

# COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Blue Ridge Regional Office www.deq.virginia.gov

David K. Paylor Director

Robert J. Weld Regional Director

Roanoke Office 3019 Peters Creek Road Roanoke, Virginia 24019 (540) 562-6700 Fax (540) 562-6725

August 10, 2010

Mr. David R. Bennett Director of Operations Intertape Polymer Corporation 1101 Eagle Springs Road Danville, VA 24540

> Location: Pittsylvania County Registration No: 30823 AFS Id. No: 51-143-00109

Dear Mr. Bennett:

Douglas W. Domenech

Secretary of Natural Resources

Lynchburg Office

(434) 582-5120

Fax (434) 582-5125

7705 Timberlake Road

Lynchburg, Virginia 24502

Attached is a permit to operate your plastic film and sheet manufacturing facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution. This permit renews your permit dated August 12, 2005.

The permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. <u>Please read all permit conditions carefully.</u>

In evaluating the application and arriving at a final decision to issue this permit, the Department deemed the application complete on March 17, 2010 and solicited written public comments by placing a newspaper advertisement in the <u>The Danville Register & Bee</u> on May 13, 2010. The thirty day comment period (provided for in 9 VAC 5-80-270) expired on June 12, 2010 with no comments having been received in this office.

This approval to operate does not relieve Intertape Polymer Corporation of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The <u>Regulations</u>, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

David K. Paylor, Director Department of Environmental Quality P. O. Box 1105 Richmond, VA 23218

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please call Keith Sandifer at 434-582-6232.

Sincerely

Robert J. Weld Regional Director

Attachment: Permit

cc: Director, OAPP (electronic file submission)

Manager, Data Analysis (electronic file submission)

Chief, Air Enforcement Branch (3AP12), U.S. EPA, Region III



# COMMONWEALTH of VIRGINIA

David K. Paylor Director

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Lynchburg Office 7705 Timberlake Road Lynchburg, Virginia 24502 (434) 582-5120 Fax (434) 582-5125

# DEPARTMENT OF ENVIRONMENTAL QUALITY

Blue Ridge Regional Office

www.deq.virginia.gov

Federal Operating Permit
Article 1

Roanoke Office 3019 Peters Creek Road Roanoke, Virginia 24019 (540) 562-6700 Fax (540) 562-6725

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:

Intertape Polymer Corporation

Facility Name:

Intertape Polymer Corporation

Facility Location:

1101 Eagle Springs Road

Danville, Virginia

Registration Number:

30823

Permit Number:

BRRO-30823

August 12, 2010 Effective Date

August 11, 2015

Expiration Date

Robert J. Weld Regional Director

August 10, 2010 Signature Date

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# I. Facility Information

Permittee Intertape Polymer Corporation 1101 Eagle Springs Road Danville, Virginia 24540

Responsible Official David R. Bennett Director of Operations

Facility
Intertape Polymer Corporation
1101 Eagle Springs Road
Danville, Virginia 24540

Contact Person Michael Jones Manager of Engineering 434-797-8359

County-Plant Identification Number: 51-143-00109

- **Facility Description:** NAICS Code 326113 - Intertape manufactures polypropylene based adhesive tape and polyethylene based stretch film.

# II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Hot Melt Ac	lhesive C	oating Line (#1)		· · · · · · · · · · · · · · · · · · ·			
1P		Hot melt Coater, Solvent Coating	0.407 tons/hr	Hoyt Carbon Adsorber, CAH 6-12-2T	25P	VOCs/toluene	March 10, 2000
2Р	2P	Hot melt Coater, Solvent Drying	0.407 tons/hr	Hoyt Carbon Adsorber, CAH 6-12-2T	25P	VOCs/toluene	March 10, 2000
3P	3P	Hot melt Coater, Adhesive Compounding	2 ton/hr	Hoyt Carbon Adsorber, CAH 6-12-2T	25P	VOCs/toluene	March 10, 2000
4P		Solvent Mixing	0.407 tons/hr	Hoyt Carbon Adsorber, CAH 6-12-2T	25P	VOCs/toluene	March 10, 2000
6P		Hot melt Coater, adhesive coating	2.2 tons/hr	Hoyt Carbon Adsorber, CAH 6-12-2T	25P	VOCs/toluene	March 10, 2000
Acrylic Adh	iesive Coa	ting Line (#2)					
8P		2 - 500 gal closed mixing churns	0.167 tons/hr	Baron Blakeslee Carbon Adsorber	26P	VOCs/toluene	March 10, 2000
9P		Acrylic Coater machine, Black Clawson, 2.2 M web	39,600 m <sup>2</sup> /hr	Baron Blakeslee Carbon Adsorber	26Р	VOCs/toluene	March 10, 2000
1 <b>0P</b> .		Solvent release coating, Black Clawson, 2.2 M web.	0.15 tons/hr	Baron Blakeslee Carbon Adsorber	26P	VOCs/toluene	March 10, 2000
11 <b>P</b>	11P	Solvent Drying, Black Clawson, 2.2 M web	0.15 tons/hr	Baron Blakeslee Carbon Adsorber	26P	VOCs/toluene	March 10, 2000
12P	,	Acrylic adhesive coating station, Black Clawson, 2.2 M web	1.43 tons/hr	Baron Blakeslee Carbon Adsorber	26P	VOCs/toluene	March 10, 2000

Storage Tanks					
1T	Toluene Storage Tank	6,000 gal			
2T	Toluene Storage Tank	8,000 gal			
4T	Polybutene H-300 storage tank	12,000 gal			
5T	Resin storage tank (heated)	25,000 gal			
6T	Resin storage tank (heated)	25,000 gal			

<sup>\*</sup>The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

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# III. Process Equipment Requirements – adhesive coating lines, #1-Hot Melt (1P, 2P, 3P, 4P, 6P) and #2-Acrylic (8P, 9P, 10P, 11P, and 12P)

# A. Limitations

- 1. Except as specified as being more stringent in this permit, each coating line is to be operated in compliance with Federal emissions requirements under 40 CFR 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations.
  - (9 VAC 5-80-110, 40 CFR 60.440 and Condition 3 of March 10, 2000 Permit)
- 2. Volatile organic compound (VOC) emissions from the #1 (hot melt) adhesive coating line (which includes solvent tanks, mixing tanks, release coating application unit and ovens) shall be controlled by a carbon bed adsorption system. The adhesive coating line and the carbon adsorption units shall be provided with adequate access for inspection.
  - (9 VAC 5-80-110 and Condition 4 of March 10, 2000 Permit)
- 3. Volatile organic compound (VOC) emissions from the #2 (acrylic) adhesive coating line (which includes solvent tanks, mixing tanks, release coating application unit and ovens) shall be controlled by a carbon bed adsorption system. The adhesive coating line and the carbon adsorption unit shall be provided with adequate access for inspection.
  - (9 VAC 5-80-110 and Condition 5 of March 10, 2000 Permit)

# 4. The permittee shall:

- a. Cause the discharge into the atmosphere from each coating line not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or
- b. Demonstrate for each coating line
  - (i) A 90 percent overall VOC emission reduction as calculated over a calendar month; or
  - (ii) The percent overall VOC emission reduction specified in 40 CFR 60.443(b) as calculated over a calendar month.
- (9 VAC 5-80-110, 40 CFR 60.442 and Condition 10 of March 10, 2000 Permit)

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5. To determine compliance with condition III.A.4.a., the permittee shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

- a. determine the weight fraction of organics and the weight fraction of solids of each coating applied to each coating line by using Reference Method 24 (40 CFR 60 Subpart A) or by the coating manufacturer's formulation data
- b. compute the weighted average by the following equation:

$$G = \frac{\sum\limits_{i=1}^{n}W_{oi}M_{ci}}{\sum\limits_{i=1}^{n}W_{si}M_{ci}}$$
 where

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month

W<sub>oi</sub> = the weight fraction of organics applied of each coating (i) applied during each calendar month as determined from Reference Method 24 or manufacturer's formulation data

M<sub>ci</sub> = the total mass (kg) of each coating (i) applied during the calendar month as determined from facility records

W<sub>si</sub> = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined from Reference Method 24 or manufacturer's formulation data

c. for each coating line where the value of G is less than or equal to 0.20 kg VOC per kg of coating solids applied, the coating line is in compliance with condition III.A.4.a.

(9 VAC 5-80-110, 40 CFR 60.443(a)(1) and Condition 11 of March 10, 2000 Permit)

6. To determine compliance with condition III.A.4.b., the permittee shall calculate the required overall VOC emission reduction according to the following equation:

$$R_q = \frac{G - 0.20}{X \cdot 100}$$
 where  $R_q = \frac{G}{G}$  the required overall VOC emission reduction (in percent)

If Rq is less than or equal to 90 percent, then the required overall VOC emission reduction is Rq. If Rq is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

(9 VAC 5-80-110, 40 CFR 60.443(b) and Condition 12 of March 10, 2000 Permit)

7. The permittee shall determine the overall VOC emission reduction for each calendar month for each coating line by the following equation:

$$R = \sum_{i=1}^{n} \frac{M_{r}}{W_{oi}M_{ci}} \times 100$$

where R = the overall VOC emission reduction achieved for a calendar month (in percent)  $M_r$  = the total mass (kg) of solvent recovered for a calendar month

If the R value is equal to or greater than the Rq value calculated per condition III.A.6, then compliance with condition III.A.4.b. is demonstrated. (9 VAC 5-80-110, 40 CFR 60.443(c) and Condition 13 of March 10, 2000 Permit)

- 8. Compliance with the VOC emission limitation and percentage reduction requirements under 60.442, as in condition III.A.4, is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month, and a new calendar month's average VOC emission reduction is calculated to show compliance with the standard.

  (9 VAC 5-80-110, 40 CFR 60.443(f) and Condition 14 of March 10, 2000 Permit)
- 9. Startups and shutdowns are normal operation for this source category. Emissions from these operations are to be included when determining if the standard specified in condition III.A.4.b. is being attained.

  (9 VAC 5-80-110, 40 CFR 60.443(j) and Condition 15 of March 10, 2000 Permit)
- 10. Emissions from the operation of the adhesive tape manufacturing facility shall not exceed the limits specified below:

Volatile Organic Compounds

241 tons/yr

Toluene

241 tons/yr

The annual emission limits shall be calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-80-110 and Condition 17 of March 10, 2000 Permit)

- 11. Compliance with the annual emission limits in condition No. III.A.10 shall be determined by material balance each calendar month as follows:
  - a. Add toluene purchases to opening toluene inventory in gallons.
  - b. Subtract from a. the closing toluene inventory and the amount of toluene disposed of off site, in gallons.
  - c. Determine the toluene losses each month by converting the result of b. to tons using a conversion factor of 0.003625 tons per gallon.

(9 VAC 5-80-110 and Condition 18 of March 10, 2000 Permit)

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12. See section IV of this permit for additional limitations for the Hot Melt Adhesive Coating Line (#1) and the Acrylic Adhesive Coating Line (#2). (9 VAC 5-80-110 and 40 CFR 63 Subpart JJJJ)

# B. Monitoring

- Each of the carbon adsorption systems shall be equipped with a device which
  continuously measures the VOC concentration of the exhaust gas in ppmv to indicate
  breakthrough. The permittee shall maintain records of the manufacturer's
  recommendations for carbon bed replacement and records of actual carbon bed
  replacement.
  - (9 VAC 5-80-110 and Condition 6 of March 10, 2000 Permit)
- 2. The permittee shall develop a VOC Emissions Monitoring Plan which addresses the proper monitoring, recordkeeping, and reporting parameters necessary to demonstrate compliance with the conditions established within this permit. The Monitoring Plan shall be maintained at the facility and made available to Department personnel upon request. This plan shall be updated to reflect changes in monitoring parameters, operations, and equipment prior to the initiation of these changes. The content and format of the Monitoring Plan shall be arranged with the Blue Ridge Regional Office. (9 VAC 5-80-110 and Condition 20 of March 10, 2000 Permit)
- 3. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:
  - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
  - b. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.
  - (9 VAC 5-80-110 and Condition 25 of March 10, 2000 Permit)
- 4. See section IV of this permit for additional monitoring requirements for the Hot Melt Adhesive Coating Line (#1) and the Acrylic Adhesive Coating Line (#2). (9 VAC 5-80-110 and 40 CFR 63 Subpart JJJJ)

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# C. Recordkeeping

- 1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:
  - a. A calendar month record of all coatings used and the results of the reference test method specified in 40 CFR 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.
  - b. A calendar month record of the amount of toluene applied to each coating line.
  - c. A calendar month record of the amount of toluene recovered by carbon adsorption on each coating line.
  - d. Records of the results of the monthly compliance demonstrations as required by condition III.A.8.
  - e. A 12-month rolling total of the toluene emissions calculated by material balance for the overall facility using the procedure in condition No. III.A.11.

All records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years. (9VAC 5-80-110, 40 CFR 60.445 and Condition 21 of March 10, 2000 Permit)

2. See section IV of this permit for additional recordkeeping requirements for the Hot Melt Adhesive Coating Line (#1) and the Acrylic Adhesive Coating Line (#2). (9 VAC 5-80-110 and 40 CFR 63 Subpart JJJJ)

# D. Testing

- The permitted facility shall be constructed so as to allow for emissions testing and
  monitoring upon reasonable notice at any time, using appropriate methods. Test ports
  shall be provided at the appropriate locations.
   (9 VAC 5-80-110 and Condition 7 of March 10, 2000 Permit)
- 2. Each performance test shall be conducted as follows:
  - a. each performance test shall be a one calendar month test and not the average of three runs as specified in 40 CFR 60.8(f).
  - b. the weighted average mass of VOC applied per mass of coating solids applied for a one calendar month period shall be determined as specified in 60.443(a)(1) and (2). This procedure is also contained in condition III.A.5a. and b. If this value is

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less than 0.2 kg VOC applied per kg of coating solids applied, the coating line is in compliance. If not, calculate the required percent overall VOC emission reduction as specified in 60.443(b) or (c), as appropriate.

- c. to determine the mass of VOC applied and recovered:
  - (i) The permittee shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of VOC applied to each coating line during each calendar month.
  - (ii) The permittee shall install, calibrate, maintain, and operate a monitoring device for indicating the cumulative amount of VOC recovered by each carbon adsorption system during each calendar month.
  - (iii)Each monitoring device required by this condition shall be accurate within +/- 2 percent.
- (9 VAC 5-80-110, 40 CFR 60.444 and 40 CFR 60.446 and Condition 9 of March 10, 2000 Permit)
- 3. See section IV of this permit for additional testing requirements for the Hot Melt Adhesive Coating Line (#1) and the Acrylic Adhesive Coating Line (#2). (9 VAC 5-80-110 and 40 CFR 63 Subpart JJJJ)

## E. Reporting

- 1. The permittee shall submit quarterly reports to the Blue Ridge Regional Office of exceedances of the VOC emission limits for each coating line. If no such exceedances occur during a particular quarter, a report stating this shall be submitted semiannually.
  - (9 VAC 5-80-110, 40 CFR 60.447(b) and Condition 16 of March 10, 2000 Permit)
- 2. See section IV of this permit for additional reporting requirements for the Hot Melt Adhesive Coating Line (#1) and the Acrylic Adhesive Coating Line (#2). (9 VAC 5-80-110 and 40 CFR 63 Subpart JJJJ)

# IV. Paper and Other Web Coating (POWC) MACT Requirements (40 CFR 63 Subpart JJJJ)

#### A. POWC MACT- General

This section of this permit is for the implementation of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paper and Other Web Coating (POWC), 40 CFR 63 Subpart JJJJ, referred to as the POWC MACT. Except where this permit is more restrictive, the permittee shall comply with the requirements of 40 CFR 63 Subpart JJJJ.

1. The affected source subject to Subpart JJJJ is the collection of all web coating lines at the permitted facility.

(9 VAC 5-80-110 and 40 CFR 63.3300)

2. All terms used in section IV of this permit that are not defined in 40 CFR 63, Subpart JJJJ have the meaning given to them in the Clean Air Act (CAA) and in Subpart A of 40 CFR 63.

(9 VAC 5-80-110 and 40 CFR 63.3310)

3. Table 2 to Subpart JJJJ specifies the provisions of Subpart A of 40 CFR 63 that apply to the permitted facility.

(9 VAC 5-80-110 and 40 CFR 63.3340)

# **B. POWC MACT-Limitations**

Combinations of control. Since the permitted facility operates more than one control device, the permittee must calculate organic HAP emissions according to the procedures in condition IV.B.2 of this permit, and use the calculation procedures specified in condition IV.B.3 of this permit to convert the monitoring and other data into units of the selected control option in paragraphs (e) through (h) of 40 CFR 63.3370. Use the procedures specified in condition IV.B.4 of this permit to demonstrate compliance.

(9 VAC 5-80-110 and 40 CFR 63.3370(n))

- 2. Solvent recovery system using liquid-liquid material balance compliance demonstration. Since the permittee chooses to comply by means of a liquid-liquid material balance for each solvent recovery system used to control a web coating line, the permittee must determine the organic HAP emissions for each web coating line controlled by that solvent recovery system in accordance with the following paragraphs of 40 CFR 63.3370:
  - (i)(1)(i) determine the mass of each coating material applied,
  - (i)(1)(ii) determine the organic HAP content of each coating material asapplied,
  - (i)(1)(iii) determine the volatile organic content of each coating material asapplied,
  - (i)(1)(v) determine and monitor the amount of volatile organic matter recovered,
  - (i)(1)(vi) calculate the volatile organic matter collection and recovery efficiency, and
  - (i)(1)(vii) calculate the organic HAP emitted.

(9 VAC 5-80-110, 40 CFR 63.3370(i), and 40 CFR 63.3370(n)(1))

3. Convert the information obtained under condition IV.B.2 of this permit into the units of the selected compliance option using the calculation procedures specified in the following paragraphs of 40 CFR 63.3370:

(n)(5)(i) - organic HAP emitted,

(n)(5)(ii) - coating solids applied,

(n)(5)(iii) - organic HAP emission rate based on coating solids applied, and

(n)(5)(iv) - organic HAP based on materials applied.

(9 VAC 5-80-110 and 40 CFR 63.3370(n))

- 4. The affected source is in compliance with the emission standards in 40 CFR 63.3320(b) for the month if all operating parameters required to be monitored under condition paragraph IV.B.2 of this permit were maintained at the values established under 40 CFR 63.3350 (monitoring) and 40 CFR 63.3360 (performance tests); and:
  - a. The total mass of organic HAP emitted by the affected source based on coating solids applied is no more than 0.20 kg organic HAP per kg coating solids applied; or
  - b. The total mass of organic HAP emitted by the affected source based on material applied is no more than 0.04 kg organic HAP per kg material applied; or
  - c. The total mass of organic HAP emitted by the affected source during the month is less than the calculated allowable organic HAP as determined using paragraph (l) of 40 CFR 63.3370; or
  - d. The total mass of organic HAP emitted by the affected source was not more than 5 percent of the total mass of organic HAP applied for the month at the permitted facility. The total mass of organic HAP applied by the affected source in the month must be determined using Equation 6 of 40 CFR 63.3370.

(9 VAC 5-80-110, 40 CFR 63.3320, and 40 CFR 63.3370(n)(6))

# C. POWC MACT- Monitoring

- 1. Following the compliance date, the permittee must monitor and inspect each control device used to comply with 40 CFR 63.3320 (emission standards and compliance dates). The permittee must install and operate the monitoring equipment as specified in paragraph IV.C.2 of this permit.
  - (9 VAC 5-80-110 and 40 CFR 63.3350(b))
- 2. The permittee must install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The

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device must be certified by the manufacturer to be accurate to within +/-2.0 percent by mass.

(9 VAC 5-80-110 and 40 CFR 63.3350(d)(2))

# D. POWC MACT- Recordkeeping

- 1. The permittee must maintain the records specified in condition IV.D.1.a of this permit on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1):
  - a. Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with Subpart JJJJ, including:
    - (i) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(c));
    - (ii) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(d));
    - (iii) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of 40 CFR 63.3370(b), (c), and (d).

(9 VAC 5-80-110 and 40 CFR 63.3410(a))

2. The permittee must maintain records of all liquid-liquid material balances performed in accordance with the requirements of 40 CFR 63.3370. The records must be maintained in accordance with the requirements of 40 CFR 63.3410(b). (9 VAC 5-80-110 and 40 CFR 63.3410(b))

# E. POWC MACT- Testing

The permittee is not required to conduct a performance test to demonstrate compliance since the control device is a solvent recovery system and the permittee will comply by means of a monthly liquid-liquid material balance.

(9 VAC 5-80-110 and 40 CFR 63.3360(b))

# F. POWC MACT- Reporting

- 1. The permittee must submit a semiannual compliance report according to the following requirements specified in 40 CFR 63.3400(c)(1) and (2)
  - a. The first compliance report, as specified in 40 CFR 63.3400(c)(1)(i) and (ii)
  - b. Each subsequent compliance report, as specified in 40 CFR 63.3400(c)(1)(iii) and (iv)

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- c. Since the permitted facility is subject to permitting regulations pursuant to 40 CFR part 70, and the Virginia Department of Environmental Quality has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates shown in condition VII.C.3 instead of according to the dates in conditions IV.F.1.a and IV.F.1.b of this permit.
- d. Each compliance report must contain the information specified in condition IV.F.1.d(i) through (vi).
  - (i) Company name and address
  - (ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
  - (iii)Date of report and beginning and ending dates of the reporting period.
  - (iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to the permittee, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
  - (v) For each deviation from an emission limitation (emission limit or operating limit) that applies to the permittee, the compliance report must contain the information in condition IV.F.1.d(v)(a) through (c) of this permit, and
    - (a) The total operating time of each affected source during the reporting period.
    - (b) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.
    - (c) Information on the number, duration, and cause for CMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.

(9 VAC 5-80-110 and 40 CFR 63.3400(c))

2. The permittee must submit startup, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5), except that the provisions in Subpart A of 40 CFR 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with Subpart JJJJ.

(9 VAC 5-80-110 and 40 CFR 63.3400(g))

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# V. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission	Emission Unit Description	Citation	Pollutant(s) Emitted	Rated Capacity
Unit No.		(9 VAC_)	(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
1 <b>F</b>	Cleaver Brooks 125 HP boiler, CB70	5-80-720 C		5.23 MMBtu/hr
2F	(13) Gas Space heaters	5-80-720 A		
3F	(6) Flame Treaters in Extrusion, Pran Italy ESSECI	5-80-720 C		0.2 MMBtu/hr each
4F	(2) Make-up Air Units - AHU-1	5-80-720 A		
6F	(6) Hot Oil Heaters in extrusion	5-80-720 C		3.0 MM Btu/hr
7F	(2) Office Heaters and A/C	5-80-720 A		
8F	First Thermal hot oil heater	5-80-720 C		3 MM Btu/hr
10F	(4) Black Clawson acrylic coater drye	5-80-720 B	VOCs	1.5 MM Btu/hr each
11 <b>F</b> -12F	(8) space heaters, (12) space heaters	5-80-720 A		
13 <b>F</b>	Gas fired cleaning furnace	5-80-720 C		0.25 MM Btu/hr
14F	Electric cleaning furnace	5-80-720 B	PM & VOC	
15F	Cleaver Brooks 200 HP boiler	5-80-720 C		8.16 MMBtu/hr
16 <b>F</b>	(6) Enercon Corona Treaters	5-80-720 B	VOC ·	
3T	Naphthenic oil storage tank	5-80-720 B	VOCs	
7T	Acrylic storage tank	5-80-720 B	none (water-based)	
5P	(6) polypropylene film extruders	5-80-720 B	PM & VOC	
7P	tape slitting (hot melt)	5-80-720 B	PM	
13P	tape slitting (acrylic)	5-80-720 B	PM	
14P-16P	Cast Extrusion	5-80-720 B	PM & VOC	
17P-19P	Cast Extrusion	5-80-720 B	PM & VOC	
22P	(14) Polyethylene resin storage silos	5-80-720 B	PM	
23P	(10) Polypropylene resin storage silos	5-80-720 B	PM	
21P&24P	Repelletizers	5-80-720 B	PM & VOC	
25P	Cast Extrusion	5-80-720 B	PM & VOC	
26P	Two Polyethylene storage silos	5-80-720 B	PM	

These emission units are presumed to be in compliance with all requirements of the federal 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 9 VAC 5-80-110.

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# VI. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 63, Subpart FFFF	Miscellaneous Organic Chemica Production and Processes	Not Applicable per 40 CFR 63.2435(c)(3) – affiliated operations
40 CFR 63, Subpart HHH	Miscellaneous Coating Manufacturing	Not Applicable per 40 CFR 63.7985(d)(2) – affiliated operations

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

# VII. General Conditions

# A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

## B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

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- 2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
- 3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
- 4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- 5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

# C. Recordkeeping and Reporting

- 1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
  - a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.
  - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

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- 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. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (9 VAC 5-80-110 F)
- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
  - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
  - b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
    - (i) Exceedance of emissions limitations or operational restrictions;
    - (ii) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
    - (iii)Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
  - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

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# D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification.
- 3. The compliance status.
- 4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- 5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- 6. Such other facts as the permit may require to determine the compliance status of the source.
- 7. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3 APD Permits@epa.gov

(9 VAC 5-80-110 K.5)

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# E. Permit Deviation Reporting

The permittee shall notify the Director, Blue Ridge Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition VII.C.3 of this permit. (9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

# F. Failure/Malfunction Reporting

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 soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Blue Ridge Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Blue Ridge Regional Office. (9 VAC 5-20-180 C)

## G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

## H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

# I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

#### J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

# K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

# L. Duty to Submit Information

- The permittee shall furnish to the Board, within a reasonable time, any information
  that the Board may request in writing to determine whether cause exists for
  modifying, revoking and reissuing, or terminating the permit or to determine
  compliance with the permit. Upon request, the permittee shall also furnish to the
  Board copies of records required to be kept by the permit and, for information
  claimed to be confidential, the permittee shall furnish such records to the Board along
  with a claim of confidentiality.
  (9 VAC 5-80-110 G.6)
- 2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.

  (9 VAC 5-80-110 K.1)

# M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

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# N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

- 1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
- 2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
- 3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
- 4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- 5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

## O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E)

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# P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

# Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- 1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

## R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

# S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

## T. Transfer of Permits

- No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another. (9 VAC 5-80-160)
- 2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)
- 3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

## U. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
  - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
  - b. The permitted facility was at the time being properly operated.

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- c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
- d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
- 4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

#### V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations. (9 VAC 5-80-190 C and 9 VAC 5-80-260)

# W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

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# X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

## Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

# Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

# AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)