

**STATEMENT OF BASIS:
COLORMASTERS, LLC (Facility #2)
Albertville, Alabama
Facility No. 711-0041**

On April 25, 2019, Colormasters, LLC (Facility #2) submitted a modification application for its Major Source Operating Permit (MSOP) to incorporate Air Permit X007. Their initial MSOP was issued on November 15, 2001, and subsequently their first, second and third renewals were issued on November 15, 2006, November 15, 2011, and December 30, 2016, respectively. Colormasters has had several equipment modifications and is currently operating with one additional Air Permit X007, issued on September 8, 2017.

OPERATION:

Incoming polyethylene plastic is printed on flexographic printing presses with associated electric drying ovens. Inks and solvents are blended in a mixing room prior to being conveyed to the presses. This facility's SIC Code is 2673 for the coating and lamination of plastic bags. Colormasters operates three shifts seven days a week for a total of 8,760 hours a year.

The current MSOP consist of Units 005 and 006:

(1) Unit 005 – (Line # 009) One (1) Flexographic Printing Press #7 (eight-color) with One (1) Drying Oven – two (2) 0.80 MMBtu/hr natural gas fired burners

(2) Unit 006 - (Line # 010) Two (2) Flexographic Printing Presses #8 (ten-color printer) and #9 (ten-color printer) with Two (2) Drying Ovens – two (2) 0.08 MMBtu/hr natural gas fired burners, and a Regenerative Thermal Oxidizer (RTO)

| Pollutant | Regulatory Emission Limit | Applicable Standard |
|-----------|---|----------------------------|
| VOCs | 245 tons any rolling 12 month period | Synthetic Minor PSD |
| HAP/HAPs | 9.5/24.5 tons any rolling 12 month period facility wide | Synthetic Minor HAP Limits |

Both Units' 005 and 006 emissions limitations are the same.

The current Air Permit is X007:

Unit 007 - Line # 011: One (1) Flexographic Printing Press with Associated Equipment, and the existing Regenerative Thermal Oxidizer (RTO): [Press #10 (ten-color) with One (1) Oven – two (2) 0.80 MMBtu/hr natural gas fired burners, and RTO – 4.0 MMBtu/hr natural gas fired]

| Pollutant | Regulatory Emission Limit | Applicable Standard |
|-----------|---|----------------------------|
| VOCs | 39.5 tons of VOCs per rolling 12-month period | Synthetic Minor PSD |
| HAP/HAPs | 9.5/24.5 tons any rolling 12-month period facility wide | Synthetic Minor HAP Limits |

This Unit's VOC emissions are limited to 39.5 tons per year.

Colormasters has requested to modify their current MSOP with the incorporation of Air Permit X007.

EMISSIONS:

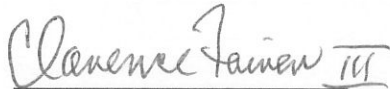
The emissions from Press #7 are vented to the atmosphere. The emissions from Presses #8, #9 and #10 are vented to their RTO. No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the Title V permitting source threshold of 100 tons per year.

REQUIREMENTS:

Colormasters is a major source for VOC emissions, and has requested emission limits to avoid a PSD review. Units 005 and 006 both have a 245 tons per year VOC emissions limits, while Unit 007 has a 39.5 tons per year VOC emissions limit. Colormasters has a facility wide HAP/HAPs emissions limitations of 9.5/24.5 tpy.

RECOMMENDATION:

Based on the above analysis, I recommend modifying Colormasters' existing MSOP with the incorporation of Air Permit X007 pending the 30 days e-notice (public notice) and EPA 45 days review. Colormasters' modifying Major Source Operating Permit will consist of Units 005, 006 and 007, as Lines # 009, #010 and # 011, respectively.



Clarence Fairer III
Chemical Branch
Air Division

August 13, 2019

Date

CF/cf