



South Carolina Department of Health
and Environmental Control

Conditional Major Air Quality Permit

**Iva Poly Bags, Inc.
201 E Broad Street
Iva, South Carolina**

In accordance with the provisions of the Pollution Control Act, Sections 48-1-50(5) and 48-1-110(a), and the 1976 Code of Laws of South Carolina, as amended, Regulation 61-62, the above named permittee is hereby granted permission to discharge air contaminants into the ambient air. The Bureau of Air Quality authorizes the operation of this facility and its applicable equipment specified herein in accordance with the Conditional Major Permit request received on September 29, 2009

This permit is subject to and conditioned upon the terms, limitations, standards, and schedules contained in or specified on the 11 pages, with the accompanying attachments, of this permit.

Permit Number: CM-0200-0141
Issue Date: [DRAFT]

Effective Date: [DRAFT]
Expiration Date: [DRAFT]

**Director, Engineering Services Division
Bureau of Air Quality**

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PART 1.0 GENERAL INFORMATION

A. APPLICABLE PERMIT DATES

ISSUE DATE: <DRAFT>
EFFECTIVE DATE: <DRAFT>
EXPIRATION DATE: <DRAFT>

B. FACILITY INFORMATION

ENVIRONMENTAL CONTACT: Kim Snook
CONTACT TELEPHONE NUMBER: 864-348-2113
INTERNET E-MAIL ADDRESS: ivapoly@charter.net
FACILITY LOCATION: 201 E. Broad Street - Iva
COUNTY: Anderson
SIC CODE(S): 2673
NAICS CODE(S): 326111
AFS CODE: 4500700141

C. FACILITY MAILING ADDRESS

FACILITY NAME: Iva Poly Bags, Inc.
ADDRESS: PO Box 970
CITY, STATE, ZIP: Iva, SC 29655

D. FACILITY BILLING ADDRESS

FACILITY BILLING NAME: Iva Poly Bags, Inc.
ADDRESS: PO Box 970
CITY, STATE, ZIP: Iva, SC 29655

PART 2.0 APPLICABILITY

A. GENERAL APPLICABILITY

Condition Number	Condition
2.A.1	This permit applies to any major stationary source which requests and fulfills the conditions of SC Regulation 61-62.1, Section II(G) to obtain and adhere to federally enforceable permit conditions to limit the source's potential to emit less than applicable major source thresholds.

B. CRITERIA

Condition Number	Condition
2.B.1	All limitations and requirements listed as enforceable permit conditions shall be permanent, quantifiable, or otherwise enforceable in a practical manner.
2.B.2	All permit conditions that constrain the operation of a source in an effort to limit potential to emit shall be federally enforceable. Unless otherwise agreed by the SC Department of Health and Environmental Control (Department) and US Environmental Protection Agency (US EPA), the Department shall provide to US EPA on a timely basis a copy of all draft and final permits intended to be federally enforceable.
2.B.3	This facility may be required to obtain a Part 70 operating permit in accordance with SC Regulation 61-62.70 if at any time an applicable major source threshold is exceeded.

PART 3.0 GENERAL CONDITIONS

The following conditions are applicable unless superseded by specific permit condition(s):

Condition Number	Condition
3.1	The permittee must comply with all applicable statutes and regulations of the United States and the State of South Carolina and this permit does not relieve the permittee from compliance with applicable local laws, ordinances, and regulations.
3.2	This permit has been issued based on information submitted by the permittee in a Conditional Major permit application. Any false information or misrepresentation in the application may be grounds for permit revocation. This permit supersedes any other operating permit issued by the Bureau of Air Quality upon the permit's effective date.

Condition Number	Condition
3.3	<p>In accordance with SC Regulation 61-62.1, Section II(H), the permittee shall submit an operating permit renewal request to the Department no later than 90 days prior to the operating permit expiration date. The source may be inspected by the Department in order to decide whether to renew the permit. Past records of compliance and future probability of compliance will be considered in making the decision regarding renewal.</p> <p>Submission of a request for renewal meeting the requirements in S.C. Regulation 61-62.1, Section II(H) shall allow the permittee to continue operating pursuant to the most recent conditional major operating permit, until such time as the Department has taken final action on the request for renewal. In addition to the minimum information required by S.C. Regulation 61-62.1, Section II(C), any facility requesting a conditional major operating permit must also provide the following:</p> <ol style="list-style-type: none"> i. Potential emission calculations and proposed Federally enforceable emission limitations for each emission unit at the facility verifying that the total emissions at the facility will be below the major source (or facility) thresholds. ii. All proposed production and/or operational limitations that will constrain the operation of each emission unit that are to be identified as Federally enforceable. iii. All proposed monitoring parameters, recordkeeping and reporting requirements the source will use to determine and verify compliance with the requested Federally enforceable limitations on a continuous basis. The source shall also provide the compliance status of these proposed parameters and requirements at the time of the request submittal.
3.4	<p>This permit expressly incorporates all the provisions of SC Regulation 61-62.1, Section II(J).</p>
3.5	<p>In accordance with SC Regulation 61-62.1, Section II(J) for all sources not required to have continuous emissions monitors, in the event of any malfunction of air pollution control equipment or system, process upset or other equipment failure which results in discharges of air contaminants lasting for one hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the local Environmental Quality Control (EQC) Regional office within twenty-four (24) hours after the beginning of the occurrence. The permittee shall also submit a written report within thirty (30) days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality (BAQ). The report shall contain as a minimum, the following: the identity of the emission unit and associated equipment where excess emissions occurred, the magnitude of excess emissions, the time and duration of excess emissions, the steps taken to remedy the malfunction and to prevent a recurrence, documentation that control equipment and processes were at all times maintained and operated, to the maximum extent practicable, in a manner that was consistent with good practice for minimizing emissions. Such a report shall in no way serve to excuse, otherwise justify, or in any manner affect any potential liability or enforcement action resulting from the occurrence.</p>
3.6	<p>This permit only covers emission units and control equipment while physically present at the indicated facility. Unless the permit specifically provides for the equipment relocation, this permit is void for an item of equipment on the day it is removed from the permitted facility, notwithstanding the expiration date specified on the permit.</p>
3.7	<p>In accordance with SC Regulation 61-62.1, Section II(M) within thirty (30) days of the transfer of ownership/operation of a facility, the current permit holder and prospective new owner/operator shall submit to the Department a written request for transfer of the source operating or construction permits. The written request for transfer of the source operating or construction permit shall include any changes pertaining to the company name and mailing address; the facility name and mailing address (if different from that of the company); the name, mailing address, and telephone number of the owner or agent for the company; and any proposed changes to the permitted activities of the source. Transfer of the operating or construction permits will be effective upon written approval by the Department.</p>

Condition Number	Condition
3.8	<p>Any permittee who plans to construct, alter, or add to a source of air contaminants, including the installation of any device for the control of air contaminant discharges shall submit a complete construction permit application package as described in SC Regulation 61-62.1, Section II(C)</p> <p>A construction permit application package for a federally-enforceable construction permit will be required if any of the emissions changes described above will affect a pollutant limited under SC Regulation 61-62.1, Section II(G). The Department may grant permission to proceed with minor alterations or additions without issuance of a permit when the Department determines that the alteration or addition will not increase the quantity and will not alter the character of the source's emissions.</p>
3.9	<p>Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:</p> <ol style="list-style-type: none"> 1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit. 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. 3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit. 4. As authorized by the Act and/or the SC Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
3.10	<p>This permit may be reopened by the Department for cause or to include any new standard or regulation which becomes applicable to a source during the life of the permit.</p>
3.11	<p>The permittee shall pay fees in accordance with SC Regulation 61-30, SC Environmental Protection Fees.</p>
3.12	<p>In the event of an emergency situation, as defined by SC Regulation 61-62.1, Section II(L), an affirmative defense to any action brought for noncompliance with an emission limitation shall be demonstrated by the facility if all of the conditions of SC Regulation 61-62.1, Section II(L) are met.</p>

PART 4.0 FACILITY WIDE REQUIREMENTS

Condition Number	Condition
4.1	<p>An air dispersion modeling analysis review has been exempted for the drying oven for the Ambient Air Quality Standards (SC Regulation 61-62.5, Standard No. 2) and Prevention of Significant Deterioration (SC Regulation 61-62.5, Standard No. 7). As specified in the Bureau of Air Quality's <i>Air Quality Modeling Guidelines</i>, Section 1.2, "Facilities that emit one pound per hour or less for each pollutant listed under Standard No. 2, with the exception of lead and fluorides (HF), are not required to submit a compliance demonstration for Standards No. 2 and 7. This exemption does not apply to lead, fluorides (HF), and air toxic pollutants subject to Standard No. 8." Written approval from this Bureau is required prior to modifying any source or parameter that would cause an increase in any pollutant concentration regulated by the above standards.</p>
4.2	<p>The permittee shall comply with SC Regulation 61-62.4 "Hazardous Air Pollution Conditions."</p>
4.3	<p>The permittee shall comply with SC Regulation 61-62.2 "Prohibition of Open Burning."</p>
4.4	<p>The permittee shall comply with SC Regulation 61-62.6 "Control of Fugitive Particulate Matter", Section III "Control of Fugitive Particulate Matter Statewide."</p>

Condition Number	Condition
4.5	<p>Limits/Standards: This facility is a potential major source for volatile organic compounds (VOC) as defined by SC Regulation 61-62.70.3(a)(1). The facility has agreed to Federally enforceable operating limitations to limit its potential to emit to less than 100 tons VOC emissions per year. Bureau approval must be obtained before the facility may increase VOC emissions over the existing permitted limits. Increases in allowable VOC emissions may be subject to the requirements of SC Regulation 61-62.5, Standard No. 5.1, “Best Available Control Technology (BACT)/Lowest Achievable Emission Rate (“LAER”) Applicable To Volatile Organic Compounds.” Under this regulation, the facility would be required to determine actual plant emissions and a VOC baseline number (if appropriate).</p> <p>Testing: None Required</p> <p>Monitoring/Record Keeping/Reporting/Other: The owner/operator shall maintain records of all volatile organic compounds (VOC). These records shall include the total amount of each material used, the VOC content in percent by weight of each material, and any other records necessary to determine facility wide VOC emissions. VOC emissions shall be calculated on a monthly basis, and a twelve-month rolling sum shall be calculated for total VOC emissions. Reports of the calculated values and the twelve-month rolling sum shall be submitted semiannually.</p> <p>An algorithm, including example calculations and emission factors, explaining the method used to determine emission rates shall be included in the initial report. Subsequent submittals of the algorithm and example calculations are unnecessary, unless the method of calculation is found to be unacceptable by the Bureau or if the facility changes the method of calculating emissions and/or changes emission factors.</p>

PART 5.0 EMISSION UNIT REQUIREMENTS

A. EMISSION UNIT DESCRIPTION

TABLE 5.1 EMISSION UNITS

Unit ID	Unit Description	Control Device
01	Victory Kidder Printer No. 1	None
02	American Kidder Printer No. 2	None

N/A = Not Applicable

TABLE 5.2 CONTROL DEVICES

Control Device ID	Control Device Description	Installation Date	Pollutant(s) Controlled
None	None	None	None

N/A = Not Applicable

B. GENERIC CONDITIONS

GENERIC CONDITIONS

Condition Number	Unit ID	Equipment ID	Condition
GC1	01 02	All sources	Unless elsewhere specified within this permit, all records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least five (5) years from the date generated and shall be made available to a Department representative upon request.

GENERIC CONDITIONS			
Condition Number	Unit ID	Equipment ID	Condition
GC2	01 02	All sources	<p>Unless elsewhere specified within this permit, all reports required under this permit including all recorded parameters and calculated values shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality, at the address listed below, postmarked no later than thirty (30) calendar days after the end of the reporting period.</p> <p style="text-align: right;">SC DHEC - BAQ Technical Management Section 2600 Bull Street Columbia, SC 29201</p>

C. EMISSION UNIT – LIMITATIONS, MONITORING AND REPORTING

Table 5.3 - Unit ID 01 – Victory Kidder Printer No. 1				
Equipment ID	Description	Installation Date/Modification Date	Control Device ID	Stack ID
783103	Flexographic printing press, a drum and (4) printing stations	1999	None	No. 1

Table 5.4 - Control Device(s) For Unit ID 01 - Victory Kidder Printer No. 1			
Control Device ID	Description	Installation Date/Modification Date	Pollutant(s) Controlled
None	None	None	None

Conditions For Unit ID 01 - Victory Kidder Printer No. 1			
Condition Number	Equip ID	Regulated Pollutant/Standard	Conditions
01.1	783103	Opacity	<p>Limits/Standards: In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began after December 31, 1985, emissions (including fugitive emissions) shall not exhibit an opacity greater than 20%.</p> <p>Testing: None Required</p> <p>Monitoring/Record Keeping/Reporting/Other: None Required</p>

Table 5.5 - Unit ID 02 – American Kidder Printer No. 2				
Equipment ID	Description	Installation Date/Modification Date	Control Device ID	Stack ID
9283630	Flexographic Printing Press	2002	None	No. 1
9283630 Dryer	0.9 x10 ⁶ Btu/hr natural gas drying oven	2002	None	No. 1

Table 5.6 - Control Device(s) For Unit ID 02 - American Kidder Printer No. 2			
Control Device ID	Description	Installation Date/Modification Date	Pollutant(s) Controlled
None	None	None	None

Conditions For Unit ID 02 - American Kidder Printer No. 2			
Condition Number	Equip ID	Regulated Pollutant/Standard	Conditions
02.1	9283630 9283630 Dryer	Opacity	<p>Limits/Standards: In accordance with SC Regulation 61-62.5, Standard No. 4 - Emissions from Process Industries, Section IX - Visible Emissions (Where Not Specified Elsewhere), where construction or modification began after December 31, 1985, emissions (including fugitive emissions) shall not exhibit an opacity greater than 20%.</p> <p>Testing: None Required</p> <p>Monitoring/Record Keeping/Reporting/Other: None Required</p>

PART 6.0 REPORTING REQUIREMENTS

TABLE 6.1 PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the effective date of the permit)	Report Due Date
Quarterly	January-March	April 30 th
	April-June	July 30 th
	July-September	October 30 th
	October-December	January 30 th
Semiannual	January-June	July 30 th
	April-September	October 30 th
	July-December	January 30 th
	October-March	April 30 th
Annual	January-December	January 30 th
	April-March	April 30 th
	July-June	July 30 th
	October-September	October 30 th

Note: This reporting schedule does not supercede any Federal reporting requirements including but not limited to 40 CFR 60, 61, and 63. All Federal reports must meet the reporting time frames specified in the Federal standard unless the Department or EPA approves a change.

PART 7.0 ADDITIONAL CONDITIONS

A. SPECIFIC CONDITIONS

Condition Number	Conditions
7.A.1	<p>Emergency power generators have been determined to be exempt from construction permitting requirements in accordance with South Carolina Regulation 61-62.1 Section II.B.2.f. If an emergency generator is installed it would be listed as exempt sources in this permit. These sources shall still comply with the requirements of all applicable regulations including but not limited to:</p> <ul style="list-style-type: none"> New Source Performance Standards (NSPS) 40 CFR 60 Subparts A (General Provisions); IIII (Stationary Compression Ignition Internal Combustion Engines); and JJJJ (Stationary Spark Ignition Internal Combustion Engines)

Condition Number	Conditions
7.A.2	The facility is not permitted to use ink that contains HAPs.
7.A.3	The 0.9 million Btu/hr natural gas burner is permitted to burn only natural gas as fuel. The use of any other substances as fuel is prohibited without prior written approval from the Bureau of Air Quality.

B. EXEMPT SOURCES

Equip ID	Source Description (Date Listed)	Exemption Basis
N/A	N/A	N/A

N/A = Not Applicable

draft

CURRENT DATE

Iva Poly Bags, Inc.
PO Box 970
Iva, SC 29655

ATTENTION: Kim Snook

Dear Ms. Snook:

Enclosed with this letter is Permit No. CM-0200-0141 that takes effect on [DATE]. This conditional major operating permit will limit the facility's potential to emit to below Title V Major Source thresholds, thereby restricting it from Title V Major Source status as defined in SC Regulation 61-62.70, "Title V Operating Permit Program." Please note the conditions and limitations imposed. This permit will be valid through EXPIRATION DATE. Pursuant to the South Carolina Administrative Procedures Act, this permit decision may be appealed in accordance with applicable state law. Please see the enclosed Notice of Appeal Procedure, effective July 01, 2006, for guidelines on appeal submittals.

Please be advised that the effective date of this permit begins the facility's reporting period under the terms and conditions of this permit. Abbreviated periodic reports shall be completed and submitted in accordance with the previous permit's conditions and shall cover the interim period between the previous permit reporting period and the new permit reporting period.

Please examine this new permit carefully for errors or omissions and notify the appropriate staff member, Alyson Hayes, (803-898-3836) or e-mail at hayesam@dhec.sc.gov promptly if any are discovered.

Thank you for your cooperation.

Sincerely,

Elizabeth J. Basil, Director
Engineering Services Division
Bureau of Air Quality

EJB:amh:<TYPIST'S INITIALS>

Enclosures

cc: Stephanie Smith-Strack, Region 1, Anderson EQC Office
Conditional Major File: 0200-0141

Notice of Appeal Procedure

The following procedures are in effect beginning July 1, 2006, pursuant to 2006 Act No. 387:

1. This decision of the S.C. Department of Health and Environmental Control (Department) becomes the final agency decision 15 days after notice of the decision has been mailed to the applicant or respondent, unless a written request for final review is filed with the Department by the applicant, permittee, licensee, or affected person.
2. An applicant, permittee, licensee, or affected person who wishes to appeal this decision must file a written request for final review with the Clerk of the Board at the following address or by facsimile at 803-898-3393.

Clerk of the Board
SC DHEC
2600 Bull Street
Columbia, SC 29201

3. The request for final review should include the following:
 - a. the grounds on which the Department's decision is challenged and the specific changes sought in the decision
 - b. a statement of any significant issues or factors the Board should consider in deciding how to handle the matter
 - c. a copy of the Department's decision or action under review
4. In order to be timely, a request for final review must be received by the Clerk of the Board within 15 days after notice of the decision has been mailed to the applicant or respondent. If the 15th day occurs on a weekend or State holiday, the request is due to be received by the Clerk of the Board on the next working day. The request for final review must be received by the Clerk of the Board by 5:00 p.m. on the date it is due.
5. If a timely request for final review is filed with the Clerk of the Board, the Clerk will provide additional information regarding procedures.
6. The Board of Health and Environmental Control has 60 days from the date of receipt of a request for final review to conduct a final review conference. The conference may be conducted by the Board, its designee, or a committee of three members of the Board appointed by the chair.
7. If a final review conference is not conducted within 60 days, the Department decision becomes the final agency decision, and a party may request a contested case hearing before the Administrative Law Court within 30 days after the deadline for the final review conference.

The above information is provided as a courtesy; parties are responsible for complying with all applicable legal requirements.