



**STATEMENT OF BASIS**  
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 BAQ Engineering Services Division  
 2600 Bull Street, Columbia, SC 29201  
 Phone: 803-898-4123 Fax: 803-898-4079

<b>Company Name:</b>	Iva Poly Bags, Inc.	<b>Permit Writer:</b>	Alyson Hayes
<b>Permit Number:</b>	CM-0200-0141	<b>Date:</b>	Draft

**DATE APPLICATION RECEIVED:** September 29, 2009  
**DATE OF LAST INSPECTION:** December 10, 2008 (no violations cited)

**FACILITY DESCRIPTION**

The facility prints text and artwork on polyethylene bag material ranging in thickness from 1 mil to 6 mil. The facility initially installed one printing press that has the capability of applying up to four separate colors. The 46" Victory Kidder printing press has four print applications. A roll of polyethylene is inserted on the machine and wound around a large drum and through various rollers and printing applicators. Depending on the number of colors to be printed, the poly sheet passes through one or more print units. One applicator unit is used for applying only one color. If multiple colors are to be applied, the poly will be exposed to multiple units. After ink is applied, the sheet passes through the drying tunnel and is re-rolled. Maximum press speed is 500 feet/minute when applying one color and 350 feet/minute when applying two to four colors. The drying tunnel can only accommodate a maximum of two layers of ink. Ink layers greater than two will not properly dry and jeopardize the quality of the finished product. The drying tunnel is electrically heated.

In most cases, the rolls of printed poly are sent to bag making. Bag making folds the sheet to the customer's specification and welds the seams. The "bag" sheet can either be re-rolled or cut to a specified size. The finished product is then shipped.

The American Kidder can accommodate 36" wide poly. The unit's operation is similar to the Victory Kidder, which is the first unit that was installed at the facility. The press speed, limited by the dryer, is 350 feet/minute when applying four colors and 500 feet/minute when applying one color. The drying oven is natural gas-fired, with a single burner rated at 900,000 Btu/hour.

**PROJECT DESCRIPTION**

The facility wishes to renew the Conditional Major Operating Permit that was issued on September 28, 2004 and will expire December 31, 2009.

**CHANGES SINCE LAST OP ISSUANCE**

Updated the contact information and addresses

Changed the VOC limit from not to exceed 99 TPY to less than 100 TPY. The less than 100 TPY limit is the regulatory threshold not 99 TPY

Changed reporting frequency to semiannual instead of quarterly because of the low actual emissions in the last few years

**PUBLIC NOTICE**

The Conditional Major permit is required to undergo a 30-day public comment period.

**EMISSIONS**

UNCONTROLLED POTENTIAL EMISSIONS (PROJECT ONLY)				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions
01	VOC	15.75	68.98	AP-42
02	VOC	10.6	46.45	Engineering Calculations (Mass Balance)
	PM/PM <sub>10</sub>	0.0067	0.0293	AP-42
	SO <sub>2</sub>	0.0005	0.002	AP-42
	NO <sub>x</sub>	0.0882	0.39	AP-42
	CO	0.0741	0.32	AP-42

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY
VOC	115.43	N/A
PM/PM <sub>10</sub>	0.0293	
SO <sub>2</sub>	0.002	
NO <sub>x</sub>	0.39	
CO	0.32	



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<b>PROJECT REGULATORY APPLICABILITY REVIEW (PROJECT ONLY)</b>			
Regulation	Applicable		Comments
	Yes	No	
<b>South Carolina Regulation 61-62.1 through 62.70: Air Pollution Regulations</b>			
<b>OPERATING PERMIT STATUS</b>			
Section II(G) - Conditional Major	X		The facility is a major source of VOC emissions and has taken federally enforceable limits to keep them below 100 TPY. This is demonstrated by keeping records of the VOC usage for each printer.
Regulation 61-62.70 - Title V		X	
<b>MODELING</b>			
Standard 2 - Ambient Air Quality Standards	X		The printers only emit VOC emissions that are not required to be modeled. The dryer emissions are less than 1 lb/hr and are exempt from requiring modeling.
Standard 7(c) - Ambient Air Increments	X		
Standard 8 - Toxic Air Pollutants (state only)		X	
<b>OTHERS</b>			
Section II(E) - Synthetic Minor		X	No synthetic minor limits have been established.
Standard 1 - Fuel Burning Operations		X	No fuel burning sources at the facility
Standard 3 - Waste Combustion/Reduction (state only)		X	No waste is being combusted
Standard 3.1 - HMI Waste Incinerators		X	The facility does not burn any medical waste
Standard 4 - Emissions from Process Industries	X		Opacity limits are on the printers and dryer of 20% each. No process PM emissions.
Standard 5 - Volatile Organic Compounds		X	Sources in Anderson County are exempt from this regulation.
Standard 5.1 - BACT/LAER For VOC (state only)		X	VOC emissions are limited to less than 10 TPY
Standard 5.2 - Control of Oxides of Nitrogen		X	Dryer is less than 10 million BTU/hr
Standard 7 - Prevention of Significant Deterioration		X	Potential VOC emissions are less than 250 TPY
Standard 7.1 - Standards for Non Attainment Areas		X	Anderson County is in attainment
62.6 - Control of Fugitive Particulate Matter		X	No fugitive PM sources
62.60 - SC Designated Facility Plan and NSPS		X	See below
62.61 - NESHAP		X	See below
62.63 - NESHAP For Source Categories		X	See below
62.68 - Chemical Accident Prevention		X	No chemicals stored about thresholds
<b>Federal Regulations</b>			
40CFR60 Subpart		X	Not subject to Subpart QQ because it is not a rotogravure printing process. Not subject to Subpart FFF because it is not a flexible vinyl and urethane coating and printing process
40CFR61 Subpart		X	The operation does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
40CFR63 Subpart Area Source Standards (Part 63) Subpart		X	Not subject to Subpart KK because this process does not emit any HAP emissions. This facility is not permitted to use inks that contain any HAPs.
Compliance Assurance Monitoring (CAM) (Part 64)		X	Not a Title V facility

**SUMMARY AND CONCLUSIONS**

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.