

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2010**

Region: Mooresville Regional Office
County: Iredell
NC Facility ID: 4900195
Inspector's Name: Jim Westmoreland
Date of Last Inspection: 05/13/2010
Compliance Code: 3 / Compliance - inspection

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|--|--|--|---|
| Facility Data | | | Permit Applicability (this application only) |
| Applicant (Facility's Name): Elmer's Products, Inc. Facility Address: Elmer's Products, Inc. 2020 West Front Street Statesville, NC 28677 SIC: 2679 / Converted Paper Products, Nec NAICS: 322299 / All Other Converted Paper Product 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: 4900195.10A Date Received: 07/29/2010 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 06639/T12 Existing Permit Issue Date: 06/30/2006 Existing Permit Expiration Date: 04/30/2011 |
| Jim Combs Corporate E/H/S Specialist (704) 818-1318 2020 West Front Street Statesville, NC 28677 | Todd Kreutzer Director of Global Supply Chain (614) 985-2731 One Easton Oval Columbus, OH 43219 | Jim Combs Corporate E/H/S Specialist (704) 818-1318 2020 West Front Street Statesville, NC 28677 | |
| Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2010 | | Comments / Recommendations: Issue 06639/T13 Permit Issue Date: date, 2010 Permit Expiration Date: date, 2015 | |

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 (**06639T12**) was issued on **June 30, 2006**, and is currently scheduled to expire on **April 30, 2011**. The renewal application was received on **July 29, 2010**, 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.

In addition to the renewal of the current Title V permit, the Permittee is requesting the addition of one insignificant activity (glue filling operation, **ID No. IGF**). The operation involves the bulk delivery of received glues from bulk tanks to individual bottles. MSDS provided for the glues indicate no volatile organic compounds or toxic air pollutants present. As a result, the Permittee estimates that no emissions are expected to occur from this process and wishes that it be added to the current list of insignificant activities.

II. Facility Description

Elmer's Products, Inc., operates a manufacturing facility for the production of laminated polystyrene foam boards (SICs 2679, 3086, and 2678). Permitted equipment includes an extruding process line, laminating process area, storage areas, foam grinding and planing equipment, and one foam waste incinerator as well as a collection of additional insignificant sources.

III. History/Background/Application Chronology

May 19, 2006 – Permit **06639T11** issued as a Title V renewal.

July 7, 2006 – Permit **06639T12** issued as a TV State-only modification to add underfire air to the waste incinerator (**ID No. ES-I8**).

May 13, 2010 – MRO completed facility's annual compliance inspection.

July 29, 2010 – Permit application **4900195.10A** received and deemed complete for processing.

August 3, 2010 – MRO submitted comments and recommendations on the renewal application via email.

August 6, 2010 – DRAFT permit sent to Regional Office and Permittee for comment prior to public notice and EPA review.

date, 2010 – DRAFT permit sent to public notice and EPA review prior to issuance.

IV. Permit Modifications/Changes and ESM Discussion

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

| Page | Section | Description of Change |
|------------|--------------------------|---|
| Attachment | Insignificant activities | -amended permit revision number -added new glue filling operations source per permit application (ID No. IGF) |
| Cover | - | -amended permit revision number and all dates |
| TOC | - | -removed all references to Part II |
| All | Header | -amended permit revision number |
| 5 | 2.1 B.1.b | -corrected testing rule cross reference |
| 6 | 2.1 B.2.b 2.1 B.2.c | -corrected testing rule cross reference -updated shell language |
| 7 | 2.1 C.1.b 2.1 C.2.b | -corrected testing rule cross reference -corrected testing rule cross reference |
| 7-8 | 2.1 C.2.c | -updated shell language |
| 8 | 2.1 C.3.a 2.1 C.3.b | -updated shell language -corrected testing rule cross reference |
| 10 | 2.3 A.1 | -updated 112r shell language to include date of last revision submittal |
| 10-20 | General Conditions | -updated shell conditions (v3.2) |
| Attachment | List of Acronyms | -added acronyms CAIR, NAA, and RACT per current shell |
| - | Part II | -removed Part II in its entirety |

The following table indicates the modifications to ESM as a result of this permit renewal:

| Current Description | Change resulting from permit renewal |
|---------------------|---|
| NA | <i>Non-VOC glue filling operations (ID No. IGF)</i> |

V. Regulatory Review

The facility is currently subject to the following regulations:

- 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 .1208, Other Incinerators
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2Q .0508, Permit Content (Prevention of Accidental Releases – Section 112(r))

A regulatory review for these existing requirements will not be included in this document.

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

NSPS – The facility is not currently subject to any new source performance standards. This permit action does not affect this status.

NESHAPS/MACT – The facility is not currently subject to any maximum achievable control technology standards. This permit action does not affect this status.

PSD – The facility is not currently subject to any prevention of significant deterioration requirements. This permit action does not affect this status.

112(r) – The facility’s isopentane underground storage tank (**ID No. IT-1**) is subject to Section 112(r) of the Clean Air Act and shall comply with all applicable requirements in accordance with 40 CFR Part 68. The Permittee is required to revise and update the risk management plan submitted under 40 CFR 68.150 according to the requirements specified in 68.190(b)(2) through (b)(7). This permit action does not affect this status. However as part of this permit renewal, the 112(r) language has been modified to indicate the date of the most recent plan revision and the next renewal date.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following table indicates the current equipment/control device relationships:

| Emission Source ID No. | Emission Source Description | Control Device ID No. | Control Device Description |
|---------------------------------------|--|-----------------------|---|
| 19, 20, 21, 22, and 26 23 SIL-1 | Foam grinding and planing operations consisting of: -five pairs of edge trim grinders -one scrap foam board grinder -one foam board scrap incinerator feed silo | CD-07 | One simple transfer cyclone (64 inches in diameter) |

| Emission Source ID No. | Emission Source Description | Control Device ID No. | Control Device Description |
|------------------------|--|-----------------------|--|
| 31 31A | Foam grinding and planing operations consisting of: -one foam grinder and transfer system -one foam shredder | CD-31A | One simple cyclone (30 inches in diameter) |
| | | CD-31B | One bagfilter (1,524 square feet of filter area) |
| ES-I8 | One natural gas-fired multiple chamber foam waste incinerator (260 pounds per hour charging rate with a minimum of 500,000 Btu per hour primary chamber burner and a minimum of 900,000 Btu per hour secondary burner) both with underfired air capability | CD-08 | One bagfilter (850 square feet of filter area) |

CAM was reviewed for applicability to the control devices during the most recent permit review (see Mark Cuilla's permit review dated **May 19, 2006 – 06639T11**). CAM was found not to be applicable for all control devices because potential uncontrolled emissions were below the applicability threshold. There have been no changes in the equipment since that review; therefore, CAM continues to not apply to this facility.

VII. Facility Wide Air Toxics

The facility is not currently subject to any toxic air pollutant emission limits. This permit action does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility:

| Pollutant(s) | 2008 Actual Emissions (tpy) | 2009 Actual Emissions (tpy) |
|------------------|-----------------------------|-----------------------------|
| CO | 3.38 | 2.80 |
| NO _x | 1.82 | 1.79 |
| PM ₁₀ | 0.5 | 0.38 |
| SO ₂ | 0.63 | 0.44 |
| VOC | 99.95 | 92.46 |
| Total HAPs/TAPs | - | 6.245x10 ⁻⁵ |

IX. Stipulation Review

Jim Westmoreland of the MRO last completed a facility-wide annual compliance inspection for this facility on **May 13, 2010**. Based on his observations the facility appeared to be in compliance with the applicable air quality regulations. He noted no required permit modifications in his inspection report.

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. South Carolina, Mecklenburg County, and Forsyth County are affected areas within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

MRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

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