

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100868
Inspector's Name: Ray Stewart
Date of Last Inspection: 03/14/2006
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)	
Applicant (Facility's Name): The Sherwin - Williams Company - Stagecoach Trail Facility Address: The Sherwin - Williams Company - Stagecoach Trail 113 Stagecoach Trail Greensboro, NC 27410 SIC: 2851 / Paints And Allied Products NAICS: 32551 / Paint and Coating 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: 4100868.05B Date Received: 12/28/2005 Application Type: Renewal Application Schedule: TV-Renewal/modification Existing Permit Data Existing Permit Number: 05755/T13 Existing Permit Issue Date: 03/24/2006 Existing Permit Expiration Date: 09/30/2006	
Jim Wall Technical Director 113 Stagecoach Trail Greensboro NC, 27410	Bert Rollings Plant Manager 113 Stagecoach Trail Greensboro NC, 27410	James Wall Environmental Coordinator (336) 292-3000 113 Stagecoach Trail Greensboro NC, 27410		
Review Engineer: Ken Babb Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 05755/T15 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 (05775T13) was issued on March 24, 2006 and was scheduled to expire on September 30, 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. Permit No. 05775T14 was recently issued to add a MACT avoidance condition prior to a compliance date. This permit will replace T14 as well. This permit and its review will also constitute the second part of the 2Q .0501(c)(2) modification process that produced permit T14.

2. Facility Description

This facility manufactures lacquer and furniture finishing materials for the office furniture manufacturing industry. Operations are 24 hours a day, five days a week and 50 weeks per year. The equipment is housed

in two buildings with the smaller of the two being an R&D lab, and the larger of the two containing manufacturing, shipping and receiving, drum filling operations and QC labs.

3. Application Chronology

December 28, 2005 - Air permit application was received by the Division of Air Quality (DAQ), Raleigh Central Office (RCO). Permit application was considered complete as of December 28, 2005.

4. Permit History

The following list provides a very brief summary of Title V permit revisions for this facility. The facility has not had a permit go to public notice since the initial Title V permit was issued:

<u>Permit No.</u>	<u>Issuance Date</u>	<u>Description of Revision</u>
05755T09	July 1999	Initial Title V permit
05755T11	April 2002	Add additional tanks and stirrers
05755T12	May 2004	Add/modify coating and filtration processes
05755T13	March 2006	Replace dispersers with new, higher horsepower ones
05755T14	November 2006	Add MACT avoidance condition

5. Regulatory Review

The facility is subject to the following regulations:

2D .0515 Particulates from Miscellaneous Industrial Processes

2D .0521 Control Of Visible Emissions

2D .1806 Control and Prohibition of Odorous Emissions

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

2D .1100 Control of Toxic Air Pollutants

2Q. 0317 Avoidance Conditions Limitation To Avoid Being Major For Hazardous Air Pollutants

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

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

NESHAP/MACT

Prior to the previous permit, this facility was subject to 40 CFR 63 Subpart HHHHH - National Emission Standards for Hazardous Air Pollutants (NESHAP): Miscellaneous Coating Manufacturing. Because of the delisting of Methyl Ethyl Ketone as a HAP, the facility requested changing to a synthetic minor facility before the compliance date of December 11, 2006. Not including MEK facility wide toxic emissions, no single HAP has exceeded six tons in recent inventories nor has combined HAPs exceeded twelve tons. Therefore 2Q .0317 was included in permit T14 so that the facility is minor for HAP upon issuance of permit T14. At the facility's request, the taking to public notice that will be part of this renewal process will also constitute the second part of the 2Q .0501(c)(2) modification process that produced permit T14.

PSD

This facility is not a major Prevention of Significant Deterioration (PSD) source.

Attainment Status

This facility is located in Guilford County which is in non-attainment for ozone and 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 because the only control devices used are several bagfilters controlling sources that would not be major sources themselves if uncontrolled.

7. Facility Compliance Status

Although the facility has previously had serious compliance issues, it was found to be in full compliance when last inspected on March 14, 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. The review is somewhat complicated by the recent delisting of methyl ethyl ketone as a HAP.

<u>Criteria Pollutant</u>	<u>2003 Actual Emissions (tons)</u>	<u>2004 Actual Emissions (tons)</u>	<u>2005 Actual Emissions (tons)</u>
CO	0.28	0.36	0.31
NO _x	0.34	0.43	0.37
PM ₁₀	0.57	0.59	0.58
PM _{2.5}	0.57	0.59	0.58
SO ₂	0.0	0.0	0.0
TSP	0.57	0.59	0.58
VOC	83.57	85.30	81.7

<u>Hazardous Air Pollutant</u>	<u>2003 Actual Emissions (pounds)</u>	<u>2004 Actual Emissions (pounds)</u>	<u>2005 Actual Emissions (pounds)</u>
Ethyl acetate	3,884	3,429	5283
Methanol	3,296	3,205	3435
MEK*	31,324	33,679	29455
Toluene	11,756	10,891	9577
Xylene	3,417	3,428	3181
Total	53,677 (22,353**)	54,632 (20,953**)	50,931 (21,476**)

*No longer listed as a HAP **Without including MEK

10. Facility Wide Air Toxics

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

11. Stipulation Review

All stipulations are standard for this type of facility.

12. 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 and local region (Forsythe County) at or before the time notice provided to the public under 2Q .0521 above. There are no affected States for this facility.

13. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

During phone call on November 30, 2006 Ray Stewart of WSRO recommended issuance of Permit No. 05755T14.

RCO concurs with WSRO's recommendation to issue air permit.