State of Utah

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Department of
Environmental Quality

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DIVISION OF AIR QUALITY
Bryce C. Bird
*Director*

DAQE-IN158320003-24

October 16, 2024

John Rogers
PPC Flexible Packaging
213 Temkin Way
Payson, UT 84651
john@temkininternational.com

Dear Mr. Rogers:

Re: Intent to Approve: Modification to Approval Order DAQE-AN158320001-18 to Add Equipment
Project Number: N158320003

The attached document is the Intent to Approve (ITA) for the above-referenced project. The ITA is subject to public review. Any comments received shall be considered before an Approval Order (AO) is issued. The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Future correspondence on this ITA should include the engineer's name, **Stockton Antczak,** as well as the DAQE number as shown on the upper right-hand corner of this letter. Stockton Antczak, can be reached at (385) 306-6724 or santczak@utah.gov, if you have any questions.

Sincerely,

Jon L. Black
Jon Black (Oct 8, 2024 23:30 MDT)

Jon L. Black, Manager
New Source Review Section

JLB:SA:jg

cc: Davis County Health Department

**STATE OF UTAH**
**Department of Environmental Quality**
**Division of Air Quality**

# INTENT TO APPROVE
# DAQE-IN158320003-24
# Modification to Approval Order DAQE-AN158320001-18 to Add Equipment

**Prepared By**
**Stockton Antczak, Engineer**
**(385) 306-6724**
**santczak@utah.gov**

**Issued to**
**PPC Flexible Packaging - Flexographic Printing Facility**

**Issued On**
**October 16, 2024**

Jon Black (Oct 8, 2024 23:30 MDT)

**New Source Review Section Manager**
**Jon L. Black**

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# GENERAL INFORMATION

## CONTACT/LOCATION INFORMATION

**Owner Name**
PPC Flexible Packaging

**Source Name**
PPC Flexible Packaging - Flexographic Printing Facility

**Mailing Address**
213 Temkin Way
Payson, UT 84651

**Physical Address**
95 South River Bend Way
North Salt Lake, UT 84054

**Source Contact**
Name: John Rogers
Phone: (801) 494-7213
Email: john@temkininternational.com

**UTM Coordinates**
420,424 m Easting
4,521,401 m Northing
Datum NAD83
UTM Zone 12

**SIC code** 2752 (Commercial Printing, Lithographic)

## SOURCE INFORMATION

General Description
PPC Flexible Packaging (PPC) operates a flexographic printing plant located in North Salt Lake. The equipment on site consists of various presses, laminators, and finishing and packaging machines. The VOC emissions from all the operations at the plant will be controlled by a regenerative thermal oxidizer (RTO) that uses supplemental natural gas to maintain the operating temperature. The VOC emissions from the ink and solvent storage areas, ink mixing areas, printer de-inking areas, the Uteco 8 color press device, and three (3) floor sweeps are controlled by the RTO as well.

NSR Classification
Minor Modification at Minor Source

Source Classification
Located in Northern Wasatch Front O3 NAA, Salt Lake City UT $PM_{2.5}$ NAA
Davis County
Airs Source Size: B

Applicable Federal Standards
None

Project Description
PPC has requested to add one (1) color printer and one (1) printer/laminator. Facility-wide PTE were re-evaluated as part of this modification based on updated equipment lists and operations. The following updates were made to the AO:

1) Added one (1) Color Printer to equipment list and PTE.
2) Added one (1) Printer/Laminator to equipment list and PTE.
3) Updated site-wide PTE.

## SUMMARY OF EMISSIONS

The emissions listed below are an estimate of the total potential emissions from the source. Some rounding of emissions is possible.

| Criteria Pollutant | Change (TPY) | Total (TPY) |
|---|---|---|
| $CO_2$ Equivalent | 0 | 1958.00 |
| Carbon Monoxide | 0 | 1.37 |
| Nitrogen Oxides | 0 | 1.63 |
| Particulate Matter - $PM_{10}$ | 0 | 0.10 |
| Particulate Matter - $PM_{2.5}$ | 0 | 0.10 |
| Sulfur Dioxide | 0 | 0.01 |
| Volatile Organic Compounds | 9.67 | 19.35 |

| Hazardous Air Pollutant | Change (lbs/yr) | Total (lbs/yr) |
|---|---|---|
| Formaldehyde (CAS #50000) | | 2 |
| Glycol Ethers (CAS #EDF109) | | 28 |
| Hexane (CAS #110543) | 0 | 59 |
| Methanol (CAS #67561) | | 18 |
| Naphthalene (CAS #91203) | 0 | 7 |
| | **Change (TPY)** | **Total (TPY)** |
| Total HAPs | 0.03 | 0.06 |

# PUBLIC NOTICE STATEMENT

The NOI for the above-referenced project has been evaluated and has been found to be consistent with the requirements of UAC R307. Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an AO by the Director.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notification of the intent to approve will be published in the Ogden Standard Examiner on October 18, 2024. During the public comment period the proposal and the evaluation of its impact on air quality will be available for the public to review and provide comment. If anyone so requests a public hearing within 15 days of publication, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated. The proposed conditions of the AO may be changed as a result of the comments received.

# SECTION I: GENERAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

| | |
|---|---|
| I.1 | All definitions, terms, abbreviations, and references used in this AO conform to those used in the UAC R307 and 40 CFR. Unless noted otherwise, references cited in these AO conditions refer to those rules. [R307-101] |
| I.2 | The limits set forth in this AO shall not be exceeded without prior approval. [R307-401] |
| I.3 | Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved. [R307-401-1] |
| I.4 | All records referenced in this AO or in other applicable rules, which are required to be kept by the owner/operator, shall be made available to the Director or Director's representative upon request, and the records shall include the two-year period prior to the date of the request. Unless otherwise specified in this AO or in other applicable state and federal rules, records shall be kept for a minimum of two (2) years. [R307-401-8] |
| I.5 | At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on equipment authorized by this AO shall be recorded. [R307-401-4] |
| I.6 | The owner/operator shall comply with UAC R307-107. General Requirements: Breakdowns. [R307-107] |
| I.7 | The owner/operator shall comply with UAC R307-150 Series. Emission Inventories. [R307-150] |
| I.8 | The owner/operator shall submit documentation of the status of construction or modification to the Director within 18 months from the date of this AO. This AO may become invalid if construction is not commenced within 18 months from the date of this AO or if construction is discontinued for 18 months or more. To ensure proper credit when notifying the Director, send the documentation to the Director, attn.: NSR Section. [R307-401-18] |

# SECTION II: PERMITTED EQUIPMENT

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

## II.A THE APPROVED EQUIPMENT

| | |
|---|---|
| II.A.1 | **Target Labels and Packaging**<br>Flexographic Printing Plant |

| | |
|---|---|
| II.A.2 | **Floor Sweeps**<br>Three (3) Floor Sweeps<br>The vents (floor sweeps) are placed in the floors to capture VOC emissions from the ink storage area, the roll changing (plating) area, and the Uteco press operations.<br>Control: RTO |
| II.A.3 | **Regenerative Thermal Oxidizer (RTO)**<br>RTO Device<br>Fuel: Natural Gas<br>Capacity: 3 MMBtu/hr<br>Processes Controlled: Three (3) floor sweeps, Uteco 8 Press, and Uteco 8XS Press |
| II.A.4 | **Ink and Roll Storage Areas**<br>Fugitive emissions from the ink storage, roll storage, and change-out areas that aren't captured in the floor sweeps. |
| II.A.5 | **Digital Presses**<br>One (1) Digital Press<br>Attached equipment: electric dryer and corona treater<br><br>One (1) Digital Press<br>Attached equipment: electric dryer |
| II.A.6 | **In-Line Flexo Presses**<br>One (1) In-Line Press<br>Attached equipment: electric dryer and corona treater<br><br>One (1) In-Line Press<br>Attached equipment: electric dryer |
| II.A.7 | **Super Simplex Printer**<br>One (1) Super Simplex Printer<br>Attached equipment: corona treater |
| II.A.8 | **Uteco 8 Color Press**<br>Attached equipment: Two (2) burners<br>Control: RTO<br>Air flow rate: 15,000 scfm |
| II.A.9 | **Uteco Mistral Printer/Laminator (NEW)**<br>Attached equipment: One (1) burner, corona treater |
| II.A.10 | **Uteco 8XS Color Press (NEW)**<br>Attached Equipment: Two (2) burners<br>Control: RTO |
| II.A.11 | **Finisher**<br>One (1) Finishing Device (used to finish the item to the proper size by cutting, folding, gluing, etc.) |
| II.A.12 | **Rewinders**<br>Five (5) Rewinders |

| | |
|---|---|
| II.A.13 | **Seamer, Cutter, Pouch Machines, Bag Machine**<br>One (1) Seamer<br>One (1) Cutter<br>Two (2) Pouch Machines<br>One (1) Bag Machine<br><br>For information purposes only. |

# SECTION II: SPECIAL PROVISIONS

The intent is to issue an air quality AO authorizing the project with the following recommended conditions and that failure to comply with any of the conditions may constitute a violation of the AO.

## II.B REQUIREMENTS AND LIMITATIONS

| | |
|---|---|
| II.B.1 | **Site-wide Requirements** |
| II.B.1.a | The owner/operator shall not allow visible emissions from any stationary point or fugitive emission source on site to exceed 10% opacity. [R307-401-8] |
| II.B.1.a.1 | Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9. [R307-401-8] |
| II.B.2 | **VOC Requirements** |
| II.B.2.a | The VOC content of the inks used at this plant shall not exceed the density limits established by R307-351. Inks shall not be thinned or otherwise reduced beyond the manufacturer's recommendations. [R307-351] |
| II.B.2.a.1 | The density parameters shall be tested by using the appropriate ASTM method or another method approved by the Director. [R307-401-8] |
| II.B.2.b | The plant-wide emissions of VOCs from the printing presses and associated operations shall not exceed:<br><br>19.35 tons per rolling 12-month period for VOCs.<br><br>[R307-401-8] |
| II.B.2.b.1 | Compliance with each limitation shall be determined on a rolling 12-month total. Based on the 20th day of each month, a new 12-month total shall be calculated using data from the previous 12 months. [R307-401-8] |

| | |
|---|---|
| II.B.2.b.2 | The VOC emissions shall be determined by maintaining a record of VOC-emitting materials used each month. The record shall include the following data for each material used:<br><br>A. Name of the VOC-emitting material, such as ink, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.<br><br>B. Density of each material used (pounds per gallon).<br><br>C. Percent by weight of all VOC in each material used.<br><br>D. Gallons of each VOC-emitting material used.<br><br>E. The amount of VOC emitted monthly by each material used shall be calculated by the following procedure:<br><br>VOC = (% VOC by Weight/100) x [Density (lb/gal )] x Gal Consumed x (1 ton/2000 lb)<br><br>F. The amount of VOC emitted monthly from all materials used.<br><br>G. The amount of VOCs reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above to provide the monthly total VOC emissions.<br><br>H. VOCs from the floor sweeps, the Uteco 8 press, and the Uteco 8XS are controlled by the RTO and shall be accounted for assuming 95% capture efficiency and 98% control efficiency.<br><br>[R307-401-8] |
| II.B.2.c | The owner/operator shall not use any chemicals with any HAPs in the printing presses and associated operations in the plant. [R307-401-8] |
| II.B.2.c.1 | The owner/operator shall use the most recent version of the SDS' to demonstrate compliance with the HAP requirement above. [R307-401-8] |
| II.B.3 | **RTO Requirements** |
| II.B.3.a | The owner/operator shall route all emissions from the floor sweeps, Uteco 8 Press, and Uteco 8XS Press to the RTO before being vented to the atmosphere. [R307-401-8] |
| II.B.3.b | At all times while operating, the owner/operator shall maintain a temperature at or above 1,500 degrees Fahrenheit in the RTO. [R307-401-8] |
| II.B.3.c | The owner/operator shall install, calibrate, maintain, and operate a device to monitor the operating temperature of the RTO. [R307-401-8] |
| II.B.3.c.1 | The monitoring device shall be located such that an inspector/operator can safely read the output at any time. The operating temperature of the RTO shall be recorded on a daily basis when the RTO operates. [R307-401-8] |

# PERMIT HISTORY

This Approval Order shall supersede (if a modification) or will be based on the following documents:

| | |
|---|---|
| Supersedes | AO DAQE-AN158320001-18 dated December 18, 2018 |
| Is Derived From | NOI dated April 30, 2021 |
| Incorporates | Additional information dated June 3, 2021 |
| Incorporates | Additional Information dated April 25, 2023 |
| Incorporates | Additional Information dated May 16, 2023 |
| Incorporates | Additional Information dated May 19, 2023 |

# ACRONYMS

The following lists commonly used acronyms and associated translations as they apply to this document:

| | |
|---|---|
| 40 CFR | Title 40 of the Code of Federal Regulations |
| AO | Approval Order |
| BACT | Best Available Control Technology |
| CAA | Clean Air Act |
| CAAA | Clean Air Act Amendments |
| CDS | Classification Data System (used by Environmental Protection Agency to classify sources by size/type) |
| CEM | Continuous emissions monitor |
| CEMS | Continuous emissions monitoring system |
| CFR | Code of Federal Regulations |
| CMS | Continuous monitoring system |
| CO | Carbon monoxide |
| $CO_2$ | Carbon Dioxide |
| $CO_2e$ | Carbon Dioxide Equivalent - Title 40 of the Code of Federal Regulations Part 98, Subpart A, Table A-1 |
| COM | Continuous opacity monitor |
| DAQ/UDAQ | Division of Air Quality |
| DAQE | This is a document tracking code for internal Division of Air Quality use |
| EPA | Environmental Protection Agency |
| FDCP | Fugitive dust control plan |
| GHG | Greenhouse Gas(es) - Title 40 of the Code of Federal Regulations 52.21 (b)(49)(i) |
| GWP | Global Warming Potential - Title 40 of the Code of Federal Regulations Part 86.1818-12(a) |
| HAP or HAPs | Hazardous air pollutant(s) |
| ITA | Intent to Approve |
| LB/YR | Pounds per year |
| MACT | Maximum Achievable Control Technology |
| MMBTU | Million British Thermal Units |
| NAA | Nonattainment Area |
| NAAQS | National Ambient Air Quality Standards |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NOI | Notice of Intent |
| $NO_x$ | Oxides of nitrogen |
| NSPS | New Source Performance Standard |
| NSR | New Source Review |
| $PM_{10}$ | Particulate matter less than 10 microns in size |
| $PM_{2.5}$ | Particulate matter less than 2.5 microns in size |
| PSD | Prevention of Significant Deterioration |
| PTE | Potential to Emit |
| R307 | Rules Series 307 |
| R307-401 | Rules Series 307 - Section 401 |
| $SO_2$ | Sulfur dioxide |
| Title IV | Title IV of the Clean Air Act |
| Title V | Title V of the Clean Air Act |
| TPY | Tons per year |
| UAC | Utah Administrative Code |
| VOC | Volatile organic compounds |