

# NORTH CAROLINA DIVISION OF AIR QUALITY

## Air Permit Review – (Renewal)

Permit Issue Date: **December \_\_, 2006**

**Region:** Winston-Salem Regional Office  
**County:** Guilford  
**NC Facility ID:** 4100835  
**Inspector's Name:** Ray Stewart  
**Date of Last Inspection:** 04/20/2006  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> Konica Minolta Manufacturing USA Inc  <b>Facility Address:</b> Konica Minolta Manufacturing USA, Inc 6900 Konica Drive Whitsett, NC 27377  <b>SIC:</b> 3861 / Photograph Equipment & Supplies <b>NAICS:</b> 325992 / Photographic Film, Paper, Plate, and Chemical Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> 15A NCAC 2Q. 0513 <b>NSPS:</b> N/A <b>NESHAP:</b> N/A <b>PSD:</b> N/A <b>PSD Avoidance:</b> N/A <b>NC Toxics:</b> N/A <b>112(r):</b> N/A <b>Other:</b> N/A
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 4100835.06A <b>Date Received:</b> 03/31/2006 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 06069T07 <b>Existing Permit Issue Date:</b> 04/30/2004 <b>Existing Permit Expiration Date:</b> 12/31/2007
Steve Cox Environmental Engineer (336) 449-8000 6900 Konica Drive Whitsett NC, 27377  Email: steve.cox@pmfg.konicaminolta.us	Robert Harris President (336) 449-8000 6900 Konica Drive Whitsett NC, 27377  Email: Bob.Harris@pmfg.konicaminolta.us	Bill Nieland Manager of Eng. (336) 449-8000 6900 Konica Drive Whitsett NC, 27377	
<b>Review Engineer:</b> Booker Pullen <b>Regional Engineer:</b> Ray Stewart  <b>Review Engineer's Signature:</b> _____ <b>Date:</b> <span style="float: right;"><b>October 17, 2006</b></span>		<b>Comments / Recommendations:</b> Issue 06069T08 <b>Permit Issue Date:</b> December __, 2006 <b>Permit Expiration Date:</b> November 30, 2011	

### I. Introduction

Konica Minolta Manufacturing USA, Inc, located in Whitsett, Guildford County, North Carolina, is a color photographic paper manufacturer for both professional and amateur purposes. The primary manufacturing portion of the facility is divided into four different process areas as follows:

#### A. KE-1 (Konica Expansion No. 1) Process

Silver halide crystals are grown for use in the emulsions process listed below. This is the only area of the facility where chemical reactions are taking place. All the equipment located in this area is on the insignificant activities list. The bagfilters on these processes are utilized to control particulate emissions when powder is added to the vessels.

- twelve batch process mixing vessels (ES-A-01 thru ES-A-12) equipped with a bagfilter (CD-BF-A)
- two batch process mixing vessels (ES-B-01 and ES-B-02) equipped with a bagfilter (CD-BF-B)
- six batch process mixing vessels (ES-C-01 thru ES-C-03, ES-C-04.1, ES-C-04.2, and ES-C04.3) equipped with a bagfilter (CD-BF-C)
- seven batch process mixing vessels (ES-D-01 thru ES-D-07)

**B. E (emulsion ) Process**

Raw materials are mixed and blended and used to coat the paper. Despite mixing and blending, no chemical reactions are actually taking place and this area is the newest part of the facility . All of the equipment in this area is on the insignificant activities list.

- fifty-eight batch process mixing vessels equipped with seven dry filters

CD-EF-E119 installed on:

ES-AVE-32, 33, and 71

ES-AHT-05

CD-EF-120A installed on:

ES-AVE-43, 44, and 51

ES-DVE-52, 53, and 54

CD-EF-120B

ES-AVE-39, 40, 41, 42, 45, 46, 63, and 64

CD-EF-120C

ES-AVE-47, 48, 65, 66, 72, 73, 74, 75, 76, 77, 78, 79, 81, 82, 83, and 84

CD-EF-120D

ES-AVE-30, 31, and 68

ES-DVE-67

CD-EF-140

ES-AVE-11, 12, 13, 14, 17, 18, 19, 20, 21, 22, 23, 24, 26, 27, 59, and 60

CD-EF-E202

ES-MVE-09, 14, 15, and 55

- seventy-nine batch process mixing vessels:  
ES-AST-04, ES-AVE-01 thru AVE-10, ES-AVE-15,ES-AVE-16, ES-AVE-57, ES-AVE-58, ES-DRT-01 thru DRT-04, ES-DST-01/01A, ES-DST-03, ES-DVE-03 thru DVE-08, ES-DVE-10 thru DVE-16, ES-D-01 thru ES-D-07, ES-MFT-01,ES-MFT-05 thruES-MFT-11, ES-MHT-01, ES-MHT-04, ES-MHT-07, ES-MHT-10 thru MHT-17, ES-MST-09 thru MST-11, ES-MVE-16 thru MVE-32
- four (4) mixing tanks (ID Nos. ES-DVE-01, ES-DVE-05, ES-DVE-09, and ES-DVE-13) equipped one each w/ a vent condenser (1.94 sq. ft. of surface area each, ID Nos. ES-DHE-01 thru DHE-04)
- six (6) powder weighing stations (ID Nos. ES-PWS-01 thru ES-PWS-04, and ES-PWS-12 thru ES-PWS-14) each equipped w/a 40% pre-filter and an 85% air filter in series
- one (1) powder weighing station (ID No. ES-PWS-R113) equipped w/ a 95% pre-filter and a 99.9% HEPA filter in series
- eight (8) outdoor bulk storage tanks (ID Nos. ES-UST-09, ES-UST-10, ES-AST-02A/02B, ES-AST-03A/03B, ES-AST-05, and ES-DST-02

**C. C (coating) Process**

The chemicals created in the E Process area are applied to the paper and the paper is then dried by the Kathabars. The vast majority of the VOCs from the facility come from this area.

**D. P (packing) Process**

After the coated paper is dried, cured, and slit to customer specifications, it is moved to this area for packing and labeling for shipping. There are no emission sources in this area of the facility.

**II. Purpose of this application:** The purpose of application 4100835.06A, received on March 31, 2006, is to apply for renewal of the existing Air Permit. This permit will be sent through a 30-day public notice period and a 45-day EPA review period. The application was considered complete on March 31, 2006.

**III. Changes to existing Title V Air permit No. 06069T07 per this Renewal Application (4100835.06A):**

Old Page No.	New Page No.	Condition No.	Changes
<b>Cover Letter</b>			
Page 1	Page 1	Heading and body of letter	Revised issue date, revised permit number to T08, changed modification received date, changed the type of permit procedure in the first paragraph to "renewal"
Page 2	Page 2	Heading and body of letter	Revised date in heading, changed the effective date of the Air Permit, changed expiration date of permit
<b>Insignificant Activities List</b>			
Page 3	Page 3	Insignificant Activities List	Removed list from the back of the permit document to the cover letter, listed all sources individually
<b>Body Of The Permit</b>			
Page 1	Page 1	Information page of permit	Revised: permit no., "replaces permit date", effective date, application no., complete application date, issue date of permit, changed the "Chief" name to Donald R. van der Vaart
All Pages	All Pages	Heading	Revised permit no. to T08
Page 3	Page 3	Permitted emissions Sources Table	Listed sources out individually in the table
Page 7	Page 7	Specific Limitations and Conditions	Removed the monitoring requirements from the permit for the fixe roof No. 2 fuel oil storage tank
Page 9	Page 8	Section 2.2 facility wide sources	Removed the MACT condition from the permit (the facility is not a major source for HAPs)
Pages 9-18	Pages 9-17	General Conditions	Added most current set of General Conditions

**IV. Statement of Compliance**

The DAQ has reviewed the compliance status of this facility. On its latest inspection, performed on April 20, 2006 by Mr. Ray Stewart of the Winston-Salem Regional Office (WiSRO), the facility was in compliance with all applicable requirements.

**V. Table of Permitted Sources at the Facility**

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-UMP-07,	One natural gas / No. 2 fuel oil -fired boiler (47.9 million Btu per hour maximum heat input rate)	NA	NA
ES-UMP-08	One natural gas / No. 2 fuel oil -fired boiler (47.9 million Btu per hour maximum heat input rate)	NA	NA
ES-UMP-10	One natural gas / No. 2 fuel oil-fired hot water heater (10.0 million Btu per hour maximum heat input rate)	NA	NA
<b>NSPS Subpart Dc</b>			
ES-UST-02	One 58,000 gallon capacity No. 2 fuel oil storage tank	NA	NA
<b>NSPS, Subpart Kb</b>			

-Table Continued on the next page-

**V. Table of Permitted Sources at the Facility -Continued**

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-CP	Coating Process consisting of :  Test coating line (ID No. ES-TCL)w/ES-TKR Kathabar regenerator  Coating line (ID No. ES-CL) w/ES-D1KE Kathabar exhaust bypass installed on dryer zone Nos. 1-3  ES-D4KE Kathabar exhaust bypass installed on dryer zone Nos. 4-6  ES-DKRG Kathabar regenerator exhaust	NA	NA
ES-DVS-04	One solvent stripper	CD-VP-01	Shell and tube condenser in series w/liquid ring vacuum pump installed one each, on solvent strippers
ES-DVS-08	One solvent stripper	CD-VP-02	
ES-DVS-12	One solvent stripper	CD-VP-03	
ES-DVS-16	One solvent stripper	CD-VP-04	

**VI. Emission Source-by-Source Evaluation- Applicable Regulations****A. Two natural gas/No. 2 fuel oil -fired boilers (47.9 million Btu per hour maximum heat input rate each, ID Nos. ES-UMP-07 and 08)**

1. 15A NCAC 2D .0503: Particulate Emissions From Fuel Burning Indirect Heat Exchangers
2. 15A NCAC 2D .0516: Sulfur Dioxide Emissions From combustion Sources
3. 15A NCAC 2D .0521: Visible Emissions

No regulatory review is required for the regulations listed above at this time since there are no new sources being added for this renewal application. These boilers **are not subject** to the boiler MACT, listed in 40 CFR Part 63, Subpart DDDDD because the facility is not a major source of HAPs. The largest hazardous air pollutant emitted by this facility according to the latest (2006) emissions inventory is methanol (less than 2 tons per year). Also, this facility submitted a letter, received by the DAQ/ Winston Salem Regional Office on March 14, 2005, stating that the facility would not be a major source for hazardous air pollutants. Compliance assurance monitoring (CAM) listed under 15A NCAC 2D .0614 **does not apply** because there are no control devices on these boilers. No additional monitoring, recordkeeping or reporting is required.

**B. One natural gas / No. 2 fuel oil-fired hot water heater (10.0 million Btu per hour maximum heat input rate, ID No. ES-UMP-10, NSPS Subpart Dc)**

1. 15A NCAC 2D .0503: Particulate Emissions From Fuel Burning Indirect Heat Exchangers
2. 15A NCAC 2D .0516: Sulfur Dioxide Emissions From combustion Sources
3. 15A NCAC 2D .0521: Visible Emissions
4. 15A NCAC 2D .0524: New Source Performance Standard, 40 CFR Part 60, Subpart Dc.

No regulatory review is required for the regulations listed above at this time since there are no new sources being added for this renewal application. This boiler **is not subject** to the boiler MACT, listed in 40 CFR Part 63, Subpart DDDDD because the facility is not a major source of HAPs. The largest hazardous air pollutant emitted by this facility, according to the latest (2006) emissions inventory, is methanol (less than 2 tons per year). Also, this facility submitted a letter, received by the DAQ/ Winston Salem Regional Office on March 14, 2005, stating that the facility would not be a major source for hazardous air pollutants. Compliance assurance monitoring (CAM) listed under 15A NCAC 2D .0614 **does not apply** because there are no control devices on this boiler. No additional monitoring, recordkeeping or reporting is required.

**C. One fixed roof No. 2 fuel oil storage tank (58,000 gallon capacity, ID No. ES-UST-05)**

This tank was previously listed as being subject to NSPS in accordance with 40 CFR Part 60, Subpart Kb. This NSPS regulation was amended on October 15, 2003. The applicability threshold, using maximum true vapor pressure for tanks greater than 39,800 gallons of fuel capacity, is that if these tanks store a liquid with a true vapor pressure of less than 3.5 kilopascals (0.5 psia) they are not subject to this regulation. This tank is not subject to this Subpart because the true vapor pressure of the No. 2 fuel oil ( $\approx$  1.6 mmHg or 0.031 psia) is well below the applicability threshold. The recordkeeping requirements will be removed from the permit during this renewal and replaced with "No applicable requirements".

No additional monitoring, recordkeeping or reporting is required.

**D. Coating Process (ID No. ES-CP) consisting of:**

- **Test coating line (ID No. ES-TCL) w/Kathabar regenerator (ES-TKR)**
  - **Coating line (ID No. ES-CL) w/Kathabar (ES-D1KE) exhaust bypass installed on dryer zone Nos. 1-3,**
  - **Kathabar (ES-D4KE) exhaust bypass installed on dryer zone Nos. 4-6, and**
  - **Kathabar regenerator (ES-DKRG).**
1. 15A NCAC 2D .0958: Work Practices For Sources of Volatile Organic Compounds
  2. 15A NCAC 2D .1806: Control and Prohibition of Odorous Emissions

No regulatory review is required for the regulations listed above at this time since there are no new sources being added for this renewal application. The Paper and other Web Coating MACT under the NESHAP listed in 40 CFR Part 63, Subpart JJJJ does not apply because this facility is not a major source of HAPs. The largest hazardous air pollutant emitted by this facility, according to the latest (2006) emissions inventory, is methanol (less than 2 tons per year). Also, this facility submitted a letter, received by the DAQ/ Winston Salem Regional Office on March 14, 2005, stating that the facility would not be a major source for hazardous air pollutants. Compliance assurance monitoring (CAM) listed under 15A NCAC 2D .0614 **does not apply** because there are no control devices on this process. No additional monitoring, recordkeeping or reporting is required.

**E. Solvent Strippers (ID Nos. ES-DVS-04, ES-DVS-08, ES-DVS-12, and ES-DVS-16) with associated shell and tube condensers (ID Nos. CD-VP-01, 02, 03 and 04) in series with liquid ring vacuum pump installed one each on solvent strippers**

1. 15A NCAC 2D .0958: Work Practices For Sources of Volatile Organic Compounds
2. 15A NCAC 2D .1806: Control and Prohibition of Odorous Emissions

No regulatory review is required for the regulations listed above at this time since there are no new sources being added for this renewal application. The Paper and other Web Coating MACT under the NESHAP listed in 40 CFR Part 63, Subpart JJJJ does not apply because this facility is not a major source of HAPs. The largest hazardous air pollutant emitted by this facility, according to the latest (2006) emissions inventory, is methanol (less than 2 tons per year). Also, this facility submitted a letter, received by the DAQ/ Winston Salem Regional Office on March 14, 2005, stating that the facility would not be a major source for hazardous air pollutants. Compliance assurance monitoring (CAM) listed under 15A NCAC 2D .0614 **does not apply** because the total potential emissions of volatile organic compounds entering each tube condenser from each stripper is less than 100 tons per unit/year.

**VII.** A consistency determination **is not** required for this renewal application.

**VIII.** An application fee **is not** required for this renewal application.

**IX.** The appropriate number of copies of the application were received by the DAQ on March 31, 2006.

**X.** The application did contain the Reduction and Recycling Form.

- XI.** The application was signed by an authorized official as defined by 15A NCAC 2Q .0304(j).
- XII.** An Air toxics review **is not** required because no new sources are being added in this renewal application.
- XIII. Other:**  
This facility is not an affected source under 40 CFR Part 68, Prevention of Accidental Releases, Section 112(r) of the Clean Air Act because it does not store any of the chemicals listed in 112(r) at the listed thresholds.
- XIV. Public Notice**  
A thirty-day public notice **is required**.
- Public notice:** The 30 day public notice period was from \_\_\_\_\_ through \_\_\_\_\_. XXXXX comments were received for this permit application.
- EPA 45-Day review Period:** The DAQ sent copies of the appropriate information the USEPA on \_\_\_\_\_. The EPA 45-day review period was from \_\_\_\_2006 through \_\_\_\_2006.
- XV. Recommendations**  
This renewal permit for the Konica Minolta Manufacturing USA, Inc., located in Whitsett, Guilford County, North Carolina, has been reviewed by the DAQ to determine compliance with all procedures and requirements. The DAQ has determined that this facility is complying or will achieve compliance as specified in the permit with all applicable requirements. The Winston-Salem Regional Office (WSRO) did comment (April 21, 2006) on the application. The WSRO also, commented on the engineering review and draft permit (\_\_\_\_\_). The WSRO concurs with the issuance of this permit.

**Issue permit No. 06069T08.**