

TITLE V PERMIT RENEWAL STATEMENT OF BASIS

Facility Name: Plus Mark, LLC
City: Afton
County: Greene

Date Application Received: April 21, 2022
Date Application Deemed Complete: April 21, 2022
Permit Issuance Date:
Permit Expiration Date:

Emission Source Reference No.: 30-0132
Permit No. 580324

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V operating permit. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1.(v). The primary purpose of the Title V operating permit is to consolidate and identify existing state and federal air requirements applicable to **Plus Mark, LLC** and to provide practical methods for determining compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms

PSD	Prevention of Significant Deterioration
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
MACT	Maximum Achievable Control Technology
NSR	New Source Review

I. Identification Information

A. Source Description: Giftwrap Printing and Converting Operation

Source 01- One Natural Gas Fired Boiler with #2 Fuel Oil as Back-up

Source 05- Seven Rotogravure Printing Presses with Natural Gas Fired Dryer (This source is subject to the standards applicable to packaging rotogravure presses under TAPCR 1200-3-18-.35, Graphic Arts Systems).

Source 10- Diesel Fuel Fired Fire Water Pump

B. Facility Classification

1. Area is designated as an attainment area for all pollutants
2. Company is located in a Class II area.

C. Regulatory Status

PSD/NSR

This facility is not a major source under PSD.

Title V Major Source Status by Pollutants:

Pollutant	Is the pollutant emitted?	If emitted, what is the facility's status?	
		Major Source Status	Non-Major Source Status
PM	X		X
PM ₁₀	X	N/A	
SO ₂	X		X
VOC	X	X	
NO _x	X		X
CO	X		X
Individual HAP	X		X
Total HAPs	X		X
CO ₂ (e)	X		X

3. Program Applicability

Are the following programs applicable to the facility?

PSD **No**

NESHAP (yes) This facility is classified as an Area Source for HAP in accordance with the provisions of Subpart KK – National Emission Standards for the Printing and Publishing Industry, 40 CFR 63.820(a)(2)(i) and (ii).

NESHAP (yes) One (1) Diesel-Fuel Fired Powered Fire Water Pump: Equipped with an Engine Rated at 227 HP - 40 CFR Part 63 Subpart ZZZZ

NSPS (yes) One (1) Diesel-Fuel Fired Powered Fire Water Pump: Equipped with an Engine Rated at 227 HP - 40 CFR Part 60 Subpart IIII.

II. Compliance Information

A. Compliance Status

Is the facility currently in compliance with all applicable requirements? **Yes**

Are there any applicable requirements that will become effective during the permit term? **No**

B. Other Requirements:

a. Emissions Trading The facility is not involved in an emission trading program.

b. Acid Rain Requirements This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. **NESHAP** This facility is subject to NESHAP, 40 CFR Part 63 Subpart ZZZZ.

III. Public Participation Procedure

THE FOLLOWING AGENCIES WERE NOTIFIED OF THE TITLE V DRAFT PERMIT FOR THIS COMPANY:

1. EPA, Region IV
2. The Eastern Band of Cherokee Indians
3. The NC Dept. of Environment and Natural Resources
4. Virginia Department of Environmental Quality
5. Johnson City Environmental Field Office

RESPONSE TO COMMENTS

General Information

Facility Name: Plus Mark
Emission Source Reference No. 30-0132
Permit No.: 580324
Date Renewal Application Received: April 21, 2022
Date Application Deemed Complete: April 21, 2022
Date of Public Notice:
Date of Public Hearing:
Date of EPA Notification:
Date EPA Review completion:

Comment Summary

Commenter	Comment	Response
EPA Region IV		

IV. Project description

Title V operation permit No 580324 represents the third renewal of the original Title V permit No. 555500 issued June 7, 2006 subsequent renewal permit 564138 issued January 10, 2012, and subsequent renewal permit 571746 issued October 6, 2017. Changes incorporated with this renewal include the addition of source 11 from permit 979528. Conditions were updated to the new standard language. Construction permit 982087 was issued on May 22, 2024 to update the emissions in source 01, the boiler capacity and these changes were incorporated into the renewal permit. Update insignificant activity list. Move VOC/HAP content condition to general condition E4-4. Add facility wide ink usage limit to E4. Update to language to match standard conditions document. Remove source specific conditions for VOC fuel burning. Update conditions E7-4, E7-10 to calendar year to match E7-15. Update description of source 05. Conditions A-D and E1 were updated to match new standards.

Facility Emissions

Pollutant	Maximum Allowable Emissions (ton/year)	Actual Emissions (ton/year)
Particulate (TSP)	2.63	
Sulfur Dioxide	47.76	
Carbon Monoxide	16.44	
Volatile Organic Compounds	249.0	
Nitrogen Oxides	37.13	

Permitting Activities Since Issuance Permit 564138

1. Administrative Amendment #1 issued on February 9, 2012

The purpose of this administrative amendment was that the permittee shall submit their report to Environmental field office located in Johnson City, Tennessee.

2. Minor Modification # 1 issued on June 30, 2017

The purpose of this modification was to add one 227 hp Diesel-Fired Fire Water Pump to their Title V Permit 564138, New Emission Source 32-0132-10.

3. Minor Modification # 2 issued on June 30, 2017

The purpose of this modification was to increase material input rate for Emission Source 30-0132-05.

Facility changes per renewal permit 571746 as follows:

1. Revised Conditions A12, B5, and E2, E3-1, E3-2, E3-3, E4-2, E5-1, E5-2, E6-1, E6-4, E6-5, E6-11, E7-3, E7-4, E5-3, E5-4, E5-5, E5-9
2. Make Condition E5-9 compliance method for E5-2 and renumber accordingly
3. Pay annual emission fee based on actual
4. Remove boiler B1 (21.5 MMBtu/hr natural gas fired boiler) from source 30-0132-01.
5. Add changes from construction permit 979528
6. Update description of source 05
7. Added attachments 3-8
8. Added Condition E6-3 for facility wide VOC.