

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Application Review**

**Issue Date:**

**Region:** Mooresville Regional Office  
**County:** Alexander  
**NC Facility ID:** 0200037  
**Inspector's Name:** Jim Hafner  
**Date of Last Inspection:** 05/15/2018  
**Compliance Code:** 3 / Compliance - inspection

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|--|--|
| <b>Facility Data</b>   | <b>Permit Applicability (this application only)</b>  |
| <p><b>Applicant (Facility's Name):</b> Shurtape Technologies, LLC - Stony Point Plant</p> <p><b>Facility Address:</b><br/>                 Shurtape Technologies, LLC - Stony Point Plant<br/>                 8510 Highway 90 West<br/>                 Stony Point, NC 28678</p> <p><b>SIC:</b> 2672 / Paper Coated And Laminated, Nec<br/> <b>NAICS:</b> 322222 / Coated and Laminated Paper Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V<br/> <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p> | <p><b>SIP:</b> 02D .0521, 02D .0524<br/> <b>NSPS:</b> Subpart RR<br/> <b>NESHAP:</b><br/> <b>PSD:</b><br/> <b>PSD Avoidance:</b> 02Q .0317 (&lt;292.7 tpy VOC emissions)<br/> <b>NC Toxics:</b><br/> <b>112(r):</b><br/> <b>Other:</b></p> |

| Contact Data  |  |   | Application Data   |
|---|--|---|--|
| <b>Facility Contact</b>   | <b>Authorized Contact</b>  | <b>Technical Contact</b>  | <p><b>Application Number:</b> 0200037.18A<br/> <b>Date Received:</b> 04/09/2018<br/> <b>Application Type:</b> Renewal<br/> <b>Application Schedule:</b> TV-Renewal<br/> <b>Existing Permit Data</b><br/> <b>Existing Permit Number:</b> 04648/T11<br/> <b>Existing Permit Issue Date:</b> 02/21/2014<br/> <b>Existing Permit Expiration Date:</b> 01/31/2019</p> |
| Mark Hawes<br>Director of Environment and Safety<br>(828) 267-8428<br>PO Box 1530<br>Hickory, NC 28603+1530 | Carl Tolbert<br>Director of North American Manufacturing<br>(828) 267-8408<br>PO Box 1530<br>Hickory, NC 28603 | Mark Hawes<br>Director of Environment and Safety<br>(828) 267-8428<br>PO Box 1530<br>Hickory, NC 28603+1530 |  |

**Total Actual emissions in TONS/YEAR:**

| CY   | SO2 | NOX | VOC    | CO  | PM10   | Total HAP | Largest HAP                                  |
|------|-----|-----|--------|-----|--------|-----------|--|
| 2016 | --- | --- | 91.71  | --- | 0.0100 | ---       | .00E+00<br>[Arsenic & Compounds (total mas)] |
| 2015 | --- | --- | 142.40 | --- | 0.0100 | ---       | .00E+00<br>[Arsenic & Compounds (total mas)] |
| 2014 | --- | --- | 170.16 | --- | 0.0100 | 0.0362    | 0.0362<br>[Toluene]                          |
| 2013 | --- | --- | 188.82 | --- | 0.0100 | 0.0361    | 0.0361<br>[Toluene]                          |
| 2012 | --- | --- | 239.44 | --- | 0.0100 | 0.0361    | 0.0361<br>[Toluene]                          |

|   |  |
|---|--|
| <p><b>Review Engineer:</b> Urva Patel</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p> | <p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 04648/T12<br/> <b>Permit Issue Date:</b><br/> <b>Permit Expiration Date:</b></p> |
|---|--|

## 1. Purpose of Application:

Currently, Shurtape Technologies, LLC – Stony Point Plant (Shurtape) holds Title V Permit No. 04648T11 with an expiration date of January 31, 2019. The Title V renewal application (Application No. 0200037.18A) was received on April 9, 2018, which was nine months prior to expiration date of the Title V Permit. 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.

In addition to the renewal of the existing permit, the facility has requested the following changes:

- Remove insignificant sources I-SS-1 through I-SS-4
- Remove No. 2 fuel oil-firing from the two insignificant boilers (I-31-BLR1 and I-31-BLR2)

## 2. Facility Description:

Shurtape Technologies, LLC – Stony Point Plant is a manufacturer of pressure sensitive tape located in Stony Point, Alexander County, North Carolina.

It is currently listed as a Title V facility because potential VOC emissions are greater than major source thresholds. The facility is not a major source for any other criteria pollutants, nor it is major for any individual or aggregate hazardous air pollutant (HAP).

## 3. History / Background / Application Chronology:

### Permit History

|                   |   |
|-------------------|---|
| February 21, 2014 | Air Quality Permit No. 04648T11 issued with an expiration date of January 31, 2019 for renewal of the TV air permit. This renewal issued by Russell Braswell, included permit renewal and addition of/ fulfilling of the requirement of permit T10 to submit a Part II of two-step significant modification within one year of startup of tape calendar and thermal oxidizer. |
| August 12, 2013   | Air Quality Permit No. 034648T10 issued with an expiration date of August 31, 2014 for TV-Significant-501(b)(2) modification. This modification issued by Kevin Godwin, included an increase in production on calendar line (ID No. 21), removal of tape calendar line (ID No. 23), and addition of natural gas boiler as an insignificant activity.                          |

### Application Chronology

|                  |  |
|------------------|--|
| April 9, 2018    | Received application for permit renewal.   |
| April 9, 2018    | Sent acknowledgement letter indicating that the application for permit was complete for processing.  |
| October 17, 2018 | Based on comments from the facility (Mr. Mark Hawes), a new tape calendar and thermal oxidizer were never formally permitted as Part II permit application submission was withdrawn. |
| October 23, 2018 | The facility has requested for responsible official name change.   |
| October 23, 2018 | The facility has requested tanks be noted as “storage” tanks since they are insignificant and product types could be switched if needed.   |

## 4. Summary of Changes to the Existing Permit (Permit No. 04648T11):

| Page No.     | Section | Description of Changes   |
|--------------|---------|--|
| Cover Letter | N/A     | <ul style="list-style-type: none"><li>• Updated cover letter with application number, permit numbers, dates, fee class, PSD increment statement, and Director name.</li><li>• Updated authorized contact information for the facility.</li></ul> |
| Permit Cover | N/A     | <ul style="list-style-type: none"><li>• Inserted new issuance and complete application date, application number, facility information.</li></ul>   |

| Page No. | Section                     | Description of Changes   |
|----------|-----------------------------|--|
|          | Insignificant activity list | <ul style="list-style-type: none"> <li>Removal of four storage silos (<b>ID No. I-SS-1 through I-SS-4</b>).</li> <li>Removal of No. 2 fuel oil firing from the two insignificant boilers (<b>ID No. I-31-BLR1; I-31-BLR2</b>).</li> <li>Removal of one process oil tank (<b>ID No. I-31-ST-3</b>) as it has been removed from the site.</li> <li>Addition of an extruder (<b>ID No. I-Extruder</b>) as per permit application determination issued on July 30, 2012.</li> <li>Updated these tanks (<b>ID No. I-31-ST-1, I-31-ST-2, I-31-ST-3, and I-31-ST-4a</b>) - switched from “product type” to “storage” tank.</li> </ul> |
| Permit   | Section 2 and Section 3     | <ul style="list-style-type: none"> <li>Updating regulation references from “2D” and “2Q” to “02D” and “02Q” to be consistent with regulation nomenclature.</li> <li>Removal of “15A NCAC 02D .0958: Volatile Organic Compounds”</li> </ul>   |
| Permit   | Section 3                   | <ul style="list-style-type: none"> <li>Updated General Conditions from version 5.2 to current shell version 5.3 (08/21/2018).</li> </ul>   |

## 5. Compliance Status:

DAQ has reviewed the compliance status of this facility. During the most recent inspection conducted on May 15, 2018, Jim Hafner of the Mooresville Regional Office indicated that the facility appeared to be in compliance with all applicable requirements. Additionally, a signed Title V Compliance Certification (Form E5) indicating that the facility was in compliance with all applicable requirements was submitted with Application No. 0200037.18A on April 9, 2018.

### *Five-year Compliance History:*

- The facility was inspected on May 15, 2018 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on May 31, 2017 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on May 24, 2016 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on August 4, 2015 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on July 30, 2014 and appeared to be in compliance with all applicable air quality regulations.
- The facility was inspected on June 4, 2013 and appeared to be in compliance with all applicable air quality regulations.

## 6. New/Modified Equipment/Changes in Emissions:

The facility has requested the following changes:

- Remove insignificant sources (**ID No. I-SS-1 through I-SS-4**) as they were never installed at the site.
- Remove No. 2 fuel oil firing from the two insignificant boilers (**ID No. I-31-BLR1 and I-31-BLR2**)
- Addition of a new extruder (**ID No. I-Extruder**).
- Removal of one 11,000 gallon process oil tank (**ID No. I-31-ST-3**) as per regional permit application review comments and compliance inspection report dated May 15, 2018.

## 7. Regulatory Review

Unless specifically noted, a detailed discussion of the following applicable permit conditions is not included as applicability status has not changed. The permit conditions have been modified to reflect the most current language, as necessary. The facility is expected to be in continued compliance.

- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60 Subpart RR)
- 15A NCAC 02Q .0317 "Avoidance Conditions" (Avoidance of 2D .0530)

### Changes in this permit

- **Removal of “15A NCAC 02D .0958: Volatile Organic Compounds”** since it is not applicable statewide anymore. On November 1, 2016, amendments to 15A NCAC 02D .0902 for VOC emissions were finalized to narrow applicability of work practice standards in 15A NCAC 02D .0958 from statewide to the maintenance area for the 1997 8-hour ozone

standard. This change is being made primarily because the abundance of biogenic VOC emissions in North Carolina results in ozone formation being limited by the amount of available NOx emissions. Provisions of the Clean Air Act require VOC requirements previously implemented in an ozone nonattainment area prior to redesignation remain in place. However, facilities outside the maintenance area counties for the 1997 8-hour ozone standard would no longer be required to comply with the work practice standards in 15A NCAC 02D .0958.

## 8. NSPS, NESHAP/MACT, NSR/PSD, 112(r), CAM

### NSPS

This facility is subject to New Source Performance Standards (NSPS).

- Specifically, 40 CFR 60, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations.

The facility is required to comply with all applicable provisions including the notification, testing, reporting, record-keeping, and monitoring requirements. The facility complies with the regulation by meeting the limit in 60.442(a)(1): emit less than 0.20 kg of VOC per kg of coating solids applied, averaged over one month.

Shurtape must calculate the average weight fraction of VOC emitted per coating applied (referred to as *G*) once per month and submit calculations twice per year. Continued compliance is expected.

### NESHAP/MACT

This facility is classified as a minor source for HAPs emissions and is **NOT** subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63. This permit renewal does not change this status.

- Subpart JJJJ:  
This regulation is not applicable to the tape calender with adhesive release agent application process (**ID No. 21**) and the film co-extrusion/tape calender with an adhesive release agent application process (**ID No. 22**) as they are not major sources of HAPs.
- Subpart JJJJJ:  
The facility has two exempt NG/oil-fired boilers.

Based on comments from the facility on October 17 and 23, 2018, the boilers have previously been disconnected from the fuel oil supply and the supply removed from the site. The boilers are currently not connected to a fuel source; however, Natural Gas is available to be connected. Should the facility elect to restart the boilers and have another Natural Gas connection made for the purpose of supplying the necessary volumes needed for the operation of the boilers, the facility must notify DAQ within 30 days of such a change.

### NSR/PSD

Alexander county is currently designated as attainment for all PSD regulated pollutants. Alexander County is triggered for SO<sub>2</sub> emissions with respect to minor source baseline date. However, this new permit renewal does not affect this triggered pollutant.

This facility is a “250 ton” industrial category source. The facility has taken limitation to avoid PSD by limiting the VOC emissions potential to emit to less than 292.7 tons/yr. Detailed discussion is provided in the permit review no. 04648T10.

- 15A NCAC 02Q .0317, Avoidance Conditions – The facility has accepted the following conditions to avoid applicability of 2D .0530, Prevention of Significant Deterioration (PSD):

| Emission Source(s)  | PSD Avoidance Condition for VOC        |
|---|--|
| One tape calender with adhesive release agent application process ( <b>ID No. 21</b> )                      | < 292.7 tons per year of VOC emissions |
| One film co-extrusion/tape calender with an adhesive release agent application process ( <b>ID No. 22</b> ) |  |

The permit includes requirements to calculate VOC emissions based on material usage and submit semi-annual reports of calculations (monthly and yearly).

Based on the CY2017 emission inventory, the facility emitted 103.6 tons of VOC per year in the year of 2017.

This permit renewal does not change facility’s potential emissions. Therefore, the emission limit does not need to be reevaluated. Continued compliance is expected.

**112(r)**

This facility is **NOT** subject to the requirements of the Chemical Accident Release Prevention Program, Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above applicability thresholds.

**Compliance Assurance Monitoring (CAM)**

Pursuant to 40 CFR 64.2, the provisions of the Compliance Assurance Monitoring (CAM) rule are applicable to emission units that meet all of the following criteria:

- Criteria #1: The unit is subject to an emission limitation AND uses a control device to achieve compliance with the limit;
- Criteria #2: The unit has pre-control potential emissions that are equal to or greater than 100% of the amount (in tpy) required for a source to be classified as a major source (i.e., 100 tpy of any criteria pollutant or 10 tpy of any HAP); and,
- Criteria #3: The unit is not exempt under 40 CFR 64.2(b).

The following table summarizes CAM applicability at Shurtape Technologies – Stony Point Plant:

| Emission Unit | Criteria #1:<br>Does the Source Use a Control Device? | Criteria #2:<br>Pre-control PTE ≥100% of major source thresholds? | Criteria #3:<br>Exempt Under 40 CFR 64.2(b)? | CAM Source? |
|---------------|---|---|--|-------------|
| ES-21         | No  | Yes (VOC)   | VOC: No                                      | No          |
| ES-22         | No  | Yes (VOC)   | VOC: No                                      | No          |

Therefore, the facility is **NOT** subject to CAM.

**9. Facility-Wide Air Toxics:**

The facility is **NOT** subject to the requirements of air toxics permitting. This permit renewal does not change potential emissions. Therefore, no further air toxics evaluation is required at this time.

**10. Facility Emission Review:**

There are no changes in potential emissions under this permit renewal. Actual emissions for 2012 through 2016 are reported in the header of this permit review.

**11. Other Regulatory Considerations:**

- A Permit Application fee is NOT required for Permit Application No. 0200037.18A.
- A P.E. Seal is NOT required for Permit Application No. 0200037.18A.
- A zoning consistency determination is not required for Permit Application No. 0200037.18A.
- A 30-day public notice is required for Permit Application No. 0200037.18A.

**12. Public Notice and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to

each affected State at or before the time notice is provided to the public under 02Q .0521 above. Virginia is an affected state; Forsyth County and Mecklenburg County are affected local programs within 50 miles of the facility.

**13. Recommendations/Conclusion:**

DAQ recommends the issuance of Air Permit No. 04648T12 to Shurtape Technologies, LLC – Stony Point Plant.