

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2009**

**Region:** Winston-Salem Regional Office  
**County:** Guilford  
**NC Facility ID:** 4100951  
**Inspector's Name:** Brent Rockett  
**Date of Last Inspection:** 06/10/2009  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<b>Applicant (Facility's Name):</b> Shamrock Corporation, Tipping Division  <b>Facility Address:</b> Shamrock Corporation, Tipping Division 870 Huffman Street Greensboro, NC 27405  <b>SIC:</b> 2754 / Commercial Printing, Gravure <b>NAICS:</b> 323111 / Commercial Gravure Printing  <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> 4100951.09A <b>Date Received:</b> 08/20/2009 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 04900/T07 <b>Existing Permit Issue Date:</b> 07/07/2005 <b>Existing Permit Expiration Date:</b> 06/30/2010
Tom Wenner Quality Assurance Manager (336) 574-4156 1055 Gatewood Avenue Greensboro, NC 27405	Eddie Trogon Director of Operation (336) 574-4161 1055 Gatewood Avenue Greensboro, NC 27405	Tom Wenner Quality Assurance Manager (336) 574-4156 1055 Gatewood Avenue Greensboro, NC 27405	
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2009</b>		<b>Comments / Recommendations:</b> Issue 04900/T08 <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 (**04900T07**) was issued on **July 7, 2005**, and is currently scheduled to expire on **June 30, 2010**. The renewal application was received on **August 20, 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 prints paper used in the cigarette manufacturing process. Current permitted equipment includes three rotogravure printing stations consisting of color press stations and associated natural gas-fired dryers.

### III. History/Background/Application Chronology

**August 20, 2009** – Permit application **4100951.09A** received and deemed complete for processing.

**August 31, 2009** – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review.

**date, 2009** – DRAFT permit sent to 30-day public notice and 45-day EPA review.

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

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

Pages	Section	Description of Changes
Attachment	Insignificant activities	-amended permit revision number
Cover	-	-amended permit revision numbers and all dates
All	Header	-amended permit revision number
4	2.1 A.1.b 2.1 A.2.b	-corrected testing rule citation -corrected testing rule citation
5	2.1 A.3.b 2.1 A.3.c	-corrected testing rule citation -updated shell language
7-17	General Conditions	-updated shell conditions (v3.0)

There were no Emission Source Module modifications necessary as part of this permit renewal.

### V. Regulatory Review

The facility is currently subject to the following regulations:

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 .0958, Work Practices for Sources of Volatile Organic Compounds  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

A regulatory review for these current permit conditions will not be included in this document.

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

**NSPS** – The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility is classified as a Title III minor source and is not currently subject to any Maximum Achievable Control Technology Standards. This permit renewal does not affect this status. The latest inspection report indicates that although the facility does print using wide-web rotogravure but because it is a Title III minor source, it is not subject to 40 CFR Part 63, Subpart KK, the printing and publishing MACT. It should be noted that this MACT does have requirements for area source facility's that are operating under a MACT avoidance condition. Specific requirements are included in the MACT for these types of facilities. However, Shamrock does not operate under any avoidance conditions, so the non-applicability to the MACT is confirmed.

As a Title III minor source, the facility has also been analyzed for potential applicability to any of the newly promulgated area source MACTs under Part 63. As currently promulgated, it does not appear that any area source MACTs are applicable to this facility.

**PSD** – The facility currently operates under a PSD Avoidance condition limiting facility-wide emissions of volatile organic compounds to less than 461.6 tons per year. To ensure compliance, the Permittee is required to calculate VOC emissions and record those results in a logbook monthly. The Permittee is also currently required to submit semi-annual reports of the monitoring and recordkeeping activities. 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-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The facility does not have control devices installed; therefore, CAM does not apply at this time. This permit renewal does not affect this status.

## **VII. Facility Wide Air Toxics**

The facility is not subject to any NC Air Toxics requirements. This permit renewal does not affect this status.

## **VIII. Facility Emissions Review**

There is no change in emissions for this renewal.

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

<b>Pollutant(s)</b>	<b>2006 Actual Emissions (tpy)</b>	<b>2007 Actual Emissions (tpy)</b>
CO	0.10	0.11
NO <sub>x</sub>	0.12	0.13
PM <sub>10</sub>	0.01	0.01
VOC	176.45	191.26
Total HAPs/TAPs	0.002	0.002

## **IX. Stipulation Review**

The facility was last inspected by Brent Rockett of the WSRO on **June 10, 2009**. Based on his visual observations and records review, the “facility appeared to be in compliance with Air Quality standards and regulations 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 pursuant 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. The State of Virginia and the Forsyth County Local Program are affected states.

## **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.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with WSRO’s recommendation to issue the renewed air permit.