

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Winston-Salem Regional Office
County: Davidson
NC Facility ID: 2900106
Inspector's Name: Steve Moser
Date of Last Inspection: 06/20/2006
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Owens-Brockway Glass Container Plt 6 Facility Address: Owens-Brockway Glass Container Plt 6 9698 Old US Highway 52 Lexington, NC 27295 SIC: 3221 / Glass Containers NAICS: 327213 / Glass Container 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: 2900106.05B Date Received: 06/24/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 01491/T18 Existing Permit Issue Date: 07/20/2005 Existing Permit Expiration Date: 03/31/2006
Keith Steele Plant Engineer (336) 764-7247 9698 Old US Highway 52 Lexington NC, 27295	Anthony Cavaiola Plant Manager (336) 764-7200 9698 Old US Highway 52 Lexington NC, 27295	James Amburgey Environmental Administrator (419) 247-7909 One Seagate - 30 LDP Toledo OH, 43666	
Review Engineer: Ken Babb Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 01491/T19 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 (01491T18) was issued on July 20, 2005 and was scheduled to expire on March 31, 2006. The renewal application was received 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

The facility makes beer bottles. The facility operates 24 hours per day for 355 days per year. The furnaces remain hot the entire time. During operation, glass is constantly extracted from the furnaces as raw materials are introduced to the furnaces. The level of molten glass in the furnace is held to within a few thousands of an inch of a predetermined level. The furnaces are fired with natural gas, and electrodes provide supplemental heating.

3. Application Chronology

June 24, 2005 - Air permit application was received by the Division of Air Quality (DAQ), Raleigh Central Office (RCO). Permit application was considered complete as of June 24, 2005.

4. Permit History

The permit has been revised only once since initial Title V issuance. That modification (T18) was issued on July 20, 2005. The modification concerned the replacement of a 40 year old Stannic Chloride surface coating system, and associated bagfilter (ID No. CD-HSTFF) to capture particulate emissions. This process was replaced with a more modern Mono Butyl Tin Tetra Chloride (MBTT) process, that has only VOC and HCl emissions.

5. Regulatory Review

The facility is subject to the following regulations:

2D .0515 Particulates from Miscellaneous Industrial Processes

2D .0516 Sulfur Dioxide Emissions From Combustion Sources

2D .0521 Control Of Visible Emissions

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

2D .1100 Toxic Air Pollutant Emissions and Reporting Requirement

2D .1806 Control and Prohibition of Odorous Emissions

2Q .0711 Emission rates Requiring a Permit

However, no regulatory review is required at this time since there are no new applicable regulations for this permit revision (renewal).

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

NSPS/ NESHAP/MACT

New Source Performance Standards (NSPS) do not apply to this facility. NESHAP (MACT) standards do not apply to this facility.

PSD

This facility is a major Prevention of Significant Deterioration (PSD) source because of NO_x emissions (624 tons in 2005). However, the facility has never undergone a modification that triggered a PSD review.

Attainment Status

This facility is located in Davidson County which is in non-attainment for ozone and for PM-2.5 according to the NC DAQ website.

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) (40 CFR Part 64) does not apply. There are no control devices for NO_x or sulfur dioxide installed on any sources at the facility. While several small fabric filters are used to control particulate sources at the facility, none of these sources would be major if uncontrolled. Therefore CAM is not required for this facility.

7. Facility Compliance Status

Although the facility has previously had minor compliance issues, it was found to be in full compliance when last inspected on June 20, 2006.

8. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection, the facility was in compliance with all applicable requirements. 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 has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

9. Facility Emissions Review

There is no change in emissions for this renewal.
The following table lists emissions from the facility as reported in recent emission inventories.

Pollutant	2004 Emissions	2005 Emissions
Carbon Monoxide	3.48 tons	3.55
Oxides of Nitrogen	569.67 tons	624.16
TSP	98.22 tons	105.31
PM10	91.88 tons	98.52
PM2.5	88.75 tons	95.09
SO2	157.01 tons	170.01
VOC	3.56 tons	3.88
Ammonia (greatest HAP/TAP)	7908.11 pounds	7728 pounds
Total HAPS/TAPS	11380.92 pounds	11739 pounds

10. Facility Wide Air Toxics

A toxics evaluation has been triggered at the facility. No update is needed for this renewal.

11. Stipulation Review

All stipulations are standard for this type of facility. The following table lists the changes to the permit

PAGE	CONDITION	CHANGE
N/A	Throughout	Permit No., dates changed.
13-21	Section 3	Updated General Conditions
	Part 2	This section was removed as all equipment has been added and this permit will go to public notice
na	Insignificant activities	Added vented to CD-MRCF to I-MR
8	2.1.A.3.c	Added clause allowing three days without VE observations
12	2.1.C.2.c	Removed monitoring/recordkeeping requirements
13	2.2.B.1	Removed ammonia from modeled TAP list

12. Changes to the Permit

Although the facility has had no observed violations of VE from the glass furnaces, the region has requested that daily observations be maintained in the new permit even when burning natural gas in the furnaces. The region's reasoning for this was that these furnaces produce significant VE from the glass materials being heated. The inspector, Steve Moser, stated in a phone conversation on 12/18/2006 that the facility's VE is usually not far below the 20% limit in the permit. Even though by nature the glass furnaces are a very steady-state operation, Mr. Moser stated that it was WSRO's opinion that the daily monitoring should be maintained in the permit. However, the statement allowing three missed observations has been added to this stipulation.

With the change to the MBTT surface coating system mentioned above, VE emissions are no longer expected from the surface coating operation. Therefore, 2D .0521 no longer has any monitoring or reporting requirements for this operation in the permit. Also with the change to the MBTT system, ammonia is no longer emitted from the facility. Therefore it has been removed from the NC toxics stipulation.

13. 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 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.

14. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.
A consistency determination was not required for this renewal.
A regional P&O review was submitted on June 24, 2005.
In an email dated December 19, 2006, Mr. Moeser or WSRO suggested minor changes which have been made.
RCO concurs with WSRO's recommendation to issue air permit.