

**NORTH CAROLINA DIVISION OF AIR QUALITY
Air Permit Review**

Region: Mooresville Regional Office
County: Alexander
NC Facility ID: 0200037
Inspector's Name: Bruce Ingle
Date of Last Inspection: 01/13/2005
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)	
Applicant (Facility's Name): Shurtape Technologies, LLC - Plant No. 31 CDS PLANT ID - 3700500073 Facility Address: Shurtape Technologies, LLC 8510 Highway 90 West Stony Point, NC 28678 SIC: 2671 / Paper Coated And Laminated Packaging NAICS: 322221 / Coated and Laminated Packaging Paper and Plastics Film Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:	
Contact Data			Application Data	
Facility Contact	Authorized Contact	Technical Contact	Application Number: 0200037.05A Date Received: 01/31/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04648/T07 Existing Permit Issue Date: 11/22/2000 Existing Permit Expiration Date: 10/31/2005	
Mark Hawes Director of Environmental Safety (828) 325-5428 P. O. Box 1530 Hickory, NC 28603-1530	David Neff Plant Manager (828) 322-2700 P. O. Box 1530 Hickory, NC 28603-1530	Mark Hawes Director of Environmental Safety (828) 325-5428 P. O. Box 1530 Hickory, NC 28603-1530		
Review Engineer: Rahul Thaker Review Engineer's Signature: _____ Date: 3/11/05			Comments / Recommendations: Issue 04648/T08 Permit Issue Date: Permit Expiration Date:	

1. Purpose of Application

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (04648T07) was issued on November 22, 2000 and is currently scheduled to expire on October 31, 2005. The renewal application was received on January 31, 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.

2. Facility Description

Shurtape Technologies, LLC - Plant No. 31 ("facility") manufactures pressure sensitive tape (duct tape). Current hours of operation are 24 hours/day and 5 to 7 days/week. This facility is a major source under the Title V of the Federal Clean Air Act (CAA). The implementing regulations for the Title V of CAA have been written at 40 CFR 70 and included in NC State Implementation Plan (SIP) at 15A NCAC 2Q .0500. The facility is a major source for Title V program for volatile organic compounds (VOC). The facility is not a major source for any other criteria pollutants, nor it is major for any individual or aggregate hazardous air pollutant (HAP).

3. Application Chronology

January 31, 2005 - Air permit application was received by the Division of Air Quality (DAQ). It was considered complete as of this date.

March 1, 2005 - Received region review for this application.

4. Permit Modification/Changes

The initial Title V permit (04648T07) was issued on November 22, 2000. This permit has not been modified since its issuance.

5. Regulatory Review

The facility is subject to the following regulations:

2D .0521 [Control of Visible Emissions]

2D .0524 "New Source Performance Standards (NSPS Subpart RR)"

2D .0958 "Work Practices for Sources of Volatile Organic Compounds"

2D .0521

The existing sources - calenders are subject to 20% opacity limit. The permit requires permittee to conduct once a month monitoring for visible emissions.

As per permittee, the observed visible emissions from these sources during the last last 4-4.25 years of permit cycle have never exceeded the established "normal" of 5% opacity. The company adds that the visible emissions from these sources are non detectable. They are also stating that in their Hickory Plant permit, DAQ did not require any visible emission monitoring for the similar sources.

This matter was discussed with Bruce Ingle of MRO. Bruce confirmed that based on his experience with this and Hickory facilities, there are no visible emissions from these type of sources and he added that it was alright to remove the visible emission monitoring requirement for the calenders.

2D .0524

The existing calenders are subject to the requirements of NSPS Subpart RR "Pressure Sensitive Tape and Label Surface Coating Operations". The current permit includes the applicable requirements of this NSPS.

However, the permit needs to be revised for the following: (i) inclusion of non-compliance statement for testing, monitoring, and record keeping activities and (ii) inclusion of semi-annual reporting for compliance, monitoring, and record keeping requirements.

2D .0958

The existing permit includes the work practice standards for VOC emissions from the facility. The permit however, does not include any monitoring requirement to assure compliance with the requirement. The renewed permit will include a requirement for performance of visual inspection of all operations and processes, which utilize VOC.

The permit will also include appropriate record keeping and semi-annual reporting requirements.

6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

As indicated above, existing tape calenders (ID Nos. 21, 22, and 23) are subject to the requirements of NSPS Subpart RR "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations". Applicable requirements of this regulation have been included in Section 2.1 A. 2. of the existing permit.

NESHAP/MACT

The MACT source category in 40 CFR 63, Subpart JJJJ, "National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating" applies to major existing and new sources of HAP, at paper and other web coating operations.

Existing tape calenders (ID Nos. 21, 22, and 23) may be classified as existing sources of paper and other web coating operations. But, this facility is not a major source for HAP emissions. Hence, this MACT standard does not apply.

It should be noted here that the company had notified the MRO on 12/3/04 that the facility was not subject to this MACT standard because it was a minor source for HAP.

PSD

This facility is a "250 tons" category stationary source for Prevention of Significant Deterioration (PSD) for regulated pollutants. For VOC, it is a major source based on its potential to emit. The actual emissions of VOC for 2002 and 2003 calendar years are approximately 243 tons and 216 tons, respectively.

For all other regulated pollutants, it is a minor source.

The renewal application does not include any request to modify the existing VOC emitting sources. Hence, applicability review for PSD major modification is not required.

Attainment Status

This facility is located in Alexander, and is in attainment for all criteria pollutants, except for 8-hr ozone standard. The county has elected to participate in the voluntary Early Action Compact (EAC) program for this matter. For EAC areas, PSD rule applies for major sources and major modifications, and the effective date for implementation date for 8-hr ozone standard has been deferred until December 2007.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule.

CAM

Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility.

In order to be subject to the Part 64 requirement, the following all three criteria must be satisfied:

- (i) pollutant specific emission unit (eg. boiler, spray booth etc.) shall be subject to an emission limitation or a standard other than the exempt limitations or standards (eg. post-1990 federal standards such as MACT, NSPS etc.),
- (ii) the pollutant specific emission unit uses an active control device to achieve compliance with the applicable requirement, and
- (iii) potential precontrol device emission rate for the pollutant specific emission unit for any regulated pollutant shall be greater than major source threshold.

None of the permitted emission sources are equipped with active control devices, and therefore CAM requirements do not apply.

7. Facility Wide Air Toxics

This facility is currently not subject to NC air toxics program.

8. Facility Compliance Status

The facility was recently inspected on 1/13/05 by Bruce Ingle of MRO. The facility was found to be in compliance of the applicable air quality regulations.

9. Statement of Compliance

The applicant has certified through a submittal of E5 form that the facility is in compliance with all applicable requirements.

10. Facility Emissions Review

There is no change in emissions for this renewal.

11. Stipulation Review

Air permit 04648T07 will be revised for the following:

- Revise insignificant activity list as per the submitted application.
- Remove monitoring/record keeping/reporting requirements for visible emissions in Section 2.1 A.1.c. through e.
- Revise Section 2.1 A. 2. to include non-compliance statement for testing, monitoring and record keeping requirements. Also revise reporting requirements to include semi-annual reporting for monitoring, record keeping, and compliance activities.
- Revise Section 2.2 A 1. to include monitoring, recordkeeping, and reporting requirements.
- Include Section 2.3 Permit Shield for Non-applicable Requirements, for CAM and MACT Standard JJJJ.

- Include the latest version of General Conditions.

12. Public Notice / EPA and Affected States Review

Pursuant to 2Q .0521, a notice of the proposed Title V Permit will be placed in the 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 will also be sent to persons on the Title V mailing list.

Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit will be provided to EPA. Based upon the EPA's current policy, the proposed permit for this facility will be sent to EPA for their 45-day review, simultaneously with noticing it in the newspaper for 30-day public review.

Also pursuant to 2Q .0522, a notice of the proposed Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. Affected states as specified by 15A NCAC 2Q .0503(1) and 40 CFR 70.8(b) are South Carolina, Tennessee and Virginia; North Carolina local air pollution control programs for Western North Carolina Regional Air Pollution Control Agency (Buncombe County), Mecklenburg County and Forsyth County; and the Catawba Indian Nation in York County South Carolina and the Eastern Band of Cherokee Indians in Swain, Jackson and Graham Counties North Carolina.

13. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

The proposed permit was e-mailed to Bruce Ingle of MRO on 2/21/05 for review and comment. The region (B. Ingle) indicated to RCO (R. Thaker) via telephone on 3/11/05, that they did not intend to review the permit at this time.

The proposed permit was also e-mailed to company on 2/21/05 for review and comment. The company responded via e-mail (M. Hawes to R. Thaker) on 3/7/05. Company comments and DAQ response are as follows:

Company Comment 1:

"Page 5 - Section 2.1(A)(2)(g)(i) Recommend specifying that the performance test data and the results from the performance test be from the "initial" performance test and the results from the "initial" performance test. This should help to that the monthly performance tests do not need to be submitted to the administrator. "

DAQ Response:

Section 2.1 A.3.g.i. will be clarified to state that the test data and results required to be submitted to EPA Administrator are for initial performance test only.

Company Comment 2:

"Page 7 – Section 2.3(A)(2) – Is it possible to also shield the facility from any MACT applicability at this time based upon the facility's minor source status for HAPs? I understand that should the facility's emissions profile change such that the PTE becomes greater than 10/25 tpy of HAPs, then MACT would be applicable. Please advise on this point."

DAQ Response:

DAQ cannot provide a blanket permit shield for all promulgated MACT source categories in 40 CFR 63. First of all, there are a few source categories for which the MACT standards apply to even area sources. Second, in order to provide a blanket permit shield for all Part 63 source categories, the company will have to provide explanation on why each of the Part 63 MACT standards are not applicable for the permitted sources. This would mean that the company will have to review applicability section of each MACT regulation, and if it concludes that the facility permitted sources are not subject to any MACT standard including the MACT standards for area sources, then the company can make the request in writing for a permit shield. DAQ will then, review the company information with the information in each MACT rule with respect to applicability.

The company has provided adequate information to DAQ to conclude that the requirements of MACT Subpart JJJJ are not applicable to facility permitted sources, and hence, DAQ has provided the permit shield for this regulation for the permitted emission sources.

RCO recommends renewing the permit after the close of public and EPA review periods.