

STATEMENT OF BASIS (SOB)
HOOD PACKAGING CORPORATION
Anniston, Alabama
Facility No. 301-0059

Hood Packaging has applied for renewal of Major Source Operating Permit (MSOP) No. 301-0059. 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 1995. The initial Title V MSOP was issued on March 15, 2019, and expires on March 14, 2024. The renewal application was received on September 14, 2023.

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

There are no current or ongoing enforcement actions against Hood Packaging 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 AL110003385872).

The current MSOP consists of Line #001: Two Flexographic Printing Press Lines No. 1 and No. 2 with associated equipment.

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 Department policy.

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) significant threshold of 250 tons per year.

Hood Packaging will maintain their current rolling 12-month emission limitations for Unit 001 of 227 tons of VOC, and their facility-wide 24.5/9.5 tons total hazardous air pollutant (HAP)/single HAP limits. There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) or Federal New Source Performance Standards (NSPS) applicable to the operations at Hood Packaging.

OPERATIONS:

This facility's SIC Code is 2643 for the flexographic printing (roller coating) of polyethylene bags, and their NAICS Code is 322220 for the manufacturing of bags, plastics film and custom blend film. This facility operates 6,240 hours a year.

Each of the significant emission units is described below:

Permit Unit No. X001 – Two Flexographic Printing Press Lines No. 1 and No. 2 with associated equipment

Overview

This unit currently operates two Uteco Onyx ten-color printing presses. Each press is heated by two 0.80 MMBtu/hr natural gas fired burners. The inks and solvents are blended in a mixing room prior to being pumped to the presses. Emissions from Press Lines No. 1 and No. 2 are vented the atmosphere.

Equipment for this process was initially permitted in Air Permit 301-0059-X001 on December 13, 2017. The requirements and limitations from this permit were incorporated into the initial Title V permit on March 15, 2019.

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 (VOC)

The combined VOC emissions from Press Lines No. 1 and No. 2 are limited to 227 tons per year in order to stay below the significant thresholds for PSD.

Hazardous Air Pollutants (HAPs)

The combined total HAPs and individual HAP emissions from the entire facility are limited to 24.5 and 9.5 TPY, respectively.

Periodic Monitoring

Opacity and PM

No opacity monitoring/visual inspections are currently required due to the low PM emissions expected from the process. However, if any issues with PM from the facility are indicated, the Department will modify the permit to require monitoring/inspections.

Volatile Organic Compounds (VOC)

The facility is required to keep accurate and understandable records of all VOC and HAP containing material content and consumption. Reports detailing this information are required to be submitted to the Department on a quarterly basis.

REPORTING REQUIREMENTS:

Emissions of VOC and HAP will be determined from material usage and 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.

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.

ENVIRONMENTAL JUSTICE:

An Environmental Justice analysis was performed utilizing EPA's EJSCREEN tool and the Council on Environmental Quality's (CEQ) Climate and Economic Justice screening tool (Justice 40). This permit is for an existing facility, and no modifications or increases in emissions will result from the issuance of this permit; therefore, it was determined that enhanced outreach is 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

January 24, 2024
Date

CTN/ctn