

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Wilmington Regional Office
County: New Hanover
NC Facility ID: 6500236
Inspector's Name: Ashby Armistead
Date of Last Inspection: 08/20/2007
Compliance Code: W/In Violation W/regard To Proc Compliance

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Oracle Packaging Company Facility Address: Oracle Packaging Company 2221 JR Kennedy Drive Wilmington, NC 28405 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: 6500236.07B Date Received: 04/26/2007 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02367/T19 Existing Permit Issue Date: 06/04/2007 Existing Permit Expiration Date: 01/31/2008
John Williams Manufacturing Manager (910) 399-0245 2221 J.R. Kennedy Drive Wilmington NC, 28405	John Cristos General Manager (910) 399-0203 2221 J.R. Kennedy Drive Wilmington NC, 28405	John Cristos General Manager (910) 399-0203 2221 J.R. Kennedy Drive Wilmington NC, 28405	
Review Engineer: Gautam Patnaik Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 02367/T20 Permit Issue Date: Permit Expiration Date:	

1. Facility Description.

Oracle makes paperboard packages for a variety of products such as beverages, laundry detergents, aluminum foil, food, etc. Then the paperboard is sent through a printing press where the appropriate inks are added. The paperboard is then cut to specifications and assembled as needed using glue.

2. Purpose of Applications:

This application is for the renewal for their Title V permit. The current Air Permit No. 02367T19, was scheduled to expire on January 31, 2008. However, the applicant submitted the required renewal application at least nine months prior to the expiration date and are therefore covered under the Title V application shield pursuant to 15A NCAC 2Q .0512(b)(1). In

accordance with 15A NCAC 2Q .0513(c) Permit No. 02367T19 shall not expire until the renewal permit has been issued or denied.

3. Application Chronology

This renewal application was received on April 26, 2007. The table below outlines the modifications to their permit starting from their initial title V permit.

Application #	Changes Made to the Permit	Permit Issued
650236A5.A	Initial title V permit	02367T16
6500236.05A	Administrative change for PSD avoidance from quarterly to semi annual.	02367T17
6500236.06A	Administrative change to correct past error.	02367T18
6500236.07A & 6500236.05C (consolidated into .07A)	(6500236.07A) a) add One 50-inch wide, nine station, flexographic printing press and associated station dryers (ES-PR07) and b) remove the 48-inch rotogravure printing press (ID No. PR-6). (6500236.05C) c) Last MACT “Air Toxics Demonstration” in compliance with 15A NCAC 2Q .0705(b)	02367T19

4. Regulatory Review

- i. 15A NCAC 2D. 0515: “Particulates from Miscellaneous Industrial Processes”
- ii. 15A NCAC 2D .0516: “Sulfur Dioxide Emissions from Combustion Sources”
- iii. 15A NCAC 2D .0521: “Control of Visible Emissions”
- iv. 15A NCAC 2D .0958: “Work Practices for Sources of Volatile Organic Compounds”
- v. 15A NCAC 2D .1100: “Control of Toxic Air Pollutants” (State-Only Requirement)
- vi. 15A NCAC 2D .1111 (MACT Subpart KK - National Emission Standards for the Printing and Publishing Industry)
- vii. 15A NCAC 2Q. 0317: for avoidance of 15A NCAC 2D .0530 “Prevention of Significant Deterioration “
- viii. 15A NCAC 2Q .0705: “Existing Facilities and SIC Calls for Toxic Air Pollutant Emissions Limitation Requirement” (State-Only Requirement)

Renewal of the permit does not change any stipulations for the above regulations.

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

NSPS

None of the sources at this facility are subject to any NSPS regulations.

NESHAP/MACT

This facility is subject to the “Printing and Publishing “(MACT Subpart KK), however, they are an area source with emissions of HAPs are below the 10/25 TPY threshold for Federal HAPs.

The applicant has earlier chosen and committed to limit individual HAP usage to less than 10 tons per year and combined HAP usage to 25 tons per year and thus be designated an area source and as per 40 CFR § 63.820 (a) (3) the applicant is subject only to the provisions of 63.829(d) (recordkeeping) and 63.830(b)(1) (reporting) requirements.

PSD/NAAQS

The minor baseline dates for New Hanover County has been triggered for PM₁₀, SO₂ and NO_x. This renewal did not increase any emissions of any PM₁₀ or SO₂ and no NO_x no emissions tracking for any criteria pollutants will be required at this time for PSD Class II increment purposes. New Hanover County is in attainment with the 8-hour ozone standard.

This County is also in attainment for PM_{2.5} pertaining to the ambient air quality standard. This facility is not a major source for PM_{2.5} and there are no increase in emission of PM_{2.5} by this renewal.

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

There are no sources in this facility with control devices and thus the facility is not subject to a (CAM) Compliance Assurance Monitoring Plan.

6. Facility Wide Air Toxics

The renewal of this permit did not require an air toxics analysis.

7. Part II of Current Permit

The current permit does have a Part II, and there was an emission sources modified during the last five year permit term that was flagged in the permit as not being shielded in accordance with General Condition R. These references were taken out since this permit will provide for a 30-day public comment period and 45-day EPA review period.

8. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. The latest inspection report for the inspection (as per IBEAM and Central Files) done on 8/29/06 by Ashby Armistead of the Regional Office indicates that the facility appears to be in compliance. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements.

The applicant did receive an NOV (Notice of Violation) on 9/20/07 due to the facility failure to submit the required semi-annual and quarterly reports on time.

9. Facility Emissions summary and Operational Status

There is no change in emissions for this renewal.

10. Public Notice / EPA and Affected State Review

Pursuant to 2Q. 0521, a notice of the draft Title V Permit will 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 will be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant will be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above.

11. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

Regional Office and the applicant were provided a draft of this permit for their comments.

The Regional Office comments received on xx/xx/07 were addressed.

Regional Office concurs with RCO recommendation to renew air permit.

11. Permit Modification/Changes

The changes to the permit are as mentioned in the table below:

Page(s)	Section	Description of Change(s)
9	General Conditions	Updated