

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

DRAFT - Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Granville
NC Facility ID: 3900087
Inspector's Name: Steve Hall
Date of Last Inspection: 04/20/2006
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): SCA Packaging North America (formerly Tuscarora, Inc.) Facility Address: SCA Packaging North America 1741 East C Street Butner, NC 27509 SIC: 3086 / Plastics Foam Products NAICS: 32614 / Polystyrene Foam Product Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: n/a NSPS: n/a NESHAP: n/a PSD: n/a PSD Avoidance: n/a NC Toxics: n/a 112(r): n/a Other: n/a		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 3900087.05A Date Received: 05/28/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 06727/T07 Existing Permit Issue Date: 03/30/2001 Existing Permit Expiration Date: 02/28/2006		
David Vasquez Plant Manager (919) 575-5100 1741 East C Street Butner NC, 27509	William M. Kelly VP - Operations (724) 847-2458 800 Fifth Avenue New Brighton PA, 15066	Victoria Brind' Amour Environmental Health and Safety Manager (724) 847-2458 800 Fifth Avenue New Brighton PA, 15066			
Review Engineer: Judy Lee		Comments / Recommendations:			
Review Engineer's Signature: _____		Issue 06727/T08 Permit Issue Date: _____ Permit Expiration Date: _____			

I. Facility Description

Tuscarora, Incorporated manufactures customized foam packaging products for various companies (e.g. Honda, Mallinckrodt, Merck, etc.) by utilizing either expandable polystyrene (EPS) beads, which uses pentane as the blowing agent; or expandable polypropylene beads (polyolefin), which does not use any volatile organic compounds (VOC) - only air is used as the blowing agent and expandable ARCEL beads which are a copolymer of polystyrene and polypropylene. The Butner facility currently employs approximately 43 people and operates 16 hours/day, 5 days/week, and 52 weeks/year.

II. Purpose of Application

The purpose of this permit modification is for renewal of their existing Title V Permit (**Permit Number 06727T07**) issued on March 30, 2001. The facility has also requested a name change during this permit revision. The facility's name will be changed from Tuscarora to **SCA Packaging North America**.

III. Application Chronology

Please see the attached Comprehensive Application Report for 3900087.05A and email correspondence for more details.

IV. Permit Modifications/Changes and ESM Discussion

The initial Title V permit has NOT been modified since issuance on March 30, 2001 (Permit Number 07760T07).

Changes to their current Title V permit (**Permit Number 06727T07**) for this renewal (application number 3900087.05A) are summarized in the table below:

New Page Number	Old Page Number	Condition Number	Change
Entire Permit, where applicable			<p>Modified to reflect current permit number, issue and effective date, and associated application information</p> <p>Changed facility name from Tuscarora, Inc. to SCA Packaging North America</p> <p>Effective date is 60 days from issue date due to addition of MRR under 2D .0958</p> <p>Removed reference to “Air Quality Title V Operation Permit” and “Air Quality Construction and Operation Permit”</p> <p>Updated language with current shell guidance</p> <p>Removed asterisks and footnotes for previously permitted new or modified sources</p>
Attachment	--	Attachment to Cover Letter	Added Table of Changes
Attachment	--	Attachment to Cover Letter	Moved Insignificant Activities to front as an attachment to the cover letter and updated descriptions.
Page 3	Page 3	Part I, Section 1 - Table	Updated descriptions to be consistent with IBEAM database
Page 4 through Page 8	Page 4 through Page 8	Part I, Section 2.1-A. through 2.1-C.	<p>Updated descriptions, regulations, section references and permit typos.</p> <p>Changed quarterly reporting to semi-annual</p>
Page 10	--	Part I, Section 2.2-A.1.	Updated per shell guidance - Addition of MRR under 2D .0958
Page 10	Page 9	Part I, Section 2.2-A.2.	Replaced 15A NCAC 2D .0522 with 2D .1806
Page 10 through Page 12	Page 10	Part I, Section 2.2-A.3. & 2.2-A.4.	Updated language
Page 12 through Page 20	Page 11 through Page 18	Part I, Section 3	Replaced General Conditions with current shell guidance
Page 21 through Page 23	Page 20 through Page 22	Part II	Updated Part II – General Conditions

V. Compliance History [Taken from Steve Hall's latest inspection (04/20/2006) report]

Tuscarora has not received any Notices of Violation in the last five years, nor have any civil penalties been assessed against the facility.

Based on observations made during the April 20, 2006 inspection, Tuscarora appeared to be in compliance with all requirements outlined in their air permit

VI. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0522, Control and Prohibition of Odorous Emissions (repealed since issuance of initial Title V permit)
- 15A NCAC 2D .0524, New Source Performance Standards (40 CFR Part 60 Subpart Dc)
- 15A NCAC 2D .0530, PREVENTION OF SIGNIFICANT DETERIORATION
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1100, Control of Toxics Air Pollutants
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

The following regulations were addressed during this permit revision (renewal):

- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions (will replace 15A NCAC 2D .0522)
- 15A NCAC 2Q .0317, Avoidance Conditions for 15A NCAC 2D .0530, PREVENTION OF SIGNIFICANT DETERIORATION (will be updated)
- 15A NCAC 2Q .0705 – Existing Facilities and SIC Calls - See Section VIII - Toxics below

VII. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is currently subject to NSPS requirements for one natural gas/No. 2 fuel oil-fired boiler (ID No. PB1). The renewal of this permit does not require NSPS analysis.

NESHAPS/MACT – The facility is currently NOT required to comply with any MACT Standard. Based on Tuscarora's 2004 Emission Inventory submittal their actual HAPs were:

- 1.35 tons per year, the highest HAP being Ethyl benzene 0.57 tpy

If you ratio these up from 4,160 hours per year to 8,760 hours per year the total potential HAPs were:

- 2.84 tpy HAP Combination and 1.21 tpy for the highest Single HAP

Based on their potential HAP emissions, the facility is considered a minor source for HAPs. The MACT database was also looked at and based on the information, the facility was evaluated for the following MACT standards: Subpart III, PPPP, MMMMM, and DDDDD and appear NOT to be subject.

Also, the two existing boilers are natural gas/No. 2 fuel-fired; therefore, if the boiler MACT applied they would be considered large liquid/gas fuel-fired, but would not be affected because there are no new emission limits.

As stated in Section VIII below, "last MACT" has been reviewed during this permit renewal and does not apply.

Attainment Status

Based on the EPA's boundary designation for 8-hour ozone standards for North Carolina (4/15/04), Granville County has been designated as "basic" nonattainment. The facility is considered MINOR for PSD purposes and thus avoided PSD major source review.

PSD – The facility is currently considered minor for PSD purposes because they are operating under one 250 ton per year PSD avoidance condition for VOC. The renewal of this permit does not require PSD analysis because no emissions increase was requested.

Granville County has **NOT** been triggered for PSD increment tracking.

112(r) – The 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 – A Compliance Assurance Monitoring (CAM) (40 CFR Part 64) review is required for this permit renewal because the facility is a Title V facility with potential emissions that exceed the Title V major source levels without considering controls. However; there are NO sources subject to an emission limitation or standard that require controls in order to comply with the emission limitation. 40 CFR 64 requires that a CAM plan be developed for all equipment located at a major facility, that have *pre-controlled emissions above the major source threshold*, and use a control device to meet an applicable standard [see 40 CFR 64.2(a)(2)]. Therefore, CAM does NOT apply to this facility.

VIII. Facility Wide Air Toxics

The facility must comply with the emission limitations and other requirements of 2D .1100 and 2Q .0711 as stated above. Once sources at a facility that are subject to a MACT standard trigger their “last MACT”, the Permittee must submit a permit application that includes an evaluation for all toxic air pollutants covered under 15A NCAC 2D .1104 for all sources at the facility, excluding those sources exempt from evaluation under 15A NCAC 2Q .0702. Last MACT does **NOT** apply to this permit renewal because Tuscarora is not subject to any MACT standard; therefore, a toxics review is not triggered with this permit renewal.

IX. Facility Emissions Review

There is no change in emissions for this renewal. The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2004 Actual Emissions (tpy)	Potential Emissions (tpy)
CO	2.26	101
NO _x	2.69	
PM ₁₀	7.34	
SO ₂	0.02	
VOC	75.35	685
Total HAP	1.35	2.84

X. Other Stipulations and Regulatory Considerations

RRO had the following suggestions:

1. Regional Comments and Recommendations

No Regional Comments and Recommendations were received for this Application. An email was sent to Mr. Charles McEachern, RRO on August 2, 2006 and he responded “I’m not aware of any issues with these facilities, and will look at them more closely when you send me your drafts.”

2. Annual Inspection Comments/Corrections

Based on Mr. Hall’s last inspection report, RRO suggest the following changes to the existing Title V permit – “...it is recommended that the description for the KBM Stryrodens regrinder be modified at the next permit revision to indicate that this process utilizes several bagfilters, all of which exhaust inside the building.”

Agree, modification was made.

XI. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 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 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant 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. The affected State is Virginia.

Public Notice of the DRAFT Title V Permit ran from XX/XX/2006 to XX/XX/2006.

Comments Received on the Draft Permit – No public comments have been received to date.

EPA's 45 Day Review period ran concurrent with the 30 day Public Notice from XX/XX/2006 to XX/XX/2006.

EPA had the following comments regarding the Draft Permit per email received XXXX, 2006 from XXXX, U. S. EPA, Region 4.

XII. Conclusions, Comments, and Recommendations

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

A consistency determination was NOT required for this renewal.

RRO recommends issuance of the permit and DOES request a DRAFT permit prior to issuance.

A draft permit and review were emailed to Mr. Charles McEachern, RRO on October 17, 2006 and comments received on October 17, 2006.

A draft permit was emailed to Ms. Victoria Brind'Amour and Mr. David Vasquez of SCA Packaging, on October 17, 2006 for review and no comments received.

RCO concurs with RRO's recommendation to issue the renewed air permit (**Permit Number 06727T08**).