

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date: XX**

**Region:** Winston-Salem Regional Office  
**County:** Guilford  
**NC Facility ID:** 4100404  
**Inspector's Name:** Ray Stewart  
**Date of Last Inspection:** 04/20/2005  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>	
<b>Applicant (Facility's Name):</b> The Sherwin - Williams Co, Consumer Group  <b>Facility Address:</b> The Sherwin - Williams Co, Consumer Group 1025 Howard Street Greensboro, NC 27403  <b>SIC:</b> 2851 / Paints And Allied Products <b>NAICS:</b> 32551 / Paint and Coating Manufacturing  <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> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>	
<b>Contact Data</b>			<b>Application Data</b>	
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 4100404.05A <b>Date Received:</b> 05/26/2005 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 04763/T11 <b>Existing Permit Issue Date:</b> 09/13/2002 <b>Existing Permit Expiration Date:</b> 02/28/2006	
Justin Sergent Safety & Environmental Manager (336) 299-9351 1025 Howard Street Greensboro NC, 27403	John Shagena Plant Manager (336) 299-9351 1025 Howard Street Greensboro NC, 27403	Justin Sergent Safety & Environmental Manager (336) 299-9351 1025 Howard Street Greensboro NC, 27403		
<b>Review Engineer:</b> Kevin Godwin  <b>Review Engineer's Signature:</b> _____ <b>Date: XX</b>		<b>Comments / Recommendations:</b> Issue 04763/T12 <b>Permit Issue Date:</b> <b>Permit Expiration Date:</b>		

**1. Purpose of Application**

This permit revision is a renewal of existing Title V permit 04763T11 pursuant to 15A NCAC 2Q .0513. The initial Title V permit 04763T09 was issued in March of 2001 and is set to expire on February 28, 2006. The renewal application was received on June 2, 2005 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewed permit has been either issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewed permit has been issued or denied.

**2. Facility Description**

Sherwin Williams Company is a coatings manufacturer. According to the renewal application, operations include raw material mixing, thinning, filling and packaging for distribution.

### 3. Permit Modification/Changes

The initial Title V permit was issued in March of 2001. A permit revision involving an administrative amendment was issued on August 3, 2001. A permit revision involving a 502(b)(10) change was issued on September 13, 2002 to add several pieces and correctly list the paint manufacturing equipment. No other permit changes have taken place.

### 4. Application Chronology

June 2, 2005	Received renewal application from Sherwin Williams Company – Consumer Products Division
June 14, 2005	Received regional P&O from Winston-Salem Regional Office (WSRO)
, 2005	Draft noticed to public and EPA

### 5. Regulatory Review

Sherwin Williams Company – Consumer Products Division located in Greensboro is subject to the following regulations:

- 15A NCAC 2D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”
- 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 .0535 “Excess Emissions Reporting and Malfunctions”
- 15A NCAC 2D .0958 “Work Practices for Sources of Volatile Organic Compounds”
- 15A NCAC 2D .1111 “Maximum Achievable Control Technology”
- 15A NCAC 2D .1806 “Control and Prohibition of Odorous Emissions”

Below is a summary of potential facility-wide criteria pollutant emissions based on 2003 emissions inventory information.

Pollutant	Emission Rate (tpy)
Carbon monoxide	0.79
Nitrogen oxides	0.94
Particulate matter less than 10 microns	0.16
Sulfur dioxide	0.11
Volatile organic compounds	104.2

The following table summarizes the changes to the permit:

Pages	Section	Description of Change
Entire permit	Entire Permit, where applicable	Changed reference from “Air Quality Title V Operation Permit” to “Air Quality Federal Title V and State Operation Permit” and “Air Quality Construction and Operation Permit” to “Air Quality State Operation Permit”
Cover letter	Cover letter	Modified to reflect current permit number, issue and effective date, and associated application information.
N/A	Attachment	Added table with changes to Title V as Attachment

13	Section 2.2 A.2.	Included condition relating to 40 CFR 63 Subpart HHHHH applicability including final compliance date
14	Section 2.2 A.4	Included condition requiring facility-wide TAP compliance upon last MACT compliance date
15	Section 3	Updated with most recent General Conditions and List of Acronyms

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

### NSPS

New Source Performance Standards do not apply to this facility.

### NESHAPS

Sherwin Williams Company – Greensboro is subject to 40 CFR 63 Subpart HHHHH “National Emissions Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing.” According to the latest inspection report, initial notification from the facility was received by DAQ on April 11, 2004. The final compliance date is December 11, 2006.

### PSD

Based on potential VOC emissions this facility is classified as PSD minor.

### Attainment Status

Guilford County is not in attainment with the 8-hour ozone standard.

### 112(r)

Based on the most recent inspection report, Sherwin Williams Company – Greensboro does not have any sources that are subject to Section 112(r) of the 1990 CAAA.

### CAM

Pursuant to 15A NCAC 2D .0614, a compliance assurance monitoring (CAM) applicability determination is required for this renewal because: (1) the facility is a Title V source with potential emissions that exceed the Title V major source thresholds without considering controls; and (2) there are sources subject to an emission standard that require controls in order to comply with that standard.

In this case, the emission sources controlled by the bagfilter (ID No. 001) are potentially subject to CAM. The applicant reports the maximum dry material (pigment) usage over the last three years is 15,050,000 pounds per year. Using the AP-42 factor of 1% dry material (pigment) loss (ref. AP-42, 5<sup>th</sup> Edition, Vol. 1, Chapter 6.4.1), potential uncontrolled PM<sub>10</sub> emissions are 150,500 pounds or 75.25 tons. Since pre-control PM<sub>10</sub> emissions are less than 100 tons per year, the facility is exempt from the requirements of CAM. **Note:** the applicant conservatively assumes all particulate matter is PM<sub>10</sub>.

## 7. Facility-wide Air Toxics

An increase in facility-wide TAP emissions is not expected. The existing permit does not contain any conditions relating to state-only TAP emissions.

## 8. Facility Compliance Status

The DAQ has reviewed the compliance status of this facility. Sherwin Williams Company - Greensboro was last inspected on April 20, 2005 by Mr. Ray Stewart (WSRO). At the time of inspection, the facility was found to be in likely compliance with the requirements of the permit. The facility's five year compliance history is detailed in the regional inspection report.

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 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. Stipulation Review**

The following stipulation changes are made upon this renewal:

Section 2.2 A.2. - Included specific condition relating to 40 CFR Part 63 Subpart HHHHH applicability. Since the compliance date has not passed the condition is general in nature. After the compliance date December 11, 2006, a more detailed MACT Subpart HHHHH condition will be placed in the permit identifying applicable standards and requirements.

Section 2.2 A.4. - Included specific condition requiring facility to comply with facility-wide air toxics as of the last MACT compliance date. [15A NCAC 2Q .0705]

No other stipulations are changed upon this renewal. All other stipulations are standard for this type of facility.

## **10. Public Notice/EPA and Affected States Review**

Pursuant to 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 2Q .0522, a copy of each permit application, each proposed permit and each final permit 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. Virginia is an affected state for this facility.

Public notice of the DRAFT Title V permit was published in the XX on XX and the public comment period ran from XX through XX.

## **11. Conclusions, Recommendations, and Comments**

The renewal Title V application for Sherwin Williams Company - Greensboro has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The Winston-Salem Regional Office concurs with issuance of this permit renewal. Upon completion of public notice and EPA review periods, the DAQ proposes to issue the Title V permit renewal.

## **12. Miscellaneous Requirements**

### PE Seal

Pursuant to 2Q .0112, no PE Seal was required because the permit renewal does not involve the determination of applicability and appropriateness or performance of air pollution capture and control systems [15A NCAC 2Q .0112(b)(2) and (3)].

### Zoning

A request for zoning consistency determination is not required for this permit renewal.

Fee Classification

Based on potential to emit, this facility has been classified as **Title V Major**. The facility's current IBEAM status is **Title V Major**. This renewal **will not** change the fee classification.