

**STATEMENT OF BASIS (SOB)**  
**COLORMASTERS, INC.**  
**Albertville, Alabama**  
**Facility No. 711-0066**

On July 8, 2013, Colormasters, Inc. was issued a Major Source Operating Permit (MSOP) 001, for: One (1) flexographic printing press with associated equipment, as Line #1. On March 6, 2014, an Air Permit X002 was issued for an additional flexographic printing press and associated equipment, as Line #2. Subsequently a temporary authorization to operate (TAO) and authorization to operate (ATO) were granted on February 10, 2015 and May 11, 2015, respectively for Line #2. On July 27, 2016, Colormasters submitted an updated application to modify their MSOP to combine the two Lines #1 and #2 under one Permit.

On October 31, 2016, Colormasters submitted a revised MSOP application to incorporate their recently installed regenerative thermal oxidizer (RTO) into the application. Both Lines #1 and #2 are vented to the RTO. See previous SOB and Engineering Analyses. With the combination of Line #1, Line #2 and the RTO, Colormasters' current MSOP 001 would be modified to form MSOP 003, while rescinding Air Permit X002.

**OPERATION:**

Colormasters' SIC Code is 2673 for the flexographic printing (roller coating) of polyethylene bags and their NAICS Code is 322223 for the manufacturing of bags, plastics film and custom blend film. This facility operates 8,760 hours a year. The incoming polyethylene plastics are printed on ten-color flexographic presses with associated natural gas drying ovens venting to the RTO. The presses' ovens are heated by two (2) 0.80 MMBtu/hr natural gas fired burners each. The inks and solvents are blended in the mixing room prior to being conveyed to the presses. This facility also operates a non-solvent laminator.

**Assembly and Cutting**

The printed or laminated plastic and non-printed plastic is assembled into bags and cut at one of two machines, where a maximum cutting temperature of 950°F is reached. Once assembled, the bags are boxed and shipped. Some of the printed bags are sent out uncut.

**EMISSIONS:**

Colormasters' emissions are based on their inks and solvents usage. Their VOC and HAP emissions are determined at the end of each month to be submitted quarterly based on a rolling twelve-month basis.

The modified MSOP Unit 003's (Lines #1 and #2) flexographic printing presses emissions are vented to the RTO for destruction. The temperature of the RTO shall be maintained at a minimum of the combustion chamber temperature used to demonstrate that no less than 95% destruction efficiency (DE) is being achieved from the most recent RTO efficiency performance (3-run arithmetic average) test.

For periods when the temperature is less than the minimum operating temperature, the VOC emissions are calculated as if there was no (0%) capture and destruction of VOC in the RTO.

Colormasters has requested to limit Unit 003's VOC emissions to 245 tpy utilizing the RTO. The facility wide annual HAP emissions are restricted to 9.5 tons for any single HAP and 24.5 tons for any combination of HAPs.

The greenhouse gases (GHG) emissions from the facility's natural gas fired ovens [2 X (2 X 0.80 MMBtu/hr)] are 4,047 and 4,072 tons per year for CO<sub>2</sub> and CO<sub>2e</sub>, respectively.

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the PSD major source threshold of 250 tons per year.

### **REQUIREMENTS:**

Colormasters has requested to maintain their current MSOP's VOC and HAP emission limitations of 245 and 24.5 / 9.5 tons, respectively. This facility is located in an attainment area for all pollutants. There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), Federal New Source Performance Standards (NSPS) or State regulations applicable to this facility.

### **Monitoring of Emissions**

Emissions of VOC and HAP will be determined from material usage. These emissions will be submitted to the Department in quarterly reports.

### **Permitting Fees**

Major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

### **RECOMMENDATION:**

Based on the above analysis, I recommend that Colormasters be reissued its MSOP to reflected the requested changes pending the 30-day public notice and EPA's 45-day review. This Title V Permit would be assigned Unit No. 003: for Lines #1 and #2 venting to the RTO.

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Clarence Fairer III  
Chemical Branch  
Air Division

October 28, 2016  
Date

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