

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Region: Asheville Regional Office
County: Caldwell
NC Facility ID: 1400185
Inspector's Name: Patrick Ballard
Date of Last Inspection: 07/23/2004
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Shurtape Technologies, LLC - Plt No 24 Facility Address: Shurtape Technologies, LLC - Plt No 24 220 Pleasant Hill Road Hudson, NC 28638 SIC: 2672 / Paper Coated And Laminated, Nec 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: 2D .0614 (CAM) NSPS: N/A NESHAP: MACT Subpart JJJJ and DDDDD PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 1400185.05A Date Received: 01/27/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08486/T06 Existing Permit Issue Date: 08/30/2002 Existing Permit Expiration Date: 10/31/2005
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Review Engineer: Rahul Thaker Review Engineer's Signature: _____ Date: 11/3/05		Comments / Recommendations:	
		Issue 08486/T07 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 (08486T06) was issued on August 30, 2002 and is currently scheduled to expire on October 31, 2005. The renewal application was received on January 27, 2005 or 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

Shurtape Technologies, LLC - Plant No. 24 ("facility") manufactures pressure sensitive tape (carton sealing tape). Current hours of operation are 24 hours/day and 7 days/week. This facility is a major source under the Title V of the Federal Clean Air Act (CAA). The implementing regulations for the Title V of CAA have been written at 40 CFR 70 and included in NC State Implementation Plan (SIP) at 15A NCAC 2Q .0500. The

facility is a major source for Title V program for volatile organic compounds (VOC), and for individual hazardous air pollutant (HAP) (toluene) and aggregate HAP.

3. Application Chronology

January 27, 2005 - Air permit application was received by the Division of Air Quality (DAQ). It was considered complete as of this date.

February 25, 2005 - Received region review for this application.

4. Permit Modification/Changes

The initial Title V permit (08486T03) was issued on November 27, 2000.

Pursuant to 15A NCAC 2Q .0523, the following Section 502(b)(10) changes were made to the initial Title V permit (08486T03) by issuing Title V permit 08486T04 on July 30, 2001:

- to install new hood over the OPP release coating oven (ID No. 24-CL1-2).
- to revise air toxic emission limits for toluene for (a) the combined emission point of OPP release coating station (ID No. 24-CL1-1), release coat mixing tanks (ID Nos. 24-MT-1 through 24-MT-4), and the fugitive emissions collected from the OPP release coating oven (ID No. 24-CL1-2) during the normal operation, (b) OPP release coating oven (ID No. 24-CL1-2) including the fugitive emissions collected during the fast-purge cycle, (c) toluene storage tank (ID No. 24-TST-1), and (d) quality assurance laboratory (ID No. 24-QALAB-1).

Pursuant to 15A NCAC 2Q .0523, the following Section 502(b)(10) changes were made to the Title V permit (08486T04) by issuing Title V permit 08486T05 on August 8, 2002:

- to revise toluene emission limits and add benzene emission limits for (a) OPP line with release coat (ID Nos. 24-CL1-1, 24 CL1-2, and 24 CL1-3), (b) QA Lab and Miscellaneous cleaning (ID No. 24-QALB-1), and (c) toluene storage tank (ID No. 24-TST-1).

As per the procedures of 15A NCAC 2Q .0514, the following changes were made to the Title V permit (08486T05) by issuing Title V permit 08486T06 on August 30, 2002:

- to correct the permit revision number and include most recent toluene limits.

5. Regulatory Review

The permitted emission sources are subject to the following regulations:

2D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
2D .0515 "Particulates from Miscellaneous Industrial Processes"
2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
2D .0521 "Control of Visible Emissions"
2D .0524 "New Source Performance Standards (NSPS Subparts Dc, Kb, and RR)"
2D .0614 "Compliance Assurance Monitoring"
2D .0958 "Work Practices for Sources of Volatile Organic Compounds"
2D .1100 "Control of Toxic Air Pollutants"
2D .1111 "Maximum Achievable Control Technology"
2D .1806 "Control and Prohibition of Odorous Emissions"
2Q .0317 "Avoidance Conditions for PSD"

No regulatory review is required for the above applicable requirements, except for the requirements in 2D .0614 (CAM) and .1111 (MACT Subpart JJJJ and Subpart DDDDD). For CAM and MACT applicability, please refer to Section 6.

It should be noted that the Permittee has requested a number of additional changes. The company requested changes have been discussed below.

- *VE Monitoring Requirement for Coating Line Emission Sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3) and Raw Materials Hoppers (ID Nos. 24-RB-1, 24-AO-1, and 24-TH-1)*

As required by the air permit since the issuance of initial Title V permit, the Permittee is conducting monthly visible emission monitoring for coating line sources (24-CL1-1, 24-CL1-2, and 24-CL1-3), and raw materials hoppers, and associated control device (24-RB-1, 24-AO-1, 24-TH-1, and 24-BH-1). The Permittee argues that due to the fact that no VE emissions were observed from these sources over the past four years, DAQ should remove VE monitoring requirement for these sources.

The emissions from coating line are primarily VOC while emissions from raw materials hoppers are PM only. DAQ has reviewed company-supplied data on monthly visible emissions for these sources. It indicates that these sources do not exhibit any visible emissions. DAQ will therefore, remove visible emission monitoring requirement for coating line emission sources and raw material hoppers.

- *PSD Avoidance Requirement for Coating Line Emission Sources (ID Nos. 24-CL-1, 24-CL1-2, and 24-CL1-3), One Recovered Solvent (toluene) Above Ground Storage Tank (ID No. 24-TST-1), Four Release Coat Mixing Tanks (ID Nos. 24-MT-1 through 24 MT-4), Two Resin Storage Tanks (ID Nos. 24-MRT-1 and 24-MRT-2), One Process Oil Storage Tank (ID No. 24-POST-1), One Natural Gas/Propane-fired Boiler (ID No. 24-BLR-1), Two Raw Material Hoppers (ID Nos. 24-RB-1 and 24-AO-1), One Extruder Throat Hopper (ID No. 24-TH-1), One Quality Assurance Laboratory (ID No. 24-QA-LAB), and One Solvent Cleaning Process (ID No. PESC)*

The above emission sources operate under a federally enforceable permit condition, limiting VOC emissions below 250 tons/yr. The Permittee indicates that the facility does not emit nor it has a potential to emit VOC emissions above 250 tons/yr, and hence, PSD avoidance condition is not necessary and needs to be removed from the permit. The Permittee has supported this request with potential to emit data for VOC emissions, using the last 4-5 years' actual VOC emissions. The highest VOC potential to emit emission rate (from the last 4-5 years) was for year 2001, which was approximately 151 tons/yr. The company used actual emission rate of approximately 76 tons/yr and hours of operation of 4,398, to scale the potential to emit emissions for 8,760 hrs. For comparison, the actual emissions for the most recent calendar year 2004 were approximately 39 tons/yr.

Because the potential to emit VOC emissions for this facility are less than 250 tons/yr, it can be deemed as a natural minor source for PSD regulations, and hence, PSD avoidance condition for VOC emissions is not required. DAQ will hence, remove this permit condition.

- *NSPS Applicability for Process Oil Tank (ID No. 24-POST-1)*

The process oil storage tank is currently subject to NSPS Subpart Kb requirements. This tank has a capacity of 10,606 gallons. The NSPS Kb applicability threshold for VOC storage vessels has been revised to 75 m³ (19,815 gallons). Refer to 68 FR 59332, Oct. 15, 2003. The company has requested to remove the applicability of this NSPS to the process oil tank. Hence, this tank can and will be deemed as non-subject for NSPS.

The Permittee has also requested to qualify this tank as insignificant activity under 2Q .0503(8) based on the potential VOC emissions. This request cannot be approved even though the potential VOC

emission rate is less than 5 tons/yr. Because this tank is a part of an affected source, under MACT Subpart JJJJ.

- *List Corona Treater (ID No. CT) as Insignificant Activity*

The Permittee is proposing to add one corona treater, having an output capacity of 25 kW, as an insignificant activity. This source is installed with a catalyst to reduce ozone emissions. The Permittee has estimated an emission rate for ozone at approximately 0.12 tons/yr. Although, ozone is not a regulated pollutant in Title V program, this source will be deemed as insignificant activity under 2Q .0503(8) and listed as an attachment to the permit.

- *List Raw Material Unloading Operation (ID Nos. RMUO) and Raw Materials Hoppers (ID Nos. 24-RB-1, 24-AO-1, 24-TH-1) as Insignificant Activities*

The potential PM emission rate for each of these sources is less than 5 tons per year and can hence, they can be deemed as insignificant activities under 2Q .0503(8). However, these sources are part of affected source under MACT Subpart JJJJ, and therefore, they cannot be classified as insignificant emission sources.

- *Descriptor for Process Equipment Solvent Clean-Up Process (ID No. PESC)*

The Permittee wants to list this source to describe it as "process cleanup operations that include several parts washers". The existing source descriptor in the current permit is adequate and there is no need to change it. The company request is, hence, denied.

- *Remove Monitoring / Record keeping / Reporting Requirements under NC Air Toxics*

The existing permit includes monitoring / record keeping / reporting requirements for modeled emission rates of toluene and benzene from coating line emission Sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), one recovered solvent (toluene) above ground storage tank (ID No. 24-TST-1), four release coat mixing tanks (ID Nos. 24-MT-1 through 24 MT-4), one quality assurance laboratory (ID No. 24-QA-LAB), and one solvent cleaning process (ID No. PESC). The Peemittee has stated that the same sources are subject to MACT Subpart JJJJ requirements and the MACT requirements shall be sufficient to comply with NC air toxics, and therefore, any monitoring / record keeping / reporting under NC air toxics condition shall be removed.

The following Table includes a comparison of modeled emission rates and worst-case potential emission rates. This summary indicates that modeled emission rates for toluene and benzene are higher than the potential emission rates. Hence, it is justified to exclude monitoring or associated record keeping and reporting for these sources. DAQ will remove these requirements from the revised permit.

Emission Source	Toluene Modeled Emission Rate	Toluene Potential Emission Rate	Benzene Modeled Emission Rate	Benzene Potential Emission Rate
24-CL-1, 24-CL1-2, and 24-MT-1 through 24-MT-4 (includes fugitive emissions of 24-CL1-2 during normal operation)	497.2 lbs/hr 11,932 lbs/day	12.1 lbs/hr 291.5 lbs/day	565.2 lbs/yr	31.92 lb/yr
24-CL1-2 (fugitive emissions during purge cycle)	83.3 lbs/hr 1,998 lbs/day	< 12.1 lbs/hr < 291.5 lbs/day	94.32 lbs/yr	< 31.92 lb/yr

24-TST-1	16.7 lbs/hr 400 lbs/day	0.02 lb/hr 0.49 lb/day	18.72 lbs/yr	0.05 lb/yr
PESC and 24-QA-LAB-1	36.5 lbs/hr 875 lbs/day	0.11 lb/hr 2.66 lb/day	41.76 lbs/yr	0.29 lb/yr

- *Remove Flake Resin System from Insignificant Activity List*

This emission source has been removed from the facility and hence, it will be removed from the insignificant activity list.

- *Monitoring Requirement for 2D .0958*

The VOC emissions from the facility wide sources are required to be complied with this requirement. The existing permit does not include monitoring for this applicable requirement. The Permittee has requested that it will accept monitoring requirements similar to the monitoring required in their Hickory permit for the 2D .0958 requirements. In brief, the revised permit will include monitoring requirements consisting of once a month visual inspections of all processes, which utilize VOC. The permit will also include record keeping and reporting requirements.

- *Include Internal Resin Tank as Insignificant Activity*

This is a 215-gallon tank. The Permittee indicates that the emissions are negligible and they do meet the 2Q .0503(8) threshold. Therefore, this source will be classified as insignificant.

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

NSPS

As indicated above, existing coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3) are subject to the requirements of NSPS Subpart RR "Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations". Applicable requirements of this regulation have been included in the existing permit.

It should be noted that the same emission source are subject to the requirements of MACT Subpart JJJJ (see below). The NSPS includes monthly requirement of liquid-liquid material balance for VOC. The MACT also includes very similar monthly requirement of liquid-liquid material balance for HAP. The main VOC are toluene and benzene, which are also HAP. So, DAQ has decided to remove all NSPS required monitoring / record keeping / reporting requirements. The revised NSPS permit condition will state that the coating line emission sources need to meet the monitoring / record keeping / reporting requirements under the requirement of MACT Subpart JJJJ. The permit will also state any noncompliance with MACT monitoring / record keeping / reporting requirements will be deemed as noncompliance with NSPS.

NESHAP/MACT

The MACT source category in 40 CFR 63, Subpart JJJJ, "National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating" applies to major existing and new sources of HAP, at paper and other web coating operations.

This facility is a major source of HAP. Permitted coating line emission sources (ID Nos. 24-CL-1, 24-CL1-2, and 24-CL1-3) are part of an existing affected source, requiring compliance by December 5, 2005. The facility has provided adequate demonstration that shows compliance with the MACT requirement. It should be noted that other affiliated sources are also subject this MACT; however EPA has not established any emission limit or any other requirements under the MACT. The affiliated sources at this facility are release coat mixing tanks

(ID Nos. 24-MT-1 through 24-MT-4), raw material hoppers and extruder throat hopper (ID Nos. 24-RB-1, 24-AO-1, and 24-TH-1), recovered solvent storage tank (ID No. 24-TST-1), resin storage tanks (ID Nos. 24-MRT-1 and 24-MRT-2), process oil storage tank (ID No. 24-POST-1), raw material unloading operation (ID No. RMUO), and process equipment solvent clean-up process (ID No. PESC). The following is a complete review of this MACT standard:

- Emission Standard

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee has chosen the option of limiting organic HAP emissions to no more than 20 percent of the mass of coating solids applied for each month [§63.3320(b)(3)].

- Performance Test

The Permittee is not required to conduct performance test on solvent recovery device as per §63.3360(b)(3).

- Monitoring

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee has chosen to meet the requirements of liquid-liquid material balance in §63.3350(d)(2) to comply with emission standard in §63.3320(b)(3). The Permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device shall be certified by the manufacturer to be accurate within ± 2.0 percent by mass [§63.3350(d)].

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if a monitoring device is not installed, calibrated, maintained, and operated for determining cumulative amount of volatile matter recovered by the solvent recovery device over a monthly basis.

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee shall determine the organic HAP mass fraction of each coating material "as-applied" as per §63.3360(c). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if organic HAP mass fraction of each coating material "as-applied" is not determined using the procedures in §63.3360(c).

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee shall determine the volatile organic and coating solids content of each coating material "as-applied" as per §63.3360(d). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if volatile organic and coating solids content of each coating material "as-applied" is not determined using the procedures in §63.3360(d).

The Permittee shall operate a capture system and control device such that the organic HAP emission rate for the oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3) is limited to 0.20 kg organic HAP emitted per kg coating solids applied. If the affected source operates more than one capture system, more than one control device, one or more never-controlled work stations, or one or more intermittently-controlled work stations, then the Permittee shall demonstrate compliance in accordance with the provisions of paragraph (n) of §63.3370. The Permittee shall demonstrate compliance following the procedure in paragraph (i) and (o) of §63.3370 when emissions from the affected source are controlled by a solvent recovery device [§63.3370(f)].

The Permittee shall perform a monthly liquid-liquid material balance as specified in paragraphs (i)(1)(ii), (iii), (v), and (vi) and (o) of §63.3370 and use the applicable equations in paragraphs (i)(1)(ii), (iii), (v), and (vi) and (o) of §63.3370 to convert the data to units of the selected compliance option in §63.3370(f). Compliance shall be determined in accordance with paragraph (i)(1)(ii), (iii), (v), and (vi) and (o) of §63.3370.

- i. If demonstrating compliance on the basis of organic HAP emission rate based on coating solids applied, organic HAP emission rate based on coating material applied, or emission of less than the calculated allowable organic HAP, determine the organic HAP content of each coating material as-applied during the month following the procedure in §63.3360(c) [§63.3370(i)(1)(ii)].
- ii. Determine the volatile organic content of each coating material as-applied during the month following the procedure in §63.3360(d) [§63.3370(i)(1)(iii)].
- iii. Determine and monitor the amount of volatile organic matter recovered for the month according to the procedures in §63.3350(d) [§63.3370(i)(1)(v)].
- iv. *Recovery efficiency.* Calculate the volatile organic matter collection and recovery efficiency using Equation 7 in 40 CFR 63 Subpart JJJJ: [§63.3370(i)(1)(vi)]

$$R_v = \frac{M_{vr} + M_{vret}}{\sum_{i=1}^p C_{vi} M_i + \sum_{i=1}^q C_{vij} M_{ij}} \times 100 \quad \text{Eq. 7}$$

Where:

R_v = Organic volatile matter collection and recovery efficiency, percent.

M_{vr} = Mass of volatile matter recovered in a month, kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.

p = Number of different coating materials applied in a month.

C_{vi} = Volatile organic content of coating material, i , expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i , applied in a month, kg.

q = Number of different materials added to the coating material.

C_{vij} = Volatile organic content of material, j , added to as-purchased coating material, i , expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j , added to as-purchased coating material, i , in a month, kg.

- v. *Never-controlled work stations.* The Permittee shall determine mass of all coating materials as-applied on never-controlled work station (ID No. 24-CL1-3) during the month [§63.3370(o)(1)].
- vi. *Liquid liquid material balance compliance demonstration.* For each web coating line or group of web coating lines for which the Permittee uses the provisions of paragraph (n)(1)(ii) of this section, the Permittee shall calculate the organic HAP emitted during the month using Equation 14 of this section [§63.3370(o)(3)];

$$H_e = \left[\sum M_{ci} C_{ahi} \left[1 - \frac{R_v}{100} \right] + \left[\sum M_{Bi} C_{ahi} \right] \right] - M_{vret} \quad \text{Eq. 14}$$

Where:

H_e = Total monthly organic HAP emitted, kg.

p = Number of different coating materials applied in a month.

M_{ci} = Sum of the mass of coating material, i , as-applied on intermittently-controlled work stations operating in controlled mode and the mass of coating material, i , as-applied on always controlled work stations in a month, kg.

C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i , expressed as a mass fraction, kg/kg.

R_v = Organic volatile matter collection and recovery efficiency, percent.

M_{Bi} = Sum of the mass of coating material, i , as-applied on intermittently-controlled work stations operating in by-pass mode and the mass of coating materials, i , as-applied on never-controlled work stations, in a month, kg.

C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i , expressed as a mass fraction, kg/kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.

vii. Convert the information obtained under paragraph (n)(1) through (4) of this section into the unit of the selected compliance options using the calculation procedures specified in paragraphs (n)(5)(i) through (iv) of this section [§63.3370(n)(5)].

(A) *Organic HAP emitted.* Calculate the organic HAP emissions for the affected source for ht month by summing all organic HAP emissions calculated according to paragraphs (n)(1), (2)(ii), 3(iii), and (4) of §63.3370.

(B) *Coating solids applied.* If demonstrating compliance on the basis of organic HAP emission rate based on coating solids applied, organic HAP emission rate based on coating material applied, or emission of less than the calculated allowable organic HAP, determine the organic HAP content of each coating material as-applied during the month following the procedure in §63.3360(d).

(C) *Organic HAP emission rate based on coating solids applied.* Calculate the organic HAP emission rate based on coating solids applied using Equation 9 in 40 CFR 63 Subpart JJJJ:

$$L = \frac{H_e}{\sum_{i=1}^p C_{si}M_i + \sum_{j=1}^q C_{sij}M_{ij}} \quad \text{Eq. 9}$$

Where:

L = Mass organic HAP emitted per mass of coating solids applied, kg/kg.

H_e = Total monthly organic HAP emitted, kg.

p = Number of different coating materials applied in a month.

C_{si} = Coating solids content of coating material, i , expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i , applied in a month, kg.

q = Number of different materials added to the coating material.

C_{sij} = Coating solids content of material, j , added to as-purchased coating material, i , expressed as a mass-fraction, kg/kg.

M_{ij} = Mass of material, j , added to as-purchased coating material, i , in a month, kg.

The Permittee shall be deemed in noncompliance with the emission standards in §63.3320(b) if the organic HAP emission rate based on coating solids applied exceeds 0.20 kg organic HAP per kg coating solids applied or the procedures in §63.3370(n) are not utilized to demonstrate compliance.

- Record Keeping

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee shall maintain the following records specified in §63.3410(a)(1) on a monthly basis in accordance with the requirements of §63.10(b)(1):

i. Records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including:

(A) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(c);

(B) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(d);

- ii. The Permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of §63.3370. The records must be maintained in accordance with the requirements of §63.10(b).

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if the above records are not maintained.

- Reporting

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee shall submit a semiannual compliance report according to §63.3400(c).

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee shall submit a Notification of Compliance Status as specified in §63.9(h) [§63.3400(e)].

For oriented polypropylene web coating line emission sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3), the Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

Separately, the natural gas fired boiler (10.46 million Btu/hr, ID No. 24-BLR-1) is an affected source under MACT Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters". The MACT was promulgated on September 14, 2004. This boiler will be classified under the category of "existing, large, and gas". For this category, only requirement is for submittal of initial notification. The Permittee has submitted this notification to DAQ via submittal dated 3/11/05. Compliance is demonstrated.

PSD

Please refer to Section 5 for complete details.

ATTAINMENT STATUS

This facility is located in Caldwell, and is in attainment for all criteria pollutants excluding for 8-hr ozone standard. The county has elected to participate in the voluntary Early Action Compact (EAC) program for this matter. For EAC areas, PSD rule applies for major sources and major modifications, and the effective date for implementation date for 8-hr ozone standard has been deferred until December 2007.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements.

CAM

In order to be subject to the Part 64 requirement, the following all three criteria must be satisfied:

- (i) pollutant specific emission unit (eg. boiler, spray booth etc.) shall be subject to an emission limitation or a standard other than the exempt limitations or standards (e.g. post-1990 federal standards such as MACT, NSPS etc.),
- (ii) the pollutant specific emission unit uses an active control device to achieve compliance with the applicable requirement, and

- (iii) potential precontrol device emission rate for the pollutant specific emission unit for any regulated pollutant shall be greater than major source threshold.

The following Table provides a summary, which indicates that only coating line emission sources (ID Nos. 24-CL1-1 and 24-CL1-2) are subject to CAM.

PSEU	Pollutant	Applicable Requirement	Control Device (Active)	Pre-controlled Emission Rate	Major Source Threshold	Subject to CAM?
Coating Line (24-CL-1 and 24-CL1-2)	VOC	15A NCAC 2D .0524 (NSPS Subpart RR)	carbon adsorber (24-SR-1) and condenser (24-ASRS-1)	788.4	100	Yes
Mixing Tanks (24-MT-1 through 24-MT-4)	VOC	15A NCAC 2D .0958	carbon adsorber (24-SR-1)	3.3	100	No
Raw Materials Hopper (24-RB-1, 24-AO-1, and 24-TH-1)	PM	15A NCAC 2D .0515	bag filter (24-BH-1)	3.89	100	No
Rubber Silo (SRSS)	PM	15A NCAC 2D .0515	vent filter	3.89	100	No
Raw Material Unloading (RMUO)	PM	15A NCAC 2D .0515	vent filter	3.89	100	No

The CAM plan for coating line equipment has been based on monthly liquid-liquid material balance requirement under MACT Subpart JJJJ. The monitoring and associated record keeping and reporting under MACT will be sufficient to assure compliance with the CAM requirement.

In addition, if any monthly liquid-liquid material balance in MACT standard indicates that the organic HAP (which are also VOC) emissions from the coating equipment are within 10 percent of emission standard of organic HAP emissions not to exceed 20 percent of coating solids applied (0.2 kg organic HAP/kg coating solids), the Permittee shall initiate inspection of dual bed carbon system. The Permittee shall also monitor the pressure drop (operating range 5-15 inches of water) across the carbon bed. If the inspection is not made within 24 hours of the sub-10 percent of material balance calculation, the Permittee will be deemed in noncompliance with the CAM requirement.

7. Facility Wide Air Toxics

Please refer to Section 5 for complete details.

In addition, because the facility is subject to MACT JJJJ (last MACT excluding boiler MACT), the 2Q .0705 requires the facility to demonstrate compliance with the 2D .1100 at the same time the MACT compliance date (December 5, 2005). The Permittee has in the past provided a facility wide modeling for toluene and benzene (these are the only two pollutants, which are expected to be released from the facility). There are no modifications occurred since the approval of previous facility wide air toxic compliance demonstration. DAQ believes that the existing modeling demonstration does meet the requirement of 2Q .0705 and no new air toxics demonstration is required at this time.

8. Facility Compliance Status

The facility was recently inspected on 8/18/05 by Patrick Ballard of ARO. The facility was found to be in compliance of the applicable air quality regulations.

9. Statement of Compliance

The applicant has certified through a submittal of E5 form that the facility is in compliance with all applicable requirements.

10. Facility Emissions Review

There is no change in emissions for this renewal.

11. Stipulation Review

Air permit 08486T06 will be revised for the following:

- Revise the Part I Section 1 Table to include references to NSPS, CAM and MACT.
- Revise Section 2.1 A. Table to include applicable requirements of 2D .0614 and .1111.
- Remove visible emission monitoring requirement, and associated record keeping and reporting from Section 2.1 A.1.
- Remove Section 2.1 A.2.c. through h. and replace them with new Section 2.1 A.2.c. and d.
- Include Section 2.1 A.3. for CAM.
- Include Section 2.1 A.4. for MACT Subpart JJJJ.
- Remove reference to requirement of 2D .0530 "Avoidance of PSD" from Section 2.1 A. Table, Section 2.1 B. Table, 2.1 C. Table, and 2.1 D. Table.
- Remove applicable requirement of 2D .0530 "Avoidance of PSD" from Section 2.2 A.1.
- Revise Section 2.1 B. Table, 2.1 C. Table, and 2.1 E. Table to include applicable requirement of MACT Subpart JJJJ.
- Revise Section 2.1 D. Table to include applicable requirement of MACT Subpart DDDDD.
- Remove visible emission monitoring requirement, and associated record keeping and reporting from Section 2.1 E.2.
- Include Section 2.1 F. and G. for quality assurance laboratory and process equipment solvent clean-up process.
- Include applicable requirement of 2D .1806 in Section 2.2 A.2.
- Revise Section 2.2 B. through E. to remove monitoring requirements and to indicate that the permitted emission limits for air toxics satisfy the requirement of 2Q .0705.
- Include latest version of General Conditions.
- Revise insignificant activity list to include one corona treater and one 215-gallon internal resin tank, and to remove flake resin system.

12. Public Notice / EPA and Affected States Review

Pursuant to 2Q .0521, a notice of the proposed Title V Permit will be placed in the 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 also be sent to persons on the Title V mailing list.

Based upon the EPA's current policy, the proposed permit for this facility will be sent to EPA for their 45-day review simultaneously with noticing it in the newspaper for 30-day public review. The final permit will also be provided to EPA after issuance.

Also pursuant to 2Q .0522, a notice of the proposed Title V Permit will be sent to each affected State at or before the time notice provided to the public under 2Q .0521 above. Affected states as specified by 15A NCAC 2Q .0503(1) and 40 CFR 70.8(b) are South Carolina and Tennessee; North Carolina local air pollution control programs for Western North Carolina Regional Air Pollution Control Agency (Buncombe County) and Mecklenburg County; and the Catawba Indian Nation in York County South Carolina.

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.

The ARO (Patrick Ballard) has submitted region review dated 2/23/05 on this application. The review includes comments each company request requiring revision to the permit. These company requests have been adequately addressed in Section 5.

The proposed permit was e-mailed to ARO on 10/12/05 for review and comment. The region (Patrick Ballard) responded on 10/13/05 that he did not have any comment.

The proposed permit was also e-mailed to company on 10/12/05 for review and comment. The company responded on 10/24/05 with the following comments:

Company Comment 1:

"Throughout the permit the ID number for the coating line oven is incorrect. It should be 24-CL1-1-2."

DAQ Response:

Agreed. It is a typographical error and it will be corrected.

Company Comment 2:

"In the tables for each source. The regulated pollutants column is blank for the NESHAP citations. Shurtape suggests adding HAPS as the regulated pollutants in the table."

DAQ Response:

Agreed. DAQ will insert "HAP" as a pollutant in the applicable tables.

Company Comment 3:

"Page 7 – Permit Condition 2.1.A.4.h: The adhesive oven, ES-24-CL1-3, is an uncontrolled source. Since this is included as part of the coating line affected source at the Hudson facility, it should be treated as a “never controlled work station” under the NESHAP compliance demonstration. This means that the “h” condition should reference the provisions of paragraph §63.3370 (n)(1)(ii), which directs you to provisions §63.3370 (i)(1)(ii), (iii), (v), and (vi) and (o)."

DAQ Response:

Agreed. The draft permit Condition 2.1 A.4.h. and i. will be revised to include §63.3370 (i)(1)(ii), (iii), (v), and (vi) and (o).

Company Comment 4:

Page 9 – Permit Condition 2.1.A.4.j(i)(C). The reference condition is required if demonstrating compliance using §63.3370(b), (c), or (d) which does not apply for our scenario. The condition should be replaced with the requirements listed in §63.3410(b). “Maintain records of all liquid-liquid material balances performed in accordance with the requirements for §63.3370.”

DAQ Response:

Agreed. Condition 2.1 A.4.j.i.(C). will be removed, as it is not applicable to Shurtape facility.

Company Comment 5:

"Page 10 – Table for 2.1.D. The table should include HAPs as the regulated pollutant for Subpart DDDDD. Also, there is not a condition for the NESHAP Subpart DDDDD citation in the table. Shurtape suggests to include the following language.

5. 15A NCAC 2D .1111: NESHAP [40 CFR PART 63 SUBPART DDDDD]

- a. The Permittee shall comply with all applicable provisions, including the notification requirements contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart DDDDD, including Subpart A "General Provisions." [15A NCAC 2D .1111].

Due to the fact that this is an existing large gaseous fuel fire-tube type boiler, the boiler will not be required to comply with any emission limits, work practice standards or any other applicable requirements."

DAQ Response:

DAQ will include HAP as a pollutant in the regulatory applicability table for boiler. This is a 10.46 million btu/hr boiler. The boiler can be deemed as an existing, large, gaseous fuel fired under this MACT standard. Even though it is a fire tube boiler, it cannot be defined as *small gaseous fuel-fired*, because the heat input rate exceeds 10 million btu/hr. See §63.7575 for definition of small gaseous fuel category. For, existing, large, gaseous fuel fired boilers, only initial notification requirement apply. See §63.7506(b)(1).

Company Comment 6:

For CAM plan in Section 2.1A.3.d., the company wishes (i) to replace the pressure drop range from 7.5-9 inches of water to 5-15 inches of water, (ii) to remove the requirement of continuous measurement of vacuum and replace it with a device to ensure proper operation of fan, and (iii) to replace the requirement of "Any variance from manufacturer's recommendations..." to "any variance from manufacturer's recommendations or best practices identified by the company",

DAQ Response:

These changes are reasonable and they are based on actual site conditions. They will be implemented.

RCO recommends issuing the renewed permit after the completion of EPA and public review periods.