



North Carolina Department of Environment and Natural Resources

DIVISION OF AIR QUALITY

Michael F. Easley, Governor

William G. Ross Jr., Secretary
B. Keith Overcash, P.E., Director

February 10, 2006

Mr. James Rattz
Vice President, Manufacturing
Static Control Components, Inc. - Plant 17
PO Box 152
Sanford, NC 27330

Subject: Air Permit No. 08870R04
Static Control Components, Inc. - Plant 17
Sanford, Lee County, North Carolina
Fee Class: Title V
Site Number: 05/53/00123

Dear Mr. Rattz:

In accordance with your completed application received October 13, 2005, we are forwarding herewith Permit No. 08870R04 to Static Control Components, Inc. - Plant 17, Sanford, Lee County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Additionally, any emissions activities determined from your air permit application as meeting the exemption requirements contained in 15A NCAC 2Q .0102 or 15A NCAC 2Q .0503 have been listed for information purposes as an "ATTACHMENT" to the enclosed air permit. Please note the records retention requirements are contained in General Condition 2 of the General Conditions and Limitations.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. Such a request will stay the effectiveness of the entire permit. This hearing request must be in the form of a written petition, conforming to G.S. 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Unless a request for a hearing is made pursuant to G.S. 150B-23, this air permit shall be final and binding.

You may request modification of your air permit through informal means pursuant to G.S. 150B-22. This request must be submitted in writing to the Director and must identify the specific

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provisions or issues for which the modification is sought. Please note that the permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under G.S. 150B-23.

Unless exempted by a condition of this permit or the regulations, construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices described in this permit must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B.

This permit shall be effective from February 10, 2006 until February 28, 2010, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Changes have been made to the permit stipulations. The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Please note that, in addition to the removal of the restrictions that have previously limited your potential to emit and thus prevented your facility from being included in the Title V program, two new stipulations have been added to your permit. The first is **A.8** which requires a “report by **June 30 of each year** (of) the actual emissions of each air pollutant listed in 15A NCAC 2Q .0207(a) from each emission source within the facility during the previous calendar year.” The second is **A.9** that requires that “the Permittee shall have one year from February 10, 2006 to submit a complete Title V application to the Division of Air Quality, Raleigh Central office, DAQ.” Should you have any questions concerning this matter, please contact Ken Babb at (919) 715-7218.

Sincerely,

Laura S. Butler, P.E.
Chief, Permits Section

KHB
Enclosures

c: Central Files
Raleigh Regional Office
Ernie Fuller, Raleigh Regional Office

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF AIR QUALITY

AIR PERMIT NO. 08870R04

Issue Date: February 10, 2006

Effective Date: February 10, 2006

Expiration Date: February 28, 2010

Replaces Permit: 08870R03

To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere in accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

Static Control Components, Inc. - Plant 17
 2903 Lee Avenue
 P.O. Box 152
 Sanford, Lee County, North Carolina
 Fee Class: Title V
 Site Number: 05/53/00123

(the Permittee) is hereby authorized to construct and operate the air emissions sources and/or air cleaning devices and appurtenances described below:

Emission Source ID	Emission Source Description	Control System ID	Control System Description
Plant #2			
ES-8	Topcoat spin dryer	N/A	N/A
Plant #17 (includes Primary Charge Roller (PCR) and Developer Roller			
ES-1	PCR spray coating operation equipped with a dry filter	N/A	N/A
ES-2	PCR recycling stripping line	N/A	N/A
ES-3	PCR etching/rinse process	N/A	N/A
ES-4	PCR coating operation	N/A	N/A
ES-5	Developer roller coating operation equipped with a dry filter	N/A	N/A
ES-6	Developer roller coating operation equipped with a dry filter	N/A	N/A
ES-7	Mix kitchen	N/A	N/A
ES-9	Developer roller coating operation equipped with a	N/A	N/A

Emission Source ID	Emission Source Description	Control System ID	Control System Description
	dry filter		

in accordance with the completed application 5300123.05A received October 13, 2005 including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environment and Natural Resources, Division of Air Quality (DAQ) and are incorporated as part of this permit.

This permit is subject to the following specified conditions and limitations including any TESTING, REPORTING, OR MONITORING REQUIREMENTS:

A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0202, 2D .0515, 2D .0521, 2D .0535, 2D .0958, 2D .1806 and 2Q .0317 and .0504(d) .
2. PARTICULATE CONTROL REQUIREMENT - As required by 15A NCAC 2D .0515 "Particulates from Miscellaneous Industrial Processes," particulate matter emissions from PCR coating operation (ID No. ES-4), Developer roller coating operation equipped with a dry filter (ID No. ES-6), Developer roller coating operation equipped with a dry filter (ID No. ES-5), Developer roller coating operation equipped with a dry filter (ID No. ES-9) and PCR spray coating operation equipped with a dry filter (ID No. ES-1) shall not exceed allowable emission rates. The allowable emission rates are, as defined in 15A NCAC 2D .0515, a function of the process weight rate and shall be determined by the following equation(s), where P is the process throughput rate in tons per hour (tons/hr) and E is the allowable emission rate in pounds per hour (lbs/hr).

$$E = 4.10 * (P)^{0.67} \quad \text{for } P \leq 30 \text{ tons/hr, or}$$

$$E = 55 * (P)^{0.11} - 40 \quad \text{for } P > 30 \text{ tons/hr}$$

3. VISIBLE EMISSIONS CONTROL REQUIREMENT - As required by 15A NCAC 2D .0521 "Control of Visible Emissions," visible emissions from the emission sources, manufactured after July 1, 1971, shall not be more than 20 percent opacity when averaged over a six-minute period, except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. However, sources which must comply with 15A NCAC 2D .0524 "New Source Performance Standards" or .1110 "National Emission Standards for Hazardous Air Pollutants" must comply with applicable visible emissions requirements contained therein.
4. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:

- a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
 - i. the name and location of the facility,
 - ii. the nature and cause of the malfunction or breakdown,
 - iii. the time when the malfunction or breakdown is first observed,
 - iv. the expected duration, and
 - v. an estimated rate of emissions.
- b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

5. WORK PRACTICES REQUIREMENTS - As required by 15A NCAC 2D .0958(c) "Work Practices for Sources of Volatile Organic Compounds," the Permittee shall adhere to the following required work practices:

- a. The Permittee shall store all VOC-containing material not in use (including waste material) in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects.
- b. The Permittee shall clean up spills as soon as possible following proper safety procedures.
- c. The Permittee shall store wipe rags in closed containers.
- d. The Permittee shall not clean sponges, fabric, wood, paper products, and other absorbent materials.
- e. The Permittee shall drain solvents used to clean supply lines and other coating equipment into closable containers and close containers immediately after each use.
- f. The Permittee shall clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent, closing the vat or container before agitating the cleaning solvent.
- g. The Permittee shall pour spent cleaning solvent into closable containers and close containers immediately after each use.

6. CONTROL AND PROHIBITION OF ODOROUS EMISSIONS - As required by 15A NCAC 2D .1806 "Control and Prohibition of Odorous Emissions" the Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

7. AVOIDANCE CONDITION - Pursuant to 15A NCAC 2Q .0317 "Avoidance Conditions," the Permittee has requested conditions be placed in the permit in order to avoid applicability of 15A NCAC 2D .1111, Maximum achievable control technology
- a. As required by 15A NCAC 2Q .0317, the facility emissions shall be less than the following:
 - i. 10 tons per year of each hazardous air pollutant (HAP); and
 - ii. 25 tons per year of all HAPs combined.
 - b. As required by 15A NCAC 2Q .0317, the Permittee shall comply with the following requirements:
 - i. Consumption Records Maintenance Requirement - The Permittee shall maintain monthly consumption records of each material used containing HAP as follows:
 - A. the quantity of each HAP (in pounds per gallon) in each material used during the month;
 - B. the usage of each HAP (in pounds) for each material used during the month;
 - C. calculation of the 12-month total usage of each HAP (in pounds) for each material used during the 12-month period ending on that month;
 - D. the quantity of all HAPs combined (in pounds per gallon) in each material used;
 - E. the usage of all HAPs combined (in pounds) for each material used; and
 - F. calculation of the 12-month total usage of all HAPs combined (in pounds) for each material used during the 12-month period ending on that month;
 - ii. Quarterly Reporting Requirement - Within 30 days after each calendar year quarter, regardless of the actual emissions, the Permittee shall submit to the Regional Supervisor, DAQ, a report summarizing emissions of HAPs containing the following:
 - A. the greatest quantity in pounds of an individual HAP used, tabulated as follows:
 1. for each month during the quarter; and
 2. for each 12-month period ending on each month during the quarter;
 - B. pounds of all HAPs used, tabulated as follows:
 1. for each month during the quarter; and

2. for each 12-month period ending on each month during the quarter.
- iii. Purchase Records Maintenance Requirement - The Permittee shall maintain purchase orders and invoices of materials containing HAPs. These purchase orders and invoices shall be maintained for a period of at least three years and be made available to DAQ personnel upon request.
- iv. Notification Requirement - The Permittee shall report to the Regional Supervisor, DAQ, any exceedance of a requirement of rule 15A NCAC 2Q .0317 within one week of occurrence.
- v. Certification Requirement - The Permittee shall certify all submittals as to the truth, completeness, and accuracy of all information recorded and reported over the signature of the appropriate official as identified in rule 15A NCAC 2Q .0304(j) "Applications."

Compliance with the recordkeeping and reporting requirements contained in this specific condition shall not relieve the Permittee from the applicability of 15 NCAC 2D .1111 if the actual emissions from the facility exceed 10 tons per year of an individual HAP, or 25 tons per year of all HAPs combined.

8. EMISSION INVENTORY REQUIREMENT - The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 2Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.
9. TITLE V PERMIT APPLICATION REQUIREMENT - Pursuant to 15A NCAC 2Q .0504(d) "Option for Obtaining Construction and Operation Permit," the Permittee shall submit a complete Title V application to the Division of Air Quality, Raleigh Central office, DAQ by February 9, 2007.

B. GENERAL CONDITIONS AND LIMITATIONS

1. TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to the:

Regional Air Quality Supervisor
North Carolina Division of Air Quality
Raleigh Regional Office
3800 Barrett Drive
Raleigh, NC 27609
(919) 791-4200

2. RECORDS RETENTION REQUIREMENT - Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon

request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.

3. PERMIT RENEWAL REQUIREMENT - The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit. The renewal request should be submitted to the Regional Supervisor, DAQ.
4. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
5. EQUIPMENT RELOCATION - A new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
6. This permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. REPORTING REQUIREMENT - Any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

8. This permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
9. This issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
10. This permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
11. Reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be

required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.

12. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
13. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
14. The Permittee must comply with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
15. PERMIT RETENTION REQUIREMENT - The Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
16. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 40 CFR Part 68 "Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.
17. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**

Permit issued this the 10th of February, 2006.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

Laura S. Butler, P.E.
Chief, Permits Section
By Authority of the Environmental Management Commission

Air Permit No. 08870R04

Insignificant / Exempt Activities

Source	Date of Application	Exemption Regulation	Source of TAPs?	Source of Title V Pollutants?
IES-9 - electroless nickel-plating process controlled by fume scrubber (Plant #2)	10/13/2005	2Q .0102 (c)(2)(E)(i)	Yes	Yes
IES-10 - 25 kw NG-fired emergency generator, Plant #10	10/13/2005		No	No
IES-11 - 100 kw NG-fired emergency generator, Plant #17	10/13/2005		No	No
IES-12 - 100 kw NG-fired emergency generator, Plant #17	10/13/2005		No	No
IES-13 - 2.76 mmBtu/hr natural gas-fired boiler, Plant #2	10/13/2005		No	No
IES-14 - 0.220 mmBtu/hr natural gas-fired evaporator (18-gph maximum throughput)	10/13/2005		No	No

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1. Because an activity is exempted from being required to have a permit or permit modification does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
 2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 2D .1100 "Control of Toxic Air Pollutants" or 2Q .0711 "Emission Rates Requiring a Permit."