

## Air Permit Review

Permit Issue Date: **date, 2009**

**Region:** Fayetteville Regional Office  
**County:** Montgomery  
**NC Facility ID:** 6200042  
**Inspector's Name:** Robert Hayden  
**Date of Last Inspection:** 04/21/2009  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> Gibraltar Packaging Group, Inc.</p> <p><b>Facility Address:</b> Gibraltar Packaging Group, Inc. 5465 NC Highway 73 West Mt Gilead, NC 27306</p> <p><b>SIC:</b> 2759 / Commercial Printing, Nec <b>NAICS:</b> 323112 / Commercial Flexographic Printing</p> <p><b>Facility Classification: Before:</b> Title V    <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V    <b>After:</b> Title V</p>			<p><b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b></p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 6200042.09A <b>Date Received:</b> 08/31/2009 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 06174/T10 <b>Existing Permit Issue Date:</b> 05/02/2006 <b>Existing Permit Expiration Date:</b> 05/31/2010</p>
<p>Julie Sikes HR Director (910) 439-6137 PO Box 700 Mt. Gilead, NC 27306</p>	<p>James Downey Vice President and General Manager (910) 439-6137 5465 NC Highway 73 West Mt. Gilead, NC 27306</p>	<p>Conrad Carter President, Alpha Env. Mgt. (704) 983-2302 PO Box 1760 Albemarle, NC 28002+1760</p>	
<p><b>Review Engineer:</b> Mark Cuilla</p> <p><b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2009</b></p>		<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 06174/T11 <b>Permit Issue Date:</b> <b>date, 2009</b> <b>Permit Expiration Date:</b> <b>date, 2014</b></p>	

### I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**06174T10**) was issued on **May 2, 2006**, and is scheduled to expire on **May 31, 2010**. The renewal application was received on **August 31, 2009**, or at least nine months prior to the expiration date. Therefore, the existing permit is shielded from expiration until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

### II. Facility Description

The facility is a commercial printer with both flexographic and offset printing presses.

### III. History/Background/Application Chronology

**August 31, 2009** – Permit application 6200042.09A was received and deemed complete for processing.

**September 17, 2009** – Received an email from Julie Sikes of Gibraltar confirming that the three six-color flexographic printing presses with associated natural gas-fired dryers (**ID Nos. ES-130-1 through ES-130-3**) have been removed from the facility and should be removed from the permit. This statement is consistent with the latest inspection report by the FRO and the cover letter of the renewal application.

**September 22, 2009** – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review.

**date, 2009** – DRAFT permit sent to 30-day public notice and 45-day EPA review.

### IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant activities	-amended permit revision number
Cover	-	-amended permit revision numbers and all dates
TOC	-	-removed all references to Part II
All	Header	-amended permit revision number
3	Equipment table 2.1 A	-removed reference to three flexographic printing presses ( <b>ID Nos. ES-103-1 through ES-130-3</b> ) per Permittee request -grouped all presses venting to atmosphere under one Section with common requirements (renumbered remaining Sections accordingly)
3-4	2.1 A (table)	-corrected cross reference to 2D .0958 condition
4	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.2.a 2.1 A.2.b	-added ID numbers -corrected testing rule citation and corrected cross reference -added ID numbers -added ID numbers -corrected testing rule citation and corrected cross reference
4-5	2.1 A.2.c	-updated shell language and added ID numbers
5	2.1 A.2.e 2.1 B 2.1 B (Table)	-updated shell language -renumbered Section -corrected cross reference to 2D .0958 condition
7-17	General Conditions	-updated shell conditions (v2.22.1)
-	Part II	-removed Part II

The following table indicates the required Emission Source Module modifications necessary as part of this permit renewal.

Current Description	Modified Description
Three six-color flexographic printing presses each with two associated natural gas-fired dryers (0.8 million Btu per hour maximum heat input capacity each; <b>ID Nos. ES-130-1 through ES-130-3</b> )	End-dated per Permittee request

**V. Regulatory Review**

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2D .0711, Emission Rates Requiring a Permit

A regulatory review for these current permit conditions will not be included in this document.

**VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM**

**NSPS** – The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility is classified as a Title III minor source as potential emissions of any single hazardous air pollutant (HAP) are below 10 tons per year and a combination of all HAPs is less than 25 tons per year. Therefore, the facility is not subject to any Maximum Achievable Control Technology standards. This permit renewal does not affect this status.

The facility was also compared to the list of currently promulgated area source GACT standards in 40 CFR 63. At this time there appears to be no applicable regulations that apply.

**PSD** – The facility is not currently subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

**112(r)** – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The facility does not operate any control devices; therefore CAM is not applicable.

**VII. Facility Wide Air Toxics**

The Permittee has made a demonstration that the emissions of ammonia and xylene are each below their respective Toxic Pollutant Emission Rates. Those rates are listed in the permit. This permit renewal does not affect this status.

**VIII. Facility Emissions Review**

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility:

<b>Pollutant(s)</b>	<b>2006 Actual Emissions (tpy)</b>	<b>2007 Actual Emissions (tpy)</b>
CO	0.07	Not reported
NO <sub>x</sub>	0.09	Not reported
PM <sub>10</sub>	0.18	0.14
VOC	70.57	114.37
Total HAPs/TAPs	1.17	1.38

**IX. Stipulation Review**

The facility was last inspected by Robert Hayden of the FRO on **April 21, 2009**. Based on his visual observations and records review, the facility appeared to be in compliance with Air Quality standards and regulations at the time of the inspection.

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The State of South Carolina and the Mecklenburg County Local Program are affected areas within 50 miles of the facility.

**XI. Conclusions, Comments, and Recommendations**

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

FRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with FRO's recommendation to issue the renewed air permit.