

**STATEMENT OF BASIS
Colormasters LLC (Facility #3)
Marshall County
Facility No. 711-0072**

INTRODUCTION

Colormasters has applied for renewal of Major Source Operating Permit (MSOP) No. 711-0072. This proposed Title V MSOP renewal has been developed in accordance with the provisions of ADEM Admin. Code r. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of the permit.

The facility was originally constructed in 2018. The initial Title V MSOP was issued on September 3, 2020, with an expiration date of September 2, 2025. The renewal application was received on January 15, 2025. ADEM Admin. Cond r. 335-3-16-12(c) states “If a timely and complete application for a permit renewal is submitted, but the Department fails to take final action to issue or deny the renewal permit before the end of the term of the previous permit, then the permit shall not expire until the renewal permit has been issued or denied and any permit shield granted for the permit shall continue in effect during that time”; therefore, the current MSOP was administratively continued.

The facility is located in Marshall County, which is currently in compliance with all National Ambient Air Quality Standards (NAAQS).

There are no current or ongoing enforcement actions against Colormasters necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov/> (Search using Facility ID AL110070814642).

The current MSOP consists of Line #001: Two Flexographic Printing Presses with Associated Equipment – [Press #1 (ten-color) and Press #2 (ten-color) with One Oven - Two 0.80 MMBtu/hr natural gas fired burners per Press] and 4.50 MMBtu/hr RTO

No major additions or changes to the current MSOP are occurring during this renewal. Minor changes include updating the general permit provisos to better reflect current Department policies.

EMISSIONS

The facility is a major source with respect to Title V for volatile organic compounds (VOCs). No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the Prevention of Significant Deterioration (PSD) threshold of 250 tons per year.

Colormasters will maintain their current rolling 12-month emission limitations for Unit 001 of 245 tons of VOC, 24.5 tons of total-hazardous air pollutants (HAPs), and 9.5 tons of any single

HAP. This facility is not a potential major source of particulate matter, nitrogen oxides, sulfur dioxide, or carbon monoxide. The flexographic printing presses are the only significant source of air emissions at this facility. There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) or New Source Performance Standards (NSPS) applicable to the operations at Colormasters.

OPERATIONS (Unit No. X001 – Two – Flexographic Printing Presses with Associated Equipment – [Press #1 (ten-color) and Press #2 (ten-color) with One Oven - Two 0.80 MMBtu/hr natural gas fired burners per Press] and 4.50 MMBtu/hr RTO)

Overview

This unit currently operates two flexographic printing presses which print designs onto pre-made plastic film. Emissions from these presses are vented to RTO-1. This line is not subject to any NESHAPs or NSPSs.

Equipment for this process was initially permitted in Air Permit 711-0072-X001 on January 31, 2019. The requirements and limitations from this permit were incorporated into the initial Title V permit on September 3, 2020.

Emission Standards/Limitations

Opacity and Particulate Matter (PM)

This unit is subject to the state allowable particulate limit and the state opacity limit for general industries.

Volatile Organic Compounds (VOCs)

VOC emissions from this unit are limited to 245 tons during any 12-month rolling period in order to stay below the significant thresholds for PSD. As mentioned above, these limitations were established in Air Permit 711-0072-X001 issued on January 31, 2019, and subsequently incorporated into the Title V permit issued on September 3, 2020.

Colormasters shall maintain the temperature of the RTO at the levels used to demonstrate that at least 95% destruction and removal efficiency (DRE) is being achieved, as established during the most recent performance test. The RTO shall have an audible alarm that will sound if the 3-hour rolling average temperature falls below the setpoint. For periods when the temperature is less than the minimum operating (3-hour rolling average) temperature, VOC will be calculated as if there were no (0%) capture and destruction of VOCs in the RTO.

Hazardous Air Pollutants (HAPs)

HAP emissions from this unit are limited to 24.5 tons of total-hazardous air pollutants (HAPs), and 9.5 tons of any single HAP. As mentioned above, these limitations were established in Air Permit 711-0072-X001 issued on January 31, 2019, and subsequently incorporated into the Title V permit issued on September 3, 2020.

Periodic Monitoring

Opacity and PM

Due to the facility's low potential to emit PM of 0.48 tons per year, no additional monitoring is required for opacity and PM.

Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Colormasters is required to track its usage of VOC and HAP containing materials, the percent by weight and volume of VOC and HAP in these materials, and the amount of VOC and HAP emitted by these materials per calendar month.

Records of the 3-hour rolling average temperature of the RTO must be kept in a form suitable for inspection and be made available upon request.

Reporting Requirements

Emissions of VOCs and HAPs will be determined from material usage assuming worst case scenario and will be submitted to the Department along with details about the RTO usage and performance in quarterly reports by the 20th day of the month following the end of the quarter.

Colormasters will also be required to submit an Annual Compliance Certification report detailing the facility's compliance status with each permit proviso.

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.

FUGITIVE DUST

All plant roads are paved or graveled. There are no raw materials, storage piles, products, etc. capable of generating fugitive dust at this facility. Therefore, additional specific requirements for fugitive dust are not necessary.

RECOMMENDATION

Based on the above analysis, I recommend that this facility's MSOP be renewed pending the 30-day public notice and EPA's 45-day review.

Christopher Nuckels
Chemical Branch
Air Division

May 5, 2026
Date

CTN/ctn