Particulate Matter <10 μ	0.00	0.00	0.00
Particulate Matter <2.5 μ	0.00	0.00	0.00
Sulfur Dioxide	0.00	0.00	0.00
Nitrogen Oxides	0.00	0.00	0.00
Carbon Monoxide	0.00	0.00	0.00
Volatile Organic Compounds	2.79	232.83	3.97
Lead	0.00	0.00	0.00
Diethylene Glycol M Ether	0.6276	0.6903	0.0083
Toluene	0.0007 lb/hr	-	-
Xylene	0.00	-	-
MEK	0.00	-	-

The applicable regulations for the replacement of press (**ID No. ES-17**) are discussed below in the Section 7.

Application ID No. 9700122.21B

This application is submitted as Title V – renewal. There is no modification/change associated with this permit application.

Facility-wide Emissions Summary:

Air Pollutant	Expected Actual Emission, tpy	Potential Emissions, tpy (Before Control)	Potential Emissions, tpy (After Control)
Particulate Matter	0.011	0.074	0.074
Particulate Matter <10 μ	0.008	0.055	0.055
Particulate Matter <2.5 μ	0.003	0.018	0.018
Sulfur Dioxide	0.001	0.006	0.006
Nitrogen Oxides	0.52	0.97	0.97
Carbon Monoxide	0.44	0.815	0.815
Volatile Organic Compounds	27.76	660.56	30.525
Lead	0.00	0.00	0.00
GHGs	629.25	629.25	629.25
Diethylene Glycol M Ether	0.0139	1.278	0.0153
Toluene	0.0011 lb/hr	-	-
Xylene	0.00	-	-
MEK	0.00	-	-
Ethyl Acetate	0.0111	-	-

As per email conversation from Ms. Beverly Kershner on February 1-3, 2023, PTE of Three vertical fixed roof organic liquid storage tanks (3,000-gallon capacity, each) (**ID Nos. ES-T1, ES-T2, and ES-T3**)

Tank #	Tank Capacity (gals)	Turnovers per year	VOC PTE (lbs/yr)	VOC PTE (tons/yr)
ES-T1	3000	24	105.6334	0.0528
ES-T2	3000	24	27.3165	0.0137
ES-T3	3000	24	27.3165	0.0137

Note: I used the OK DEQ Storage Tank Calculation Tool

It is determined to be an insignificant activity due to size, use, and amount of emissions of the source under 15A NCAC 02Q .0503(8). An insignificant activity means any activity

“...whose emissions potential emission of particulate, sulfur dioxide, nitrogen oxides, volatile organic compounds, and carbon monoxide before air pollution control devices, i.e., potential uncontrolled emissions, are each no more than five tons per year and whose potential emissions of hazardous air pollutants before air pollution control devices, are each below 1000 pounds per year.”

With the uncontrolled emissions of HAPs from the proposed emission source are less than 1,000 pounds per year and criteria pollutants emissions are less than five tons per year as shown in the calculations above, these three vertical fixed roof organic liquid storage tanks - 3,000-gallon capacity, each (**ID Nos. ES-T1, ES-T2, and ES-T3**) meets the criteria for insignificant activities under 15A NCAC 02Q .0503(8). No permit is required for installation and operation of the equipment.

While the full permit stipulation will not be included in the permit since these are insignificant pieces of equipments. The facility shall still be required to comply with all applicable provisions including the notification, testing, reporting, recordkeeping, and monitoring requirements. Compliance is expected and will be verified during facility inspections.

Three vertical fixed roof organic liquid storage tanks (3,000-gallon capacity, each) (**ID Nos. ES-T1, ES-T2, and ES-T3**) are moved to insignificant activity list as per email conversation with Ms. Beverly Kershner and these tanks emission sources IDs would be **IES-T1, IES-T2 and IES-T3**.

7. Regulatory Review

Interflex Group (IFG) is subject to following regulations. Unless specifically noted, a detailed discussion of the following list of permit conditions is not included as applicability status has not changed. For some regulations below, more discussion is provided for clarification and background, as necessary. When necessary, the permit was updated to reflect the most current requirements and permit language for all applicable regulations. DAQ has reviewed the regulations and other than the changes discussed below, no changes to the permit are required. The facility is expected to be in continued compliance.

- 15A NCAC 02D .0515 “Particulates from Miscellaneous Industrial Processes”

This rule applies to stacks, vents, or outlets emitting particulates from industrial processes with no other applicable standards. The allowable emission rate is in terms of pounds per hour and is calculated using the following equations:

For process rates up to 30 tons per hour:

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

For process rates greater than 30 tons per hour:

$$E = 55.0(P)^{0.11} - 40$$

Where: E = Allowable emission rate in pounds per hour
P = Process weight in tons per hour

The following emission sources at IFG are subject to 02D .0515:

- One 50” wide web flexographic printing presses with ten printing stations and an all-electric drying system operating within an enclosed pressroom (PTE) (**ID No. ES-17**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-02**) for particulate matter emissions control.

- One 60” wide web flexographic printing press with ten printing stations and an all-electric drying system operating within an enclosed pressroom (PTE) (**ID No. ES-14**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-02**) for particulate matter emissions control.
- One 67” wide web flexographic printing press with ten printing stations and ten direct natural gas/propane-fired bake ovens (1.13 million Btu per hour total maximum heat input rate) operating within an enclosed pressroom (PTE) (**ID No. ES-15**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-02**) for particulate matter emissions control.
- One 67” wide web flexographic printing press with ten printing stations and ten direct natural gas/propane-fired bake ovens (1.13 million Btu per hour total maximum heat input rate) operating within an enclosed pressroom (PTE) (**ID No. ES-16**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-03**) for particulate matter emissions control.

Compliance is demonstrated by maintaining production records. For facilities that use a control device to comply with this regulation, reporting is required. IFG uses a fired regenerative thermal oxidizer for VOC control, which can also be used to control particulates. However, IFG’s potential and actual particulate emissions are well below the allowable rates pursuant to this rule. Therefore, no reporting requirements are required. Continued compliance is expected.

- 15A NCAC 02D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

This regulation applies to any source of combustion that emits sulfur dioxide, which is formed by the combustion of sulfur in fuels, wastes, ores, and other substances. This rule does not apply to sources subject to sulfur dioxide standards under 02D .0524, .0527, .1110, .1111, .1206, and .1210 per 516(b) respectively. Sources subject to this standard have an emission limit of 2.3 pounds of sulfur dioxide per million Btu heat input. Sulfur dioxide formed or reduced as a result of treating flue gases with sulfur trioxide or other materials shall also be accounted for when determining compliance with this standard. The following emission sources at IFG are subject to this rule:

- One 67” wide web flexographic printing press with ten printing stations and ten direct natural gas/propane-fired bake ovens (1.13 million Btu per hour total maximum heat input rate) operating within an enclosed pressroom (PTE) (**ID No. ES-15**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-02**), and
- One 67” wide web flexographic printing press with ten printing stations and ten direct natural gas/propane-fired bake ovens (1.13 million Btu per hour total maximum heat input rate) operating within an enclosed pressroom (PTE) (**ID No. ES-16**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-03**) -

Each press is subject to 2.3 pounds SO₂ per million Btu heat input limit when firing propane or natural gas. Because the sulfur content of both propane and natural gas is inherently low, compliance with the above emission limit is expected. Thus, no monitoring / record keeping / reporting is required for SO₂ emissions from these presses due to firing of propane or natural gas. Continued compliance is expected.

- 15A NCAC 02D .0521 “Control of Visible Emissions”

This regulation applies to fuel burning operations and industrial processes where visible emissions can be reasonably expected to occur. Sources subject to visible emissions standards specifically identified per rules under 02D (including .0506, .0508, .0524, .1110, .1111, .1206, and .1210) are required to meet the standards of those rules instead of the standards in 02D .0521. Emission sources manufactured after July 1, 1971, have a visible emissions limit of 20 percent opacity when averaged over a 6-minute period. The 6-minute averaging periods may exceed 20 percent if no 6-min period exceeds 87 percent opacity, no more than one six-minute period exceeds 20 percent opacity in one hour, and no more than 4 6-minute periods exceed 20 percent in any 24-hour period. Compliance with this standard is demonstrated by conducting semiannual stack observations. The following sources are required to conduct semiannual observations to ensure compliance with the 20 percent opacity visible emissions standard, along with recordkeeping and reporting.

- One 50” wide web flexographic printing presses with ten printing stations and an all-electric drying system operating within an enclosed pressroom (PTE) (**ID No. ES-17**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-02**).
- One 60” wide web flexographic printing press with ten printing stations and an all-electric drying system operating within an enclosed pressroom (PTE) (**ID No. ES-14**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-02**).
- One 67” wide web flexographic printing press with ten printing stations and ten direct natural gas/propane-fired bake ovens (1.13 million Btu per hour total maximum heat input rate) operating within an enclosed pressroom (PTE) (**ID No. ES-15**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-02**).

- One 67” wide web flexographic printing press with ten printing stations and ten direct natural gas/propane-fired bake ovens (1.13 million Btu per hour total maximum heat input rate) operating within an enclosed pressroom (PTE) (**ID No. ES-16**) with associated natural gas-fired regenerative thermal oxidizer (**ID No. CD-03**).

The Permittee is required to perform scheduled observations and compare those to an established “normal”. The results of the observations shall be recorded in a logbook and reported to DAQ semiannually. Continued compliance is expected.

- 15A NCAC 02D .1806 “Control and Prohibition of Odorous Emissions” (State-enforceable only)
The facility is subject to this regulation. 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. No odorous emissions have been documented as per current compliance inspection report, performed on February 23, 2022. Continued compliance is expected.
- 15A NCAC 02Q .0317 “Avoidance Conditions (for 15A NCAC 02D .0530, Prevention of Significant Deterioration)”
Please, see Section 8 (NSR/PSD) for detailed information. This permit renewal and 502(b)(10) modification do not affect this status. Continued compliance is expected.
- 15A NCAC 02Q .0317 “Avoidance Conditions (for 15A NCAC 02D .1111, Maximum Achievable Control Technology)”
Please, see Section 8 (NESHAP/MACT) for detailed information. This permit renewal and 502(b)(10) modification do not affect this status. Continued compliance is expected.
- 15A NCAC 02Q .0711 “Emission Rates Requiring a Permit” (State-enforceable only)
Please, see Section 8 for detailed information. This permit renewal and 502(b)(10) modification do not affect this status. Future modifications involving any one or more of these pollutants will need to be evaluated at that time. Continued compliance is expected.

8. NSPS, NESHAP/MACT, NSR/PSD, 112(r), CAM

NSPS

This facility is subject to New Source Performance Standards (NSPS), 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

- This Subpart is applicable to the facility’s 40 kW diesel-fired emergency generator (**ID No. I-Gen**). The full permit regulation is not included in the permit since this emission source is classified as an insignificant activity. The facility is required to comply with the following applicable provisions including the notification, testing, reporting, recordkeeping, and monitoring requirements.
- As per §60.4214 (b), If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in 40 CFR 60, Subpart IIII, table 5, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must monitor and keep record of the time of operation of the engine and the reason the engine was in operation during that time and submit report annually.

Compliance is expected and will be verified during facility inspections. This permit renewal and 502(b)(10) modification does not change the status.

NESHAP/MACT

The facility is classified as an “area” source (<10 tons/yr individual HAP and <25 tons/yr aggregate HAP) for MACT under “National Emission Standard for the Printing and Publishing Industry”. This facility is subject to the following National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 as an area source. This permit renewal and 502(b)(10) modification does not change this status. Specifically,

- The Permittee is subject to 40 CFR 63, Subpart KK “National Emission Standards for the Printing and Publishing Industry” for emission sources ID Nos. ES-17, ES-14, ES-15, and ES-16, however the Permittee has chosen to commit to and meets the criteria of paragraphs (a)(2)(i) and (ii) of 40 CFR 63.820 for purposes of establishing the facility to be an area source of HAP with respect to 40 CFR 63 Subpart KK. Therefore, IFG is considered Minor for Title III. Area sources are not subject to any of the provisions under this Subpart, except recordkeeping as specified in 40 CFR 63.829(d) and 63.830(b)(1). In order to remain classified as a minor source of HAPS per the Subpart, emissions of HAPs are limited to less than 10 tons per year of any individual HAP and to less than 25 tons per year of any combination of HAPs. The current permit includes monitoring, recordkeeping, and reporting requirements.
- The Permittee is subject to 40 CFR 63, Subpart ZZZZ “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”. This standard for area sources applies to Interflex’s insignificant diesel-fired emergency generator (**ID No. I-Gen**). According to 40 CFR 63.6590(c)(1), the diesel-fired generator meets the requirements of 40 CFR 63 Subpart ZZZZ by complying with requirements under 40 CFR Part 60 Subpart IIII for compression ignition engines as indicated above. Compliance is expected and will be verified during facility inspections.

To ensure compliance with MACT avoidance condition, the Permittee shall be less than 10 tons per each rolling 12-month period of each HAP and 25 tons per rolling 12-month period of any combination of HAP. The Permittee shall record materials used for purposes other than printing and publishing monthly. The Permittee shall submit semiannual summary report of monitoring and recordkeeping activities.

This permit renewal and 502(b)(10) modification does not result in a change in HAPs emissions. Continued compliance with the HAPs avoidance requirement is expected.

NSR/PSD

As noted above, the facility is located in Wilkes County, which is currently designated in attainment or unclassified for all criteria pollutants. This facility is major stationary source for PSD as it has potential emissions of VOC above 250 tons per year.

The County of Wilkes is in attainment or unclassified of NAAQS for all criteria pollutants. Hence, PSD program applies in this County to all major sources and major modifications.

Interflex facility in Wilkesboro is a “250 tons” industrial category source. The facility is a “major” source for PSD. The facility has avoided PSD by limiting the VOC potential to emit to less than 250 tons/yr, as included in Section 2.1 A.4 in the current permit.

The permit includes two PSD avoidance conditions for VOC emissions. The current permit limits VOC emissions from the Nos. 8 and 14 printing presses to less than 250 tpy and VOC emissions from the Nos. 15 and 16 printing presses are also limited to less than 250 tpy. These two PSD avoidance permit conditions language was revised as per permit shell language and separated. These permit conditions have included operating parameter limits for RTOs, established during the stack test performed on March 13-14, 2019. This permit renewal and 502(b)(10) modification does not result in a change in VOC emissions. Therefore, it does not impact the existing PSD avoidance limitations. Any modification must be reviewed for PSD under the “major modification” provision if the emissions are estimated to be above the significance threshold (such 40 tons per year for VOC). The Permittee requires to calculate VOC emissions based on material usage and submit semi-annual reports of calculations (monthly and yearly).

Emission Source(s)	PSD Avoidance Condition for VOC
flexographic presses (ID No. ES-16 and ES-15)	Less than 250 tons per year of VOC emissions
flexographic presses (ID No. ES-17 and ES-14)	Less than 250 tons per year of VOC emissions

This permit renewal and 502(b)(10) modification does not affect this status. Continued compliance is expected.

112(r)

This facility is not subject to the requirements of the Chemical Accident Release Prevention Program, Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above thresholds in the Rule. This permit renewal and 502(b)(10) modification does not affect this status.

Compliance assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, the provisions of the Compliance Assurance Monitoring (CAM) rule are applicable to emission units that meet all of the following criteria:

Criteria #1: The unit is subject to a non-exempt emission limitation AND uses a control device to achieve compliance with the limit;

Criteria #2: The unit has pre-control potential emissions that are equal to or greater than 100% of the amount (in tpy) required for a source to be classified as a major source (i.e., 100 tpy of any criteria pollutant or 10 tpy of any HAP); and,

Criteria #3: The unit is not exempt under 40 CFR 64.2(b).

Emission Unit	Criteria #1: Does the Source Use a Control Device?	Criteria #2: Pre-control PTE \geq 100% of major source thresholds?	Criteria #3: Exempt Under 40 CFR 64.2(b)?	CAM Source?
ES-17	Yes - RTO (ID No. CD-2)	Yes (VOC)	VOC: Yes	VOC: No
ES-14	Yes - RTO (ID No. CD-2)	Yes (VOC)	VOC: Yes	VOC: No
ES-15	Yes - RTO (ID No. CD-2)	Yes (VOC)	VOC: Yes	VOC: No
ES-16	Yes - RTO (ID No. CD-3)	Yes (VOC)	VOC: Yes	VOC: No

The emission units (ES-17, ES-14, ES-15 and ES-16) are subject to VOC emission standard of 15A NCAC 02Q .0317 (PSD Avoidance limit < 250 tons/year and HAPs avoidance limit > 10/25 tons/year). This emission standard is CAM exempt under 40 CFR 64.2(b)(v) – *An emission cap that meets the requirements specified in 40 CFR 70.4(b)(12)*. Therefore, CAM is not required for these units for this exempt applicable requirement in 02Q .0317 (PSD avoidance and HAPs avoidance limit). This permit renewal and 502(b)(10) modification does not affect the status.

8. Facility-Wide Air Toxics:

As indicated above, the Permittee is subject to 15A NCAC 02Q .0711. This regulation lists the toxic permitting emission rates (TPERs) for each regulated TAP. The Permittee has made a demonstration that emissions of the listed pollutants (ethyl acetate, methyl ethyl ketone, xylene, and toluene) are each below their respective TPERs as established in 15A NCAC 02Q .0711. A permit/permit modification is required if the facility-wide actual emissions exceed the applicable TPERs for the listed pollutants or for any other (non-listed in the current permit) regulated pollutants these limits. The current permit requires that the Permittee maintain records indicating these emission rates are not being exceeded. This permit renewal and 502(b)(10) modification does not affect this status.

9. Facility Emission Review:

There are no changes in potential emissions under this permit renewal and 502(b)(10) modification. Actual emissions for 2017 through 2021 are reported in the header of this permit review.

10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State and affected local program at or before the time notice is provided to the public under 02Q .0521 above.

Virginia and Tennessee are affected states; Forsyth County Air Quality and Mecklenburg County Air Quality are local programs within 50 miles of the facility. However, the Department is sending the notices to South Carolina and Asheville-Buncombe County Air Quality program too.

Notice of the DRAFT Title V Permit to Affected States ran from XXXX YY, 2023 to XXXX YY, 2023. *Summarize comments from Affected States.*

Public Notice of the DRAFT Title V Permit ran from XXXX YY, 2023 to XXXX YY, 2023. *Summarize comments from the public.*

EPA's 45-day review period ran concurrent with the 30-day Public Notice, from XXXX YY, 2023 to XXXX YY, 2023. *Summarize comments from EPA and U.S. EPA Region 4 that were received regarding the DRAFT Title V Permit.*

11. Other Regulatory Considerations:

- A Permit Application fee is NOT required for Permit Application No. 9700122.21A and 9700122.21B.
- A Zoning Determination is NOT required for Permit Application No. 9700122.21A and 9700122.21B.
- A P.E. Seal is NOT required for Permit Application No. 9700122.21A and 9700122.21B.
- A 30-day public notice and 45-day EPA review is NOT required for Permit Application No. 9700122.21A.
- A 30-day public notice and 45-day EPA review is required for Permit Application No. 9700122.21B as noted above.

12. Recommendations/Conclusion:

TBD