

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Lee
NC Facility ID: 5300131
Inspector's Name: Stan Williams
Date of Last Inspection: 04/18/2006
Compliance Code: 3/In Compliance - Inspection

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|--|--|---|--|--|--|
| Facility Data | | | Permit Applicability (this application only) | | |
| Applicant (Facility's Name): 3M Sanford - Plant 13 Facility Address: 3M Sanford - Plant 13 917 J R Industrial Drive Sanford, NC 27330 SIC: 3083 / Laminated Plastics Plate And Sheet NAICS: 32613 / Laminated Plastics Plate, Sheet (except Packaging), and Shape 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: 5300131.06B Date Received: 12/01/2006 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 09136/T05 Existing Permit Issue Date: 10/13/2006 Existing Permit Expiration Date: 09/30/2010 | | |
| Rick Phillips Plant Manager (919) 718-0000 917 JR Industrial Drive Sanford NC, 27330 | Rick Phillips Plant Manager (919) 718-0000 917 JR Industrial Drive Sanford NC, 27330 | Wendy Reno Advanced Environmental Engineer (651) 778-7674 P. O. Box 33331 St. Paul MN, 55133+3331 | | | |
| Review Engineer: Purva Prabhu Review Engineer's Signature: _____ Date: _____ | | | Comments / Recommendations: Issue 09136/T06 Permit Issue Date: Permit Expiration Date: September 30, 2010 | | |

1. Purpose of application

Application was received from 3M Sanford – Plant 13 for significant modification. This is the second step of 2Q .0501(c)(2) modification. The facility submitted application to add a condition to avoid MACT applicability, specifically to the National Emission Standards for Hazardous Air Pollutants from Paper and Other Web Coating (40 CFR 63, Subpart JJJJ) on November 8, 2005. The permit was issued on December 1, 2005 and required the facility to submit a Title V Air Quality Permit Application for the MACT avoidance condition on or before December 1, 2006. The facility submitted this application in timely manner.

2. Facility description

3M Sanford - Plant 13 manufactures the sheets of anti-static material from which Static Control Components makes their electronic component anti-static bags. The facility is permitted to operate a 5 head coater/laminator with 5 internal natural gas-fired drying ovens. The process consists of running either a polyester or polyethylene film through one of the heads. An anti-static coating is applied to the outside layer of the polyester and the outside layer of the polyethylene. Then an adhesive material is applied to the inside layers of the polyester and polyethylene and they are laminated together. Therefore, the final product consists of two layers, laminated together, with an anti-static coating on both sides. Static Control Components then takes the

product, folds, cuts, and seals the material into anti-static bags. Both the anti-static coating and the adhesive coating contain VOCs and are the source of VOC & HAP emissions. (Taken from air permit review document for Initial Title V permit.)

3. Application Chronology:

- December 1, 2006 Application was received in the RCO for modification. RCO received the following:
 - Application forms
 - Fee \$834.00
 - Zoning consistency determination
- December 5, 2006 Acknowledgement letter was sent to the facility.
- January 9, 2007 Submitted draft permit to region and received email back from region the same day with no comments.
- February 12, 2007 Comments on draft permit were received from the facility (Email from Ms. Wendy Reno). The facility wanted to remove the reference to the number of coating heads and the number of ovens for emission source C-1as they think that this information is confidential.
- March 12, 2007 Phone discussion between Wendy Reno of 3M, Donald Vandervaart and Purva Prabhu of RCO regarding the above request. Mr. Donald Vandervaart informed Wendy Reno that the facility needs to submit another permit modification application with the above request and it will be decided at that time whether or not the information is confidential. It cannot be combined with this second step of 501(c)(2) modification.

4. Permit History:

The following list provides a very brief summary of Title V permit revisions for this facility:

| Permit No. | Date issued | |
|------------|------------------|--|
| 09136T02 | October 11, 2005 | Initial Title V permit |
| 09136T03 | December 1, 2005 | 2Q .0501(c)(2) significant modification to add a condition to avoid MACT applicability, specifically to the National Emission Standards for Hazardous Air Pollutants from Paper and Other Web Coating (40 CFR 63, Subpart JJJ) |
| 09136T04 | December 9, 2005 | Administrative application to change the due date in General Condition P, for the annual certification of compliance, from January 30 to March 1. |
| 09136T05 | October 13, 2006 | Application for Ownership change from JJ Converting, LLC to 3M Company |

5. Statement of compliance

Mr. Stan Williams of RRO last inspected this facility on April 18, 2006. The facility was in compliance with all air quality requirements.

6. New Equipment/Change in Emission and Regulatory Review:

Not applicable

7. NSPS, NESHAPS, PSD, CAM, attainment status and 112r:

NSPS

Not applicable.

NESHAP

The facility has NESHAP avoidance condition for Paper and Web Coating (40 CFR 63, Subpart JJJ).

PSD

The facility is a PSD minor source for VOC and has taken a PSD avoidance limit.

CAM

CAM is applicable for control device Id. No. CD-1 and it is in the existing permit.

Attainment status

Lee County is in attainment for ozone.

112r

The facility is not subject to 112(r) requirements. This application does not affect this status.

8. Facility Wide Air Toxics:

This modification does not increase any toxics emissions. Toxics review is not required.

9. Facility Emissions Review:

The following table represents actual emissions for year 2005 as reported by the facility in its emissions inventory. Note that the facility wide individual HAP and total HAP emissions are greater than 10 and 25 tons per year due to the fact that the MACT avoidance condition was included in the permit that was issued on December 1, 2005.

| Pollutant | Actual Emissions (tons per year) |
|------------------------------------|---|
| Particulate (TSP) | 0.02 |
| Particulate (PM-10) | 0.02 |
| NOx | 0.25 |
| Carbon Monoxide | 0.21 |
| SO2 | |
| Volatile Organic Compounds | 113.8 |
| Single largest HAP (ethyl acetate) | 30.28 |
| All HAPs (combined) | 67.8 |

10. Stipulation Review /Permit modifications/changes:

| Page(s) | Section | Description of Change(s) |
|----------------|-----------------|--|
| Cover | - | -Amended all dates and permit revision numbers |
| All | Header | -Amended permit revision number |
| 3 | Equipment table | -Removed note regarding NESHAP avoidance condition |
| 3 | 2.1A | -Removed note regarding NESHAP avoidance condition |
| 12-19 | Section 3 | -Revised general conditions |

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

To be completed later

12. Conclusions, Comments, and Recommendations:

All applicable DAQ air requirements should be met. I recommend issuance of the air permit.