

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

(DRAFT) Air Permit Review

Permit Issue Date: (4/21/06)

Region: Mooresville Regional Office
County: Alexander
NC Facility ID: 0200088
Inspector's Name: Jim Westmoreland
Date of Last Inspection: 10/18/2005
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Chase Coating & Laminating Facility Address: Chase Coating & Laminating 138 Wittenburg Industries Drive Taylorsville, NC 28681 SIC: 3497 / Metal Foil And Leaf NAICS: 322225 / Laminated Aluminum Foil Manufacturing for Flexible Packaging Uses 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: 0200088.05A Date Received: 03/14/2005 Application Type: Renewal Application Schedule: Significant modification Existing Permit Data Existing Permit Number: 08934/T02 Existing Permit Issue Date: 03/02/2004 Existing Permit Expiration Date: 10/31/2005
Al Stotzer Manager/Facility/Inspecti on contact (828) 632-6666 138 Wittenburg Industry Drive Taylorsville NC, 28681	Everett Chadwick Vice President Finance (508) 279-1789 Bethany House Bridgewater MA, 02324	Jake O'Neill Specialist /Permit/Technical Contact (800) 279-1789 980 Washington Street Dedham MA, 02026	
Review Engineer: Gautam Patnaik Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 08934/T03 Permit Issue Date: Permit Expiration Date:	

1. Introduction:

Laminates are manufactured at this facility for various industries by applying adhesive coatings to plastic film and foil composites.

2. Purpose of Application - 1st Time Title V permit / Significant Modification

This application is for the renewal of their current title V permit. The current Air Permit No. 08934T02 was effective from March 2, 2004 and expired on October 31, 2005.

The current permit and previous permits have never been subject to a "public notice" or an "EPA review." Thus administratively the facility never had a .0500 permit. Thus, subjecting

this draft permit to a “public notice” and a “EPA review” would make this permit the facility’s 1st time title V permit.

However, Sammy Amerson of this Section objected to the classification of this application being processed as “1st time title V permit.” His objection was on the grounds that – thought it was an error on the part of the Section to issue this facility a title V permit without a public notice and an EPA review they already did have a title V permit and the best way to rectify the processing and adjust the IBEAM was to process this application as an “Significant modification.” he mentioned that he had already changed the application classification as a “Significant modification” in the IBEAM. Thus, this application is now being processed as “Significant modification” and will undergo a public notice and an EPA review.

3. Application Chronology

This renewal application was received on March 14, 2005. Since the initial title V permit was issued the facility had applied for a permit modification, the table below outlines the modification to this permit.

Application #	Date Application Completed	Changes Made to the Permit	Permit Issued	Permit Issue Date
0200088.04B	March 2, 2004	Administrative amendment	08934T02	March 2, 2004

4. Permit Modification/Changes

No additions or changes have been made with this renewal of the permit.

5. Regulatory Review

The facility is subject to the following regulations:

15A NCAC 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

15A NCAC 2D .0521 “Control Of Visible Emissions”

15A NCAC 2D .0958: “Work Practices for Sources of Volatile Organic Compounds”

15A NCAC 2D .1100 "Control of Toxic Air Pollutants"

However, no regulatory review is required at this time since for the above regulations.

15A NCAC 2D .1112 “Case By Case MACT”

The current permit limits the emission of MEK from the laminator (ID No. ES01) to 8.97 lbs/hr (or 39.29 tons per year) and 98 % control efficiency.

As per Federal Register Notices *Citation # 70 FR 75047*: “EPA is amending the list of hazardous air pollutants (HAP) contained in section 112 of the Clean Air Act (CAA) by removing the compound methyl ethyl ketone (MEK) (2-Butanone) (CAS No. 78– 93–3). This action is being taken in response to a petition submitted by the Ketones Panel of the American Chemistry Council (formerly the Chemical Manufacturers Association) on behalf of MEK producers and consumers to delete MEK from the HAP list. Petitions to remove a substance from the HAP list are permitted under section 112 of the CAA. This became effective from December 19, 2005.

As per Don van der Vaart, supervisor at the Regional Office any relaxation of any limit or pollutant subject to a MACT limit has to have the approval of the Director.

5A NCAC 2Q .0705 “EXISTING FACILITES AND SIC CALLS”

This facility has to demonstrate compliance with toxics when the facility is subject to the last MACT regulation and for this facility the last MACT that this facility would be subject to is the “Case by Case” MACT (mentioned below). The facility is already in compliance with this MACT. The facility is already subject to emission limit of several TAPs (methyl ethyl, ketone, toluene, ammonia and ethyl acetate) in order to ensure compliance with 2D .1100. The latest inspection report did not state any violation of this regulation, thus, the facility is in compliance with toxics. The place-holder language regarding this regulation is kept in place to ensure that the facility will be required to be in compliance with toxics in case they are subject any future MACT regulations.

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

NSPS

None of the sources at this facility is subject to this standard.

NESHAP/MACT

This facility is already subject to 15A NCAC 2D .1112 “Case By Case” MACT. To ensure compliance the facility is subject to the following emissions limit from various HAPs as follows:

Source	Pollutant	MACT Limitation
laminator (ID No. ES01) and mixing room (ID No. ES02) controlled by RTO (ID No. CD01)	Toluene	6.59 lbs/hr (or 28.89 tons per year) and 98 % control
	Total HAPs	8.97 lbs/hr (or 39.29 tons per year) and 98 % control

The facility should be subject to the 40CFR63 Subpart JJJJ “Paper and Other Web Coating MACT.” This MACT (Subpart JJJJ) got promulgated on 12/04/2002 and the compliance date for this MACT is 12/04/2005. However, as per 15A NCAC 2D .1112 (i) the facility

has eight years from the promulgated date to comply with the new standards. The facility chose to comply with Subpart JJJJ “Paper and Other Web Coating MACT” by 12/4/2010.

Also, as per 15A NCAC 2D .1112 (j) **the Division while incorporating the new standard for Subpart JJJJ may** insist on the existing version of the current MACT (Case By Case) standards, whichever, is more stringent.

PSD

This facility is a minor PSD facility.
Attainment Status

This facility is located in Alexander County for which the PSD minor baseline has been triggered for SO2 emissions since 5/30/1980. This County is in non-attainment but is a EAC (Early Action Compact) County.

112(r)

As per the applicant the only substance used at the facility that might be subject to this regulation is ammonia, which is present as a mixture and the concentration is less than one percent. Then, as per 40 CFR 68.115 (b) (1) (threshold determination) “If a regulated substance is present in a mixture and the concentration of the substance is below one percent by weight of the mixture, the amount of the substance in the mixture need not be considered when determining whether more than a threshold quantity is present at the stationary source.” Thus, this facility is not subject to this regulation.

CAM

The applicant informed us on 1/17/06 by e-mail “the sources at Chase Coating and Laminating facility in Taylorsville, NC have a potential to emit two HAPS - methyl ethyl ketone and Toluene at a rate exceeding 10 tpy each before controls and is applicable to paper and other web coating MACT rules. The other HAPS have a potential to emit less than 10 tpy each and 25 tpy combined before controls. All criteria pollutants have a potential to emit of less than 100 tpy before controls. Thus this facility is not applicable to the CAM rules.”

7. Construction Permit (Part II)

The sources listed under Part II of the current permit (The permit shield described in General Condition R did not apply to these sources in the current permit) are removed from this part of the permit. And since this permit will provide for 30 days for comment period for the public and 45 days for an EPA review, there will no longer be a Part II in the current permit.

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES01 ¹ MACT	propane-fired laminator ; 4.8 million Btu per heat input, 90 gallons per hour coating usage rate.	CD01	propane-fired regenerative thermal oxidizer; three million Btu per our heat input
ES02 ¹	mixing room		

1. This facility is permitted under Part II Construction Permit as a significant change per NCAC 2Q .0501(c)(2). The permit shield described in General Condition R does not apply.

8. Facility Compliance Status

As per the latest inspection report (on IBEAM) done on 1/19/05 this facility was found to be in compliance.

9. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection, the facility was in compliance with all applicable requirements. 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.

10. Facility Emissions Review

There is no change in emissions for this renewal.

11. Stipulation Review

All stipulations are standard for this type of facility. The general conditions are updated with the latest version found in the title V shell.

12. Public Notice / EPA and Affected State Review

Pursuant to 2Q. 0521, a notice of the draft Title V Permit will 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 will 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 pursuant will be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected States for this facility.

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.

Regional Office and the applicant were provided a draft of this permit and their comments taken into consideration.

Regional Office concurs with RCO recommendation to issue air permit.

14. Table of Changes

Page Number	Condition Number	Change
7	2.3 Schedule of Compliance	put 2Q .0705 compliance requirement
7	Section 3 – General Condition	Update General Condition
	Part II	Removed