

**STATEMENT OF BASIS  
GENPAK, LLC (Hope Hull, Facility #2)  
Montgomery County  
Facility No. 209-0087**

On January 6, 2020, Genpak was issued their modified third renewal Major Source Operating Permit (MSOP) for the facility's operations. On October 9, 2020, an Air Permit X002 was issued for two additional thermoformer lines #9 and #10. Subsequently, a temporary authorization to operate (TAO) and an authorization to operate (ATO) were granted on March 4, 2021 and April 27, 2021, respectively, for Air Permit X002. On May 12, 2021, Genpak submitted a modified MSOP application to incorporate Air Permit X002.

There are no current or ongoing enforcement actions against Genpak necessitating additional requirements to achieve compliance with permit conditions. Montgomery County is currently listed in attainment with all National Ambient Air Quality Standards (NAAQS).

**OPERATION:**

All of Genpak's manufacturing operations remain the same as before. Their SIC and NAICS codes are (3086, 3089) and (326140, 326199) for the extrusion and thermoforming of polystyrene sheets, respectively. Genpak produces foam polystyrene food trays and containers using a tandem system of extruded polystyrene foam sheet (XPS).

**EMISSIONS:**

Calculations can be found in Statement of Basis dated September 17, 2018. Genpak's current blowing agent (iso-pentane and/or n-Butane) usage limit is 594.5 tpy, which is equivalent to their permitted volatile organic compound (VOC) 249.1 tpy emissions limitation. This VOC limitation is required to avoid a prevention of significant deterioration (PSD) review.

Genpak is located in a Class 1 County and its allowable particular matter (PM) emissions are 21.8 tpy, where  $P = 1.7$  tons/hr, using  $E = 3.59P^{0.62}$ , as required under ADEM Rules 335-3-4.04(1), 335-3-4-.01(1) and 335-3-4-.02.

Their greenhouse gases (GHG) emissions from the facility's natural gas equipment are negligible for CO<sub>2</sub> and CO<sub>2e</sub>. This facility's hazardous air pollutants (HAP) emissions are also negligible.

**REQUIREMENT AND UPDATE:**

Genpak is located in an attainment area for ozone. Currently, there are no NESHAPs, NSPS or state regulations specifically applicable to this facility's operations. Another requirement is that the blowing agent retention rate shall be 93% or greater and submitted with their quarterly emissions reports. There will be a total of ten thermoformer lines associated with the incorporation of Air Permit X002.

### **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.

### **Affected States Notification**

Notification of the proposal of this major source operating permit will be sent to all affected states bordering Alabama.

### **RECOMMENDATION:**

Based on the above information, I recommend modifying Genpak's MSOP pending the public comment period and EPA review. Their blowing agent (iso-pentane and /or n-Butane) usage and the total VOC's emissions shall remain at 594.5 and 249.1 tons per year, respectively.

This modified MSOP will consist of ten (10) thermoformers, six (6) fluff storage silos with bin vent baghouses, four (4) extrusion lines, two (2) repelletizers, one (1) 30,000 gallon iso-pentane storage tank, one (1) 18,000 gallon butane storage tank, one (1) 12-ton carbon dioxide (CO<sub>2</sub>) receiver tank and associated equipment.



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June 4, 2021  
Date

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