

## Air Permit Review

**Permit Issue Date: ??, 2010**

**Region:** Winston-Salem Regional Office  
**County:** Davidson  
**NC Facility ID:** 2900268  
**Inspector's Name:** Stephen Moser  
**Date of Last Inspection:** 01/26/2010  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<b>Applicant (Facility's Name):</b> Kurz Transfer Products, LP  <b>Facility Address:</b> Kurz Transfer Products, LP 4939 North NC Highway 150 Lexington, NC 27295  <b>SIC:</b> 2771 / Greeting Card Publishing <b>NAICS:</b> 323111 / Commercial Gravure Printing  <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> N/A <b>NSPS:</b> N/A <b>NESHAP:</b> N/A <b>PSD:</b> N/A <b>PSD Avoidance:</b> N/A <b>NC Toxics:</b> N/A <b>112(r):</b> N/A <b>Other:</b> 15A NCAC 2D .1109 <i>[112(j) – Part 2 MACT Hammer for Boilers &amp; Process Heaters]</i>		
<b>Contact Data</b>			<b>Application Data</b>		
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 2900268.09B <b>Date Received:</b> 08/31/2009 <b>Application Type:</b> 112(j) Part I <b>Application Schedule:</b> TV-Significant <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 06542/T16 <b>Existing Permit Issue Date:</b> 09/01/2010 <b>Existing Permit Expiration Date:</b> 02/28/2013		
Greg Dellinger EHS Manager (336) 397-1724 4939 North NC Highway 150 Lexington, NC 27295	Drew Beringer Vice President and COO (704) 596-9091 3200 Woodpark Boulevard Charlotte, NC 28206	Greg Dellinger EHS Manager (336) 397-1724 4939 North NC Highway 150 Lexington, NC 27295			
<b>Review Engineer:</b> Brian Bland  <b>Review Engineer's Signature:</b> _____ <b>Date:</b> ??, 2010			<b>Comments / Recommendations:</b> Issue 06542/T17 <b>Permit Issue Date:</b> ??, 2010 <b>Permit Expiration Date:</b> February 28, 2013		

**I. Purpose of Application**

Kurz Transfer Products, LP (KTP) is located in Lexington, Davidson County, North Carolina. Application No. 2900268.09B, received August 31, 2009, is a Part 2 MACT "Hammer" application for one (1) No. 2 fuel oil boiler rated at 3.36 MMBtu/hr.

Additionally, according to the most recent compliance inspection report, "boilers IBO1 and IBO2 have been removed from the facility and replaced with the single larger unit ESO6." Their removal from the facility, and removal from the insignificant activities portion of the air permit, was confirmed with Greg Dellinger.

KTP operates a "hot foil stamping" process at its Lexington facility. KTP applies various coatings to polyester film substrate utilizing several rotogravure process lines

**II. Permit Modifications/Changes**

The following table describes the modifications to the current permit.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	Removed No. 2 fuel oil-fired boilers (ID Nos. IB01 and IB02)
1 - 28	All	Updated permit revision number and permit issuance date.
3	Section 1	Added "2D .1100 Case-by-Case MACT" designation to boiler ES06
3	Section 1	Removed 60 day waiting period language for ID Nos. ES07 and RTO-1
8	Section 2.1 C, Table	Added 15A NCAC 2D .1109 to list of applicable regulations
9	Section 2.1 C.4	Add Section to include 112(j) MACT Hammer requirements applicable to the affected boiler.

Page(s)	Section	Description of Change(s)
19-27	Section 3	Updated General Conditions

### III. Regulatory Review

1. **15A NCAC 2D .1109 –Case-by-Case MACT** – On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General’s office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT “hammer” provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On September 14, 2009, the NC DAQ received a Part 2 MACT “Hammer” application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ’s recommendations.

No control technologies for the control of CO, metals, Hg, or HCl were identified for natural gas or No. 2 fuel oil-fired boilers in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA’s AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas combustion sources of this size, consistent with the provisions in CAA § 112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boiler as follows:

To assure compliance, the Permittee shall perform an annual boiler inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:

- i. Inspect the burner, and clean or replace any components of the burner as necessary;
- ii. Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,
- iii. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.

The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected boilers are not inspected and maintained as required above.

In addition, the Permittee will be required to record the results of the annual inspection in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

### IV. Draft Permit Review Summary

Jalal Adouli of the Winston-Salem Regional Office was provided a draft permit and draft permit review document on October 14, 2010. <SUMMARY OF COMMENTS>.

Greg Dellinger of Kurz Transfer Products, LP was provided a draft permit for review on October 14, 2010. <SUMMARY OF COMMENTS>.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on <DATE>. <SUMMARY OF COMMENTS>.

### V. Recommendations

This permit modification application for Kurz Transfer Products, LP located in Lexington, Davidson County County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Issue Permit No. 06542T17