

Air Permit Review

Permit Issue Date: ??

Region: Raleigh Regional Office
County: Lee
NC Facility ID: 5300139
Inspector's Name: Steven Carr
Date of Last Inspection: 02/24/2011
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Coty US LLC Facility Address: Coty US LLC 1400 Broadway Road Sanford, NC 27332 SIC: 2844 / Toilet Preparations NAICS: 32562 / Toilet Preparation 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: 5300139.10A Date Received: 02/05/2010 Application Type: Modification Application Schedule: TV-1st Time Existing Permit Data Existing Permit Number: 09910/R01 Existing Permit Issue Date: 03/11/2011 Existing Permit Expiration Date: 01/31/2014		
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Review Engineer: Brian Bland Review Engineer's Signature: _____ Date: _____			Comments / Recommendations: Issue 09910/R02 Permit Issue Date: ?? Permit Expiration Date: ??		

1. Introduction and Purpose of Application

Coty US LLC operates a fragrance manufacturing facility at this Lee County site.

This facility is requesting a first time Title V in accordance with 15A NCAC 2Q .0501(c). Application No. 5300139.10A was received by the Division of Air Quality (DAQ) on February 5, 2010. Air Permit No. 09910R00 included a Specific Condition requiring that this facility submit a Title V permit application within one year of the issue date of that permit. Application No. 5300139.10A fulfilled that requirement. No new emission sources or control devices were added as part of this application.

2. Changes to Permit

The following changes have been made to Air Permit No. 09910R01:

Page(s)	Section	Description of Changes
ALL	Entire Permit	+Change permit format from a state only (2Q .0300) permit to the current Title V permit standards (2Q .0500) +Federally enforceable limitations, monitoring, recordkeeping and reporting requirements were added to all permit conditions (with the exception of the "State Enforceable Only" conditions)

Page(s)	Section	Description of Changes
N/A	Specific Conditions A.5 and A.6 (Revision R01)	+Remove 15A NCAC 2D .0535 "Notification Requirement" and 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources" from Specific Limitations Section as these are part of the General Conditions of the 2Q .0500 permit.
N/A	Specific Conditions A.10 and A.11. (Revision R01)	+Remove 15A NCAC 2Q .0504(d) and 15A NCAC 2Q .0507 (Title V permit application requirements)
6-end	General Conditions	+Use General Conditions version 3.5

3. Regulatory Review

The permit language was updated and expanded as needed, but the requirements of these existing stipulations remained essentially unchanged. No new regulations were added during this modification.

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 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 (40 CFR 60, Subpart IIII)
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart ZZZZ)
- 15A NCAC 2Q .0711, Requirements for Toxic Air Pollutants

15A NCAC 2D .0503 "Particulates From Fuel Burning Indirect Heat Exchangers"

This regulation applies to particulate matter (PM) emissions from indirect heat exchangers, except the PM emissions from electric steam generating units are subject to 2D .0536.

Emissions of PM from combustion of natural gas that is discharged from each boiler into the atmosphere shall not exceed PM emission rate as derived using 2D .0503(c).

Accordingly, allowable emissions of particulate matter (PM) from burning of natural gas in each boiler shall be calculated as follows:

$$E = 1.090 \times Q^{-0.2594} \quad \text{Where: } E = \text{allowable PM emission rate in lbs/million Btu heat input}$$

$$Q = \text{maximum heat input rate in million Btu per hour at the facility}$$

Compliance with the PM emission standard of 2D .0503 is expected, as (using the AP-42 emission factor from Table 1.4-2) the potential emission rate of PM is less than the allowable emission rate.

15A NCAC 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"

Emission of sulfur dioxide from any source of combustion that is discharged from any vent, stack, or chimney shall not exceed 2.3 pounds of sulfur dioxide per million BTU input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. Compliance is expected with the above standard due to low sulfur content of natural gas.

15A NCAC 2D .0521 “Control of Visible Emissions”

For sources manufactured before July 1, 1971 (applies to boiler ID No. B-3), visible emissions shall not be more than 40 percent opacity when averaged over a six-minute period. For sources manufactured as of July 1, 1971, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period.

Compliance with the 40 (or 20) percent opacity limit shall be determined as follows:

- i. No six-minute period exceeds 90 (87 in the case of newer sources) percent opacity;
- ii. No more than one six-minute period exceeds 40 (or 20) percent opacity in any hour; and
- iii. No more than four six-minute periods exceed 40 (or 20) percent opacity in any 24-hour period.

Compliance is expected due to the low visible emissions associated with the burning of natural gas.

15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart ZZZZ) and 15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart IIII):

Although the facility is a minor source of HAPs, the two diesel-fired fire water pump RICEs located at the facility are subject to MACT Subpart ZZZZ. ID No. I-FWP.2 (manufactured in 1971) is considered an existing (construction/reconstruction before June 12, 2006) stationary CI RICE and has a compliance date of May 3, 2013. ID No. I-FWP.1 (manufactured in 2008) is classified as new for the purposes of Subpart ZZZZ, and is required to demonstrate compliance through compliance with NSPS IIII.

15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

This condition requires that work practices to be followed when using VOCs, and corrective measures be implemented when these practices are not followed. Also required are monthly visual inspections of all operations and processes utilizing VOCs during normal operations, recordkeeping, and semi-annual reporting.

The most recent facility inspection indicates the facility is adhering to the work practices. Continued compliance is expected.

State-Only Requirements

15A NCAC 2D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

The permit condition requires that the facility provide for the control and prohibition of objectionable odorous emissions. This rule applies to all operations at the facility that may produce odorous emissions that can cause or contribute to objectionable odors beyond the facility's boundaries.

No odors were detected outside of the main building at the time of the February 2011 inspection. Continued compliance is expected.

15A NCAC 2Q .0711 “Requirements for Toxic Air Pollutants”

With the March 2011 addition of the nail lacquer (polish) bottle-filling process (emission source ID No. ES-2) and the resulting emissions of the TAP ethyl acetate, the 2Q .0711 limit for ethyl acetate of 36 lb/hour was added to the permit. Based on the calculations provided in the associated application, the actual emissions of 6.65 lb/hr are well below the TPER.

4. PSD and 112r:

PSD

The facility is not currently subject to any Prevention of Significant Deterioration requirements. This permit application does not affect this status.

Note: The facility's application requested a "15A NCAC 2Q .0317 for Avoidance of 15A NCAC 2D .0530 "Prevention of Significant Deterioration" condition be included in order for the facility to avoid being classified as a major PSD source. However, since the facility's maximum potential VOC emissions are ~195 tpy and the PSD major source threshold is 250 tpy, an avoidance condition is not necessary and is not included. This potential is slightly higher than the calculated potential VOC emissions of 185.9 tpy in permit application 5300139.11A, as this total did not include the VOCs from the insignificant activities.

112r

The facility does not store materials in quantities subject to 112r.

5. Facility Emissions Review

There are no changes in equipment or processes for this application.

The following table represents the highlights of the latest available reviewed emission inventory from the facility:

Pollutant	2009 Actual Emissions (tpy)
VOC	59.08
NO _x	3.58
CO	2.96

6. Facility Compliance Status:

The last full inspection of this facility was completed on February 24, 2011 by Steve Carr of the Raleigh Regional Office. At this time, "the facility appeared to be in compliance with all permitted requirements."

7. Draft Permit Review Summary:

Dena Pittman of the Raleigh Regional Office was provided a draft permit and draft permit review document on September 16, 2011. A response from Ms. Pittman indicated that the RRO had no comments on the draft documents.

David Vann of Coty US LLC was provided a draft permit for review on September 16, 2011.

U.S. EPA was provided a draft permit for review on ??, 2011. No comments were received at the time of permit issuance.

A 30-day public notice period was initiated on ??, 2011. No comments were received at the time of permit issuance.

8. Recommendation :

Issuance of Air Permit No. 09910T02.