

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2009**

**Region:** Asheville Regional Office  
**County:** Caldwell  
**NC Facility ID:** 1400142  
**Inspector's Name:** Patrick Ballard  
**Date of Last Inspection:** 10/30/2008  
**Compliance Code:** 3 / In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> Sealed Air Corporation  <b>Facility Address:</b> Sealed Air Corporation 2075 Valway Road Lenoir, NC 28645  <b>SIC:</b> 3086 / Plastics Foam Products <b>NAICS:</b> 32615 / Urethane and Other Foam Product (except Polystyrene) 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> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 1400142.09A <b>Date Received:</b> 06/09/2009 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 06671/T09 <b>Existing Permit Issue Date:</b> 05/09/2005 <b>Existing Permit Expiration Date:</b> 04/30/2010
Rick Taylor Day Supervisor (828) 726-2100 P O Box 1018 Lenoir, NC 28645	Roger Jackson Regional Plant Manager  P. O. Box 1018 Lenoir, NC 28654	Vincent White Site Manager (828) 726-2038 2001 International Boulevard Hudson, NC 28638	
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b>		<b>Comments / Recommendations:</b> Issue 06671/T10 <b>Permit Issue Date:</b> <b>date, 2009</b> <b>Permit Expiration Date:</b> <b>date, 2014</b>	

**I. Purpose of Application**

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**06671T09**) was issued on **May 9, 2005**. The renewal application was received on **June 8, 2009**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

**II. Facility Description**

The facility is a manufacturer and printer of polyethylene-packing material. They are title V for potential volatile organic compounds.

### III. History/Background/Application Chronology

**February 2, 2001** – Permit **06671T08** was issued as an initial Title V permit.

**May 9, 2005** – Permit **06671T09** was issued as a Title V renewal.

**June 8, 2009** – Permit application **1400142.09A** was received for the renewal of the existing title V air permit. The application was deemed complete for processing at that time.

**June 17, 2009** – DRAFT permit sent to Permittee and ARO for comment prior to public notice and EPA review.

**Date, 2009** – DRAFT sent to 30-day public notice and 45-day EPA review prior to issuance.

### IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page	Section	Description
Attachment	Insignificant activities	-removed reference to diesel fuel tank ( <b>ID No. I-DieselTank</b> ) per Permittee -added former Subpart Kb applicable tank ( <b>ID No. I-ESNo2-M</b> )
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed references to Part II (here and throughout the permit)
All	Header	-amended permit revision numbers
3	Equipment table	-removed reference to extrusion/print line ( <b>ID No. EPHD3-E and EPHD3-P</b> ) -removed reference to former Subpart Kb applicable tank ( <b>ID No. I-ESNo2-M</b> )
4	2.1 A 2.1 A.1.a 2.1 A.1.b	-removed reference to extrusion/print line ( <b>ID No. EPHD3-E and EPHD3-P</b> ) -removed reference to extrusion/print line ( <b>ID No. EPHD3-E and EPHD3-P</b> ) -testing rule cross reference correction
5	2.1 A.1.c 2.1 A.1.d  2.1 A.2.a  2.1 A.2.b 2.1 A.2.c	-shell language update -removed reference to extrusion/print line ( <b>ID No. EPHD3-E and EPHD3-P</b> ) -removed reference to extrusion/print line ( <b>ID No. EPHD3-E and EPHD3-P</b> ) -testing rule cross reference correction -shell language update and removed reference to extrusion/print line ( <b>ID No. EPHD3-E and EPHD3-P</b> )
6	2.1 B.1.b 2.1 B.1.c	-testing rule cross reference correction -updated shell language
7	2.1 B.2.b 2.1 B.2.c	-testing rule cross reference correction -updated shell language

Page	Section	Description
8	2.1 C.1.b 2.1 C.2.b 2.1 C.3.b	-testing rule cross reference correction -testing rule cross reference correction -testing rule cross reference correction
9	2.1 D	-removed Section for non-applicable requirements
10	2.2 A.3	-rule citation correction
11-20	General Conditions	-updated shell conditions (v2.22.1)

*Other than minor updating of equipment descriptions, there were no necessary modifications to ESM as a result of this permit renewal.*

## V. 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 .0515, Particulates from Miscellaneous Industrial Processes  
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources  
15A NCAC 2D .0521, Control of Visible Emissions  
15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart Kb)  
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds  
15A NCAC 2D .1806, Control and Prohibition of Odorous  
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for the existing sources will not be included in this document. However, the applicability of the NSPS, Subpart Kb has been modified. Therefore, 15A NCAC 2D .0524 no longer applies to the facility and will be removed from the permit. See discussion below.

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

**NSPS** – The Permittee is currently required to comply with the recordkeeping requirements for one No. 2 fuel oil vertical fixed-roof storage tank (15,000 gallon capacity; **ID No. ESN02-M**) per Subpart Kb. To ensure compliance, the Permittee shall maintain readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. However, this Subpart was amended **October 15, 2003** to re-establish applicability cutoffs. 60.110b(a) states *“Except as provided in paragraph (b) of this Section, the affected facility to which this Subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (~19,800 gallons) that is used to store volatile organic liquids for which construction, reconstruction, or modification is commenced after July 23, 1984.”* This is in contrast to previous versions of the Subpart which applied to all tanks greater than 40 cubic meters (~10,560 gallons). Therefore, this source is no longer required to comply with this Subpart. It will be moved to the list of insignificant activities with a footnote explaining its status.

**NESHAPS/MACT** – The facility is classified as a Title III minor facility and therefore, is not currently subject to any National Emission Standards for Hazardous Air Pollutants. This permit renewal does not affect this status. (It should be noted that there are numerous MACTs with the following classification codes listed as potential applicable facilities. However, being Title III minor, an applicability determination for those Subparts is not necessary). As shown above, the facility is classified as follows:

**SIC:** 3086 / Plastics Foam Products

**NAICS:** 32615 / Urethane and Other Foam Product (except Polystyrene) Manufacturing

These classification codes were compared to those listed in the following area source MACTs/GACTs for potential applicability:

1. 40 CFR 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources – This Subpart was reviewed for applicability of the printing operations of the facility. However, applicability of the Subpart is limited to “spray applications of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium, collectively referred to as the target HAP to any part of product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.” The Permittee does not engage in these operations, therefore, this Subpart does not apply.
2. 40 CFR 63, Subpart OOOOOO – National Emission Standards for Hazardous Air Pollutants for Flexible Polyurethane Foam Production and Fabrication Area Sources – This Subpart was reviewed for applicability of the plastic extrusion operations of the facility. However, applicability of the Subpart is limited to “the operation of a facility that produces polyurethane foam or rebond foam as defined in 63.1292 of Subpart III or the operation of a flexible polyurethane foam fabrication facility as defined in 63.11419.” The Permittee does not engage in these operations. Patrick Ballard of the ARO writes in his latest inspection report “the facility manufactures and prints polyethylene-packing material.” Therefore, this Subpart does not apply.

**PSD** – The facility is not currently subject to any Prevention of Significant Deterioration requirements. This permit renewal does not affect this status.

**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. This permit renewal does not affect this status.

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-control emissions above the major source threshold, and use a control device to meet an applicable standard. There are no control devices permitted at the facility; therefore, CAM is not applicable.

## VII. Facility Wide Air Toxics

The Permittee has made a demonstration that the following NC Toxic Air Pollutants are below their respective Toxic Pollutants Emission Rates: This permit renewal does not affect this status.

Pollutant(s) (CAS number)	TPER Limitations			
	Carcinogens (lbs/yr)	Chronic Toxicants (lbs/day)	Acute Systemic Toxicants (lbs/hr)	Acute Irritants (lbs/hr)
Acetaldehyde (75-07-0)				6.8
Acrolein (107-02-8)				0.02
Formaldehyde (50-00-0)				0.04
Methyl ethyl ketone (78-93-3)		78		22.4
Toluene (108-88-3)		98		14.4
Xylene (1330-20-7)		57		16.4

## VIII. Facility Emissions Review

The following table represents the latest years' emission inventories from the facility:

Pollutant(s)	2006 Actual Emissions (tpy)	2007 Actual Emissions (tpy)
CO	0.21	0.22
NO <sub>x</sub>	0.83	0.87
PM <sub>10</sub>	0.04	0.04
SO <sub>2</sub>	2.96	3.08
VOC	62.58	54.26
Total HAP/TAP	0.27	0.20

## IX. Stipulation Review

The facility was last inspected by Patrick Ballard of the ARO on **October 10, 2008**. He noted the following items in his inspection report:

1. **EPHD3-P** and **EPHD3-E** have been removed from the facility (supported by a **March 10, 2003** letter to ARO).
2. One diesel fuel tank listed on the insignificant activities list has been removed from the facility. He also stated "it appears that this facility was in compliance with air permit 06671T09 at the time of the inspection."

**X. 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 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. Tennessee is an affected State within 50 miles of the facility.

**XI. Conclusions, Comments, and Recommendations**

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

A consistency determination was not required for this renewal.

ARO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with ARO's recommendation to issue the renewed air permit.