

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: date, 2009

Region: Mooresville Regional Office
County: Alexander
NC Facility ID: 0200037
Inspector's Name: Joseph Foutz
Date of Last Inspection: 05/06/2009
Compliance Code: W / Violation - procedures

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Shurtape Technologies Inc. - Stony Point Plant Facility Address: Shurtape Technologies Inc. - Stony Point Plant 8510 Highway 90 West Stony Point, NC 28678 SIC: 2672 / Paper Coated And Laminated, Nec NAICS: 322222 / Coated and Laminated Paper 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: 0200037.09A Date Received: 06/23/2009 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04648/T08 Existing Permit Issue Date: 05/12/2005 Existing Permit Expiration Date: 04/30/2010		
Mark Hawes Director of Environmental Safety (828) 325-5428 P O Box 1530 Hickory, NC 28603+1530	David Neff Plant Manager (828) 322-2700 P O Box 1530 Hickory, NC 28603+1530	Mark Hawes Director of Environmental Safety (828) 325-5428 P O Box 1530 Hickory, NC 28603+1530			
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2009			Comments / Recommendations: Issue 04648/T09 Permit Issue Date: date, 2009 Permit Expiration Date: date, 2014		

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 (**04648T08**) was issued on **May 12, 2005**, and was scheduled to expire on **April 30, 2010**. The renewal application was received on **June 23, 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 of pressure sensitive tape. It is currently listed as a Title V facility because potential VOC emissions are greater than major source thresholds.

III. History/Background/Application Chronology

June 23, 2009 – Permit application **0200037.09A** was received for the renewal of the Title V air permit. Permit application was deemed complete for processing.

July 7, 2009 – Received MRO's comments and recommendations on the renewal application via email.

July 22, 2009 – DRAFT permit sent to Permittee and MRO 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	-put into current format -added newly associated device (ID No. I-QA/RD)
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed references to Part I/Part II -moved current Section 2.3 to Section 2.2 (with the deletion of that Section)
All	Header	-amended permit revision number
3	Equipment table 2.1 A.1.a	-added NSPS Subpart designations -added ID numbers
4	2.1 A.1.b 2.1 A.1.c	-corrected testing rule citation -added ID numbers
5-6	2.1 A.3 (new)	-moved 2D .0958 language from now deleted Section 2.2 to this position
6	2.2 (new)	-moved previous Section 2.3 language to this position
7-16	General Conditions	-updated shell conditions (v2.22.1)

Note. ESM was checked and necessary minor modifications were made according to current ESM guidelines.

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart RR)
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds

A regulatory review for these existing regulations will not be included in this document.

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

NSPS – The facility is currently subject to the New Source Performance Standards listed in 40 CFR 60, Subpart RR. Specific emission standards, testing, monitoring, recordkeeping, and reporting requirements are currently established in the permit. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is classified as a Title III minor source. Therefore, MACT standards do not apply. The SIC/NAICS was compared to the current list of area source GACTS. Non were found to apply to this facility at this time.

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 for that pollutant. The Permittee does not currently use control devices to ensure compliance with any applicable standards. Therefore, CAM is not applicable. It should be noted that the permit currently contains a permit shield for nonapplicable requirements in Section 2.2. This shield notes that no control devices are being used.

VII. Facility Wide Air Toxics

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

VIII. Facility Emissions Review

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

Pollutant(s)	2007 Actual Emissions (tpy)	2006 Actual Emissions (tpy)
CO	0.09	0.08
NO _x	0.36	0.32
PM ₁₀	0.03	0.03
SO ₂	0.94	0.83
VOC	171.39	175.65
Total HAP/TAP	0.17	0.30

IX. Stipulation Review

MRO noted no stipulation modifications as part of their permit application review or as part of their latest inspection report. The facility was last inspected by Joe Foutz of the MRO on **May 6, 2009**. At that time the facility appeared to be in compliance with all applicable air quality regulations.

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. The Forsyth and Mecklenburg County Local Programs are each affected programs 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.

MRO recommends issuance of the permit and has reviewed the DRAFT permit prior to notice and issuance (See Section III above).

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