

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date: Date 2005**

**Region:** Asheville Regional Office  
**County:** Caldwell  
**NC Facility ID:** 1400142  
**Inspector's Name:** Patrick Ballard  
**Date of Last Inspection:** 11/23/2004  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<b>Applicant (Facility's Name):</b> Sealed Air Corp  <b>Facility Address:</b> Sealed Air Corp 2075 Valway Road Lenoir, NC 28645  <b>SIC:</b> 3086 / Plastics Foam Products <b>NAICS:</b> 32615 / Urethane and Other Foam Product (except Polystyrene) Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> NA <b>NSPS:</b> NA <b>NESHAP:</b> NA <b>PSD:</b> NA <b>PSD Avoidance:</b> NA <b>NC Toxics:</b> NA <b>112(r):</b> NA <b>Other:</b> NA		
<b>Contact Data</b>			<b>Application Data</b>		
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 1400142.05A <b>Date Received:</b> 02/01/2005 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 06671/T08 <b>Existing Permit Issue Date:</b> 02/02/2001 <b>Existing Permit Expiration Date:</b> 01/31/2006		
Craig Robert Senior Plant Engineer (828) 726-2100 P O Box 1018 Lenoir NC, 28645	Roger Jackson Regional Plant Manager  P O Box 1018 Lenoir NC, 28654	Craig Robert Senior Plant Engineer (828) 726-2100 P O Box 1018 Lenoir NC, 28645			
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b>			<b>Comments / Recommendations:</b> Issue 06671T09 <b>Permit Issue Date:</b> Date 2005 <b>Permit Expiration Date:</b> Date 2010		

**I. Purpose of Application**

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (06671T08) was issued on March 20, 2001, and is currently scheduled to expire on January 31, 2006. The renewal application was received on February 1, 2005, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

**II. Facility Description**

The facility manufactures polyethylene-packing material and has printing operations for the packing material. The facility operates 24 hours per day, 7 days per week. Permitted equipment include flexographic film sheeting printing lines, high and medium density polyethylene extrusion lines, air film printing and extrusion lines, bubble film extruders, and one No. 2 fuel oil-fired boiler.

### III. History/Background/Application Chronology

**February 1, 2005** – Permit application **1400142.05A** received and deemed complete for processing.

**February 18, 2005** – Asheville Regional Office application review received.

**March 3, 2005** – DRAFT permit sent to Title V Coordinator, Regional Office and Permittee for comment prior to public notice and EPA review.

### IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
-	Attachment	-added equipment ID Nos. to insignificant activities to match current ESM entries
All	Header	-amended permit revision number
Cover	-	-amended all dates and permit revision numbers -corrected regional office address
TOC	-	-updated Section titles to most recent shell
3	Equipment Table	-added reference to NSPS Subpart
4	2.1 A (Table)	-corrected cross-reference errors
4-5	2.1 A.1.a-d	-added equipment ID Nos. -added monitoring/recordkeeping requirements
5-6	2.1 A.2.a-e	-added equipment ID Nos. -updated shell language
6	2.1 B (Table) 2.1 B.1.a-d	-corrected cross-reference errors -added equipment ID Nos. -added monitoring/recordkeeping requirements
7	2.1 B.2.a-e	-added equipment ID Nos. -updated shall language
8	2.1 C.1.a-c 2.1 C.2.a-c 2.1 C.3.a-c	-added equipment ID Nos.
9	2.2 A (Table)	-corrected rule citation
10	2.2 A.1.c-e 2.2 A.2.a	-added monitoring/recordkeeping/reporting requirements -updated shell language and corrected rule citation
11-19	General Conditions	-updated to most recent shall conditions

*There were no necessary modifications to ESM as a result of this renewal. The only modifications to the permitted equipment were to add identification numbers in the permit to match those already assigned in ESM.*

### V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers  
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes  
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources  
15A NCAC 2D .0521, Control of Visible Emissions  
15A NCAC 2D .0524, New Source Performance Standards  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 2D .0958, Work Practice for Sources of Volatile Organic Compounds  
15A NCAC 2Q .0711, Permit Requirements for Toxic Air Pollutants

No new or additional requirements have been added to this renewed permit. Therefore, a regulatory review will not be included in this document. The facility was last inspected on November 23, 2004. It was found to be in compliance with all applicable regulations; continued compliance is expected.

**VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM**

**NSPS** – The Permittee is currently required to comply with the recordkeeping requirements for one No. 2 fuel oil vertical fixed-roof storage tank (15,000 gallon capacity). To ensure compliance, the Permittee maintain readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Continued compliance is expected.

**NESHAPS/MACT** – The facility is not currently subject to any Maximum Achievable Control Technology Standards because its emissions of all HAPs are below the major source thresholds. There is no change as a result of this action to renew the permit.

**PSD** – The facility is not a PSD major source. There is no change as a result of this action to renew the permit.

**112(r)** – The facility indicates that it is not subject to the standards of Section 112(r) because it does not store any of the regulated chemicals in significant quantities.

**CAM** – The facility is not subject to Part 64 because it does not use a control device to achieve compliance with any emission limitation or standard per 40 CFR 64.2(a)(2).

**VII. Facility Wide Air Toxics**

The Permittee has made a demonstration that facility-wide actual emissions of the following pollutants do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711. The Permittee shall operate and maintain his facility in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed the TPER.

Pollutant (CAS Number)	TPERs Limitations			
	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Acetaldehyde (75-07-0)				6.8
Formaldehyde (50-00-0)				0.04
Acrolein (107-02-8)				0.02
Methyl ethyl ketone (78-93-3)		78		22.4
Toluene (108-88-3)		98		14.4
Xylene (1330-20-7)		57		16.4

### VIII. Facility Emissions Review

There is no change in emissions for this renewal. The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2003 Actual Emissions (tpy)
CO	0.16
NO <sub>x</sub>	0.64
PM <sub>10</sub>	2.93
SO <sub>2</sub>	2.25
VOC	66.93
Total HAP	0.48

Per the latest inspection report:

*“The primary emissions from the facility are VOCs from the alcohol-based inks. The facility emitted 67 tpy of VOCs in 2003. All other criteria pollutants are minimal. HAP emissions are well below the 10/25 tpy threshold levels and this facility is not title III major for HAPs. Although VOC emissions are below the 100 tpy they have no plans to reclassify the facility.”*

### IX. Stipulation Review

ARO notes the following issues:

1. There are no equipment changes requested with this renewal. It should be noted that the High Density Polyethylene Extrusion and Printing Line (ID Nos. EPHD3-E and EPHD3-P) has been removed from the facility. A March 10, 2003 letter from the facility states that at some point this line will be replaced with a similar one. This line should remain on the permit. *Agree; equipment will remain on permit.*
2. The old “40 lb/day photochemically reactive VOC rule” (Permit Condition No. 2.2.A.1) should be removed from the permit. *Agree; condition will be removed.*
3. The old odor regulation 2D .0522 (Permit Condition No. 2.2 B.2) should be replaced with the new regulation 2D .1806. *Agree; rule citation will be corrected.*
4. All the printing line and extruder operations have a monthly VE observation requirement. The No. 2 fuel oil fired boiler does not have any VE observation requirements. Maybe a monthly VE observation requirement should be required. *Disagree; change not necessary for No. 2 fuel oil-fired boiler.*
5. ARO is unsure why the propane tank is listed on the insignificant activities list. Maybe it should be removed. *No change in permit required; tank to be kept for information purposes.*

### X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. Both Tennessee and Virginia fall within a 50 mile radius of Lenoir.

### XI. Conclusions, Comments, and Recommendations

A professional engineer’s seal was not required for this renewal.

A consistency determination was not required for his renewal.

ARO recommends issuance of the permit and DOES request a DRAFT permit prior to issuance.

RCO concurs with ARO's recommendation to issue the renewed air permit.