August 18, 2025

Zachary Bittner
Kentucky Division of Air Quality
Permit Review Branch
Permit Support Section
300 Sower Blvd.
Frankfort, KY 40601

RE: Title V Air Permit Renewal Application
Amcor Pharmaceutical Packaging USA, Shelbyville, KY
Permittee Name: Amcor Flexibles, LLC
Source ID: 21-211-00054
Agency Interest: 107007
Permit ID: V-20-19
Expiration Date: February 28, 2026

Dear Air Permitting Staff,

Amcor Flexibles, LLC ("Amcor") is pleased to submit the attached Title V/Synthetic Minor Air Permit Renewal Application for its facility in Shelbyville, Kentucky, in accordance with 401 KAR 52:020, Section 4. The facility intends to retain its current Title V/Synthetic Minor status, and no modifications are requested as part of this renewal. The facility is not subject to any ongoing enforcement actions. The company remains committed to maintaining full compliance with all federal, state, and local air quality regulations. Three hard copies of the application have been included, and one electronic copy has been submitted through the eForms system as required.

Facility Description

Amcor operates a flexible packaging manufacturing facility located at 6850 Midland Industrial Drive, Shelbyville, KY. The operation includes rotogravure presses and laminators used to print and coat paper, plastic film, and foil substrates, as part of SIC 2671 (Coated and Laminated Packaging Paper and Plastics Film).

Key sources include:

- **Rotogravure Printing Presses** (EP-13, EP-18, EP-19)
- **Laminators** (EP-12, EP-14, EP-16)
- **Mixing and Storage Operations** (EP-02)

- **Off-Line Parts Washer** (EP-03)
- **Natural Gas Boilers** (EP-01, EP-23, EP-24)

All printing and coating lines operate within a Permanent Total Enclosure (PTE) with 100% capture efficiency. Emissions are routed to three tandem regenerative thermal oxidizers (RTOs), which continue to demonstrate a VOC destruction efficiency of 97.0%, per the last stack test.

Recent operational updates since the previous renewal:

- The facility has began using a new solvent in their parts washer since the last renewal. The new solvent is Bemis Blend which increases the VOC content from 3.85 lb/gal to 7.93 lb/gal. The revised PTE calculations show this change. I have also attached the Environmental Data Sheet to the end of this application.
- Bulk deliveries of MEK have been eliminated; n-propyl acetate is now stored in the 8,000-gallon legacy MEK tank.
- Usage of toluene-based coatings has been further reduced.
- There have been no changes to the Compliance Assurance Monitoring (CAM) procedures submitted with the previous Title V renewal application and the facility continues to follow all requirements listed within.

There have been no physical changes to process equipment or control devices since the previous renewal.

Permit History

In 2010, Amcor acquired the pharmaceutical packaging division of the Alcan facility located at 6700 Midland Drive, Shelbyville, KY as a wholly own subsidiary. However, the acquisition of Alcan by Amcor did not unify the sources into a facility wide permit. Alcan retained Title V permit V-05-035, and Amcor was issued Title V/Synthetic Minor Permit V-10-15 in 2010.

In 2020, Amcor and collocated facility Bemis were issued a revision to Title V permit V-15-026 for a single source determination. However, the facilities will retain their own separate permit limits, and each will be responsible for maintaining their own permits and any associated activities.

A complete list of all revisions and permit activities can be found in Table I.

Table 1: Permit History

Permit #	Permit Type	Issuance Date	Action
V-10-015	Initial	10/04/2010	Initial Construction/Operating Permit
V-15-026	Renewal	01/04/2016	Renewal
V-15-026 R1	Minor Revision	09/24/2017	Removal of P5 and P9 simultaneous operation restriction and B1 boiler replacement.
V-15-026 R2	Admin Revision	04/28/2020	Single Source Determination
V-20-019	Renewal	02/28/2021	Renewal

Source Description

Amcor's flexible packaging manufacturing facility operates rotogravure presses and laminators to apply coatings to a variety of foil/film/paper substrates. All laminators and presses utilize natural gas ovens as well as a hot oil system to cure the coatings. The presses and laminators operate within a permanent total enclosure (PTE) which captures 100% of the emissions from these sources. The emissions from these sources are directed to three tandem Regenerative Thermal Oxidizers. The oxidizers operate at a minimum VOC Destruction Efficiency of 97.0%, as demonstrated during the stack test conducted in 2022. The facility also operates a storage and mixing room, parts washer, and several natural gas combustion sources. A complete list of all sources and control devices can be found in Table 2 and insignificant activities are listed in Table 3. A process flow diagram has also been included with this application (Appendix A).

Table 2: Facility Sources & Control Devices

Emission Unit	Name	Type	Date of Construction/Install	Additional Info
EP-01	Boiler B-4	Combustion	1/1994	3.5 MMBtu/hr (Natural Gas)
EP-02	Pharmaceutical Packaging Mixing & Storage	Process	2005	
EP-03	Off-Line Parts Washer	Process	2005	Progressive Recovery SWS-400 (Manufacturer)
EP-12	L4 Laminator	Process	1994	2 Station 35.5-inch Polynorm Triplex
EP-13	P5 Rotogravure Press	Process	1994	8 Station 35.5-inch Rotopak
EP-14	L5 Laminator	Process	1994	2 Station 47-inch Polynorm III
EP-16	L7 Laminator	Process	5/2008	3 Station 47-inch Triplex
EP-18	P9 Rotogravure Press with Laminator	Process	1/2015	10 Station 47.25-inch
EP-19	P10 Rotogravure Press	Process	9/2001	4 Station 27.5-inch Rotopak 3000-5ES 700/150
EP-23	B7, B8, B9 Boiler	Combustion	2008	(2) 5.5 MMBtu/hr (1) 9.85 MMBtu/hr (Natural Gas)
EP-24	B1 Boiler	Combustion	12/2016	3.0 MMBtu/hr (Natural Gas)
CD #3	Oxidizer #3	Control Device	12/2008	Megtech CS-II-400 (Natural Gas)
CD #8	Oxidizer #8	Control Device	12/2008	Megtech CS-500 (Natural Gas)

CD #10	Oxidizer #10	Control Device	1/2011	Megtech CS-II-400 (Natural Gas)

Table 3: Insignificant Activities

Emission Point/ID	Name	Additional Info
IA-01	Dry Grinder for repair of rubber on printing cylinders	
IA-02	2 Lab Bunsen Burners	3.412 Btu/hr each (Natural Gas)
IA-03	Office Furnaces and Make-up Air Units	5.4 MMBtu/hr total (Natural Gas)
IA-04	2 Unit Heaters	450 MBtu/hr total (Natural Gas)
IA-05	Water Heater	75 MBtu/hr (Natural Gas)
IA-06	Trim Systems	
IA-07	Bailing Systems	
IA-08	Legacy MEK Storage Tank	8000 gal
IA-09	Ethyl Acetate Storage Tank	8000 gal
IA-10	N-Propyl Acetate Storage Tank	2000 gal
IA-11	Process Air Heater	0.8 MMBtu/hr (Natural Gas)

Synthetic Minor Status

As previously stated, the facility wishes to retain its Title V/Synthetic Minor status:

- VOC emissions: $\leq$ 230 TPY (12-month rolling total), precluding PSD applicability.
- Single HAP emissions: $\leq$ 4.5 TPY (12-month rolling total).
- Total combined HAP emissions: $\leq$ 11.25 TPY (12-month rolling total).

Additionally, all rotogravure printing lines are controlled to ensure no more than 35% of VOC input is emitted to the atmosphere (30-day average), and all laminators are controlled to ensure no more than 15% of VOC input is emitted (30-day average).

Applicable Regulations

Facility Wide Requirements

401 KAR 50:055 – At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control practice for minimizing emissions.

401 KAR 59:005 – General provisions, provides for the establishment of monitoring requirements, performance testing requirements, and other general provisions as related to new sources effective December 1, 1982.

401 KAR 59:010 – New process emissions, is applicable to each affected facility or source, associated with process operations, which are not subject to another emission standard with respect to particulate matter emissions and commenced after July 2, 1975.

401 KAR 63:020 – Potentially hazardous matter or toxic substances, is applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

Source Requirements

EP-01 (B4 Boiler), EP-23 (B7, B8, B9 Boilers) & EP-24 (B1 Boiler)

401 KAR 59:015 - New indirect heat exchangers, is applicable with respect to particulate emissions and sulfur dioxide emissions to each affected facility with a capacity of 250 MMBtu/hr or less and commence on or after April 9, 1972.

EP-02 (Pharm Packaging Storage & Mixing)

401 KAR 59:212 - New graphic arts facilities using rotogravure and flexography, applies to each printing line for packaging rotogravure, specialty rotogravure, and flexographic printing that commenced after June 24, 1992, and is part of a major source in a county designated attainment.

401 KAR 59:210 – New fabric, vinyl and paper surface coating operations applies to each coating line commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

401 KAR 63:020 – Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

EP-03 (Off-Line Parts Cleaning)

401 KAR 59:210 – New fabric, vinyl and paper surface coating operations applies to each coating line commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

401 KAR 59:212 - New graphic arts facilities using rotogravure and flexography, applies to each printing line for packaging rotogravure, specialty rotogravure, and flexographic printing that commenced after June 24, 1992, and is part of a major source in a county designated attainment.

401 KAR 59:210 – New fabric, vinyl and paper surface coating operations applies to each coating line commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

EP-13 (P5), EP-18 (P9), EP-19 (P10) Printing Group

401 KAR 59:212 – New graphic arts facilities using rotogravure and flexography, applies to each printing line for packaging rotogravure, specialty rotogravure, and flexographic printing that commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

401 KAR 63:020 – Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

EP-12 (L4), EP-14 (L5), EP-16 (L7) Laminator Groups

401 KAR 59:210 – New fabric, vinyl and paper surface coating operations applies to each coating line commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

401 KAR 63:020 – Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

IA-01 (Dry Grinder), IA-06 (Trim System), IA-07 (Bailer System)

401 KAR 59:010 – New process emissions, is applicable to each affected facility or source, associated with process operations, which are not subject to another emission standard with respect to particulate matter emissions and commenced after July 2, 1975.

IA-09 (Ethyl Acetate Tank)

401 KAR 59:210 – New fabric, vinyl and paper surface coating operations applies to each coating line commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

401 KAR 59:212 – New graphic arts facilities using rotogravure and flexography, applies to each printing line for packaging rotogravure, specialty rotogravure, and flexographic printing that commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

401 KAR 63:020 – Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.

IA-08 (Legacy MEK Tank), IA-10 (N-Propyl Tank)

401 KAR 59:210 – New fabric, vinyl and paper surface coating operations applies to each coating line commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

401 KAR 59:212 – New graphic arts facilities using rotogravure and flexography, applies to each printing line for packaging rotogravure, specialty rotogravure, and flexographic printing that commenced after June 24, 1992, and is part of a major source in a county designated attainment for ozone.

The applicable regulations and compliance methods for each source are listed in Table 4.

Table 4: Applicable Regulations and Compliance Methods

Emission Unit	Applicable Regulation	Compliance Method
EP-01 (B4 Boiler) EP-23 (B7, B8, B9 Boilers) EP-24 (B1 Boiler)	401 KAR 59:015	Sources shall use natural gas and be properly operated/maintained to comply with: PM Limits – 0.56 lb/MMBtu (EP-01) 0.44 lb/MMBtu (EP-23, EP-24) SO2 Limits – 3.0 lb/MMBtu (EP-01) 2.0 lb/MMBtu (EP-23, EP-24) Opacity Limits - EP-01, EP-23, EP-24

		Fuel usage/maintenance records shall be maintained.
EP-02 (Pharm Mixing & Storage)	401 KAR 59:212 401 KAR 59:210 401 KAR 63:020	Monitor and record daily usage of coatings, adhesives and solvents used. Monitor and record HAP/VOC emissions on a monthly and 12-month rolling sum basis. Monitor and record weight percent of VOCs emitted for each 30 day-period. Maintain, monitor and record best management practices on a weekly basis. Submit semi-annual report
EP-03 (Off-Line Parts Cleaning)	401 KAR 59:212 401 KAR 59:210	Monitor and record amount of cleaner consumed for each 30 day-period. Monitor and record HAP/VOC emissions on a monthly and 12-month rolling sum basis.
EP-13 (P5) EP-18 (P9) EP-19 (P10) Printing Group	401 KAR 59:212 401 KAR 59:210 401 KAR 63:020	Monitor and record daily usage of coatings, adhesives and solvents used. Monitor and record HAP/VOC emissions on a monthly and 12-month rolling sum basis. Monitor and record weight percent of VOCs emitted for each 30 day-period. Submit semi-annual report. Maintain records of all calibration checks, adjustments, and maintenance performed on monitoring equipment associated with this source.
EP-12 (L4) EP-14 (L5) EP-16 (L7) Laminator Group	401 KAR 59:212 401 KAR 59:210 401 KAR 63:020	Monitor and record daily usage of coatings, adhesives and solvents used. Monitor and record HAP/VOC emissions on a monthly and 12-month rolling sum basis. Monitor and record weight percent of VOCs emitted for each 30 day-period. Submit semi-annual report. Maintain records of all calibration checks, adjustments, and maintenance performed on monitoring equipment associated with this source.
IA-01 (Dry Grinder) IA-06 (Trim System) IA-07 (Bailer System)	401 KAR 59:010	Sources have negligible particulate matter. Operate/maintain systems properly.
IA-08 (8,000-gal Legacy MEK Storage Tank IA-09 (8,000-gal Ethyl Acetate Tank)	401 KAR 59:212 401 KAR 59:210 401 KAR 63:020	Maintain bulk solvent delivery records. Maintain waste disposal records.

Permanent Total Enclosure	None	Monitor pressure differential every 15 minutes. Maintain pressure differential of 0.007 H_20 into the building as demonstrated by 1-hr average. Maintain/operate pressure gauges with continuous recorders in accordance with manufacturer's specs.
Control Devices #3, #8, #10	None	Continuously monitor and record temperature in combustion chamber, calculating 3-hr average in 15-minute intervals. Maintain average temperature in oxidizer such that 3-hr average does not fall more than 28°C (50°F) of established temperature limit. Calibrate temperature monitoring devices every 3 months. Maintain/operate oxidizers in accordance with manufacturer's specs. Maintain records of test performance data and maintenance.

Additional Requirements/Information

The following sources have been identified as having negligible emissions:

1. Dry grinders
2. Trimming and Bailing

Proper operation and maintenance of these sources and their associated control devices ensures the emissions from these will remain negligible.

Summary

Amcor respectfully requests the renewal of the Title V Permit V-20-19 without modifications. The facility continues to operate within its established limits and remains committed to full compliance with all applicable air quality regulations.

If you have any questions or concerns, please do not hesitate to contact me at Robert.Ragar@amcor.com or (502) 232-7836, or Steven Mieszkowski of GFT at smieszkowski@gftinc.om or (412) 526-6295.

Sincerely,

Mary Sturgill
Plant Manager
Cc: Gannett Fleming, Inc.

List of Appendices

Appendix A: Required KYEEC Forms

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007AI

Administrative Information

___ Section AI.1: Source Information

___ Section AI.2: Applicant Information

___ Section AI.3: Owner Information

___ Section AI.4: Type of Application

___ Section AI.5: Other Required Information

___ Section AI.6: Signature Block

___ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

___ Additional Documentation attached

Source Name: **Amcor Flexibles Healthcare Shelbyville**

KY EIS (AFS) #: **21- 211-00054**

Permit #: **V-20-19**

Agency Interest (AI) ID: **107007**

Date: **8/12/2025**

Section AI.1: Source Information

Physical Location Address:	**Street:**	6850 Midland Industrial Drive				
	City:	Shelbyville	**County:**	Shelby	**Zip Code:**	40065
Mailing Address:	**Street or P.O. Box:**	6850 Midland Industrial Drive				
	City:	Shelbyville	**State:**	KY	**Zip Code:**	40065

Standard Coordinates for Source Physical Location

Longitude: 85.2569 (decimal degrees) **Latitude:** 38.2275 (decimal degrees)

Primary (NAICS) Category: Plastics Packaging Film and Sheet Manufacturing **Primary NAICS #:** 326112

Classification (SIC) Category: Packaging Paper and Plastics Film, Coated and Laminated single-web and multi-web **Primary SIC #:** 2671

Briefly discuss the type of business conducted at this site: The facility produces printed/laminated materials for use in the healthcare/pharmaceutical industry.

Description of Area Surrounding Source: ☐ Rural Area ☑ Industrial Park ☐ Residential Area ☐ Urban Area ☐ Industrial Area ☐ Commercial Area

Is any part of the source located on federal land? ☐ Yes ☑ No

Number of Employees: 115

Approximate distance to nearest residence or commercial property: 1/3 mile (residential)

Property Area: 12 acres

Is this source portable? ☐ Yes ☑ No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:	☑ Currently Hold	☐ Need	☐ N/A
Solid Waste:	☐ Currently Hold	☐ Need	☑ N/A
RCRA:	☑ Currently Hold	☐ Need	☐ N/A
UST:	☐ Currently Hold	☐ Need	☑ N/A

Type of Regulated Waste Activity:

☐ Mixed Waste Generator ☑ Generator ☐ Recycler ☐ Other: _____

☐ U.S. Importer of Hazardous Waste ☐ Transporter ☐ Treatment/Storage/Disposal Facility ☐ N/A

Section AI.2: Applicant Information

Applicant Name: Amcor Flexibles Healthcare Shelbyville

Title: (if individual)

Mailing Address:
Street or P.O. Box: 6850 Midland Industrial Drive
City: Shelbyville **State:** KY **Zip Code:** 40065

Email: (if individual)

Phone: 502-232-7823

Technical Contact

Name: Robert Ragar

Title: EHS Manager

Mailing Address:
Street or P.O. Box: 6850 Midland Industrial Drive
City: Shelbyville **State:** KY **Zip Code:** 40065

Email: Robert.Ragar@amcor.com

Phone: 502-232-7836

Air Permit Contact for Source

Name: Same as Technical Contact above

Title:

Mailing Address:
Street or P.O. Box:
City: **State:** **Zip Code:**

Email:

Phone:

Section AI.3: Owner Information

☑ **Owner same as applicant**

Name: _____

Title: _____

Mailing Address: **Street or P.O. Box:** _____

City: _____ **State:** _____ **Zip Code:** _____

Email: _____

Phone: _____

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name	Position

Section AI.4: Type of Application

Current Status: ☑ Title V ☐ Conditional Major ☐ State-Origin ☐ General Permit ☐ Registration ☐ None

Requested Action: *(check all that apply)*

☐ Name Change	☐ Initial Registration	☐ Significant Revision	☐ Administrative Permit Amendment
☑ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide OperatingPermit
☐ 502(b)(10)Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice
☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities
☐ Ownership Change	☐ Closure		

Requested Status: ☑ Title V ☐ Conditional Major ☐ State-Origin ☐ PSD ☐ NSR ☐ Other: _____

Is the source requesting a limitation of potential emissions? ☐ Yes ☐ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter		☐ Single HAP	4.5 TPY
☐ Volatile Organic Compounds (VOC)	230 TPY	☐ Combined HAPs	11.25 TPY
☐ Carbon Monoxide		☐ Air Toxics (40 CFR 68, Subpart F)	
☐ Nitrogen Oxides		☐ Carbon Dioxide	
☐ Sulfur Dioxide		☐ Greenhouse Gases (GHG)	
☐ Lead		☐ Other	

For New Construction:

Proposed Start Date of Construction: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

For Modifications:

Proposed Start Date of Modification: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

Applicant is seeking coverage under a permit shield. ☐ Yes ☑ No

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- ☐ DEP7007A Indirect Heat Exchangers and Turbines
- ☑ DEP7007B Manufacturing or Processing Operations
- ☐ DEP7007C Incinerators and Waste Burners
- ☐ DEP7007F Episode Standby Plan
- ☐ DEP7007J Volatile Liquid Storage
- ☐ DEP7007K Surface Coating or Printing Operations
- ☐ DEP7007L Mineral Processes
- ☑ DEP7007M Metal Cleaning Degreasers
- ☐ DEP7007N Source Emissions Profile
- ☐ DEP7007P Perchloroethylene Dry Cleaning Systems
- ☐ DEP7007R Emission Offset Credit
- ☐ DEP7007S Service Stations
- ☐ DEP7007T Metal Plating and Surface Treatment Operations
- ☐ DEP7007V Applicable Requirements and Compliance Activities
- ☐ DEP7007Y Good Engineering Practice and Stack Height Determination
- ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units
- ☐ DEP7007BB Certified Progress Report
- ☐ DEP7007CC Compliance Certification
- ☑ DEP7007DD Insignificant Activities
- ☐ DEP7007EE Internal Combustion Engines
- ☐ DEP7007FF Secondary Aluminum Processing
- ☐ DEP7007GG Control Equipment
- ☐ DEP7007HH Haul Roads
- ☐ Confidentiality Claim
- ☐ Ownership Change Form
- ☑ Secretary of State Certificate
- ☑ Flowcharts or diagrams depicting process
- ☐ Digital Line Graphs (DLG) files of buldings, roads, etc.
- ☐ Site Map
- ☐ Map or drawing depicting location of facility
- ☑ Safety Data Sheet (SDS)
- ☐ Emergency Response Plan
- ☐ Other: _____

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Mary Sturgill
Authorized Signature

8-18-25
Date

Mary Sturgill
Type or Printed Name of Signatory

Plant Manager
Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
___ Section B.2: Materials and Fuel Information
___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: Amcor Flexibles Healthcare Shelbyville
KY EIS (AFS) #: 21- 211-00054
Permit #: V-20-19
Agency Interest (AI) ID: 107007
Date: 8/12/2025

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
EP-02	Mix Room	Pharm Packaging Storage & Mixing	Pharm Packaging	Processing Operation	N/A		01/2005	Batch	N/A	N/A
EP-03	Parts Washer	Off-line Parts Washer	Off-Line Parts	Processing Operation	Progressive Recovery	SWS400	01/2005	Batch	24	1

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input	(Specify Units/hr)	Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output	(Specify Units/hr)	Fuel Type	Maximum Hourly Fuel Usage Rate	(Specify Units)	Maximum Yearly Fuel Usage Rate	(Specify Units)	Sulfur Content (%)	Ash Content (%)
EP-02	Mix Room	Various Inks, Coatings & Solvents	See PTE Spreadsheet			Inks & Coatings for Application	Variable dependent on product throughput								
EP-03	Parts Washer	FRP Ultra Resin Remover	Variable dependent upon types and sizes of parts washed			Cleaned pans/trays/parts containers	Variable dependent upon types and sizes of parts washed								

Section B.3: Notes, Comments, and Explanations

Parts washer uses Bemis Blend Solvent. Environmental Data Sheet located in Appendix D

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007M

Metal Cleaning Degreasers

__ Section M.1: Cold Cleaning Degreasers Only
__ Section M.2: Open Top Vapors Degreasers
__ Section M.3: Conveyorized Degreasers
__ Section M.4: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG

___ Attach SDS for solvent

Source: **Amcor Flexibles Healthcare Shelbyville**

KY EIS (AFS) #: **21- 211-00054**

Permit #: **V-20-19**

Agency Interest (AI) ID: **1007007**

Date: **8/12/2025**

Section M.1: Cold Cleaning Degreasers Only

Emission Unit #: EP-03

Emission Unit Name: V-20-19

Control Device/Stack #: Solvent Recovery Tank

Manufacturer: Progressive Recovery

Model/Serial Number: SWS400

Proposed/Actual Date of Construction Commencement (MM/YYYY): 5-Jan

Type: ☐ Dip Tank ☑ Spray Sink

Maximum Operating Schedule:

24	7	52
Hours/Day	Days/Week	Weeks/Year

Solvent Information

Trade Name: Bemis Blend L-1775

Manufacturer: Univar Solutions

Maximum Amount Solvent Used: See attached PTE calc gal/hr See attached PTE calc gal/yr

Maximum Volatility at 100°F: _____ mmHg

Equipment Design

Inside dimensions of tank: Width (ft): 9 Length (ft): 4.5 Depth (ft): 4.5 Freeboard Height (ft): _____

If heated, indicate temperature: _____ °F

If sprayed, indicate spray pressure: 65-80 psi

If agitation is utilized, indicate type: ☐ Pumped ☐ Air ☐ Mechanical ☐ Ultrasonic

If drainage board is utilized, indicate type: ☑ Internal ☐ External

Is a tank cover utilized? ☑ Yes ☐ No

If external, is drainage return used? ☐ Yes ☐ No

Operating Procedure

Is degreaser cover closed during degreaser operation? ☑ Yes ☐ No

Is degreaser cover closed when degreaser is not in use? ☑ Yes ☐ No

Are parts dry before removal from drying rack? ☑ Yes ☐ No

Describe disposal of waste solvent and sludge: Solvent is recycled within the system and still bottoms are disposed of offsite

Control Devices:

Identify if any are utilized: ☐ Refrigerated ☐ Water Spray ☐ Carbon Adsorption ☐ Freeboard Ratio greater than or equal to 0.7

Other *(specify)*: Condenser

Section M.4: Notes, Comments, and Explanations
Please see attached system description.

Division for Air Quality
300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007DD

Insignificant Activities

___ Section DD.1: Table of Insignificant Activities
___ Section DD.2: Signature Block
___ Section DD.3: Notes, Comments, and Explanations

Source Name: **Amcor Flexibles Healthcare Shelbyville**

KY EIS (AFS) #: **21- 211-00054**

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Agency Interest (AI) ID: **107007**

Date: **8/12/2025**

Section DD.1: Table of Insignificant Activities

*Identify each activity with a unique Insignificant Activity number (IA #); for example: 1, 2, 3… etc.

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
IA-01	Dry Grinder for repair of rubber on printing cylinders		401 KAR 59:010	Not determined
IA-02	(2) Lab Bunsen Burners (Rated capacity 3,412 Btu/hr each)		N/A	see attached PTE calculations
IA-03	Office Furnaces and Make up Air Units (Total Rated capacity 5.4 MMBtu/hr)		N/A	see attached PTE calculations
IA-04	2 unit Heaters (Total rated capacity 0.45 MMBtu/hr)		N/A	see attached PTE calculations
IA-05	Water Heater (Rated Capacity 75,000 Btu/hr		N/A	see attached PTE calculations
IA-06	Trim Systems		401 KAR 59:010	Negligible

Insignificant Activity #	Description of Activity including Rated Capacity	Serial Number or Other Unique Identifier	Applicable Regulation(s)	Calculated Emissions
IA-07	Bailing Systems		401 KAR 59:010	Negligible
IA-08	8000-gal Legacy MEK Storage Tank		401 KAR 59:212 401 KAR 59:210	see attached PTE calculations
1A-09	8000- gal Ethyl Acetate Solvent Storage Tank		402 KAR 59:212 401 KAR 63:020 401 KAR 59:210	see attached PTE calculations
1A-10	2000-gal n/Propyl Acetate Solvent Storage Tank		403 KAR 59:212 401 KAR 59:210	see attached PTE calculations
IA-11	0.8 MMBtu/hr Natural Gas Process Heater		None	see attached PTE calculations

Section DD.2: Signature Block

I, THE UNDERSIGNED, HEREBY CERTIFY UNDER PENALTY OF LAW, THAT I AM A RESPONSIBLE OFFICIAL, AND THAT I HAVE PERSONALLY EXAMINED, AND AM FAMILIAR WITH, THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ITS ATTACHMENTS. BASED ON MY INQUIRY OF THOSE INDIVIDUALS WITH PRIMARY RESPONSIBILITY FOR OBTAINING THE INFORMATION, I CERTIFY THAT THE INFORMATION IS ON KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE OR INCOMPLETE INFORMATION, INCLUDING THE POSSIBILITY OF FINE OR IMPRISONMENT.

Mary Stugill — **Authorized Signature**

8-18-25 — **Date**

By:

Mary Stugill — **Type/Print Name of Siguatory**

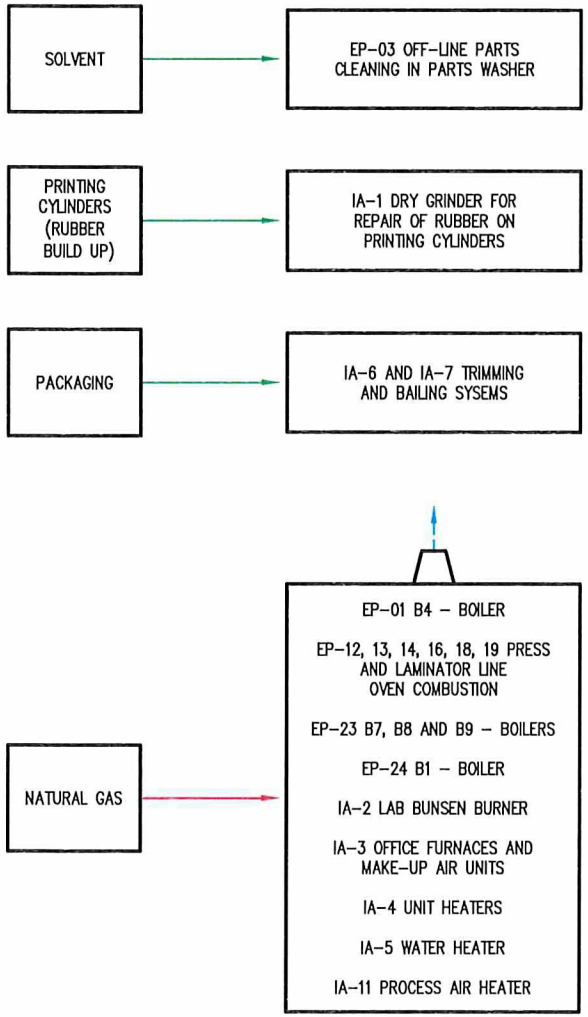
Plant Manager — **Title of Siguatory**

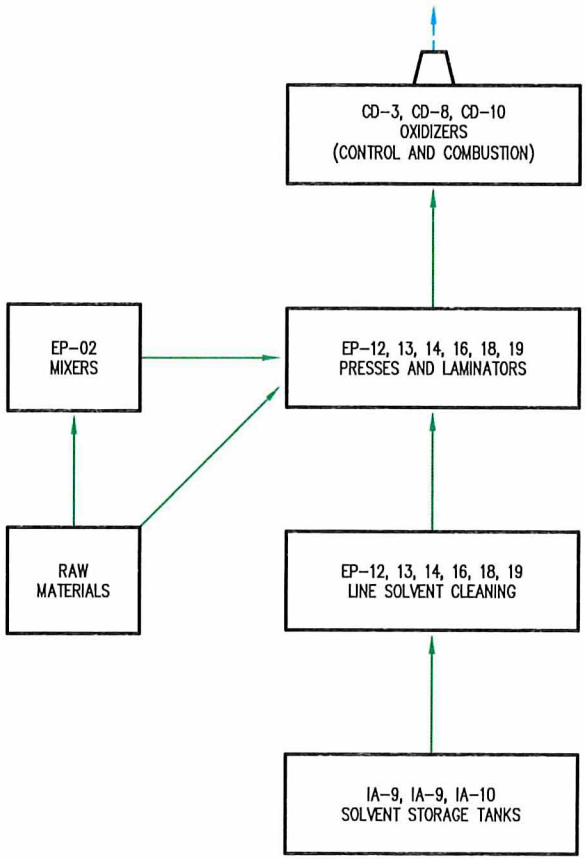
Section DD.3: Notes, Comments, and Explanations

Appendix B: Process Flow Diagram

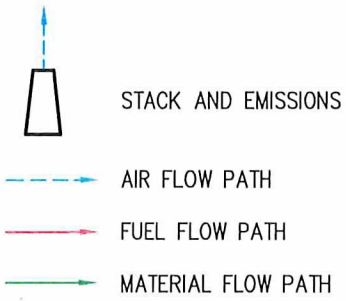
Gannett Fleming

FIGURE 1





LEGEND



PROCESS FLOW DIAGRAM – FACILITY WIDE

AMCOR FLEXIBLES HEALTHCARE

SHELBYVILLE, KENTUCKY

061720
alc_R67180--001_2020_0602_F01

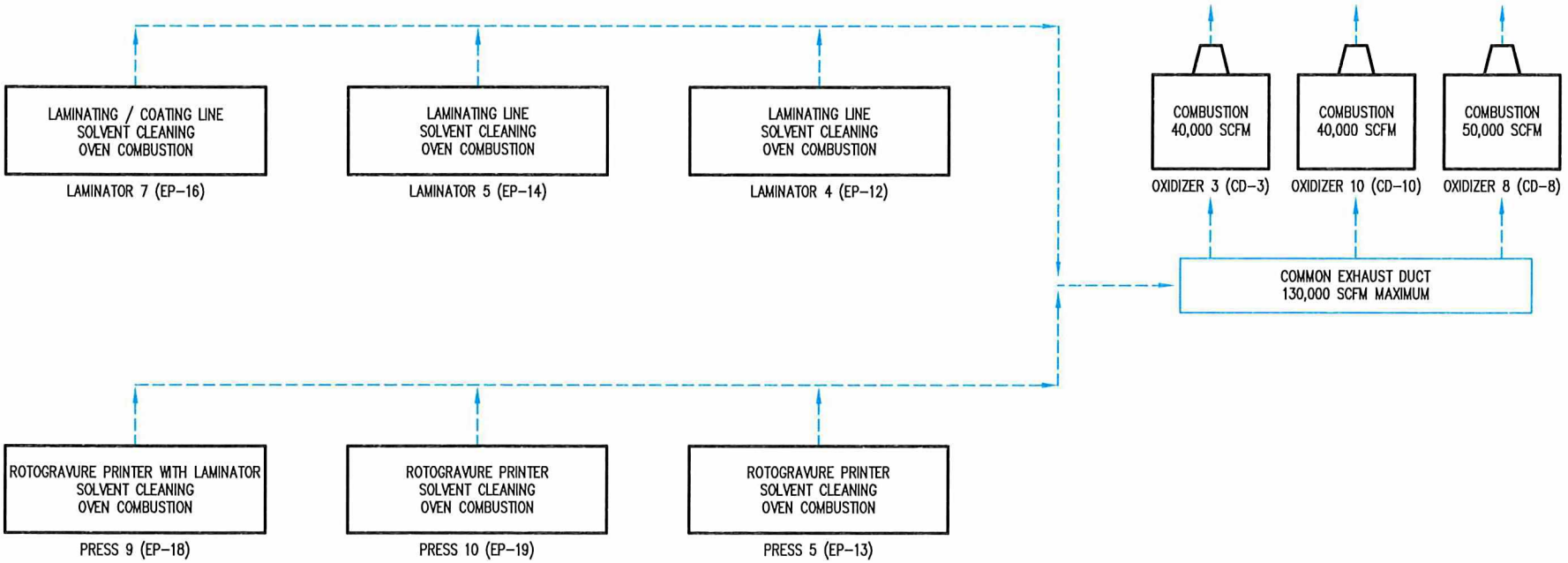
Gannett Fleming

FIGURE 2

LAMINATOR INPUTS:

COATINGS AND ADHESIVES:
URETHANE ADHESIVES AND LACQUERS
POLYESTER ADHESIVE
NITROCELLUOSE LACQUERS
VINYL ACRYLIC LACQUERS
WATER–BASED ADHESIVE

SUBSTRATES:
UNSUPPORTED ALUMINUM FOIL
FOIL/NYLON LAMINATES
FOIL/NYLON/PVC LAMINATES
FOIL/PET LAMINATES
PVC
PAPER/FOIL LAMINATES
PAPER/PET/FOIL LAMINATES

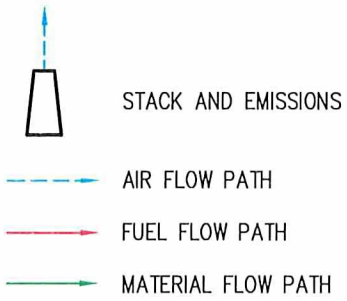


PRESS INPUTS:

INKS AND COATINGS:
NITROCELLUOSE INKS AND LACQUERS
VINYL INKS
URETHANE INKS AND LACQUER
VINYL ACRYLIC LACQUERS

SUBSTRATES:
UNSUPPORTED ALUMINUM FOIL
POLYESTER (PET) FILM
PAPER/FOIL LAMINATES
PAPER/PET/FOIL LAMINATES

LEGEND



PROCESS FLOW DIAGRAM – LINES

AMCOR FLEXIBLES HEALTHCARE
SHELBYVILLE, KENTUCKY

061720
alc_R67180-001_2020_0602_F02

Appendix C: PTE

Appendix C

Table 1:

Amcor Pharmaceutical Packaging USA, Inc
6850 Midland Drive
Shelbyville, KY
Shelby County

Emission Units		NOx	CO	SO2	VOC (Uncontrolled)	VOC (Controlled)	PM/PM2.5/PM10	Individual HAP (Uncontrolled)	Individual HAP (Controlled)	Total HAPs (Uncontrolled)	Total HAPs (Controlled)
		TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY	TPY
EP-01 (B4 Boiler)	Combustion	1.50	1.26	0.01	0.08	0.08	0.11	0.03	0.03	0.03	0.03
EP-02 (Storage & Mixing)	Process	0.00	0.00	0.00	8.14	8.14	0.00	0.02	0.02	0.03	0.03
EP-03 (Parts Washer)	Process	0.00	0.00	0.00	19.35	19.35	0.00	0.00	0.00	0.00	0.00
EP-12 (L4 Laminator)	Process/Combustion	2.15	1.80	0.01	1477.27	44.43	0.16	2.02	0.06	2.23	0.07
EP-13 (P5 Printer)	Process/Combustion	4.29	3.61	0.03	382.40	11.69	0.33	2.02	0.08	2.23	0.07
EP-14 (L5 Laminator)	Process/Combustion	3.66	3.07	0.02	802.98	24.28	0.28	2.02	0.07	2.23	0.07
EP-16 (L7 Laminator)	Process/Combustion	2.83	2.38	0.02	1752.78	52.73	0.22	2.02	0.06	2.29	0.05
EP-18 (P9 Printer)	Process/Combustion	2.83	2.38	0.02	195.64	6.02	0.22	2.02	0.06	2.29	0.05
EP-19 (P10 Printer)	Process/Combustion	3.86	3.25	0.02	171.06	5.34	0.29	2.02	0.07	2.31	0.07
EP-23 (B7, B8, B9 Boiler)	Combustion	8.95	7.52	0.05	0.49	0.49	0.68	0.16	0.16	0.17	0.17
EP-24 (B1 Boiler)	Combustion	1.29	1.08	0.01	0.07	0.07	0.10	0.02	0.02	0.02	0.02
Oxidizers 3, 8, 10	Combustion	7.28	6.12	0.04	0.40	0.40	0.55	0.13	0.13	0.00	0.00
Insig Combustion Sources	Combustion	2.89	2.43	0.02	0.16	0.16	0.22	0.05	0.05	0.05	0.05
Insig Tanks	Process	0.00	0.00	0.00	0.59	0.59	0.00	0.00	0.00	0.00	0.00
Totals		**30.09**	**25.27**	**0.18**	**4811.42**	**173.79**	**3.16**	**12.52**	**0.81**	**13.88**	**0.68**
Existing Permit Limits		-	-	-	-	**230.00**	-	-	**4.50**	-	**11.25**
Major Facility Thresholds		**100**	**100**	**100**	**100**	**100**	**100**	**10**	**10**	**25**	**25**

Table 2
Amcor Pharm (PTE)
Natural Gas Combustion
EP-01 (B4 Boiler)

Maximum Rated Capacity of Burners	3,500,000 BTU/hr
Maximum Hours of Operation per Year	8760 hr/yr
Rated Heating Value of Fuel	1020 BTU/cf
Fuel Type	100% Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor[1]	Units	Emissions TPY
NO_x	1.000E-04	lb/cf	1.503E+00
CO	8.400E-05	lb/cf	1.262E+00
SO_x	6.000E-07	lb/cf	9.018E-03
VOC	5.500E-06	lb/cf	8.266E-02
PM/PM10/PM2.5	7.600E-06	lb/cf	1.142E-01
N_2O	2.20E-06	lb/cf	3.306E-02
CO_2	1.20E-01	lb/cf	1.804E+03
CH4	2.30E-07	lb/cf	3.457E-03

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	3.006E-06
BENZENE	2.10E-09	lb/cf	3.156E-05
BERYLLIUM	1.20E-11	lb/cf	1.804E-07
CADMIUM	1.10E-09	lb/cf	1.653E-05
CHROMIUM	1.40E-09	lb/cf	2.104E-05
COBALT	8.40E-11	lb/cf	1.262E-06
FORMALDEHYDE	7.50E-08	lb/cf	1.127E-03
HEXANE	1.80E-06	lb/cf	2.705E-02
LEAD	5.00E-10	lb/cf	7.515E-06
MANGANESE	3.80E-10	lb/cf	5.711E-06
MERCURY	2.60E-10	lb/cf	3.908E-06
NAPHTHALENE	6.10E-10	lb/cf	9.168E-06
NICKEL	2.10E-09	lb/cf	3.156E-05
TOLUENE	3.40E-09	lb/cf	5.110E-05
Total HAPS			2.836E-02

Notes:
1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4

Table 3
Amcor Pharmaceutical
Surface Coating Operations
EP-02 (Storage & Mixing)

Supercomposite Density of Coating (VOC)	7.27 lb/gal
Maximum Hours of Operation per Year[1]	8760 hr/yr
Losses from mixing and storage	0.20%

Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Maximum Throughput gal/yr	Emissions TPY
L4 Laminator(VOC)	7.27	lb VOC/gal	45290	3.29E-01
P5 Rotogravure Printer (VOC)	7.27	lb VOC/gal	282037	2.05E+00
L5 Laminator(VOC)	7.27	lb VOC/gal	116868	8.50E-01
L7 Laminator(VOC)	7.27	lb VOC/gal	530584	3.86E+00
P9 Rotogravure Printer(VOC)	7.27	lb VOC/gal	97308	7.07E-01
P10 Rotogravure Printer(VOC)	7.27	lb VOC/gal	46985	3.42E-01
Total VOCs				8.14E+00

Hazardous Air Pollutants	HAP Usage (All lines) lbs	Emissions (Uncontrolled) TPY
CUMENE	360.00	0.00
4,4-DIPHENYL METHANE DIISOCYANATE	24207.00	0.02
ETHYL BENZENE	87.00	0.00
FORMALDEHYDE	39.00	0.00
HEXAMETHYLENE DIISOCYANATE	0.00	0.00
METHANOL	0.00	0.00
PHTHALIC ANHYDRIDE	1206.00	0.00
PROPYLENE GLYCOL METHYL ETHER	441.00	0.00
2,4-TOLUENE DIISOCYANATE	33.00	0.00
2,6-TOLUENE DIISOCYANATE	33.00	0.00
TOLUENE DIISOCYANATE MIXED ISOMERS	27.00	0.00
XYLENES MIXED ISOMERS	360.00	0.00
Total HAPs	26793.00	0.03

Notes:

1 - Maximum Hours based on plant operation (24 hr/day, 7 day/wk, 52 wk/yr)

2 - Maximum Throughputs for Surface Coating Operations are based on 2023RY Supercomposite Estimates for each line, tripling annual throughputs.

3 - The emission factor for raw storage and mixing is assumed to be 0.2% loss, based on best management practices.

4- HAP usage is calculated through NovaFlow software based on total amounts of coatings, solvents, and adhesives used for 2023, tripling annual usage, and combining HAP usage for all six lines.

Table 4
Amcor Pharmaceutical
Surface Coating Operations
EP-03 (Parts Washer)
FRP Ultra Resin Remover

VOC content[1]	7.93	lb/gal
Maximum Hours of Operation per Year	8760	hr/yr
Maximum Throughput[2]	4881	gal/yr

Pollutant Criteria Pollutants/Greenhouse Gas	Emission Factor	Units	Emissions TPY
VOC	7.93	lb/gal	19.35

Notes:

1 - VOC content reference: Univar Solutions Product Name: Blend Bemis L-1775 DR448 C, Product Code 16160247

2 - Maximum yearly throughput based on 2024RY data (1,627 gal/yr), tripling annual throughputs.

Table 5
Amcor Pharm (PTE)
Surface Coating Operations
EP-12 (L4 Laminator)

Supercomposite Density of Coating (VOC)	7.27	lb/gal
Maximum Throughput (VOC)	406072	gal/yr
Maximum Throughput (VOC)[2,3]	46.36	gal/hr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
VOC	7.27	lb VOC/gal	1476.07	44.28

Hazardous Air Pollutants	HAP Usage[4] lbs	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
CUMENE	60.00	0.03	0.00
4,4-DIPHENYL METHANE DIISOCYANATE	4034.50	2.02	0.06
ETHYL BENZENE	14.50	0.01	0.00
FORMALDEHYDE	6.50	0.00	0.00
HEXAMETHYLENE DIISOCYANATE	0.00	0.00	0.00
METHANOL	0.00	0.00	0.00
PHTHALIC ANHYDRIDE	201.00	0.10	0.00
PROPYLENE GLYCOL METHYL ETHER	73.50	0.04	0.00
2,4-TOLUENE DIISOCYANATE	5.50	0.00	0.00
2,6-TOLUENE DIISOCYANATE	5.50	0.00	0.00
TOLUENE DIISOCYANATE MIXED ISOMERS	4.50	0.00	0.00
XYLENES MIXED ISOMERS	60.00	0.03	0.00
Total HAPs	4465.50	2.23	0.07

EP-12 (L4 Laminator)
Cleanup Operations
Ethyl Acetate cleanup Solvent

Density of Coating (Dc))	7.52	lb/gal
Weight Percent of VOC (Wo)	100%	
VOC Content = (Wo)(Dc)	7.52	lb/gal
Maximum Throughput[5]	288	gal/yr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions Controlled TPY
VOC	7.52	lb VOC/gal	1.08	0.03

Natural Gas Combustion
EP-12 (L4 Laminator Oven)

Maximum Rated Capacity of Burners	5,000,000	BTU/hr
Maximum Hours of Operation per Year	8760	hr/yr
Rated Heating Value of Fuel	1020	BTU/cf
Fuel Type	100%	Natural Gas

Oven

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor[1]	Units	Emissions TPY
NO_x	1.000E-04	lb/cf	2.147E+00
CO	8.400E-05	lb/cf	1.804E+00
SO_x	6.000E-07	lb/cf	1.288E-02
VOC	5.500E-06	lb/cf	1.181E-01
PM/PM10/PM2.5	7.600E-06	lb/cf	1.632E-01
N_2O	2.20E-06	lb/cf	4.724E-02
CO_2	1.20E-01	lb/cf	2.576E+03
CH4	2.30E-07	lb/cf	4.938E-03

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	4.294E-06
BENZENE	2.10E-09	lb/cf	4.509E-05
BERYLLIUM	1.20E-11	lb/cf	2.576E-07
CADMIUM	1.10E-09	lb/cf	2.362E-05
CHROMIUM	1.40E-09	lb/cf	3.006E-05
COBALT	8.40E-11	lb/cf	1.804E-06
FORMALDEHYDE	7.50E-08	lb/cf	1.610E-03
HEXANE	1.80E-06	lb/cf	3.865E-02
LEAD	5.00E-10	lb/cf	1.074E-05
MANGANESE	3.80E-10	lb/cf	8.159E-06
MERCURY	2.60E-10	lb/cf	5.582E-06
NAPHTHALENE	6.10E-10	lb/cf	1.310E-05
NICKEL	2.10E-09	lb/cf	4.509E-05
TOLUENE	3.40E-09	lb/cf	7.300E-05
Total HAPS			4.052E-02

Notes:
1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4
2 - Maximum Hours based on plant operation (24 hr/day, 7 day/wk, 52 wk/yr)
3 - Maximum Throughputs for Surface Coating Operations are based on 2023RY Supercomposite Estimates (96,419 gal/yr), tripling annual throughputs

4- HAP usage is calculated through NovaFlow software based on total amounts of coatings, solvents, and adhesives used for 2023, tripling annual usage.
5- Maximum Throughputs for Clean-up Operations are based on 2023RY Supercomposite Estimates (96 gal/yr), tripling clean-up usage

Table 6
Amcor Pharm (PTE)
EP-13 (P5 Printer)
Surface Coating Operations

Supercomposite Density of Coating (VOC)	7.27	lb/gal
Maximum Throughput (VOC)	105057	gal/yr
Maximum Throughput (VOC)[2,3]	11.99	gal/hr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions Controlled TPY
VOC	7.27	lb VOC/gal	381.88	11.46

Hazardous Air Pollutants	HAP Usage[4] lbs	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
CUMENE	60.00	0.03	0.00
4,4-DIPHENYL METHANE DIISOCYANATE	4034.50	2.02	0.06
ETHYL BENZENE	14.50	0.01	0.00
FORMALDEHYDE	6.50	0.00	0.00
HEXAMETHYLENE DIISOCYANATE	0.00	0.00	0.00
METHANOL	0.00	0.00	0.00
PHTHALIC ANHYDRIDE	201.00	0.10	0.00
PROPYLENE GLYCOL METHYL ETHER	73.50	0.04	0.00
2,4-TOLUENE DIISOCYANATE	5.50	0.00	0.00
2,6-TOLUENE DIISOCYANATE	5.50	0.00	0.00
TOLUENE DIISOCYANATE MIXED ISOMERS	4.50	0.00	0.00
XYLENES MIXED ISOMERS	60.00	0.03	0.00
Total HAPs	4465.50	2.23	0.07

EP-13 (P5 Printer)
Cleanup Operations
Ethyl Acetate Cleanup Solvent

Density of Coating (Dc))	7.52	lb/gal
Weight Percent of VOC (Wo)	100%	
VOC Content = (Wo)(Dc)	7.52	lb/gal
Maximum Throughput[5]	75	gal/yr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions Controlled TPY	Emissions Controlled TPY
VOC	7.52	lb VOC/gal	0.28	0.01	0.00

EP-13 (P5 Printer Oven)
Natural Gas Combustion

Maximum Rated Capacity of Burners	10,000,000	BTU/hr
Maximum Hours of Operation per Year	8760	hr/yr
Rated Heating Value of Fuel	1020	BTU/cf
Fuel Type	100%	Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor[1]	Units	Emissions TPY
NO_x	1.000E-04	lb/cf	4.294E+00
CO	8.400E-05	lb/cf	3.607E+00
SO_x	6.000E-07	lb/cf	2.576E-02
VOC	5.500E-06	lb/cf	2.362E-01
PM/PM10/PM2.5	7.600E-06	lb/cf	3.264E-01
N_2O	2.20E-06	lb/cf	9.447E-02
CO_2	1.20E-01	lb/cf	5.153E+03
CH4	2.30E-07	lb/cf	9.876E-03

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	8.588E-06
BENZENE	2.10E-09	lb/cf	9.018E-05
BERYLLIUM	1.20E-11	lb/cf	5.153E-07
CADMIUM	1.10E-09	lb/cf	4.724E-05
CHROMIUM	1.40E-09	lb/cf	6.012E-05
COBALT	8.40E-11	lb/cf	3.607E-06
FORMALDEHYDE	7.50E-08	lb/cf	3.221E-03
HEXANE	1.80E-06	lb/cf	7.729E-02
LEAD	5.00E-10	lb/cf	2.147E-05
MANGANESE	3.80E-10	lb/cf	1.632E-05
MERCURY	2.60E-10	lb/cf	1.116E-05
NAPHTHALENE	6.10E-10	lb/cf	2.619E-05
NICKEL	2.10E-09	lb/cf	9.018E-05
TOLUENE	3.40E-09	lb/cf	1.460E-04
Total HAPS			8.104E-02

Notes:

1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4

2 - Maximum Hours based on plant operation (24 hr/day, 7 day/wk, 52 wk/yr)

3 - Maximum Throughputs for Surface Coating Operations are based on 2023RY Supercomposite Estimates (24,945 gal/yr), tripling annual throughputs

4- HAP usage is calculated through NovaFlow software based on total amounts of coatings, solvents, and adhesives used for 2023, tripling annual usage.

5- Maximum Throughputs for Clean-up Operations are based on 2023RY Supercomposite Estimates (25 gal/yr), tripling clean-up usage.

Table 7
Amcor Pharm (PTE)
EP-14 (L5 Laminator)
Surface Coating Operations

Supercomposite Density of Coating (VOC)	7.27	lb/gal
Maximum Throughput (VOC)	220685	gal/yr
Maximum Throughput (VOC)[2,3]	25.19	gal/hr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
VOC	7.27	lb VOC/gal	802.19	24.07

Hazardous Air Pollutants	HAP Usage[4] lbs	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
CUMENE	60.00	0.03	0.00
4,4-DIPHENYL METHANE DIISOCYANATE	4034.50	2.02	0.06
ETHYL BENZENE	14.50	0.01	0.00
FORMALDEHYDE	6.50	0.00	0.00
HEXAMETHYLENE DIISOCYANATE	0.00	0.00	0.00
METHANOL	0.00	0.00	0.00
PHTHALIC ANHYDRIDE	201.00	0.10	0.00
PROPYLENE GLYCOL METHYL ETHER	73.50	0.04	0.00
2,4-TOLUENE DIISOCYANATE	5.50	0.00	0.00
2,6-TOLUENE DIISOCYANATE	5.50	0.00	0.00
TOLUENE DIISOCYANATE MIXED ISOMERS	4.50	0.00	0.00
XYLENES MIXED ISOMERS	60.00	0.03	0.00
Total HAPs	4465.50	2.23	0.07

EP-14 (L5 Laminator)
Cleanup Operations
Ethyl Acetate Cleanup Solvent

Density of Coating (Dc)	7.52	lb/gal
Weight Percent of VOC (Wo)	100%	
VOC Content = (Wo)(Dc)	7.52	lb/gal
Maximum Throughput[5]	156	gal/yr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
VOC	7.52	lb VOC/gal	0.59	0.02

EP-14 (L5 Laminator Oven)
Natural Gas Combustion

Maximum Rated Capacity of Burners	8,520,000	BTU/hr
Maximum Hours of Operation per Year	8760	hr/yr
Rated Heating Value of Fuel	1020	BTU/cf
Fuel Type	100%	Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor[1]	Units	Emissions TPY
NO_x	1.000E-04	lb/cf	3.659E+00
CO	8.400E-05	lb/cf	3.073E+00
SO_x	6.000E-07	lb/cf	2.195E-02
VOC	5.500E-06	lb/cf	2.012E-01
PM/PM10/PM2.5	7.600E-06	lb/cf	2.781E-01
N_2O	2.20E-06	lb/cf	8.049E-02
CO_2	1.20E-01	lb/cf	4.390E+03
CH4	2.30E-07	lb/cf	8.415E-03

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	7.317E-06
BENZENE	2.10E-09	lb/cf	7.683E-05
BERYLLIUM	1.20E-11	lb/cf	4.390E-07
CADMIUM	1.10E-09	lb/cf	4.024E-05
CHROMIUM	1.40E-09	lb/cf	5.122E-05
COBALT	8.40E-11	lb/cf	3.073E-06
FORMALDEHYDE	7.50E-08	lb/cf	2.744E-03
HEXANE	1.80E-06	lb/cf	6.585E-02
LEAD	5.00E-10	lb/cf	1.829E-05
MANGANESE	3.80E-10	lb/cf	1.390E-05
MERCURY	2.60E-10	lb/cf	9.512E-06
NAPHTHALENE	6.10E-10	lb/cf	2.232E-05
NICKEL	2.10E-09	lb/cf	7.683E-05
TOLUENE	3.40E-09	lb/cf	1.244E-04
Total HAPS			6.90E-02

Notes:
1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4
2 - Maximum Hours based on plant operation (24 hr/day, 7 day/wk, 52 wk/yr)
3 - Maximum Throughputs for Surface Coating Operations are based on 2023RY Supercomposite Estimates (52,400 gal/yr), tripling annual throughputs

4 - HAP usage is calculated through NovaFlow software based on total amounts of coatings, solvents, and adhesives used for 2023, tripling annual usage.
5 - Maximum Throughputs for Clean-up Operations are based on 2023RY Supercomposite Estimates (52 gal/yr), tripling clean-up usage

Table 8
Amcor Pharm (PTE)
EP-16 (L7 Laminator)
Surface Coating Operations

Supercomposite Density of Coating (VOC)	7.27	lb/gal
Maximum Throughput (VOC)	481800	gal/yr
Maximum Throughput (VOC)[2,3]	55.00	gal/hr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
VOC	7.27	lb VOC/gal	1751.34	52.54

Hazardous Air Pollutants	HAP Usage[4] lbs	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
CUMENE	60.00	0.03	0.00
4,4-DIPHENYL METHANE DIISOCYANATE	4034.50	2.02	0.06
ETHYL BENZENE	14.50	0.01	0.00
FORMALDEHYDE	6.50	0.00	0.00
HEXAMETHYLENE DIISOCYANATE	0.00	0.00	0.00
METHANOL	0.00	0.00	0.00
PHTHALIC ANHYDRIDE	201.00	0.10	0.00
PROPYLENE GLYCOL METHYL ETHER	73.50	0.04	0.00
2,4-TOLUENE DIISOCYANATE	5.50	0.00	0.00
2,6-TOLUENE DIISOCYANATE	5.50	0.00	0.00
TOLUENE DIISOCYANATE MIXED ISOMERS	4.50	0.00	0.00
XYLENES MIXED ISOMERS	60.00	0.03	0.00
Total HAPs	4465.50	2.23	0.07

EP-16 (L7 Laminator)
Cleanup Operations
Ethyl Acetate Cleanup Solvent

Density of Coating (Dc))	7.52	lb/gal
Weight Percent of VOC (Wo)	100%	
VOC Content = (Wo)(Dc)	7.52	lb/gal
Maximum Throughput[5]	342	gal/yr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
VOC	7.52	lb VOC/gal	1.29	0.04

EP-16 (L7 Laminator Oven)
Natural Gas Combustion

Maximum Rated Capacity of Burners	6,600,000	BTU/hr
Maximum Hours of Operation per Year	8760	hr/yr
Rated Heating Value of Fuel	1020	BTU/cf
Fuel Type	100%	Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor[1]	Units	Emissions TPY
NO_x	1.000E-04	lb/cf	2.834E+00
CO	8.400E-05	lb/cf	2.381E+00
SO_x	6.000E-07	lb/cf	1.700E-02
VOC	5.500E-06	lb/cf	1.559E-01
PM/PM10/PM2.5	7.600E-06	lb/cf	2.154E-01
N_2O	2.20E-06	lb/cf	6.235E-02
CO_2	1.20E-01	lb/cf	3.401E+03
CH4	2.30E-07	lb/cf	6.518E-03

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	5.668E-06
BENZENE	2.10E-09	lb/cf	5.952E-05
BERYLLIUM	1.20E-11	lb/cf	3.401E-07
CADMIUM	1.10E-09	lb/cf	3.118E-05
CHROMIUM	1.40E-09	lb/cf	3.968E-05
COBALT	8.40E-11	lb/cf	2.381E-06
FORMALDEHYDE	7.50E-08	lb/cf	2.126E-03
HEXANE	1.80E-06	lb/cf	5.101E-02
LEAD	5.00E-10	lb/cf	1.417E-05
MANGANESE	3.80E-10	lb/cf	1.077E-05
MERCURY	2.60E-10	lb/cf	7.369E-06
NAPHTHALENE	6.10E-10	lb/cf	1.729E-05
NICKEL	2.10E-09	lb/cf	5.952E-05
TOLUENE	3.40E-09	lb/cf	9.636E-05
Total HAPS			5.35E-02

Notes:

1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4

2 - Maximum Hours based on plant operation (24 hr/day, 7 day/wk, 52 wk/yr)

3 - Maximum Throughputs for Surface Coating Operations are based on 2023RY Supercomposite Estimates (114,400 gal/yr), tripling annual throughputs

4 - HAP usage is calculated through NovaFlow software based on total amounts of coatings, solvents, and adhesives used for 2023, tripling annual usage.

5 - Maximum Throughputs for Clean-up Operations are based on 2023RY Supercomposite Estimates (114 gal/yr), tripling clean-up usage

Table 9
Amcor Pharm (PTE)
EP-18 (P9 Printer)
Surface Coating Operations

Supercomposite Density of Coating (VOC)	7.27	lb/gal
Maximum Throughput (VOC)	53739	gal/yr
Maximum Throughput (VOC)[2,3]	6.13	gal/hr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions Controlled TPY
VOC	7.27	lb VOC/gal	195.34	5.86

Hazardous Air Pollutants	HAP Usage[4] lbs	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
CUMENE	60.00	0.03	0.00
4,4-DIPHENYL METHANE DIISOCYANATE	4034.50	2.02	0.06
ETHYL BENZENE	14.50	0.01	0.00
FORMALDEHYDE	6.50	0.00	0.00
HEXAMETHYLENE DIISOCYANATE	0.00	0.00	0.00
METHANOL	0.00	0.00	0.00
PHTHALIC ANHYDRIDE	201.00	0.10	0.00
PROPYLENE GLYCOL METHYL ETHER	73.50	0.04	0.00
2,4-TOLUENE DIISOCYANATE	5.50	0.00	0.00
2,6-TOLUENE DIISOCYANATE	5.50	0.00	0.00
TOLUENE DIISOCYANATE MIXED ISOMERS	4.50	0.00	0.00
XYLENES MIXED ISOMERS	60.00	0.03	0.00
Total HAPs	4465.50	2.23	0.07

EP-18 (P9 Printer)
Cleanup Operations
Ethyl Acetate Cleanup Solvent

Density of Coating (Dc))	7.52	lb/gal
Weight Percent of VOC (Wo)	100%	
VOC Content = (Wo)(Dc)	7.52	lb/gal
Maximum Throughput[5]	39	gal/yr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Uncontrolled) TPY
VOC	7.52	lb VOC/gal	0.15	0.00

EP-18 (P9 Printer Oven)
Natural Gas Combustion

Maximum Rated Capacity of Burners	6,600,000	BTU/hr
Maximum Hours of Operation per Year	8760	hr/yr
Rated Heating Value of Fuel	1020	BTU/cf
Fuel Type	100%	Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor[1]	Units	Emissions TPY
NO_x	1.000E-04	lb/cf	2.834E+00
CO	8.400E-05	lb/cf	2.381E+00
SO_x	6.000E-07	lb/cf	1.700E-02
VOC	5.500E-06	lb/cf	1.559E-01
PM/PM10/PM2.5	7.600E-06	lb/cf	2.154E-01
N_2O	2.20E-06	lb/cf	6.235E-02
CO_2	1.20E-01	lb/cf	3.401E+03
CH4	2.30E-07	lb/cf	6.518E-03
Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	5.668E-06
BENZENE	2.10E-09	lb/cf	5.952E-05
BERYLLIUM	1.20E-11	lb/cf	3.401E-07
CADMIUM	1.10E-09	lb/cf	3.118E-05
CHROMIUM	1.40E-09	lb/cf	3.968E-05
COBALT	8.40E-11	lb/cf	2.381E-06
FORMALDEHYDE	7.50E-08	lb/cf	2.126E-03
HEXANE	1.80E-06	lb/cf	5.101E-02
LEAD	5.00E-10	lb/cf	1.417E-05
MANGANESE	3.80E-10	lb/cf	1.077E-05
MERCURY	2.60E-10	lb/cf	7.369E-06
NAPHTHALENE	6.10E-10	lb/cf	1.729E-05
NICKEL	2.10E-09	lb/cf	5.952E-05
TOLUENE	3.40E-09	lb/cf	9.636E-05
Total HAPS			5.35E-02

Notes:
1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4
2 - Maximum Hours based on plant operation (24 hr/day, 7 day/wk, 52 wk/yr)
3 - Maximum Throughputs for Surface Coating Operations are based on 2023RY Supercomposite Estimates (12,760 gal/yr), tripling annual throughputs

4 - HAP usage is calculated through NovaFlow software based on total amounts of coatings, solvents, and adhesives used for 2023, tripling annual usage.
5 - Maximum Throughputs for Clean-up Operations are based on 2023RY Supercomposite Estimates (13 gal/yr), tripling clean-up usage

Table 10
Amcor Pharm (PTE)
EP-19 (P10 Printer)
Surface Coating Operations

Supercomposite Density of Coating (VOC)	7.27	lb/gal
Maximum Throughput (VOC)	46891	gal/yr
Maximum Throughput (VOC)	5.35	gal/hr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	97.00%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Uncontrolled) TPY
VOC	7.27	lb VOC/gal	170.45	5.11

Hazardous Air Pollutants	HAP Usage lbs	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
CUMENE	60.00	0.03	0.00
4,4-DIPHENYL METHANE DIISOCYANATE	4034.50	2.02	0.06
ETHYL BENZENE	14.50	0.01	0.00
FORMALDEHYDE	6.50	0.00	0.00
HEXAMETHYLENE DIISOCYANATE	0.00	0.00	0.00
METHANOL	0.00	0.00	0.00
PHTHALIC ANHYDRIDE	201.00	0.10	0.00
PROPYLENE GLYCOL METHYL ETHER	73.50	0.04	0.00
2,4-TOLUENE DIISOCYANATE	5.50	0.00	0.00
2,6-TOLUENE DIISOCYANATE	5.50	0.00	0.00
TOLUENE DIISOCYANATE MIXED ISOMERS	4.50	0.00	0.00
XYLENES MIXED ISOMERS	60.00	0.03	0.00
Total HAPs	4465.50	2.23	0.07

EP-19 (P10 Printer)
Cleanup Operations
Ethyl Acetate Cleanup Solvent

Density of Coating (Dc))	7.52	lb/gal
Weight Percent of VOC (Wo)	100%	
VOC Content = (Wo)(Dc)	7.52	lb/gal
Maximum Throughput	105	gal/yr
Maximum Hours of Operation per Year	8760	hr/yr
Capture Efficiency	100%	
Control Efficiency	98.71%	

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions (Uncontrolled) TPY	Emissions (Controlled) TPY
VOC	7.52	lb VOC/gal	0.39	0.01

EP-19 (P10 Printer Oven)
Natural Gas Combustion

Maximum Rated Capacity of Burners	9,000,000	BTU/hr
Maximum Hours of Operation per Year	8760	hr/yr
Rated Heating Value of Fuel	1020	BTU/cf
Fuel Type	100%	Natural Gas

Oven

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions TPY
NO_x	1.000E-04	lb/cf	3.865E+00
CO	8.400E-05	lb/cf	3.246E+00
SO_x	6.000E-07	lb/cf	2.319E-02
VOC	5.500E-06	lb/cf	2.126E-01
PM/PM10/PM2.5	7.600E-06	lb/cf	2.937E-01
N_2O	2.20E-06	lb/cf	8.502E-02
CO_2	1.20E-01	lb/cf	4.638E+03
CH4	2.30E-07	lb/cf	8.889E-03

Hazardous Air Pollutants				
ARSENIC	7440-38-2	2.00E-10	lb/cf	7.729E-06
BENZENE	71-43-2	2.10E-09	lb/cf	8.116E-05
BERYLLIUM	7440-41-7	1.20E-11	lb/cf	4.638E-07
CADMIUM	7440-43-9	1.10E-09	lb/cf	4.251E-05
CHROMIUM	7440-47-3	1.40E-09	lb/cf	5.411E-05
COBALT	7440-48-4	8.40E-11	lb/cf	3.246E-06
FORMALDEHYDE	50-00-0	7.50E-08	lb/cf	2.899E-03
HEXANE	110-54-3	1.80E-06	lb/cf	6.956E-02
LEAD	7439-92-1	5.00E-10	lb/cf	1.932E-05
MANGANESE	7439-96-5	3.80E-10	lb/cf	1.469E-05
MERCURY	7439-97-6	2.60E-10	lb/cf	1.005E-05
NAPHTHALENE	91-20-3	6.10E-10	lb/cf	2.357E-05
NICKEL	7440-02-0	2.10E-09	lb/cf	8.116E-05
TOLUENE	108-88-3	3.40E-09	lb/cf	1.314E-04
Total HAPS				7.29E-02

Notes:

1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-1, 1.4-2, 1.4-3, 1.4-4

2 - Maximum Hours based on plant operation (24 hr/day, 7 day/wk, 52 wk/yr)

3 - Maximum Throughputs for Surface Coating Operations are based on 2023RY Supercomposite Estimates (12,760 gal/yr), tripling annual throughputs

4 - HAP usage is calculated through NovaFlow software based on total amounts of coatings, solvents, and adhesives used for 2023, tripling annual usage.

5 - Maximum Throughputs for Clean-up Operations are based on 2023RY Supercomposite Estimates (13 gal/yr), tripling clean-up usage

Table 11

Amcor Pharm (PTE)	**B7 Boiler**	9,850,000 BTU/hr
Natural Gas Combustion	**B8 Boiler**	5,500,000 BTU/hr
EP-23 (B7, B8, B9 Boiler)	**B9 Boiler**	5,500,000 BTU/hr
Maximum Rated Capacity of Burners (Total)		20,850,000 BTU/hr
Maximum Hours of Operation per Year		8760 hr/yr
Rated Heating Value of Fuel		1020 BTU/cf
Fuel Type		100% Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	**Emission Factor**	**Units**	**Emissions** TPY
NO_x	1.000E-04	lb/cf	8.953E+00
CO	8.400E-05	lb/cf	7.521E+00
SO_x	6.000E-07	lb/cf	5.372E-02
VOC	5.500E-06	lb/cf	4.924E-01
PM/PM10/PM2.5	7.600E-06	lb/cf	6.804E-01
N_2O	2.20E-06	lb/cf	1.970E-01
CO_2	1.20E-01	lb/cf	1.074E+04
CH4	2.30E-07	lb/cf	2.059E-02

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	1.791E-05
BENZENE	2.10E-09	lb/cf	1.880E-04
BERYLLIUM	1.20E-11	lb/cf	1.074E-06
CADMIUM	1.10E-09	lb/cf	9.849E-05
CHROMIUM	1.40E-09	lb/cf	1.253E-04
COBALT	8.40E-11	lb/cf	7.521E-06
FORMALDEHYDE	7.50E-08	lb/cf	6.715E-03
HEXANE	1.80E-06	lb/cf	1.612E-01
LEAD	5.00E-10	lb/cf	4.477E-05
MANGANESE	3.80E-10	lb/cf	3.402E-05
MERCURY	2.60E-10	lb/cf	2.328E-05
NAPHTHALENE	6.10E-10	lb/cf	5.461E-05
NICKEL	2.10E-09	lb/cf	1.880E-04
TOLUENE	3.40E-09	lb/cf	3.044E-04
Total HAPS			1.690E-01

Notes:

1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-2, 1.4-3, 1.4-4

Table 12
Amcor Pharm (PTE)
Natural Gas Combustion
EP-24 (B1 Boiler)

Maximum Rated Capacity of Burners	3,000,000 BTU/hr
Maximum Hours of Operation per Year	8760 hr/yr
Rated Heating Value of Fuel	1020 BTU/cf
Fuel Type	100% Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions TPY
NO_x	**1.000E-04**	**lb/cf**	1.288E+00
CO	**8.400E-05**	**lb/cf**	1.082E+00
SO_x	**6.000E-07**	**lb/cf**	7.729E-03
VOC	**5.500E-06**	**lb/cf**	7.085E-02
PM/PM10/PM2.5	**7.600E-06**	**lb/cf**	9.791E-02
N_2O	2.20E-06	lb/cf	2.834E-02
CO_2	1.20E-01	lb/cf	1.546E+03
CH4	2.30E-07	lb/cf	2.963E-03

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	2.576E-06
BENZENE	2.10E-09	lb/cf	2.705E-05
BERYLLIUM	1.20E-11	lb/cf	1.546E-07
CADMIUM	1.10E-09	lb/cf	1.417E-05
CHROMIUM	1.40E-09	lb/cf	1.804E-05
COBALT	8.40E-11	lb/cf	1.082E-06
FORMALDEHYDE	7.50E-08	lb/cf	9.662E-04
HEXANE	1.80E-06	lb/cf	2.319E-02
LEAD	5.00E-10	lb/cf	6.441E-06
MANGANESE	3.80E-10	lb/cf	4.895E-06
MERCURY	2.60E-10	lb/cf	3.349E-06
NAPHTHALENE	6.10E-10	lb/cf	7.858E-06
NICKEL	2.10E-09	lb/cf	2.705E-05
TOLUENE	3.40E-09	lb/cf	4.380E-05
Total HAPS			2.431E-02

Notes:
1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-2, 1.4-3, 1.4-4

Table 13

Amcor Pharm (PTE)	**Oxidizer 3**	3,580,000 BTU/hr
Natural Gas Combustion	**Oxidizer 8**	9,800,000 BTU/hr
Oxidizers 3, 8, 10	**Oxidizer 10**	3,580,000 BTU/hr
Maximum Rated Capacity of Burners (Total)		16,960,000 BTU/hr
Maximum Hours of Operation per Year		8760 hr/yr
Rated Heating Value of Fuel		1020 BTU/cf
Fuel Type		100% Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	**Emission Factor**	**Units**	**Emissions** TPY
NO_x	**1.000E-04**	**lb/cf**	7.283E+00
CO	**8.400E-05**	**lb/cf**	6.118E+00
SO_x	**6.000E-07**	**lb/cf**	4.370E-02
VOC	**5.500E-06**	**lb/cf**	4.006E-01
PM/PM10/PM2.5	**7.600E-06**	**lb/cf**	5.535E-01
N_2O	2.20E-06	lb/cf	1.602E-01
CO_2	1.20E-01	lb/cf	8.739E+03
CH4	2.30E-07	lb/cf	1.675E-02

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	1.457E-05
BENZENE	2.10E-09	lb/cf	1.529E-04
BERYLLIUM	1.20E-11	lb/cf	8.739E-07
CADMIUM	1.10E-09	lb/cf	8.011E-05
CHROMIUM	1.40E-09	lb/cf	1.020E-04
COBALT	8.40E-11	lb/cf	6.118E-06
FORMALDEHYDE	7.50E-08	lb/cf	5.462E-03
HEXANE	1.80E-06	lb/cf	1.311E-01
LEAD	5.00E-10	lb/cf	3.641E-05
MANGANESE	3.80E-10	lb/cf	2.767E-05
MERCURY	2.60E-10	lb/cf	1.894E-05
NAPHTHALENE	6.10E-10	lb/cf	4.443E-05
NICKEL	2.10E-09	lb/cf	1.529E-04
TOLUENE	3.40E-09	lb/cf	2.476E-04
Total HAPS			0.000E+00

Notes:

1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-2, 1.4-3, 1.4-4

Table 14
Amcor Pharm (PTE)
Natural Gas Combustion
Insignificant Activities

(2) Lab Bunsen Burners	6.8 BTU/hr
Office Furnaces & MUAs	5,400,000 BTU/hr
Unit Heaters	450,000 BTU/hr
Water Heater	75,000 BTU/hr
Process Air Heater	800,000 BTU/hr
Maximum Rated Capacity of Burners (Total)	6,725,007 BTU/hr
Maximum Hours of Operation per Year	8760 hr/yr
Rated Heating Value of Fuel	1020 BTU/cf
Fuel Type	100% Natural Gas

Pollutant Criteria Pollutants/Greenhouse Gases	Emission Factor	Units	Emissions TPY
NO_x	**1.000E-04**	**lb/cf**	2.888E+00
CO	**8.400E-05**	**lb/cf**	2.426E+00
SO_x	**6.000E-07**	**lb/cf**	1.733E-02
VOC	**5.500E-06**	**lb/cf**	1.588E-01
PM/PM10/PM2.5	**7.600E-06**	**lb/cf**	2.195E-01
N_2O	2.20E-06	lb/cf	6.353E-02
CO_2	1.20E-01	lb/cf	3.465E+03
CH4	2.30E-07	lb/cf	6.642E-03

Hazardous Air Pollutants			
ARSENIC	2.00E-10	lb/cf	5.776E-06
BENZENE	2.10E-09	lb/cf	6.064E-05
BERYLLIUM	1.20E-11	lb/cf	3.465E-07
CADMIUM	1.10E-09	lb/cf	3.177E-05
CHROMIUM	1.40E-09	lb/cf	4.043E-05
COBALT	8.40E-11	lb/cf	2.426E-06
FORMALDEHYDE	7.50E-08	lb/cf	2.166E-03
HEXANE	1.80E-06	lb/cf	5.198E-02
LEAD	5.00E-10	lb/cf	1.444E-05
MANGANESE	3.80E-10	lb/cf	1.097E-05
MERCURY	2.60E-10	lb/cf	7.508E-06
NAPHTHALENE	6.10E-10	lb/cf	1.762E-05
NICKEL	2.10E-09	lb/cf	6.064E-05
TOLUENE	3.40E-09	lb/cf	9.819E-05
Total HAPS			5.450E-02

Notes:
1 - Combustion Emission Factors are all USEPA AP-42: US EPA 42 Emission Factors, Fifth Edition,Volume 1, Chapter 1: External Combustion Sources, Supplement D, July 1998, Tables 1.4-2, 1.4-3, 1.4-4

Table 15
Amcor Pharm (PTE)
Insignificant Activities
Storage Tanks
VOC content = 100%

Tank	Density (lb/gal)	Capacity (gal)	Diameter (ft)	Height (ft)	Monthly Usage[1] (lbs)	Annual Throughput (lbs)	Annual Throughput (gals)	Annual Throughput (bbl)	Number of Turnovers
8,000 gal Legacy MEK (n-propyl Acetate)	7.42	8000	8	21.3	4.49E+03	5.39E+04	8.00E+03	1.91E+02	1
8,000 gal Ethyl Acetate	7.38	8000	8	21.3	278610	3343320	453024.3902	10786.29501	57
2,000 gal n-Propyl Acetate	7.42	2000	5.3	12	1.45E+04	1.74E+05	2.35E+04	5.59E+02	12

Tank ID-Description	Tank Type	Chemical Name	City, State	Met Station	Standing Losses (lb/yr)	Working Losses (lb/yr)	Total Losses (lb/yr)	Total Losses (TPY)	Controlled Emissions (TPY)
2000 gallon n-Propyl Acetate	Horizontal Fixed Roof Tank	n-Propyl Acetate	Shelbyville, KY	Lexington, KY	8.88E-12	1.80E-11	2.68E-11	1.34E-14	1.34E-14
8,000 gal Ethyl Acetate	Horizontal Fixed Roof Tank	Ethyl acetate	Shelbyville, KY	Lexington, KY	100.40	1075.78	1176.18	0.59	0.59
8,000 gal Legacy MEK (n-propyl Acetate)	Horizontal Fixed Roof Tank	n-Propyl Acetate	Shelbyville, KY	Lexington, KY	3.59E-11	6.12E-12	4.20E-11	2.10E-14	2.10E-14
Total VOCs									0.59

Notes:

1 -Based on Average 2025 monthly consumption from facility records
Ref: VOC Emissions are based on calculations performed using EPA Tanks 5.1,

Appendix D: Parts Washer Solvent Environmental Data Sheet

3 Waterway Square Place
The Woodlands, TX 77380

UnivarSolutions

ENVIRONMENTAL DATA SHEET

Univar Product Code:	16160247	**Date:**	8/7/2025
Product Name:	BLEND BEMIS L-1775 DR448 C		

A.	Density:	7.93	lbs./gal	F. MW:	115.67	g/mol
B.	Percent Solids:	0.00%	Weight Percent	G. Vapor Pressure @ 70° F	0.0038	psia
C.	Percent Water:	0.00%	Weight Percent	H. Vapor Pressure @ 95° F	0.0120	psia
D.	Organic Volatiles:	100.00%	Weight Percent	I. Organic Volatiles:	7.93	lbs./gal
E.	Total HAP Content:	0.00%	Weight Percent	J. Total HAP Content:	0.00	lbs./gal

Product Compositon	CAS Number*	Normalized Weight Percent	VOC (Y/N)	HAP (Y/N)
UNIVAR GLYCOL ETHER PNB	5131668	45 - 55 %	YES	NO
Methyl-2 n-Pyrrolidone	872504	45 - 55 %	YES	NO
*(Suppliers of this material may report different CAS numbers)				
Total		**100.00%**		

Amcor Flexibles, Shelbyville Healthcare
6850 Midland Industrial Drive
Shelbyville, KY 40065

12/8/2025

Kentucky DEP, Energy and Environment Cabinet
300 Sower Boulevard
Frankfort, KY 40601

RE: Permit ID: V-20-019. Insignificant Activity, emission point IA-05
KYEIS I.D. Number: 2121100054; AI #: 107007; Activity #: APE20250001

Dear Shufang Yang,

Amcor Flexibles Shelbyville Healthcare is replacing a water heater and through the planning phase, realized that the BTU rating on the existing permit and renewal application is inaccurate.

The water heater will be replaced with a 365,000 BTU unit and it is listed as a 75,000 BTU unit in our permit renewal application. Please update this insignificant activity in our permit renewal application or let me know if additional action is required from Amcor.

Sincerely,

Mary Sturgill

Mary Sturgill

Plant Manager

February 20, 2026

Qinyi Wang
Kentucky Division of Air Quality
DAQ Permit Review, Surface Coating Section
300 Sower Blvd
Frankfort, Kentucky 40601
qinyi.wang@ky.gov

Re: Delegation of Responsible Official Authority
Facility: Amcor Flexibles, LLC – Shelbyville Facility
Source ID: 21-211-00054
Permit ID: V-20-19
Agency Interest ID: 107007
Facility Address: 6850 Midland Industrial Drive, Shelbyville, Kentucky 40065

Dear Ms. Wang,
Pursuant to 401 KAR 52:001, this letter delegates Responsible Official authority for air permitting and compliance matters associated with the above-referenced facility.

I Baljeet Mokha am a VP of Manufacturing of Amcor Flexibles, LLC and meet the definition of a Responsible Official without delegation under 401 KAR 52:001. I hereby delegate Responsible Official authority to the following individuals:

Primary Delegated Responsible Official
Ms. Mary Sturgill | Title: Plant Manager
Organization: Amcor Flexibles, LLC| Mailing Address: Same as facility address
Phone Number: 502-232-7841 | Email: mary.sturgill@amcor.com

Alternate Delegated Responsible Official
Mr. Robert Ragar | Title: EHS Manager
Organization: Amcor Flexibles, LLC | Mailing Address: Same as facility address
Phone: 502-232-7836 | Email: robert.ragar@amcor.com

Each individual named above is responsible for overall operation of the manufacturing facility and is authorized to act independently as a Responsible Official for purposes of the Title V Permit Renewal Application as well as ongoing air quality compliance obligations. This authority includes, but is not limited to, signing permit applications, certifications, reports, and other documents required under Kentucky division of Air Quality.

This delegation shall remain in effect unless revoked in writing or until one or more of the individuals listed above no longer occupy the position identified.

Please contact me if additional information is required.

Sincerely,

Baljeet Mokha
Amcor Flexibles, LLC
2200 Badger Ave, Oshkosh, WI 54904
920-527-5256
baljeet.mokha@amcor.com