

Facility Name: **Transcontinental Griffin**
City: Griffin
County: Spalding
AIRS #: 04-13-255-00047

Application #: TV-807159
Date Application Received: December 22, 2023
Permit No: 2673-255-0047-V-06-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name: Transcontinental Griffin

2. Parent/Holding Company Name

Transcontinental US LLC

3. Previous and/or Other Name(s)

Union Camp Corporation
International Paper Griffin – Flexible Packaging
Coveris Flexibles US LLC – Griffin

4. Facility Location

1304 Arthur K. Bolton Parkway
Griffin, GA 30223

5. Attainment, Non-attainment Area Location, or Contributing Area

Transcontinental Griffin is located in Spalding County, an attainment area for all criteria air pollutants. Previously this area was designated non-attainment for ozone. EPA has determined that the Atlanta ozone non-attainment area now meets the 2015 NAAQS for ozone based on the 2018-2020 air quality monitoring data.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
2673-255-0047-V-05-0	May 1, 2019	Title V Permit Renewal
2673-255-0047-V-05-1	April 1, 2021	Significant Modification with construction to install Press P9, Parts Washer W1, RTO PC9, and remove Press P6.

2673-255-0047-V-05-2	July 11, 2022	502(b)10 for construction and operation of a new 10 color flexographic press P10.
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D. Process Description

1. SIC Codes(s)

2673 – Plastics, Foils, Laminated and Coated Paper Bags

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility produces printed polyethylene film, printed plastic bags etc.

3. Overall Facility Process Description

The facility manufactures printed polyethylene film and plastic bags. The process for manufacturing polyethylene film begins with the heating and extrusion of low-density polyethylene (LDPE) pellets. After extrusion, the film is fed through one of eight corona treaters that etch the surface of the film to prepare the surface for printing. After etching, the film is transferred to one of three flexographic printing presses (P8, P9, and P10) where either solvent or water-based ink is applied. The presses are controlled by one of two regenerative thermal oxidizers (PC8 or PC9). After printing, the film is sold as roll stock or converted to plastic bags or pouches for packaging various commercial goods.

In addition to the heating and extrusion and corona treating activities, several other insignificant activities are performed at the facility in support of the printing operations.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Transcontinental Griffin is located in Spalding County, an attainment area for all criteria air pollutants. The facility is not one of the 28 named source categories under Prevention of Significant Deterioration (PSD) regulations. To remain as a "minor" source under the PSD regulation, the permit contains a facility wide PSD minor limit of 249 tons per year (tpy) on volatile organic compound (VOC) emissions.

Non-Attainment Area New Source Review (NAA NSR) is not applicable to the facility since Spalding County is an attainment area for all criteria pollutants.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓		✓	
Total HAPs	✓		✓	

3. MACT Standards

In past permitting actions, the facility requested limiting the use of materials containing hazardous air pollutants (HAP) in order to avoid "National Emission Standards for the Printing and Publishing Industry," 40 CFR Part 63 Subpart KK. HAP emissions from the entire facility are limited to 10 tons per year for any individual HAP and 25 tons per year of any combination of HAP. The limits are embodied in Condition 2.1.1. In accordance with 40 CFR 63.820(a)(2) and (7), the Printing and Publishing MACT is not applicable to the facility.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No

Program Code	Applicable (y/n)
Program Code 9 - NSPS	No
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

The current Title V permit, Permit No. 2673-255-0047-V-05-0, limits facility-wide VOC emissions to 249 tons per year for PSD avoidance. The current permit also limits facility-wide HAP emission to 25 tpy for combined HAP emissions and 10 tpy for individual HAP emissions. These limits are carried over into this renewal permit.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

The facility has not indicated any non-compliant situations in the renewal permit application.

D. Permit Conditions

Condition 2.1.1 limits individual and Total HAPs to 10 tpy and 25 tpy respectively.

Condition 2.1.2 limits facility-wide VOC emissions to 249 tons per year for PSD avoidance.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
P8	Flexographic Printing Press (2017)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm)	PC8	Regenerative Thermal Oxidizer (RTO)
P9	Flexographic Printing Press with wet end total enclosure and 2.389 MMBtu/hr dryer burner capacity. (2021)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm)	PC9	Regenerative Thermal Oxidizer (RTO)
W1	Flexo Wash PK 300 WR Front Load ATEX Electric Parts Washer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)		
P10	Flexographic Printing Press 10-Color (2022)	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(mm)	PC8	Regenerative Thermal Oxidizer (RTO)
CST	Chemical Storage Tanks	391-3-1-.02(2)(vv)	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

** The equipment list has been updated to remove Flexographic Printing Press P7 as requested in the renewal application. P7 has been replaced.

B. Equipment & Rule Applicability

Equipment and Rule Applicability for this renewal permit is based on the requirements for the emission units as permitted in existing Permit No. 2673-255-0047-V-05-0 and Amendment Nos. 2673-255-0047-V-05-1 and 2673-255-0047-V-05-2, as discussed below.

Emission and Operating Caps:

None applicable.

Conditions 3.2.1, 3.2.2, and 3.2.3 in the current permit, Permit No. 2673-255-0047-V-05-0, contain PSD avoidance limits of 40 tpy for VOC emissions from the flexographic printing presses P6, P7, and P8. These conditions were removed in Amendment No. 2673-255-0047-V-05-1. Flexographic printing press P6 was damaged in a fire and removed from service. Since the facility is a PSD SM source due to Condition 2.1.2, the individual 40-tpy PSD avoidance limits in Conditions 3.2.2 and 3.2.3 were no longer needed.

Rules and Regulations Assessment:

All flexographic printing presses at the facility are subject to Georgia Rule (b) – Visible Emissions, Georgia Rule (e) – Particulate Emission from Manufacturing Processes and Georgia Rule (mm) – VOC Emissions from Graphic Arts Systems. NESHAP Subpart KK does not apply because the source has taken a HAP limit of 10/25 tons per year to avoid this regulation. Georgia Rule (mm) applies to all the presses. Two regenerative thermal oxidizers are used to comply with this regulation for solvent based inks, while the water-based inks are compliant without add-on controls.

The parts cleaner W1 is fully enclosed, and its PTE is less than 100 tons per year. Per GA Rule 391-3-1-.02(2)(a)6.(i)(I), the parts cleaner W1 is not subject to Georgia Rule (ff) – Solvent Metal Cleaning.

C. Permit Conditions

These conditions are based on the requirements for the emission units as currently permitted in Permit No. 2673-255-0047-V-05-0 and Amendment Nos. 2673-255-0047-V-05-1 and 2673-255-0047-V-05-2. The renewal application requests the removal of flexographic printing press P7, which has been replaced. These conditions have been updated to remove references to flexographic printing press P7.

Condition 3.2.1 was removed in Amendment No. 2673-255-0047-V-05-1 since flexographic printing press P6 was damaged in a fire and removed from service.

Conditions 3.2.2 and 3.2.3 were removed in Amendment No. 2673-255-0047-V-05-1. Since the facility is a PSD SM source due to Condition 2.1.2, the individual 40-tpy PSD avoidance limits are not needed.

Condition 3.4.1 subjects opacity of visible emissions from all the flexographic printing presses to the 40 percent opacity limit per Georgia Rule (b).

Condition 3.4.2 subjects PM emissions from all the flexographic printing presses to Georgia Rule (e) limits.

Condition 3.4.3 subjects all the flexographic printing presses to the VOC emission limits of Georgia Rule (mm) – “VOC emissions from Graphic Arts System.”

Condition 3.4.4 requires the Permittee to maintain a log of the date and time the Permittee starts and stops using the alternate compliance options in Conditions 3.4.3.b. or 3.4.3.c.

Condition 3.4.5 prohibits transfer of any VOLs other than gasoline from any delivery vessel to a stationary storage tank 4,000 gallons or more unless the tank is equipped with submerged fill lines.

Condition 3.5.1 lays out work practice requirements for all printing operations at the facility.

Condition 3.5.2 requires the operation of the RTO PC9 whenever flexographic printing presses P8 and P10 are operating. To allow more flexibility, the condition has been modified to specify operation using solvent-based inks in order to comply with Georgia Rule (mm).

Condition 3.5.3 requires the Permittee to maintain the combustion temperature of RTO PC8 at or above the temperature established during the last performance test at which compliance was demonstrated with Condition 3.4.3.c.

Condition 3.5.4 requires the operation of the RTO PC9 whenever flexographic printing press P9 or parts washer W1 is operating. To allow more flexibility, the condition has been modified to specify operation using solvent-based inks in order to comply with Georgia Rule (mm).

Condition 3.5.5 requires the Permittee to maintain the combustion temperature of RTO PC9 at or above the temperature established during the last performance test at which compliance was demonstrated with Condition 3.4.3.c.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Testing requirements for this renewal permit are based on the requirements for the emission units as currently permitted in Permit No. 2673-255-0047-V-05-0 and Amendment Nos. 2673-255-0047-V-05-1 and 2673-255-0047-V-05-2.

Condition 4.2.1 requires the Permittee to conduct performance tests for determining the destruction efficiency of the regenerative thermal oxidizers PC8 and PC9 for VOC once every five years.

Conditions 4.2.2 and 4.2.3 stating testing requirements for flexographic printing press P9 from Amendment No. 2673-255-0047-V-05-1, have been removed. Testing was completed September 8, 2021. Conditions 4.2.2 and 4.2.3 required the facility to demonstrate that the VOC emission reduction system had at least 90.0 percent reduction efficiency and a capture system approved by the Division to demonstrate compliance with Condition 3.4.3.c.

Conditions 4.2.4 and 4.2.5 stating testing requirements for flexographic printing press P10 from Amendment No. 2673-255-0047-V-05-2, have been removed. Testing was completed February 9, 2023. Conditions 4.2.4 and 4.2.5 required the facility to demonstrate that the VOC emission reduction system had at least 90.0 percent reduction efficiency and a capture system approved by the Division to demonstrate compliance with Condition 3.4.3.c.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Monitoring requirements for this renewal permit are based on the requirements for the emission units as currently permitted in Permit No. 2673-255-0047-V-05-0 and Amendment Nos. 2673-255-0047-V-05-1 and 2673-255-0047-V-05-2. The renewal application requests the removal of flexographic printing press P7, which has been replaced. These conditions have been updated to remove references to flexographic printing press P7.

Condition 5.2.1 requires continuous monitoring of the RTO combustion chamber temperature.

Condition 5.2.2 requires continuous monitoring of the pressure differential across the permanent total enclosure (PTE) or the natural draft opening (NDO) face velocity and recorded at least once each day the presses are operated.

Condition 5.2.3 requires implementation of a program for monthly inspection of the ductwork, hoods, and equipment of the capture and control systems for the printing presses.

Condition 5.2.4 requires monthly inspection of printing operations to implement the work practice requirement of Condition 3.5.1.

C. Compliance Assurance Monitoring (CAM)

CAM requirements for this renewal permit are based on the requirements for the emission units as currently permitted in Permit No. 2673-255-0047-V-05-0 and Amendment Nos. 2673-255-0047-V-05-1 and 2673-255-0047-V-05-2.

Condition 5.2.5 states that the flexographic printing presses P8, P9 and P10 are subject to Compliance Assurance Monitoring (CAM) for VOC.

Condition 5.2.6 in the renewal permit lists the CAM indicator parameters for flexographic printing presses P8, P9 and P10. The CAM indicator parameters are RTO Combustion chamber temperature, VOC capture system operation and structural integrity.

Condition 5.2.7 requires the Permittee to perform RTO maintenance annually.

Conditions 5.2.8 and 5.2.9, stating the CAM requirements for flexographic printing press P10 from Amendment No. 2673-255-0047-V-05-2, have been removed. They have been incorporated into Conditions 5.2.5 and 5.2.6.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Recordkeeping and reporting requirements for this renewal permit are based on the requirements for the emission units as currently permitted in Permit No. 2673-255-0047-V-05-0 and Amendment Nos. 2673-255-0047-V-05-1 and 2673-255-0047-V-05-2. The renewal application requests the removal of flexographic printing press P7, which has been replaced. These conditions have been updated to remove references to flexographic printing press P7.

Conditions 6.1.7.b and 6.1.7.c contain the reportable exceedances and excursions.

Condition 6.1.7.d requires reporting of failure to conduct work practice inspections required by Conditions 5.2.3 and 5.2.4.

Condition 6.2.1 to 6.2.3 are the MACT avoidance limit recordkeeping requirements.

Conditions 6.2.4 to 6.2.7 are the PSD avoidance limit recordkeeping requirements.

Condition 6.2.8 is the Georgia Rule (mm) recordkeeping requirement.

Condition 6.2.10 and 6.2.11 are the recordkeeping requirements for the RTO combustion chamber temperature and the capture system monitoring measurements stated in Conditions 5.2.1 and 5.2.2.

Conditions 6.2.12 and 6.2.13 are the work practice inspection recordkeeping conditions.

Condition 6.2.14, requiring records of the capture system monitoring measurements from Amendment No. 2673-255-0047-V-05-2, has been removed. It has been incorporated into Condition 6.2.11.

VII. Specific Requirements**A. Operational Flexibility**

Not applicable.

B. Alternative Requirements

None.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

Not applicable.

E. Short-Term Activities

Not applicable.

F. Compliance Schedule/Progress Reports

Not applicable.

G. Emissions Trading

Not applicable.

H. Acid Rain Requirements

Not applicable.

I. Stratospheric Ozone Protection Requirements

Not applicable.

J. Pollution Prevention

Not applicable.

K. Specific Conditions

Not applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//