

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Blue Ridge Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Intertape Polymer Corporation
1101 Eagle Springs Road - Danville, Virginia
Permit No. BRRO-30823

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9VAC5 Chapter 80, Intertape Polymer Corporation has applied for a Title V Operating Permit for its Danville facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____
Terry Moore
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Air Permit Manager: _____ Date: _____
David J. Brown

Regional Director: _____ Date: _____
Robert J. Weld

FACILITY INFORMATION

Permittee

Intertape Polymer Corporation
1101 Eagle Springs Road
Danville, VA 24540

Facility

Intertape Polymer Corporation
1101 Eagle Springs Road
Danville, VA 24540

County-Plant Identification Number: 51- 143-00109

SOURCE DESCRIPTION

NAICS Code: 326113 - Unsupported plastics film and sheet

Intertape Polymer Corporation (aka Intertape Polymer GroupTM, IPG or Intertape) is a manufacturer of polypropylene based adhesive tape and polyethylene based stretch film. The production of the adhesive tape begins with the extrusion of compounded polypropylene pellets into a “film.” This film is then coated with adhesive and a release agent on one of two “coating lines” and wound on to rolls. After slitting to size, the adhesive tape is packaged for shipment. The two coating lines are the “hot melt” line and the “acrylic” line and both are subject to NSPS Subpart RR Pressure Sensitive Tape and Label Surface Coating, MACT Subpart JJJJ, Paper and Other Web Coating and MACT Subpart DDDDD Industrial, Commercial and Institutional Boilers and Process Heaters at major sources of HAPs. The production of the stretch film begins with extrusion of the polyethylene pellets into a film which is then slit to size and packaged for shipment.

The two toluene storage tanks and the Polybutene storage tank are not subject to NSPS Subpart Kb because they are below the exemption level of 75 cubic meters (19,815 gallons). Neither of the two 25,000 gallon resin storage tanks is subject to NSPS Subpart Kb because the indicated vapor pressure of the stored material is less than the applicability threshold of 15 kPa (2.18 psi).

MACT Subpart EEEE National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline) or OLD MACT is not applicable per §63.2338(c)(1), as discussed below in **PERMIT SHIELD AND INAPPLICABLE REQUIREMENT**.

With a potential-to-emit (PTE) of 241 tons of toluene per year, the facility is a Title V major source of Volatile Organic Compounds (VOC), and for Hazardous Air Pollutants (HAPs). This

source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was previously permitted under a NSR Permit issued on March 10, 2000 (3/10/00 permit) and is currently operating under the Title V permit (i.e., 8/12/10 T5)¹ with an expiration date of August 11, 2015. A permit exemption letter² was issued in September 2013.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit on May 15, 2013, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the Emissions Units and the insignificant emissions listed in the Title V permit (**T5**). Changes to the emissions units in the current Title V permit include the following as delineated:

- The following emissions units changed from insignificant to significant because the units are subject to MACT Subpart DDDDD and there are applicable requirements:
 - 1F – Cleaver Brooks boiler 5.23 MMBtu/hr natural gas fired
 - 15F – Cleaver Brooks boiler 8.16 MMBtu/hr natural gas fired
 - 6F – Six Hot Oil Heaters in extrusion
 - 8F – First Thermal hot oil heater
- The following are identified in the application as insignificant emissions units and are not listed in the current Title V permit:
 - 8T – 12,000 gals process oil storage tank
 - 9T – 500 gals waste³ oil tank
 - 27P – repelletizer
- Replacement of the Sly Tube Jet Model dust collector for the Hot Melt Coater Adhesive Compounding (Ref. 3P) with a Donaldson-Torit DF02-4)⁴.

¹ The current Title V permit has a signature date of August 10, 2010 and an effective date of August 12, 2010. This permit is referred to in this SOB as the 8/12/10 T5.

² Particulate emissions from PPE pellet handling for the extrusion lines estimated to be less than one ton/yr, were previously not controlled. The exemption letter addressed the following: One baghouse (Model #108MBT8) will treat process air from the Polypropylene Film Extrusions area (Unit ID #5P) and the other (Model #162MBT8) will treat the Cast extrusion lines (Unit ID #'s 14P, 15P, 16P & 25P).

³ Title V application identifies the tank as “waste oil”. However, IPG’s 6/16/15 letter states that the tank content is used gearbox oil, and that the oil is sent off-site for recycling.

⁴ This information provided by the updated application dated 3/24/15.

The Title V renewal application list the maximum rated capacity of the following emissions as 0.346 tons/hr; however the rated capacity based on the underlying NSR permit is 0.407 tons/hr as stated in the Title V permit and remains the same in the **T5** (i.e., 800 m/min, 2.2 wide, and 3.5 grams coating / m² ~ 0.407 tons/hr):

- 1P – Hot melt Coater, Solvent Coating
- 2P – Hot melt Coater, Solvent Drying
- 4P – Solvent Mixing

EMISSIONS INVENTORY

A copy of the 2014 annual emission update is attached. Emissions are summarized in the following tables.

2014 Actual Emissions

Emission Unit	2014 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	41.73	2.81	0.020	4.78	3.34

2014 Facility Hazardous Air Pollutant Emissions

Pollutant	2014 Hazardous Air Pollutant Emission in Tons/Yr
Toluene	37.48

The new Title V permit included the following general changes from the current Title V permit:

- New condition numbering format.
- The regional office name is updated to the current title (i.e., Blue Ridge Regional Office)
- On 11/7/12, a set of amendments to Virginia’s minor NSR program became effective. Those amendments included a new section 9VAC5-80-1255, “Actions to combine permit terms and conditions.” Because of the requirements of that section, it became important to distinguish between “permit approvals” and the “permit documents” in which such approval are housed. Therefore, the citations in the Title V permit now appear as “x/y/zz Permit Document” instead of “x/y/zz Permit”. Also, the “Applicable Permit Date” column in Emission Units Table is now “Permit Document Date”.

EMISSION UNIT APPLICABLE REQUIREMENTS

The emissions units⁵ at this facility are contained in the Emission Units table and the Insignificant Emission Units Condition of this Title V permit (**T5**), as represented by IPG's renewal application dated February 3, 2015 (2/3/15 application), the following updated applications⁶ and IPC's comments concerning the initial draft permit⁷:

- March 24, 2015 (3/24/15 application)⁸
- May 18, 2015 (5/18/15 application)⁹
- June 16, 2015 (6/16/15 application)¹⁰
- August 27, 2015 (8/27/15 application)¹¹

⁵ IPC has informed the DEQ of the following future changes:

- Intent to remove BOPP lines 1 & 2, two of six polypropylene film extruders identified as Insignificant Source No. 5P in the 8/12/10 T5 (see IPC's first letter dated April 19, 2016). IPC stated in its letter that it intends to formally remove these lines during the next standard renewal cycle of the Title V permit.
- Intent to install a new polyethylene tap production line (see IPC's second letter dated April 19, 2016).

Because the above changes are pending, they are not addressed in the draft Title V permit. However, they are included in the SOB for future reference.

⁶ Updated applications included revised pages to the Form 805. Attachment A to this SOB provides a status summary of the Form 805 and a summary of the changes.

⁷ Ron Burge's 5/20/16 email concerning corrections to equipment ID, stack ID and APC equipment ID. IPC accepted the draft permit per Ron Burge's 6/13/16 email.

⁸ The 3/24/15 application provides the following:

- Revised significant and insignificant equipment list (e.g., removed boilers from the insignificant list).
- MACT Subpart DDDDD information.
- MACT Subparts FFFF and HHHHH are not applicable.
- Replacement of the dust collector Sly Tube Jet Model for the Hot Melt Coater Adhesive Compounding with a Donaldson-Torit DF02-4. The new collector was installed May 2015 per IPG's 6/16/15 letter.
- Revised pages to the Form 805.
- Revised Figure 2 Coating Lines Process Schematic

⁹ The 5/18/15 application provides the following:

- Response to DEQ's 4/23/15 email for additional information.
- Corrected information concerning Process Heaters Unit 6F and 10F.
- Corrected and additional information concerning the MACT Subpart DDDDD.
- Revised pages to Form 805.

¹⁰ The 6/16/15 application provides the following:

- Response to DEQ's 6/1/15 email for additional information.
- Revised pages to Form 805.

¹¹ The 8/27/15 application provides the following:

- Response to DEQ's 7/31/15 email for additional information.
- Revised pages to Form 805.
- Revised Figures 2, 3 and 4.
- Documentation for not including cast extruder Unit 20P in the Title V permit.
- Request for a mutual shutdown letter for cleaning furnaces 13F and 14F to remove them from the current Title V permit; and not include them in the new Title V permit.

- January 29, 2016 (1/29/16 application)¹²

Applicable requirements from the 3/10/00 permit¹³, federal and Virginia air regulations are summarized in this statement of basis (SOB) as delineated below:

- 3/10/00 permit
- NSPS Subpart RR
- NSPS Subpart JJJJ
- MACT Subpart DDDDD Boiler and Process Heater
- Compliance Assurance Monitoring (CAM) Rule

The **T5** conditions are grouped and numbered in sequential order as summarized in this SOB beginning with the requirements for the adhesive coating lines, #1-Hot Melt and #2-Acrylic. Each group of conditions is further classifications into sub-categories (e.g., limitations, monitoring, recordkeeping, testing and reporting) as needed.

3/10/00 permit

The applicable Title V requirements from the 3/10/00 permit are included in the following **T5** section as summarized in the SOB under the same heading: Process Equipment Requirements - (Adhesive Coating Lines, #1-Hot Melt (1P, 2P, 3P, 4P, 6P) and #2-Acrylic (8P, 9P, 10P, 11P, and 12P).

The following conditions from the 3/10/00 permit contain same requirements as **T5** boilerplate conditions and are included in the stated **T5** condition:

- 2 equipment being modified by the 3/10/00 permit and previously permitted equipment - this equipment is listed in the **T5 Emission Units**¹⁴.
- 23 DEQ inspection of facility - **T5 No. 72**.
- 24 failure or malfunction of related APC equipment - **T5 No. 25**. However, the portion of *Condition 24* addressing the provision of Rule 5-3 (state toxics) and “shut down

¹² The 1/29/16 application, and the application cover letter dated January 26, 2016, provides the following:

- Response to DEQ’s 11/25/15 email concerning the final amendment to the MACT Subpart DDDDD (i.e. promulgated in the November 20, 2015 Federal Register) and the applicable requirements (identification and compliance status) and “limited use” as defined by Subpart DDDDD. IPG has eliminated the “limited use” designation for several of the combustion units.
- Ref No. 10F (i.e., Four “existing” Maxxon burners each with a rated input of 1.6 million Btu/hr used in the Acrylic Coater Dryer) is not identified as a process heater (i.e., the heat comes into direct contact with the product in the dryer), as stated in the Title V renewal application. This was confirmed with Ron Burge in a 2/8/16 telephone conversation. This unit is now listed as an insignificant emission in the **T5** permit.
- The 2/8/16 telephone conversation with Ron Burge also confirmed that there was no compliance plan and the facility was not subject to CAM as indicated on Page 15 sheet No. 2.

¹³ Conditions from the 3/10/00 permit are identified as follows: *Condition “X” 3/10/00*.

¹⁴ Cast extruder 20P listed in the 3/10/00 permit was never installed and is not included in the 8/12/10 T5 permit.

immediately upon request of the DEQ” is not retained in the **T5** because Rule 5-3 is not a Title V requirement (i.e., not federally enforceable).

The following conditions from the 3/10/00 permit are not included or specifically listed in the **T5** as delineated below:

- 1 identifies the application dates and amendment sheets for the 3/10/00 permit.
- 3 references 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations and states “except as specified as being more stringent in this permit”. All applicable requirements of Subpart RR are identified in the **T5** or streamlined out because the requirements of the 3/10/00 permit are more stringent. Therefore, condition 3 is not included in the **T5**.
- 8 initial performance tests required by NSPS Subpart RR – tests completed and results submitted.
- 19 written notification – notifications completed.
- 27 invalidation of the 3/10/00 permit – the modification as allowed by the 3/10/00 permit has been completed.

NSPS Subpart RR

Both coating lines are subject to NSPS Subpart RR per §60.440(a)¹⁵. Applicable requirements from this subpart are included in the following **T5** section as summarized in the SOB under the same heading: **Process Equipment Requirements - (Adhesive Coating Lines, #1-Hot Melt (1P, 2P, 3P, 4P, 6P) and #2-Acrylic (8P, 9P, 10P, 11P, and 12P))**. This **T5** section also includes Title V requirements from the 3/10/00 permit. Therefore, please note the following concerning the NSPS and 3/10/00 permit requirements:

- Paragraph (h) of §60.445 recordkeeping states “Records of the measurements required in §§60.443 and 60.445 must be retained for at least two years following the date of the measurements”; however, *Condition 21* of the 3/10/00 permit requires “All records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years”. **T5 general condition No. 56** requires “Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application”.

The NSPS required performance test uses one month of collected data rather than the average of three runs as specified in 40 CFR 60.8(f). Therefore, the NSR applicable requirements related to these initial performance tests are not included in the 8/12/10 T5 permit or the **T5** renewal

¹⁵§60.440(a) states “The affected facility to which the provisions of this subpart apply is each coating line used in the manufacture of pressure sensitive tape and label materials.” *Coating line*, per §60.441 “means any number or combination of adhesive, release, or precoat coating applicators, flashoff areas, and ovens which coat a continuous web, located between a web unwind station and a web rewind station, to produce pressure sensitive tape and label materials.”

permit.

MACT Subpart JJJJ

Both coating lines are subject to MACT Subpart JJJJ¹⁶. Applicable requirements are included in the following **T5** section as summarized in the SOB under the same heading: **Paper and Other Web Coating (POWC) MACT Requirements (40 CFR 63 Subpart JJJJ) - (Adhesive Coating Lines #1-Hot Melt (1P, 2P, 3P, 4P, 6P) and #2-Acrylic (8P, 9P, 10P, 11P, and 12P))**. Affiliated operations include storage of toluene (Tanks 1T and 2T) and are part of the paper and other web surface coating source category¹⁷. However, Subpart JJJJ contains no requirements for affiliated operations. Therefore, these tanks are not listed as identified equipment in the associated permit conditions headings.

MACT Subpart DDDDD Boiler and Process Heater

As previously noted the facility is a major source of HAPs; and therefore the applicability of the facility's boilers and process heaters are addressed below in "*Boilers and Process Heaters*". The applicable requirements are included in the following **T5** section as summarized in the SOB under the same heading: **National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters MACT Subpart DDDDD**.

Boilers

¹⁶ §63.3300 states "web coating lines engaged in the coating of fabric substrates for use in pressure sensitive tape)."; and per §63.3310 *Web coating line* "means any number of work stations, of which one or more applies a continuous layer of coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind or feed station and a rewind or cutting station."

¹⁷ **From Subpart JJJJ's preamble (see December 4, 2002 FR, page 72332):** (Note – Highlight added for emphasis.)

"**Affiliated operations such as** mixing or dissolving of coating ingredients prior to application; coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; cleaning of coating lines and coating line parts; handling and **storage of** coatings and **solvent**; and conveyance and treatment of wastewater **are part of the paper and other web surface coating source category.**"

From US EPA's Q&A for Subpart JJJJ dated May 29, 2003:

Q2: Are affiliated operations that are performed at web-coating lines covered under Subpart JJJJ or will they be subject to the Miscellaneous Organic Chemical Manufacturing NESHAP and the Miscellaneous Coating Manufacturing NESHAP?

A2: As indicated in the final rule preamble (67 FR 72332, II.B), certain affiliated operations performed at web-coating lines are part of the paper and other web source category. These **affiliated operations include:** (1) mixing or dissolving of coating ingredients prior to application; (2) coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; (3) cleaning of coating lines and coating line parts; (4) handling and **storage** of coatings and **solvents**; (5) and conveyance and treatment of wastewater. **Although they are part of the paper and other web source category, Subpart JJJJ has not set emission limits or other requirements for these affiliated operations.** These operations will not be covered by the MOCM or MCM NESHAPs. Affiliated operations that go beyond those described above may be subject to MOCM or MCM and will be identified as such in the MOCM and MCM rule."

Both boilers, as identified below, are “existing” sources as defined by Subpart DDDDD, with an initial compliance date of no later than 1/31/16:

- Cleaver Brooks (Ref. No. 1F) 5.23 MMBtu/hr natural gas fired
- Cleaver Brooks (Ref. No. 15) 8.16 MMBtu/hr natural gas fired

IPG identified Boiler 1F as not operated between the effective date of the rule and the compliance date for this unit. Therefore, the initial tune-up requirements are included in the **T5** for this boiler per §63.7510(j)¹⁸.

Process heaters

IPG identified process heaters and their classification (“new” or “existing”) as delineated below. The applicable requirements of MACT Subpart DDDDD are in the **T5** (See the MACT Subpart DDDDD section of the SOB.).

- Four hot oil heaters¹⁹ (i.e., Units 7²⁰, 4, 2 and 6) identified as Ref. No. 6F used in Extrusion for the Hot Melt Adhesive Coating Line (#1) are “existing” sources, except for Unit 7, which is “new” source.
- One “existing” hot oil heater identified as Ref. No. 8F used in the Hot Melt.

The compliance date for “existing” sources is no later than January 31, 2016. However, IPG has identified some of the “existing” process heaters as not operated between the effective date of the rule and the compliance date for this unit. Therefore, the initial tune-up requirement per §63.7510(j) is included in the **T5**. The compliance date for “new” is January 31, 2013 or upon startup, whichever is later²¹.

Compliance Assurance Monitoring (CAM) Rule

Generally, the requirements of 40 CFR 64, CAM, apply to each emissions unit meeting all three of the following criteria at a major source required to obtain a Title V permit:

- The unit emits or has the potential to emit (in the absence of add-on control devices) quantities of one or more regulated air pollutants that exceed major source thresholds,

¹⁸ §63.7510(j) “For existing affected sources (as defined in §63.7490) that have not operated between the effective date of the rule and the compliance date that is specified for your source in §63.7495 you must complete the initial compliance demonstration, if subject to the emission limits in Table 2 to this subpart, as specified in paragraphs (a) through (d) of this section, no later than 180 days after the re-start of the affected source and according to the applicable provisions in §63.7(a)(2) as cited in Table 10 to this subpart. You must complete an initial tune-up by following the procedures described in §63.7540(a)(10)(i) through (vi) no later than 30 days after the re-start of the affected source and, if applicable, complete the one-time energy assessment specified in Table 3 to this subpart, no later than the compliance date specified in §63.7495.”

¹⁹ The four heaters are individually identified for the purpose of regulatory applicability.

²⁰ Formerly identified as BOPP 5 – reference id changed in the Title V renewal application.

²¹ Unit 7 was installed in 2010 per IPG’s MACT Initial Notification Report.

- The unit is subject to one or more emission limitations for the regulated air pollutants for which it is major before control, and
- The unit uses a control device to achieve compliance with one or more of these emission limitations.

Only VOC emissions from the Hot Melt Adhesive Coating Line (#1) and Acrylic Adhesive Coating Line (#2) meet all three of the above criteria. 40 CFR 64.2(b) lists several specific exemptions to the CAM rule, including §64.2(b)(1)(i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. As previously stated these coating lines are subject to 40 CFR 63 Subpart JJJJ. This subpart was proposed on September 13, 2000 and addresses HAP emissions. The permitted HAPs emissions of toluene and VOC emissions from the two coating lines are the same value of 241 tons/yr. The monitoring requirements included in Subpart JJJJ are considered equivalent to CAM. Therefore, CAM conditions are not included in the Title V permit and a CAM Plan is not required.

Process Equipment Requirements - (Adhesive Coating Lines, #1-Hot Melt (1P, 2P, 3P, 4P, 6P) and #2-Acrylic (8P, 9P, 10P, 11P, and 12P))

The two Adhesive Coatings Lines are identified in the **T5** as delineated below:

- Hot Melt Adhesive Coating Line (#1) consists of the following and is identified in the **T5** as #1 - Hot Melt:
 - Hot melt Coater Solvent Coating (Ref. 1P)
 - Hot melt Coater Solvent Drying (Ref. 2P)
 - Hot melt Coater Adhesive Compounding (Ref. 3P)
 - Solvent Mixing (Ref. 4P)
 - Hot melt Coater Adhesive Coating (Ref. 6P)
- Acrylic Adhesive Coating Line (#2) consists of the following and is identified as the **T5** as #2 - Acrylic:
 - 2 - 500 gal closed mixing churns (Ref. 8P)
 - Acrylic Coater machine, Black Clawson, 2.2 M web (Ref. 9P)
 - Solvent release coating, Black Clawson, 2.2 M web (Ref. 10P)
 - Solvent Drying, Black Clawson, 2.2 M web (Ref. 11P)
 - Acrylic adhesive coating station, Black Clawson, 2.2 M web (Ref. 12P)

The applicable requirements for the two coating lines from the 3/10/00 permit and NSPS Subpart RR²² are included in the **T5** as summarized below:

Limitations

1. *Condition 4 3/10/00* – VOC emissions controlled requirements for Hot Melt line
2. *Condition 5 3/10/00* – VOC emissions controlled requirements Acrylic line

²² The specific regulatory sections of Subpart RR are stated in the appropriate **T5** condition.

3. *Condition 10 3/10/00* and NSPS Subpart RR – for each line the VOC emissions limit (i.e., 0.20 kg/VOC/kg of coating solids applied), 90% overall reduction or the % reduction specified in the NSPS
4. *Condition 11 3/10/00* and NSPS Subpart RR – procedures for determining compliance with the VOC emissions limit
5. *Condition 12 3/10/00* and NSPS Subpart RR – procedures for determining compliance with the VOC emissions reduction
6. *Condition 13 3/10/00* and NSPS Subpart RR – procedures for determining the VOC emissions reduction
7. *Condition 14 3/10/00* and NSPS Subpart RR – *additional NSPS requirements concerning demonstrating* compliance with the VOC emission limitation and percentage reduction.
8. *Condition 15 3/10/00* and NSPS Subpart RR – startup and shutdowns are normal operation; and include in computing the weighted average
9. *Condition 17 3/10/00* – annual emissions limits
10. *Condition 18 3/10/00* – material compliance used to demonstrate compliance with the annual limit

Monitoring

11. *Condition 6 3/10/00* – each carbon adsorption systems equipped with a device to continuously measures the VOC concentration of the exhaust gas to indicate breakthrough. Also, the following records required: manufacturer's recommendations for carbon bed replacement and actual carbon bed replacement.
12. *Condition 20 3/10/00* – VOC Emissions Monitoring Plan²³
13. *Condition 25 3/10/00* – scheduled and nonscheduled maintenance

The monitoring and recordkeeping required for the Adhesive Coating Lines #1-Hot Melt and #2-Acrylic is sufficient to assure compliance with the permitted limitations.

Recordkeeping

14. *Condition 21 3/10/00* and NSPS Subpart RR – records required by the 3/10/00 permit and Subpart RR; also, record the installation date and calibration date of the monitoring devices used for indicating the cumulative amount of VOC applied to each coating line and recovered by each carbon adsorption system.

Testing

15. *Condition 7 3/10/00* – permitted facility constructed to allow for testing
16. *Condition 9 3/10/00* and NSPS Subpart RR – performance testing

²³ Per the 5/16/13 DEQ inspection “The source maintains an updated VOC monitoring plan, which has not changed since it was submitted with the onsite inspection conducted on August 1, 2007.”

Reporting

17. *Condition 16 3/10/00* and NSPS Subpart RR – reports

General

The conditions from the 3/10/00 permit listed are included in the **T5** as general requirements²⁴ as delineated below:

- 18.** *Condition 30 3/10/00* – copy of the 3/10/00 permit on-site
- 19.** *Condition 22 3/10/00* – examples for modifying revoking the 3/10/00 permit
- 20.** *Condition 28 3/10/00* – notification requirements of change in ownership of the 3/10/00 permitted source
- 21.** *Condition 29 3/10/00* – emission data reporting

National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating (POWC) MACT 40 CFR 63 Subpart JJJJ

Per §63.3300 the affected source subject to this subpart is the collection of all web coating lines²⁵, which includes the Hot Melt Adhesive Coating Line (#1) and Acrylic Adhesive Coating Line (#2). The applicable requirements from MACT Subpart JJJJ are included in the **T5** as summarized below²⁶:

Limitations

22. thru 25 Applicable limitations

Monitoring

26. and 27 Applicable monitoring requirements

The monitoring and recordkeeping required by the MACT is sufficient to assure compliance with the limitations.

Recordkeeping

28. and 29 Applicable recordkeeping requirements

Testing

30. Clarifies that material balance is used to demonstrate compliance with the MACT and not

²⁴ Because the requirements relate to the 3/10/00 permit the corresponding **T5** condition replaces the word “permit” with “March 10, 2000 permit”.

²⁵ §63.3310 What definitions are used in this subpart?

“*Web coating line* means any number of work stations, of which one or more applies a continuous layer of coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind or feed station and a rewind or cutting station.”

²⁶ Toluene tanks 1T and 2T are affiliated operations and are part of the paper and other web surface coating source category. However, Subpart JJJJ does not contain emissions limits or requirements for affiliated operations. Therefore, the tanks are not listed with referenced equipment in **T5** conditions associated with MACT Subpart JJJJ (i.e., **T5 No. 22 through 32**).

a performance test.

Reporting

- 31. Compliance report²⁷
- 32. Startup, shutdown, and malfunction reports

National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters MACT Subpart DDDDD
Initial notification is not listed in the **T5** because the initial notification²⁸ has been submitted for all boilers and process heaters. Applicable requirements from Subpart DDDDD²⁹ are listed in **T5 33 through 45**, as delineated below:

Limitations and Work Practices

- 33. Identifies the boilers and process heaters subject to Subpart DDDDD; and the following sections of Subpart DDDDD are stated in the regulatory citations: §63.7499(l) for Gas 1 fuel category; §63.7485 for boiler or process heater at a major source; and §63.7490 for new and existing. Unit 7 of the Process Heaters 6F commenced construction June 4, 2010; therefore, is a “new” source.
- 34. Identifies the process heaters to meet the subpart’s definition of a process heater.
- 35. Addresses the one-time energy assessment. However, the assessment is not required³⁰ for new process heaters. The assessment applies at all times the affected unit is operating, except during periods of startup and shutdown during which time you must comply only with Table 3 of 40 CFR 63 Subpart DDDDD per §63.7500(f).
- 36. Addresses the tune-up work practice requirement as stated for the listed category in Table 3 of the Subpart per §63.7500(a)(1). This includes records during periods of startup and shutdown; and provide reports concerning activities and periods of startup and shutdown, as specified in §63.7555³¹. Also, subsequent tune-ups are addressed by §63.7500(e) and §63.7515(d). Initial tune-ups are addressed in **T5 Condition 39** Initial Compliance.

²⁷ This condition corresponds to Condition IV.F.d of the 8/12/10 T5, which states “information specified in condition IV.F.1.(d)(i) through (vi)”. However, there is no “(vi)” in the 8/12/10 T5 condition. The information specified in “(d)(i) through (v)” corresponds to the required information listed in §63.3400(c)(2)(i) through (v). §63.3400(c)(2)(vi) addresses emission limit deviation where the source is using a CEMS, which is not applicable to IPG. Therefore, the information required by §63.3400(c)(2)(vi) is not included in the 8/12/10 T5 and in the **T5**.

²⁸ Copy of notification provided with IPG’s 5/18/15 application; however, as noted in IPG’s cover letter (see item 7 (the notification “erroneously included the five flame treaters of Unit 3F. These flame treaters do not meet the definition of Process Heater in 40 CFR 63.7575.”

²⁹ Subpart DDDDD’s requirements use the word “must” and some of these requirements appear verbatim in the T5 permit. Therefore, the word “must” is used instead of “shall” in the T5 conditions that address Subpart DDDDD requirements.

³⁰ Table 3 of Subpart DDDDD list the energy assessment as a requirement for “existing” boiler at a major HAP source, but not for “new” boiler.

³¹ Items 5 and 6 of Table 3 to Subpart DDDDD address startup and shutdown, respectively; and both reference §63.7555.

37. General duty to operate and maintain APC equipment, etc.

Monitoring

Other than recordkeeping, no specific monitoring requirements from Subpart DDDDD were identified for the emission units. The recordkeeping required by the MACT is sufficient to assure compliance with the limitations (work practice standards).

Recordkeeping

38. Applicable records required by Subpart DDDDD.

Compliance

39. Demonstrating initial compliance with respect to work practices as delineated below:

39.a All the boilers and process heaters are “existing” as defined by the Subpart DDDDD, except for One First Thermal Hot Oil Heater (Unit 7) which is addressed by **T5 No. 39.b**. A “1/31/16” initial compliance for existing sources is established by §63.749. This compliance date has passed and IPG’s submitted information concerning the status of the energy assessment and the initial tune-ups. However, the onetime energy assessment and the initial tune-ups are included in this **T5** condition to identify applicable work practices and establish dates for completing future tune-ups.

39.b Unit 7 began operation in December 2010³²; therefore, a “12/1/10” initial compliance date is stated for the purpose of establishing a date to complete subsequent tune-up. A “new” unit is not required to be included in the energy assessment.

39.c Addresses those “existing” boilers and process heaters that have not operate between January 31, 2013 and January 31, 2016, which includes on Boiler 1F. If Boiler 1F is re-started the initial tune-up must be completed no later than 30-days after the re-start.

40. Demonstrating continuous compliance. §63.7540(a)(11)³³ requires a biennial tune-up for boiler or process heater with a heat input capacity of less than 10 MMBtu/hr, except as specified §63.7540(a)(12)³⁴. The facility’s boilers and process heaters are each less than

³² As stated in IPG’s 5/18/15 application.

³³ **§63.7540(a)(11)** “If your boiler or process heater has a heat input capacity of less than 10 million Btu per hour (except as specified in paragraph (a)(12) of this section), you must conduct a biennial tune-up of the boiler or process heater as specified in paragraphs (a)(10)(i) through (vi) of this section to demonstrate continuous compliance”.

³⁴ **§63.7540(a)(12)** “If your boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio, or a heat input capacity of less than or equal to 5 million Btu per hour and the unit is in the units designed to burn gas 1; units designed to burn gas 2 (other); or units designed to burn light liquid subcategories, or meets the definition of limited-use boiler or process heater in §63.7575, you must conduct a tune-up of the boiler or process heater every 5 years as specified in paragraphs (a)(10)(i) through (vi) of this section to demonstrate continuous compliance. You may delay the burner inspection specified in paragraph (a)(10)(i) of this section until

10 MMBtu and burn natural gas. However, all the process heaters are less than or equal to 5 million Btu and the tune-up is every five years as stated in §63.7540(a)(12).

41. Identifies when the work practices apply

Reporting

42. Compliance reports per Subpart DDDDD's Table 9 as required by 63.7550(a). Also, the following are listed in the condition: §63.7550(b) - when to report; (63.7550(c) - information to include in the report (Note: (c)(1) and (c)(5)(i) through (iv) and xiv) are applicable to the facility); and §63.7550(h) - procedures for submitting the report (Note: only item (3), electronically, applies.).

Notifications

43. Initial compliance notifications

44. Notifications concerning Subpart DDDDD and Subpart A of 40 CFR Part 63

General Provisions

45. General provisions of 40 CFR 63, as indicated in Table 10 of Subpart DDDDD. Table 10 was amended in the November 2015 amendment of Subpart DDDDD (e.g., the startup, shutdown, malfunction (SSM) exemption is no longer allowed).

FACILITY WIDE CONDITIONS

There are no specific facility wide conditions.

STREAMLINED REQUIREMENTS

The initial performance tests for NSPS Subpart RR were completed; and therefore, are not included in the **T5**; and other requirements as previously identified in this SOB (e.g., MACT Subpart DDDDD recordkeeping requirement.).

INSIGNIFICANT EMISSION UNITS

The insignificant emission units identified in **T5 Condition 46**³⁵ are presumed to be in

the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months.”
[highlight added for emphasis]

³⁵ Changes to the insignificant emission units in the current Title V permit per IPG's 6/16/15 application:

- Boilers and process heaters not listed in the insignificant emission unit condition because of MACT Subpart DDDDD.
- Electric Cleaning Furnace (14F) – permanently shutdown per mutual shutdown agreement dated October 21, 2015. Therefore, not listed in the draft **T5** permit.
- Gas Fired Cleaning Furnace (13F) – permanently shutdown per mutual shutdown agreement dated October

compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9VAC5-80-110.

PERMIT SHIELD AND INAPPLICABLE REQUIREMENTS – T5-47

Inapplicable requirements are identified as delineated below:

- **40 CFR 63, Subpart FFFF, Miscellaneous Organic Chemical Production and Processes.** The requirements of Subpart FFFF do not apply to affiliated operations at facilities under subpart 40 CFR 63 Subpart JJJJ per §63.2435(c)(3)³⁶. Subpart FFFF is identified as an inapplicable requirement in the 8/12/10 T5. However, it is not listed in **T5-47** because IPG did not identify it as an inapplicable requirement in its T5 application.
- **40 CFR 63, Subpart HHHHH, Miscellaneous Coating Manufacturing.** The requirements of Subpart HHHHH do not apply to affiliated operations at facilities under subpart 40 CFR 63 Subpart JJJJ per §63.7985(d)(2)³⁷. Subpart HHHHH is identified as

21, 2015. Therefore, not listed in the draft **T5** permit.

- For 16F – the Number of Enercon Corona Treaters changed from six to four.
- Corrections to the pollutants emitted:
 - PM replaced with PM/PM10
 - VOC removed from the following due to typographical error from a past permit: 16F; 5P (Six Polypropylene film extruders); 14P-16P (Cast Extrusions); 17P-19P (Blown Extrusions); and 21P&24P (Repelletizers).
 - VOC identified as the pollutant for 7T (Two Acrylic storage tanks) – previously no pollutant identified – “none (water-based)” stated in the current Title V.

³⁶ §63.2435(c)(3): “The requirements in this subpart do not apply to the operations specified in paragraphs (c)(1) through (7) of this section.

(1)...

(3) The affiliated operations located at an affected source under subparts GG (National Emission Standards for Aerospace Manufacturing and Rework Facilities), KK (National Emission Standards for the Printing and Publishing Industry), JJJJ (NESHAP: Paper and Other Web Coating), future MMMM (NESHAP: Surface Coating of Miscellaneous Metal Parts and Products), and SSSS (NESHAP: Surface Coating of Metal Coil) of this part 63. Affiliated operations include, but are not limited to, mixing or dissolving of coating ingredients; coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; cleaning of coating lines and coating line parts; handling and storage of coatings and solvent; and conveyance and treatment of wastewater...”

³⁷ §63.7985(d)(2): “The requirements for miscellaneous coating manufacturing sources in this subpart do not apply to operations described in paragraphs (d)(1) through (5) of this section.

(1)...

(2) The affiliated operations located at an affected source under subparts GG (National Emission Standards for Aerospace Manufacturing and Rework Facilities), KK (National Emission Standards for the Printing and Publishing Industry), JJJJ (NESHAP: Paper and Other Web Coating), future MMMM (National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations) and SSSS (NESHAP: Surface Coating of Metal Coil) of 40 CFR part 63. Affiliated operations include, but are not limited to, mixing or dissolving of coating ingredients; coating mixing for viscosity adjustment, color tint or additive blending, or pH adjustment; cleaning of coating lines and coating line parts; handling and storage of coatings and solvent; and conveyance and treatment of

an inapplicable requirement in the 8/12/10 T5. However, it is not listed in **T5-47** because IPG did not identify it as an inapplicable requirement in its T5 application.

- **40 CFR 63, Subpart EEEE, National Emission Standards for Hazardous Air Pollutants Organic Liquids Distribution.** Toluene is an organic liquid as identified in Subpart EEEE and is used for and recovered from both Hot Melt Adhesive Coating and Acrylic Adhesive Coating Lines. IPG in a March 14, 2016 letter³⁸ identified the two toluene tanks as not subject to the 40 CFR Part 63 Subpart EEEE regulations as specified in §63.2338(c)(1)³⁹. As previously stated in this SOB the two toluene tanks are part of the paper and other web surface coating source category for 40 CFR 63 Subpart JJJJ; and Subpart JJJJ has no requirements for the storage of organic liquids (see Footnote 17). Subpart EEEE is identified in **T5-47**.

GENERAL CONDITIONS⁴⁰

The permit contains general conditions (Conditions No. **48 through No. 84**) required by 40 CFR Part 70 and 9VAC5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions. Comments on specific general conditions are provided as delineated below.

Permit Expiration - No. 49 through 54

These conditions refer to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

Failure/Malfunction Reporting - No. 60

Section 9VAC5-20-180⁴¹ requires malfunction and excess emission reporting within four hours

wastewater...”

³⁸ Letter from Mr. Ronald Burge Plant Engineering Manager.

³⁹ §63.2338(c)(1): “The equipment listed in paragraphs (c)(1) through (4) of this section and used in the identified operations is excluded from the affected source...”

(1) Storage tanks, transfer racks, transport vehicles, containers, and equipment leak components that are part of an affected source under another 40 CFR part 63 national emission standards for hazardous air pollutants (NESHAP).”

⁴⁰ The four Title V boilerplate general permit conditions addressing Malfunction as an Affirmative Defense are not included in the Title V permit due to the regulatory change related to SSM SIP Call which is effective June 1, 2016.

⁴¹ Effective June 1, 2016 9VAC5-20-180 C and 9VAD5-20-180 G are amended (see below) to remove an impermissible affirmative defense from the malfunction. Therefore, T5 General Condition addressing “Failure/Malfunction Reporting” (i.e., No. 60) is revised to read as stated in the T5.

9VAC5-20-180 C.In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, ~~as~~

of discovery. Section 9VAC5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9VAC5-20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. Section 9VAC5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9VAC5-20-180 and 9VAC5-80-250. The report must be made within four daytime business hours of discovery of the malfunction. The facility is subject to 9VAC5-50-50 C for new source.

Permit Modification - No. 64

This general condition cites the sections that follow:

- 9VAC5-80-50. Applicability, Federal Operating Permit For Stationary Sources
- 9VAC5-80-190. Changes to Permits
- 9VAC5-80-260. Enforcement
- 9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources
- 9VAC5-80-1605. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
- 9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major

~~soon as practicable but~~ (i) no later than four daytime business hours after the malfunction is discovered; notify the board ~~by facsimile transmission, telephone or telegraph~~ of such failure or malfunction and shall (ii) within ~~two weeks~~ 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown ~~and the demonstrations in subsection G of this section~~. Owners subject to the requirements of 9VAC5-40-50 C and 9VAC5-50-50 C are not required to provide the written statement prescribed in this subsection for facilities subject to the monitoring requirements of 9VAC5-40-40 and 9VAC5-50-40. When the condition causing the failure or malfunction has been corrected and the facility or control equipment is again in operation, the owner shall notify the board.

9VAC5-20-180 G. ~~No violation of applicable emission standards or monitoring requirements shall be judged to have taken place~~ In accordance with subsection C of this section, if the excess emissions or cessation of monitoring activities is due to a malfunction, ~~provided that~~ the owner may demonstrate the following:

1. The cause of the excess emissions or cessation of monitoring activities meets the definition of malfunction provided in 9VAC5-10-20;

~~1-2.~~ 2. The procedural requirements of this section were met or the owner has submitted an acceptable application for a variance, which is subsequently granted;

~~2-3.~~ 3. The owner has taken expeditious and reasonable measures to minimize emissions during the breakdown period;

~~3-4.~~ 4. The owner has taken expeditious and reasonable measures to correct the malfunction and return the facility to a normal operation; and

~~4-5.~~ 5. The source is in compliance with related applicable emission standards or monitoring requirements at least 90% of the operating time over the most recent 12-month period.

Modifications Locating in Nonattainment Areas

Asbestos Requirements - No. 81

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

GREENHOUSE GAS (GHG) EMISSIONS

GHG permitting requirements have not been identified. IPG is major for VOC (241 tons/yr - see **T5 No. 9**). However, the total Greenhouse Gas (GHG) PTE is less than 100,000 tons/yr as shown in Attachment B GHG Calculations.

STATE ONLY APPLICABLE REQUIREMENTS

There are no state only requirements in the Title V permit.

FUTURE APPLICABLE REQUIREMENTS

None identified.

COMPLIANCE PLAN

None

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in The Danville Register & Bee from June 23, 2016 to July 25, 2016. No comments were received during the comment period.

CHANGES TO DRAFT PERMIT

As stated above, comments were not received during the public comment period. However, Intertape identified corrections to the Facility Information (i.e., facility's responsible official name and contact person's telephone number). Also, US EPA made suggestions concerning Conditions 4, 6 and 36.b; and as a result changes were made to the following conditions as delineated:

- Condition 4: Regulatory citation changed from "60.442" to "60.443(a)"
- Condition 6: Regulatory citation changed from "60.443(b)" to "60.443(c)"
- Condition 36.b: Condition revised to clarify that "a tune-up must be completed" for the process heaters in Condition 33.

- Condition 46: The Btu input for the four burners for Emission Unit 10F revised from “1.25” to “1.6” MMBtu/hr; and “each” added for clarification.

The above changes are considered corrections and do not result in a change to applicable federal enforcement requirements.

ATTACHMENTS

Attachment A – Form 805 Submittal - Revision/Replacement Status

Attachment B – GHG Calculations

**Intertape Polymer Group (Reg. 30823) Title V Renewal
Form 805 Submittal - Revision/Replacement Status
Attachment A to SOB dated Date]**

Form 805 (Page i - Check List)	Form 805		Updated 805 Pages and Documents					
	Page	Sheet	2/3/15	3/24/15	5/18/15	6/16/15	8/27/15	1/29/16
	No.	No.		Note 3	Note 4	Note 5	Note 6	Note 7
Contents (certification)			x	x	x	-	x	x
General Information	1		x	-	-	-	-	-
General Information, continued	2		x	-	-	-	-	-
Fuel-Burning Equipment	3		x	-	x	-	-	x
Processing	4	1	x	x	-	-	-	-
		2	x	x	-	-	-	-
VOCs in Inks, Coatings, Stains and Adhesives	5		x	-	-	-	-	-
HAPs in Inks, Coatings, Stains and Adhesives	6		x	-	-	-	-	-
Incinerators for Liquid and/or Solid Waste	7		-	-	-	-	-	-
Loading Racks and Oil-water Separators	8		-	-	-	-	-	-
Stack/Fugitive Emissions Parameters (see Note 9)	9		x	x	-	-	x	x
Air Pollution Control Equipment (see Note 9)	10		x	x	-	-	x	-
Air Pollution Control/Supplemental Information	11		x	x	-	-	x	-
Annual Air Pollutant Emissions	12		x	-	-	-	-	-
Pollutants for which This Source is major	13		x	-	-	-	-	-
Applicable Requirements, page 1 of 3	14	1	x	x	x	x	x	-
		2	x	x	-	-	-	x
Applicable Requirements, page 2 of 3	15	1	x	-	-	-	-	-
		2	-	-	-	-	-	x
Applicable Requirements, page 3 of 3	16		x	x	-	-	-	x
Streamlining Applicable Requirements	17		-	-	-	-	-	-
Insignificant Emission Units/Activities	18	1	x	x	-	x	-	-
		2	x	x	-	-	-	-
		3	x	x	-	-	-	-
		4	x	x	-	-	-	-
Compliance Certification, Page 1 of 3	19		x	x	x	x	-	-
Compliance Certification, Page 2 of 3	20		x	x	x	x	-	x
Compliance Certification, Page 3 of 3	21		x	x	-	x	-	-

**Intertape Polymer Group (Reg. 30823) Title V Renewal
Form 805 Submittal - Revision/Replacement Status
Attachment A to SOB dated Date]**

Form 805 (Page i - Check List)	Form 805		Updated 805 Pages and Documents					
	Page	Sheet	2/3/15	3/24/15	5/18/15	6/16/15	8/27/15	1/29/16
	No.	No.		Note 3	Note 4	Note 5	Note 6	Note 7
								-
<i>Optional Pages</i>								-
Potential to Emit Worksheet	1		-	-	-	-	-	-
Insignificant Activities Worksheet	2		-	-	-	-	-	-
Requirements that do not Apply (see Note 8)	3		-	-	-	-	-	-
VOC/Petroleum Liquid Storage Tanks	4 - 6		-	-	-	-	-	-
<i>List Attached Documents</i>			Note 2					
Map			x	-	-	-	-	-
Facility Site Plan			x	-	-	-	-	-
Process Flow Diagram/Schematic			x	x	-	-	-	-
Figure 1 Manufacturing Process			x	-	-	-	-	-
Figure 2 Coating Lines Process Schematic			x	x	-	-	x	-
Figure 3 Solvent Recovery Process Schematic			x	-	-	-	x	-
Figure 4 Toluene Storage Tank Farm Process Schematic			x	-	-	-	x	-
Figure 5 Release Agent Compounding Process Schematic			x	-	-	-	-	-
Figure 6 Stretch Film Plant Process Schematic			x	-	-	x	-	-
MSDS			-	-	-	-	-	-
Estimated Emissions Calculations			-	-	-	Note 5.b	-	-
Stack Tests			-	-	-	-	-	-
Suggested Draft Permit			-	-	-	-	-	-
List of Cross-References			-	-	-	-	-	-
Statement and Verification of Confidential Information			-	-	-	-	-	-

Notes	Comments
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**Intertape Polymer Group (Reg. 30823) Title V Renewal
Form 805 Submittal - Revision/Replacement Status
Attachment A to SOB dated Date]**

Form 805 (Page i - Check List)	Form 805		Updated 805 Pages and Documents					
	Page	Sheet	2/3/15	3/24/15	5/18/15	6/16/15	8/27/15	1/29/16
	No.	No.		Note 3	Note 4	Note 5	Note 6	Note 7
	The yellow highlighted identifies the latest submitted page or document .							
	"x" shows submitted in the submittal							
	"-" shows not submitted							
1	General							
1.a	The listed date is the date on the Document Certification Form							
1.b	Form 805 has been updated/revised via several submittals.							
1.c	More information may be found in the corresponding SOB.							
2	The following documents included in the 2/3/15 submittal							
	Attachment A - Process Schematics (Figures 1 thru 6)							
	Attachment B - Facility Site Plan							
	Attachment C - Site Map							
3	The following included in the 3/24/15 submittal:							
3.a	Response to DEQ email dated 3/3/15 for more information							
3.b	Form 805 changes (Note: Additional changes to the 805 also provided by the 5/18/15 and 6/16/15 submittals - see Notes 4 and 5, respectively.):							
3.b.i	Revised significant and insignificant equipment list (e.g., removed boilers from the insignificant list).							
3.b.ii	MACT Subpart DDDDD information as follows:							
	Identification of process heaters							
	Identification of "existing" and "new" emissions units as defined by the MACT Subpart DDDDD; and none of the units are "reconstructed".							
	Limited use request.							
3.b.iii	Identification that the MACT Subparts FFFF and HHHHH are not applicable.							
3.b.iv	New page 3 Fuel Burning							
3.b.v	Revised page 4 Process Operations, sheet 1 (5P removed) and sheet 2 (no change)							
3.b.vi	Revised page 9 Stack Parameters, sheet 1 (8P and 10P included with 11P)							
3.b.vii	Revised page 10 APC equipment, sheet 1 (1P and 4P included with 2P; 8P and 10P included with 11P; control device reference numbers corrected; manufacturer of APC for 3P changed)							
3.b.viii	Revised page 11 APC equipment, sheet 1 (control device reference numbers corrected)							
3.b.ix	Revised page 14 Applicable Requirements, sheet 1 (26P added to emissions unit subject to Subparts RR and JJJ) and sheet 2 (boilers and process heaters listed for Subpart DDDDD)							

**Intertape Polymer Group (Reg. 30823) Title V Renewal
Form 805 Submittal - Revision/Replacement Status
Attachment A to SOB dated Date]**

Form 805 (Page i - Check List)	Form 805		Updated 805 Pages and Documents					
	Page	Sheet	2/3/15	3/24/15	5/18/15	6/16/15	8/27/15	1/29/16
	No.	No.		Note 3	Note 4	Note 5	Note 6	Note 7
3.b.x	Revised page 16 Applicable Requirements, sheet 1 (linkage numbers 8, 9 and 11 added to 10 for maintenance records; and linkage numbers 9, 10 and 11 for records added for combustion units)							
3.b.xi	Revised page 18 Insignificant Emission Units, sheets 1 through 4 (entries corrected to properly identify those units that are insignificant – see emission unit discussion in the engineering analysis).							
3.b.xii	Revised pages 19 through 21 Compliance Certification (pages 1 through 3)							
3.b.xiii	Figure 2 Coating Lines Process Schematic - stack removed from 11P.							
4	The following included in the 5/18/15 submittal:							
4.a	Response to DEQ email dated 4/23/15 for more information							
4.b	Copy of MACT Subpart DDDD initial notification report - dated 5/21/13							
4.c	Form 805 changes:							
4.c.i	Corrected information concerning Process Heaters Unit 10F as follows:							
	Revised Page 3 - Btu capacity corrected from 1.5 to 1.6 MMBtu/hr each							
	Revised Page 14, Sheet No. 2 - Number of burners corrected to four to match with page 3.							
4.c.ii	Corrected information concerning Process Heaters Unit 6 as stated below. This identifies “existing”, the one “new” and the two “limited use” process heaters.							
	Revised Pages 3 and 14 - Individual units identified and Btu capacities listed instead of a maximum capacity of the units.							
	The "new" process heater is now identified as “Unit 7” instead of “BOPP 5”.							
	The “limited use” heaters are Units 2 and 6.							
4.c.ii	Corrected and additional information concerning the MACT Subpart DDDDD							
	Revised Page 14, Sheet No. 2 – Unit specific identifications for the burners added.							
	A copy of the initial MACT notification							
	Corrected Page 19 to reflect current compliance status.							
	Revised Page 20 to clarify that Unit 7 is not part of future compliance requirement							
5	The following included in the 6/16/15 submittal:							
5.a	Response to DEQ email dated 6/1/15 for more information							
5.b	Emissions calculations for specific insignificant emissions units attached to submittal.							
	Emission Unit	Ref No						
	Thirteen Gas Space heaters	2F						
	Six Flame Treaters in Extrusion	3F						

**Intertape Polymer Group (Reg. 30823) Title V Renewal
Form 805 Submittal - Revision/Replacement Status
Attachment A to SOB dated Date]**

Form 805 (Page i - Check List)	Form 805		Updated 805 Pages and Documents					
	Page	Sheet	2/3/15	3/24/15	5/18/15	6/16/15	8/27/15	1/29/16
	No.	No.		Note 3	Note 4	Note 5	Note 6	Note 7
	Two Make-up Air Units	4F						
	Two Office Heaters	7F						
	Total of twenty space heaters	11F-12F						
	Gas fired cleaning furnace	13F	Shutdown per Mutual Shutdown Letter effective date of 10/21/15					
	Four Enercon Corona Treaters	16F						
	Six Polypropylene film Extruders	5P						
	Tape slitting for Hot Melt Line	7P						
	Tape slitting for Acrylic Line	13P						
	Cast Extrusions	14P-16P						
	Blown Extrusion	17P-19P						
	Repelletizers	21P&24P						
	Cast Extrusion	25P						
	Two Polyethylene storage silos	26P						
	Repelletizer	27P						
5.c	Form 805 changes:							
5.c.i	Revised/replacement page 14 Applicable Requirements Sheet No. 1 to correctly identify units that are part of the affected facility subject to Subparts RR and JJJ. Emission units 25P and 26P removed from Item 1 on Page 14 (Note: These emissions units should also be removed from the other items on Page 14 Sheet No. 1.).							
5.c.ii	Insignificant Emission Units/Activities updated - Cleaning furnaces 14F and 13F removed from the list (see Note 6.b).							
5.c.iii	Compliance Certification (pages 19 - 21) - page 21 (signature page) missing from the 5/18/15 submittal.							
5.c.iv	Revised Figure 6 - Silos Ref. No. 26P added.							
6	The following included in the 8/27/15 submittal, in response to Terry Moore's 7/31/15 email. Also, to clarify unit designations and avoid duplications, pages 9, 10 and 11 of the Form 805 and three identified process diagrams are modified.							
6.a	Page 14, Sheet 1 revised to remove the following as being applicable to NSPS Subpart RR and MACT Subpart JJJJ.							
6.b	Cleaning furnaces 13F and 14 F - request mutual shutdown letter to remove furnaces from the Title V permit.							
6.c	Unit 20P - confirmation that this cast extruder never existed.							
7	The below included in the 1/29/16 submittal, in response to Terry Moore's emails dated 12/4/16 and 12/15/16 concerning "Limited Use" designation and compliance status with respect to the 1/31/16 compliance date.							
7.a	Page 3 fuel burning - "Limited Use" removed equipment description							

**Intertape Polymer Group (Reg. 30823) Title V Renewal
Form 805 Submittal - Revision/Replacement Status
Attachment A to SOB dated Date]**

Form 805 (Page i - Check List)	Form 805		Updated 805 Pages and Documents					
	Page	Sheet	2/3/15	3/24/15	5/18/15	6/16/15	8/27/15	1/29/16
	No.	No.		Note 3	Note 4	Note 5	Note 6	Note 7
7.b	Page 14 Applicable Requirements - Sheet No. 2 revised:							
7.b.i	Limited use classification removed and these units included with other group of emissions units							
7.b.ii	Unit 10 F is not listed because it is not a process heater by definition. Unit 10F status confirmed with Ron Burge in a 2/8/16 telephone conversation.							
7.c	Page 15 Applicable Requirements - Sheet No. 2 added to identify initial audit, tune-ups and subsequent periodic tune-ups. Confirmed with Ron Burge in a 2/8/16 telephone conversation that there was no Compliance Plan (i.e., Boilers and process heaters in compliance with Subpart DDDDD) and the units are not subject to CAM.							
7.d	Page 16 Applicable Requirements - Sheet No. 1 updated to reflect the change to "linkage numbers" on page 14 (i.e., limited use line item removed on page 14).							
7.e	Compliance Certification Page 20 - Boiler MACT removed because the compliance date of 1/31/16 has passed; and energy assessment completed. Initial tune-up completed except for units that were not in operation. Initial tune-up for these units will be performed when they are operated.							

Attachment B of Draft SOB

Greenhouse Gas Emissions - Industrial Boilers (Heat Input Between 10 MMBtu/hr and 100 MMBtu/hr)

Source Name:	Intertape	for Title V permit renewal
Reg. No.:	30823	
Boiler Capacity:	34.38	MMBtu/hr Total Btu of fuel burning equipment (boilers, process heaters, dryers)

THROUGHPUTS	#6 Fuel Oil ^a		#5 Fuel Oil ^a		#4 Fuel Oil ^a		#2 Fuel Oil ^a		#1 Fuel Oil ^a		Natural Gas ^b		LPG ^c		Total Hours per Year
per hour:	0	(gal/hr)	33	(mcf/hr)	0	(gal/hr)									
per year:	0.0	(gal/yr)	291,265.8	(mcf/yr)	0.0	(gal/yr)									
max allowable / yr	2,007,792	(gal/yr)	2,062,800	(gal/yr)	2,091,450	(gal/yr)	2,198,312	(gal/yr)	2,247,528	(gal/yr)	291,266	(mcf/yr)	3,291,462	(gal/yr)	
hours/yr:	0	(hr/yr)	8760	(hr/yr)	0	(hr/yr)	8760								
Heat Content:	150,000	(BTU/gal)	146,000	(BTU/gal)	144,000	(BTU/gal)	137,000	(BTU/gal)	134,000	(BTU/gal)	1,034	(BTU/ft ³)	91,500	(BTU/gal)	

EMISSION FACTORS

Pollutants	#6 Fuel Oil ^a		#5 Fuel Oil ^{a,e}		#4 Fuel Oil ^{a,e}		#2 Fuel Oil ^a		#1 Fuel Oil ^{a,d}		Natural Gas ^b		LPG ^c	
	(lb/1000 gal)	GWP Factor	(lb/1000 gal)	GWP Factor	(lb/1000 gal)	GWP Factor	(lb/1000 gal)	GWP Factor	(lb/1000 gal)	GWP Factor	(lb/MMft ³)	GWP Factor	(lb/1000 gal)	GWP Factor
CO ₂	25,000.00	1	25,000.00	1	25,000.00	1	22,300.00	1	22,300.00	1	120,000.00	1	12,500.00	1
N ₂ O	0.530	310	0.530	310	0.530	310	0.260	310	0.260	310	2.200	310	0.900	310
Methane	1.000	21	1.000	21	0.052	21	0.052	21	0.052	21	2.300	21	0.200	21

MASS BASIS EMISSIONS - (TONS/YR)

Pollutants	#6 Fuel Oil (tons/yr)	#5 Fuel Oil (tons/yr)	#4 Fuel Oil (tons/yr)	#2 Fuel Oil (tons/yr)	#1 Fuel Oil (tons/yr)	Natural Gas (tons/yr)	LPG (tons/yr)	TOTAL (tons/yr)
CO ₂	0.00	0.00	0.00	0.00	0.00	17,475.95	0.00	17,475.95
N ₂ O	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.20E-01	0.00E+00	0.32
Methane	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.35E-01	0.00E+00	0.33
TOTAL	0.00	0.00	0.00	0.00	0.00	17,476.60	0.00	17,476.60

CARBON DIOXIDE EQUIVALENT (CO₂e) EMISSIONS - (TONS/YR)

Pollutants	#6 Fuel Oil (tons/yr)	#5 Fuel Oil (tons/yr)	#4 Fuel Oil (tons/yr)	#2 Fuel Oil (tons/yr)	#1 Fuel Oil (tons/yr)	Natural Gas (tons/yr)	LPG (tons/yr)	TOTAL (tons/yr)
CO ₂	0.00	0.00	0.00	0.00	0.00	17,475.95	0.00	17,475.95
N ₂ O	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	9.93E+01	0.00E+00	99.32
Methane	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	7.03E+00	0.00E+00	7.03
TOTAL	0.00	0.00	0.00	0.00	0.00	17,582.30	0.00	17,582.30

SUMMARY

Pollutants	Mass Basis (tons/yr)	CO ₂ e Basis (tons/yr)
CO ₂	17,475.95	17,475.95
N ₂ O	0.32	99.32
Methane	0.33	7.03
TOTAL	17,476.60	17,582.30

Notes:

- a - Emission factors taken from AP-42 Chapter 1.3 (5/10), Tables 1.3-3, 1.3-8, and 1.3-12.
- b - Emission factors taken from AP-42, Chapter 1.4 (7/98), Table 1.4-2. Factor for N₂O uses uncontrolled factor; for low-NOx burner use 0.64 lb/MMcf.
- c - Emission factors taken from AP-42, Chapter 1.5 (7/08), Table 1.5-3.
- d - No factors are provided for #1 fuel oil in AP-42, Chapter 1.3; emission factors are assumed equal to #2 fuel oil as a conservative estimate.
- e - No emission factors for N₂O or CO₂ are provided in AP-42, Chapter 1.3 for #4 or #5 fuel oils; emission factors are assumed equal to (low sulfur) #6 fuel oil as a conservative estimate.

Ref. ID	Equipment	MMBtu
1F	Boiler	5.23
15F	Boiler	8.16
6F		2.38
		3.02
		3.17
		3.02
8F		3
10F		6.4
total		34.38