

NORTH CAROLINA DIVISION OF AIR QUALITY

Air Permit Review including RACT Requirements
(in conformance with Section 172(c) of the CAA) including

Permit Issue Date: **XX XX, 2010**

Region: Mooresville Regional Office
County: Union
NC Facility ID: 9000117
Inspector's Name: Melinda Wolannin
Date of Last Inspection: 12/17/2009
Compliance Code: C / Compliance - procedural requirements

Facility Data			Permit Applicability (this application only)		
<p>Applicant (Facility's Name): OMNOVA Solutions, Inc.</p> <p>Facility Address: OMNOVA Solutions, Inc. 2011 Rocky River Road North Monroe, NC 28110</p> <p>SIC: 2754 / Commercial Printing, Gravure NAICS: 323111 / Commercial Gravure Printing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: 2D .0959 NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: RACT Review for Existing Facility in a Moderate NAA</p>		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 9000117.07A Date Received: XX/XX/2008 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 03281/T23 Existing Permit Issue Date: XX XX, 200X Existing Permit Expiration Date: February 28, 2013</p>		
<p>Michael Stroup Safety Engineer (704) 225-2010 2011 Rocky River Road North Monroe NC, 28110</p>	<p>Jon Schrader Director Of Plant Operations (704) 225-2017 2011 Rocky River Road North Monroe NC, 28110</p>	<p>Michael Stroup Safety Engineer (704) 225-2010 2011 Rocky River Road North Monroe NC, 28110</p>			
<p>Review Engineer: Charles F. Yirka</p> <p>Review Engineer's Signature: _____ Date: April 23, 2010</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 03281/T24 Permit Issue Date: XX XX, 2010 Permit Expiration Date: February 28, 2013</p>			

I. Introduction and Purpose of Application

OMNOVA Solutions, Inc. (OMNOVA) operates rotogravure printers that print decorative and building products at this Union County site. The facility utilizes rotogravure printing presses, which all appear to be controlled by two types of thermal oxidizers a standard direct natural gas/propane-fired unit (10.2 mmBtu/hr; ID No. C1) and a regenerative unit (76.3 mmBtu/hr; ID No. C2). These devices are configured to allow operation of one or both units.

OMNOVA is located in the Metrolina ozone non-attainment area. This area is classified as Moderate. As such major sources are required to apply RACT¹ to both new and existing sources.

¹ "Reasonably available control technology" (also denoted as RACT) means the lowest emission limit, which a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility. It may require technology, which has been, applied to similar, but not necessarily identical, source categories.

Major sources are defined as having potential emissions exceeding 100 tpy of NO_x and/or VOC. These pollutants are considered ozone precursors leading to the formation of ground-level ozone.

OMNOVA has the potential to emit over 100 tons per year of VOC. The facility appears to be a minor source for NO_x with potential NO_x emissions of less than 100 tpy. NO_x emissions result from the firing of natural gas associated with drying printed materials from the rotogravure printing operations and the operation of the natural gas-fired control devices (thermal oxidizers). The facility is located in the Metrolina ozone non-attainment area. As a result, the application addresses RACT applicability to existing sources. A concise permit history follows:

- July 17, 2007 - The DAQ provided notification that RACT may apply
- September 5, 2007 - The DAQ acknowledges and grants 90 day extension request for submittal
- September 18, 2007 - Date of Compliance Determination from OMNOVA
- March 18, 2008 - Request for additional information
- July 22, 2008 - Revised RACT application received and forms E1 and E5
- August 7, 2008 - Revised RACT application received
- August 26, 2008 - Date of revised RACT application and forms E1 and E5
- November 23, 2009 - The DAQ requests additional information for embosser emissions

II. Changes to Existing Title V Permit

The following table provides a summary of changes made to the permit **03281T23**:

Page	Section	Change
Cover letter	N/A	Header, footer, permit and application number, dates revised, and indicate permit significant modification.
Attachment Insig List	N/A	Revise table insert explanatory footnotes e.g. indicating sources and coating line exempt from VOC RACT
Permit Cover	N/A	Update permit and application number and dates.
Table of Contents	N/A	Remove all references to Part I and II according to policy.
7	Emission Source Table	-Include RACT designations to the Emission Source ID column identifying affected emissions units. -Include asterisk designating Pyadia embosser is exempt from RACT and footnote. -Added footnote indicating the facility is in a Moderate NAA and has undergone review.
7	1.	Remove all references to Part I according to policy.
9-10	2.1 A. 4.	Insert applicable RACT rule.
16-25	3.0	Replace General Conditions and List of Acronyms (version 3.1)

III. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Ms. Melinda Wolannin, Mooresville Regional Office (MRO), last inspected the facility on December 17, 2009. According to the inspection report, at the time of inspection the facility appeared to be operating in compliance with applicable air quality regulations.

IV. Regulatory Review

A. VOC RACT Review

A RACT review of an affected facility requires the evaluation of all sources of VOC emissions. The largest sources of emissions are the five multi-stage rotogravure printing presses. The applicant proposed two different viable alternatives for complying with RACT:

Option 1 - The application indicates OMNOVA can comply with the emissions standards of Rule 2D .0920 - Paper Coating where all coatings are limited to 4.8 lb VOC/gallon of solids.

Option 2 - The application also indicates OMNOVA can comply with Rule 2D .0959 - Petition for Superior Alternative Controls since the presses are all controlled by thermal oxidizers.

Additionally, OMNOVA indicated they will be an affected source when Rule 2D .0966 - Paper Film and Foil Coatings² is adopted. This rule will replace Rule 2D .0920. **It appears OMNOVA can now comply with Rule 2D .0920 and will be in compliance with proposed Rule 2D .0966.**

Emission sources are grouped below to facilitate the review of RACT affected sources:

Group 1 - RACT-Insignificant Activities Subject to RACT Exemption

All emissions units on the insignificant activities list were examined for RACT applicability. Those activities that were not part of a “coating line” are eligible for exemption. (Note: DAQ believes that individual emissions units cannot take the 15 lb/day exemption if the units are part of a “coating line” and the combined before control emissions exceed 15 lb/day). Each of the insignificant activities do not appear to be part of a coating line and it was determined all insignificant activities were exempt as per 2D .0902(b)(1) with before control emissions of less than 15 lb/day.

Group 2 – Sources Subject to the Applicable Paper Coating RACT Rule 2D .0920

The application indicates all the rotogravure printing presses 1, 2, 3, 4, and 6 are affected units and are able to demonstrate compliance with 2D .0920 (c) limit of **4.8 lbs VOC emitted /gallon of coating as delivered to the applicator**. The

² It appears OMNOVA will be able to demonstrate compliance with 2D .0966 (f): “Any individual paper, film, and foil with the potential to emit, prior to controls, at least 25 tons per year of volatile organic compounds from coatings shall apply control with overall volatile organic compounds efficiency of 90 percent rather than the emission limits established in Paragraph (d) of this Rule (0.40 lbs VOC/lb of solids) or use a combination of coating and add-on control equipment on a coating unit to meet limits that are equivalent to 90 percent overall control efficiency.”

application however also indicates the affected presses are not able to demonstrate compliance with 2D .0920 (d) limit of 2.9 lbs VOC emitted/gal of coating as delivered to the applicator. **It appears that (d) does not apply** as these operations do not appear to ever have been subject to 2D .0518(e)). (As per 2D .0920(d) “any source which has chosen to control emissions of volatile organic compounds under Rule .0518 (e) of this Subchapter and which has installed air pollution control equipment in accordance with an air quality permit in order to comply with this Rule before December 1, 1989, may comply with the limits contained in this Paragraph instead of those contained in Paragraph (c) of this Rule.”)

B. Applicable RACT Rule:

15A NCAC 2D .0920 PAPER COATING

- a. This Rule applies to roll, knife or rotogravure coater(s) and drying oven(s) of paper coating lines.
- b. Emissions of volatile organic compounds from any paper coating line subject to this Rule shall not exceed **4.8 pounds of volatile organic compounds per gallon of solids delivered to the coating applicator from a paper coating line.**

Testing [15A NCAC 2D. 2601]

- c. If emission testing is required, the testing shall be performed in accordance with 15A NCAC 2D. 2601 and General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.5.c. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0920.

Monitoring/Recordkeeping [15A NCAC 2D .0903(f)]

- d. The owner or operator of any volatile organic compound emission source shall:
 - i. maintain procedures as necessary to comply with the requirements of this Section; and
 - ii. maintain, in writing, data and reports relating to procedures which will, upon review, document that all the paper coatings are compliant (not exceeding **4.8 pounds per gallon delivered to the applicator**)
 - iii. compliance status of the volatile organic compounds applied at the applicator shall be maintained at all times.

The Permittee shall maintain data and reports that specify the types of materials and finishes processed document that all the paper coatings are compliant and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0920 if the records are not maintained or the coatings are not monitored.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations by January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified

V. NSPS, NESHAPS, NAA/NSR, CAM, 112(r), PE Requirements, Zoning Consistency, and Attainment Status:

NSPS, NESHAP/MACT , NAA/NSR , CAM, 112(r), PE Requirements, Zoning Consistency, did not apply. The facilities status is NAA/NSR major source for VOC emissions. The facility is located in a non-attainment area. This permit modification was to address RACT applicability.

VI. Facility-Wide Air Toxics:

The facility is subject to these requirements; this permit modification did not require a review of the state enforceable toxics rules.

VII. Public Notice and EPA Review:

Pursuant to 2Q .0521, a notice of the draft Title V Permit was placed in a newspaper of general circulation in the area where the facility is located. The notice provided for a 30 day comment period, with an opportunity for a public hearing. A copy of the public notice was sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant was provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit was provided to each affected State at or before the time notice provided to the public under 2Q .0521 above.

VIII. Comments from the Applicant and the Regional Office, Public and EPA:

There were **no OR there** were comments from the applicant. The Regional Office comments were received in an e-mail on 07/24/06. These comments were addressed under previous permit issuance. **None OR the following comments were received from the applicant, regional office and or EPA:**

The DAQ recommends issuance of permit 03281/T24