



June 15, 2023

Kentucky Department of Environmental Quality
Division of Air Quality
Air Permit Review Branch
200 Fair Oaks Lane, 1st Floor
Frankfort, KY 40601

Re: **Title V Air Permit Renewal Application**
Covalence Specialty Adhesives – 2320 Bowling Green Rd., Franklin, KY 42134
Permit: V-18-008
Agency: Interest 3975

On behalf of Covalence Specialty Adhesives, Cornerstone Environmental, Health, and Safety (CEHS) respectfully submits this renewal application request. KDEP issued the current Title V Air Permit on November 18, 2018 and this renewal is being submitted in advance of the expiration date of this permit.

As part of this renewal application, Covalence is requesting the following permit changes:

- 1) Removal of the Powercrete operation, which includes the following Insignificant Activities:
 - a. EP #68 – Powercrete Part A storage tank with a capacity of 8,000 gallons and maximum usage of 150,000 gallons per year*
 - b. EP #71 – Powercrete Part A storage tank with capacity of 15,000 gallons and maximum usage of 400,000 gallons per year*
 - c. EP #122 – Powercrete Production and Packaging process consisting of four mixers and one test spray booth**

* Units not subject to specific statutes

** Process subject to 401 KAR 59:010

- 2) Amendment to the description of EP #43 – Mill 120" Allen: The facility requests that the Mill Description read as follows: #12 Making Mill instead of #9 Making Mill.
- 3) The facility intends to replace EP110 0.5 MMBtu Burn-off Oven with a comparable model in 2023. Capacity and heat production are to remain the same. This will change will not affect site-wide emissions.

Upon review of the processes at the facility and careful consideration, Covalence and CEHS have determined no additional changes to the facility's operation, emission units, and pollution control equipment since the last permit update. Included in this renewal application is Form DEP7007AI, a facility layout, and process flow diagram.

If you have any questions, please feel free to contact me at (317) 983-5329 or jkeating@corner-enviro.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Keating', with a long horizontal stroke extending to the right.

Jacob Keating, MPA
Assessment Practice Lead; Environmental Specialist

Enclosed:

DEP7007AI

Process Flow Charts

Facility Layout

CC: Mareesa Fulkerson – Environmental Compliance Specialist

John Patterson – Regional Multisite EHS

Ghassan Dughaish – Environmental Director

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: Covalence Specialty Adhesives

KY EIS (AFS) #: 21-

Permit #: V-18-008

Agency Interest (AI) ID: 3975

Date: 6/9/2023

Section AI.1: Source Information

Physical Location	Street:	<u>2320 Bowling Green Rd</u>		
Address:	City:	<u>Franklin</u>	County:	<u>Simpson</u>
			Zip Code:	<u>42134</u>
Mailing Address:	Street or P.O. Box:	<u>Same Physical Location</u>		
	City:	State:	Zip Code:	

Standard Coordinates for Source Physical Location

Longitude: 086°34'35" (decimal degrees) **Latitude:** 036°45'22" (decimal degrees)

Primary (NAICS) Category: 325520 **Primary NAICS #:** _____

Classification (SIC) Category:		<u>Adhesive Manufacturing</u>		Primary SIC #: <u>2891</u>	
Briefly discuss the type of business conducted at this site:		Tapes manufacturer			
Description of Area Surrounding Source:		<input checked="" type="checkbox"/> Rural Area	<input checked="" type="checkbox"/> Industrial Park	<input type="checkbox"/> Residential Area	Is any part of the source located on federal land? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Urban Area	<input type="checkbox"/> Industrial Area	<input type="checkbox"/> Commercial Area	
Approximate distance to nearest residence or commercial property: <u>50 ft</u>		Property Area: <u>77 acres</u>		Is this source portable? <input type="checkbox"/> Yes <input type="checkbox"/> No	
What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?					
NPDES/KPDES:		<input checked="" type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input type="checkbox"/> N/A	
Solid Waste:		<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
RCRA:		<input checked="" type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input type="checkbox"/> N/A	
UST:		<input type="checkbox"/> Currently Hold	<input type="checkbox"/> Need	<input checked="" type="checkbox"/> N/A	
Type of Regulated Waste Activity:		<input type="checkbox"/> Mixed Waste Generator	<input checked="" type="checkbox"/> Generator	<input type="checkbox"/> Recycler	<input type="checkbox"/> Other: _____
		<input type="checkbox"/> U.S. Importer of Hazardous Waste	<input type="checkbox"/> Transporter	<input type="checkbox"/> Treatment/Storage/Disposal Facility	<input type="checkbox"/> N/A

Section AI.2: Applicant Information

Applicant Name: Covalence Specialty Adhesives

Title: (if individual) _____

Mailing Address: **Street or P.O. Box:** 2320 Bowling Green Rd.

City: Franklin **State:** KY **Zip Code:** 42134

Email: (if individual) _____

Phone: 270-586-2237

Technical Contact

Name: _____

Title: _____

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

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

Email: _____

Phone: _____

Air Permit Contact for Source

Name: Mareesa Fulkerson

Title: Environmental Compliance Specialist

Mailing Address: **Street or P.O. Box:** Same as facility

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

Email: mareesafulkerson@berryglobal.com

Phone: 270-586-2237

Section AI.3: Owner Information

Owner same as applicant

Name: Berry Global, Inc.

Title: _____

Mailing Address: **Street or P.O. Box:** PO Box 959
City: Evansville **State:** IN **Zip Code:** 47706

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

Name Change Initial Registration Significant Revision Administrative Permit Amendment

Requested Action: Renewal Permit Revised Registration Minor Revision Initial Source-wide Operating Permit
(check all that apply)

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

<p>Pollutant: Requested Limit:</p> <p><input type="checkbox"/> Particulate Matter _____</p> <p><input type="checkbox"/> Volatile Organic Compounds (VOC) _____</p> <p><input type="checkbox"/> Carbon Monoxide _____</p> <p><input type="checkbox"/> Nitrogen Oxides _____</p> <p><input type="checkbox"/> Sulfur Dioxide _____</p> <p><input type="checkbox"/> Lead _____</p>	<p>Pollutant: Requested Limit:</p> <p><input type="checkbox"/> Single HAP _____</p> <p><input type="checkbox"/> Combined HAPs _____</p> <p><input type="checkbox"/> Air Toxics (40 CFR 68, Subpart F) _____</p> <p><input type="checkbox"/> Carbon Dioxide _____</p> <p><input type="checkbox"/> Greenhouse Gases (GHG) _____</p> <p><input type="checkbox"/> Other _____</p>
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For New Construction:

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

(MM/YYYY) _____ _____

For Modifications:

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

(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:

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

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.



 Authorized Signature

Hope Reeves

 Type or Printed Name of Signatory

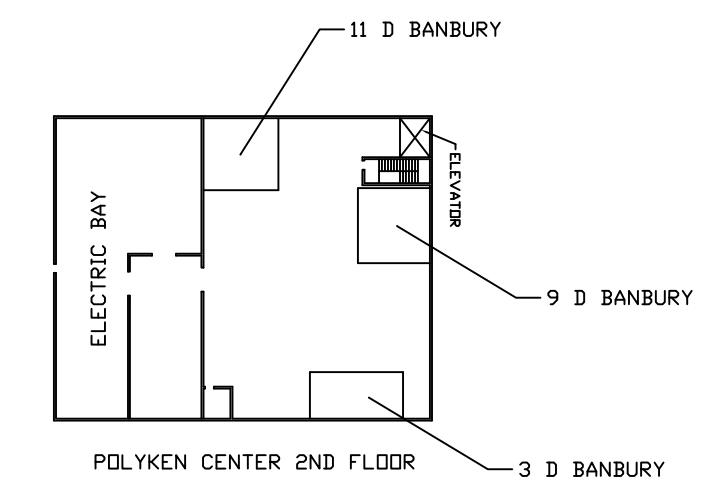
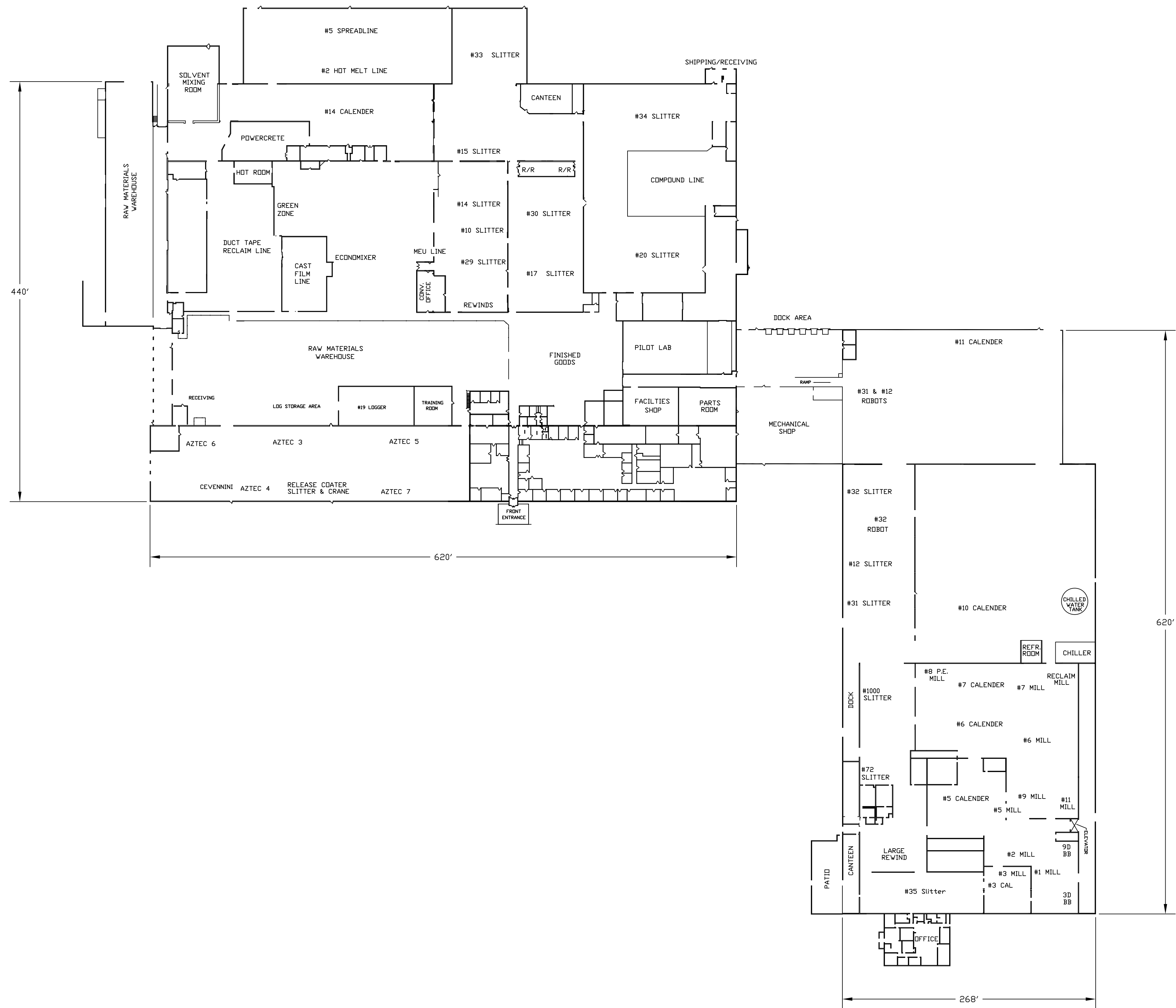
6/9/2023

 Date

 Plant Director

 Title of Signatory

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



REV. 6	UPDATE	TS	11/22/21
REV. 5	UPDATE	TS	8/16/16
REV. 4	UPDATE	TS	4/23/13
REV. 3	UPDATE	JBL	3/24/10
REV. 2	UPDATE	LK	4-18-08
REV. 1	UPDATE	LK	4-3-06

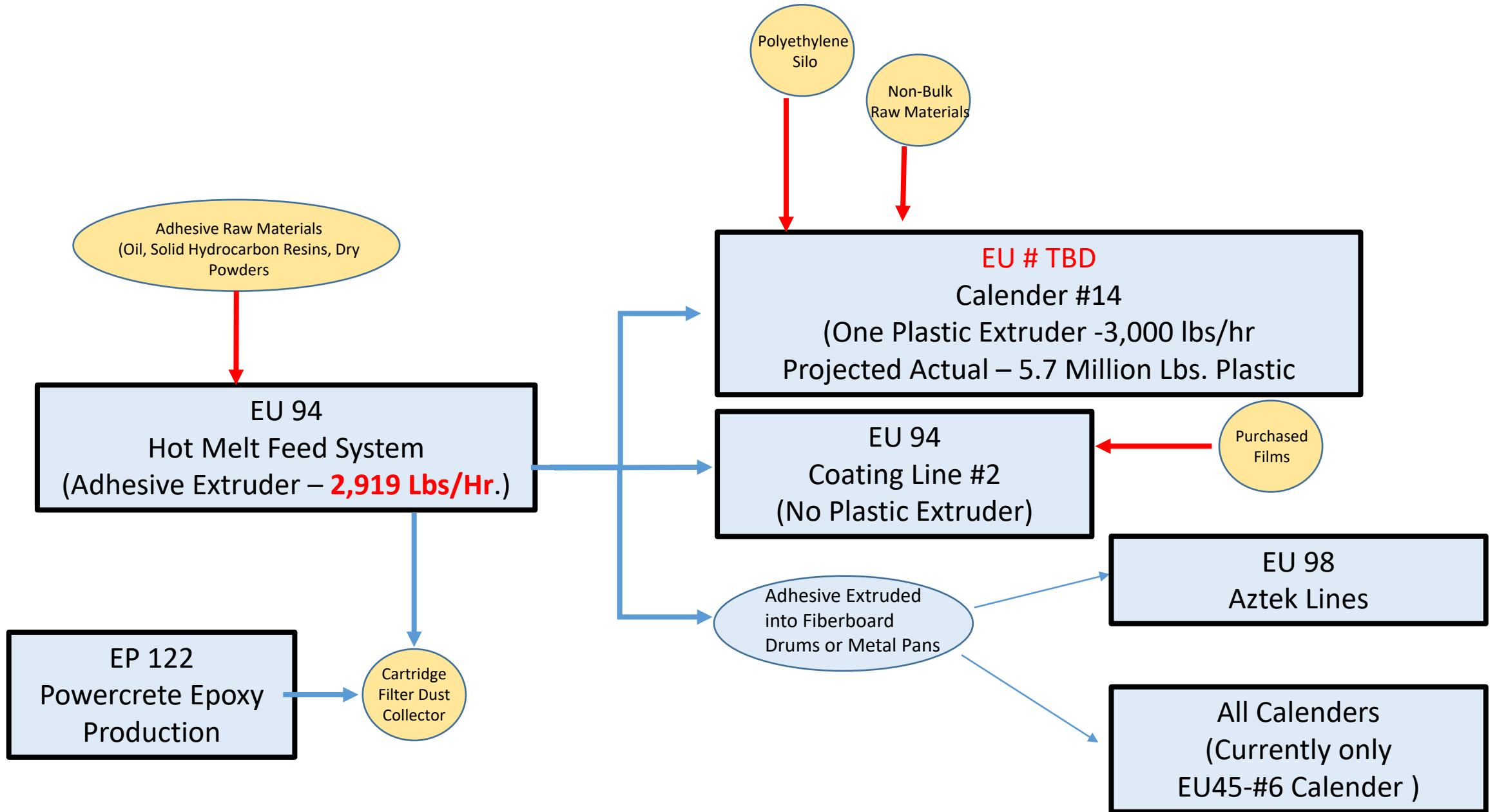
PLANT LAYOUT DRAWING

TOLERANCES: ANGLES $\pm 1/2^\circ$ FRACTIONS $\pm 1/64$
 2 PLACE DEC. $\pm .015$ 3 PLACE DEC. $\pm .002$

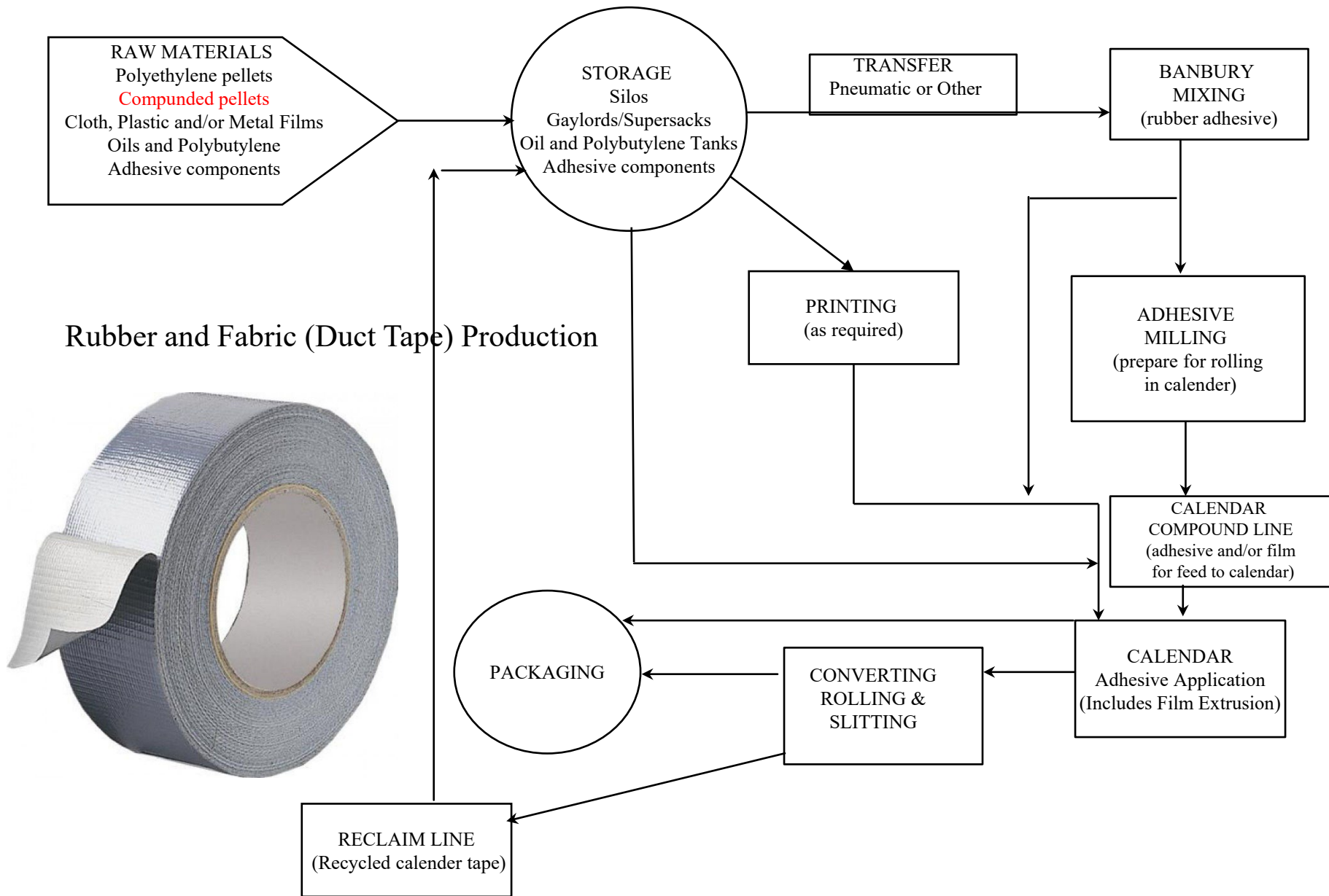
IBERU
 PLASTICS LLC
 CORPORATION

2230 BOWLING GREEN RD.
 FRANKLIN, KY 42314
 TEL: 270/586-2321

DWN. W. WILBURN DATE 11/17/98
 CKD. DATE
 SCALE
 SHEET 1 OF 1
 PL-10415-D

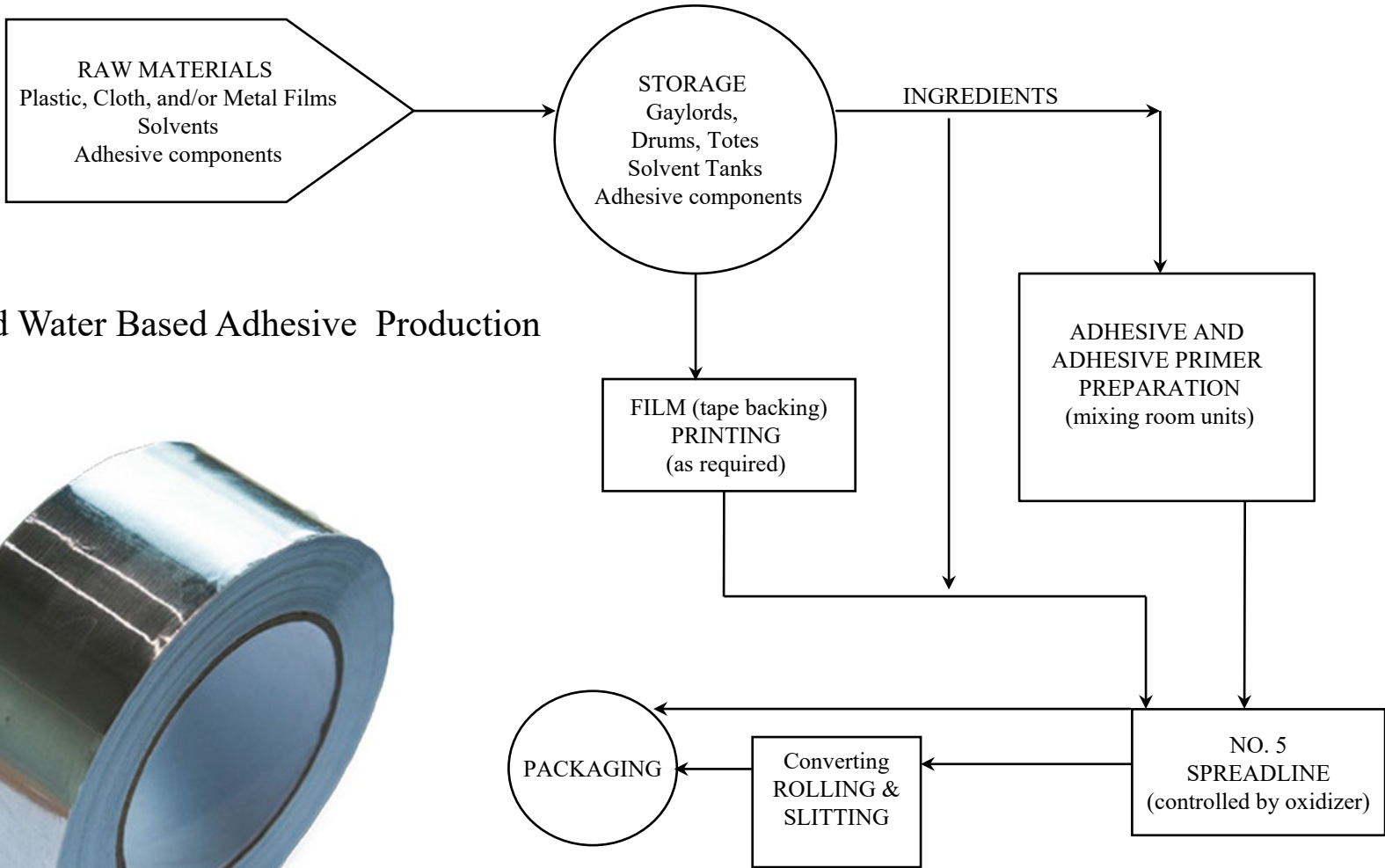


PRODUCTS PROCESS FLOW DIAGRAM CALENDARED TAPES

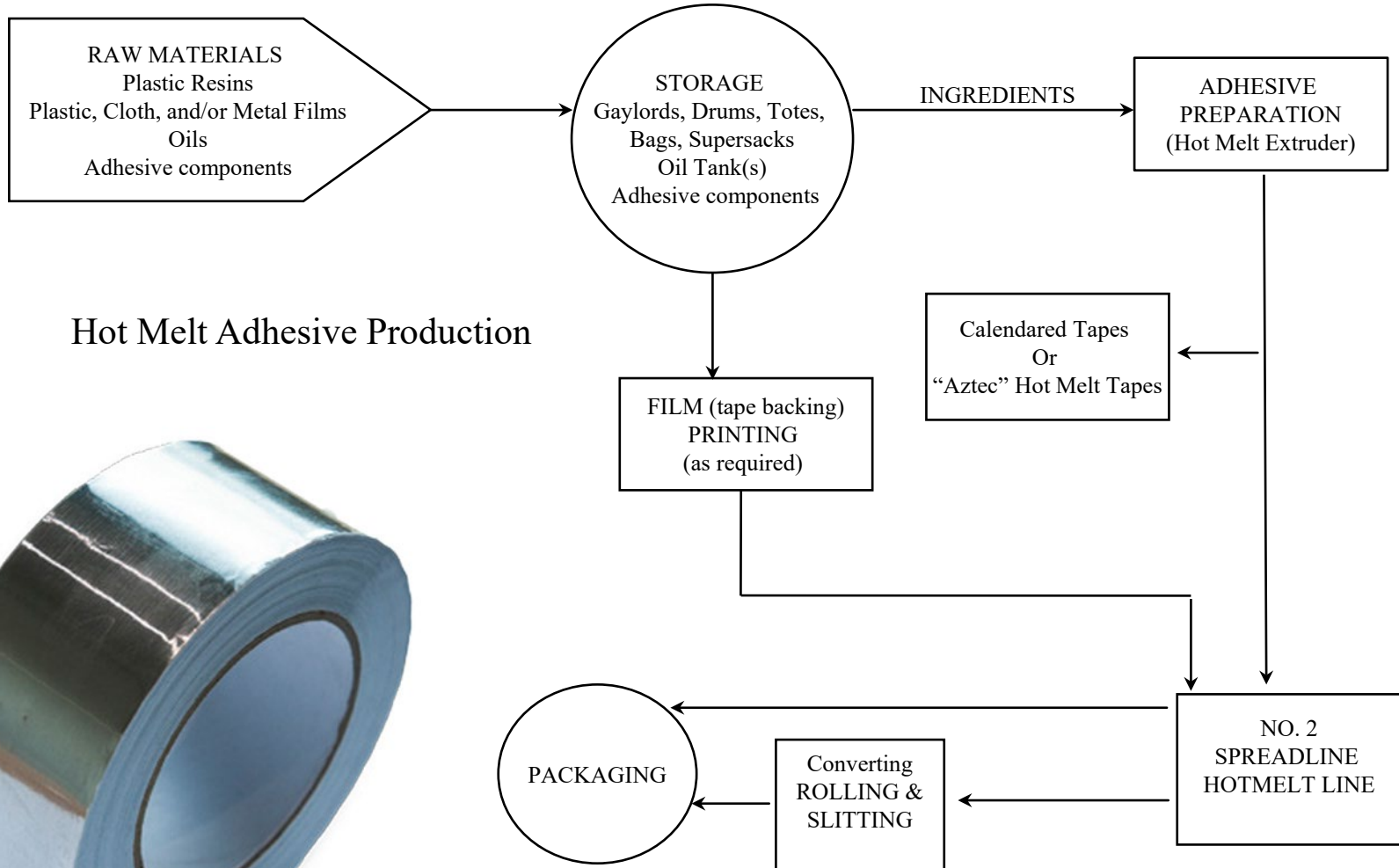


PRODUCTS PROCESS FLOW DIAGRAM SOLVENT AND WATER BASED SPREADLINE TAPES

Solvent and Water Based Adhesive Production



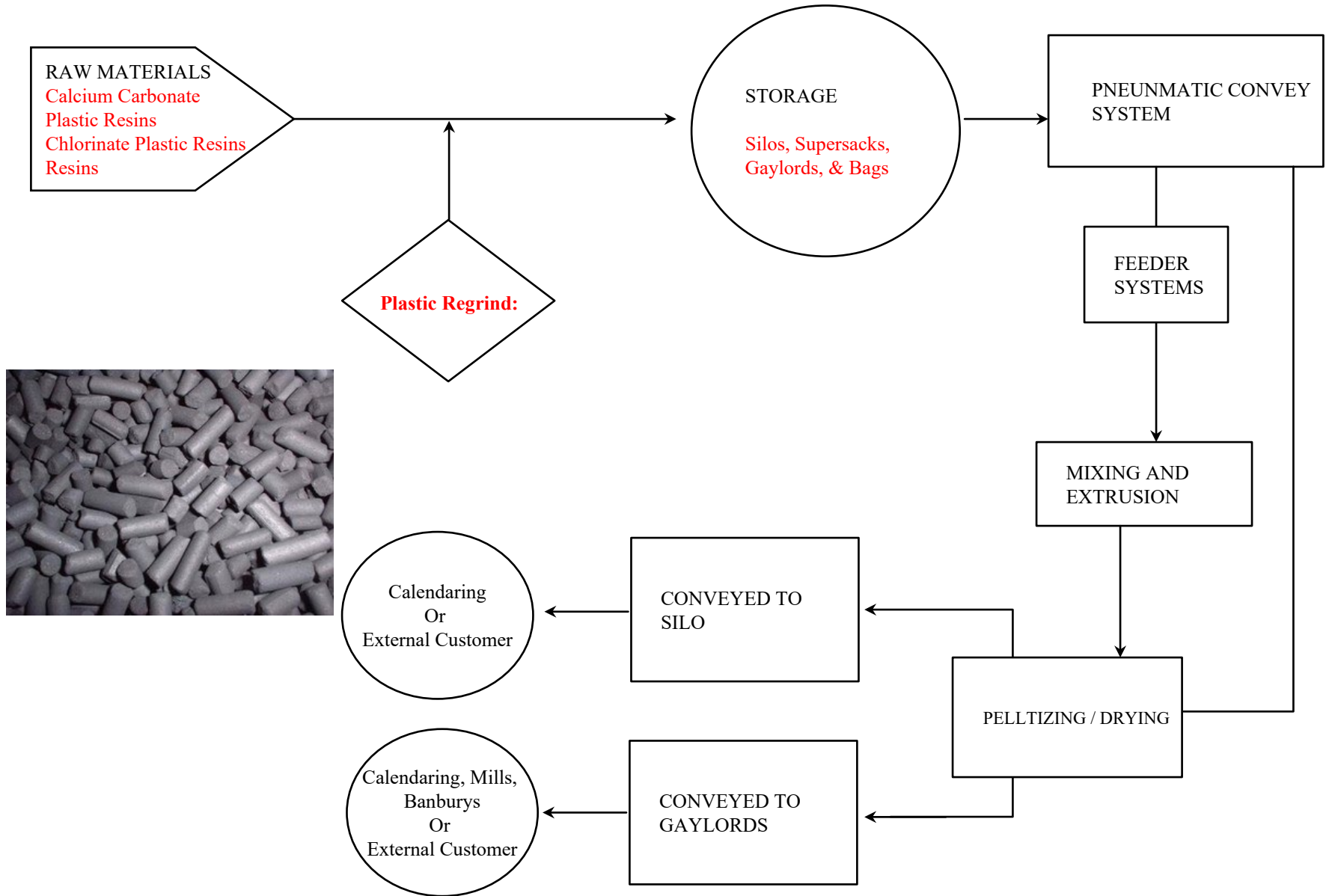
PRODUCTS PROCESS FLOW DIAGRAM HOT MELT SPREADLINE TAPES



Hot Melt Adhesive Production



PROCESS FLOW DIAGRAM COMPOUNDING LINE



PROCESS FLOW DIAGRAM PIPELINE PRIMER, LIQUID ADHESIVE

