

Application Review

Issue Date:

Region: Mooresville Regional Office
County: Iredell
NC Facility ID: 4900195
Inspector's Name: Emily Supple
Date of Last Inspection: 11/08/2019
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): 3A Front Street (formerly Sanford Statesville)</p> <p>Facility Address: 3A Front Street 2020 West Front Street Statesville, NC 28677</p> <p>SIC: 2679 / Converted Paper Products, Nec, 3086 / Plastic Foam Products, 2678 / Stationary Products NAICS: 322299 / All Other Converted Paper Product Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .1806, .0515, .0521, .0516, .1208 NSPS: N/A NESHAP: 40 CFR Part 63, ZZZZ (GACT) PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): 15A NCAC 02D .2100, Risk Management Other: N/A</p>
--	--

Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Scott Broermann Director of Operations (704) 8380-7055 Two Harbor Place 721 Jetton Street, Ste 325 Davidson, NC 28036</p>	<p style="text-align: center;">Authorized Contact</p> <p>Scott Broermann Director of Operations (704) 8380-7055 Two Harbor Place 721 Jetton Street, Ste 325 Davidson, NC 28036</p>	<p style="text-align: center;">Technical Contact</p> <p>Scott Broermann Director of Operations (704) 8380-7055 Two Harbor Place 721 Jetton Street, Ste 325 Davidson, NC 28036</p>	<p>Application Number: 4900195.20A and .20B Date Received: 02/13/2020 and 09/04/20 Application Type: Renewal/ownership/name change Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 06639/T15 Existing Permit Issue Date: 02/23/2017 Existing Permit Expiration Date: 11/30/2020</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2018	0.3400	1.41	85.06	2.17	0.3000	0.0191	0.0183 [Hexane, n-]
2017	0.5000	1.67	115.17	2.86	0.4135	0.0202	0.0194 [Hexane, n-]
2016	0.2700	1.34	82.77	1.90	0.3000	0.0191	0.0183 [Hexane, n-]
2015	0.3400	1.38	89.46	2.14	0.3000	0.0184	0.0176 [Hexane, n-]
2014	1.05	2.30	108.39	5.05	0.8200	0.0197	0.0190 [Hexane, n-]

Review Engineer: Alice Wessner Review Engineer's Signature: Date:	Comments / Recommendations: Issue 06639/T16 Permit Issue Date: Permit Expiration Date:
---	---

I. Purpose of Application

3A Front Street (formerly Sanford-Statesville) currently holds Title V Permit No. 06639T15 with an expiration date of November 30, 2020 for a manufacturing facility located in Statesville, Iredell County, North Carolina. An application (No. 4900195B) for an ownership and name change was received by the DAQ on September 1, 2020. An Acknowledgement letter was sent to the applicant stating that the application was incomplete (\$60 fee missing) on September 2, 2020. Application 4900195B was considered complete on September 4, 2020.

The primary purpose of application No. 4900195.20A is for a permit renewal. The renewal application was received on February 17, 2020 and considered complete on this date, which was at least nine months prior to the expiration date, as required by General Permit Condition 3.K. 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. The renewal application and the ownership/name change application will be consolidated and issued as 06639T16 after going through a 30-day public notice period and 45-day EPA review.

II. Facility Description

3A Front Street operates a manufacturing facility for the production of laminated polystyrene foam boards (SICs 2679 Manufacturing of converted paper and paperboard products, NEC, 3086 Manufacturing of plastic foam products, and 2678 Manufacturing of stationery products). The 2678 and 3086 SIC codes were added to IBEAM with this renewal. The facility manufactures paper foam board signs and picture backings. Permitted equipment includes an extruding process line, laminating process area, storage areas, foam grinding and planing equipment, and one foam waste incinerator, as well as a collection of additional insignificant sources. The facility operates seven days per week, 24 hours per day.

III. History/Background/Application Chronology

- December 10, 2015 Permit 06639T14 issued as a Title V renewal.
- February 23, 2017 Permit 06639T15 issued as a Title V name change.
- December 5, 2019 3A Front Street (formerly Sanford – Statesville) submitted a 502(b)(10) Notification for replacement of a bagfilter with an identical unit. Brian Bland of DAQ reviewed the notification and determined that no change to the air permit was required. Mr. Bland sent an e-mail to the facility that same day specifying that no permit modification or notification under 502(b)(10) was required for this change.
- February 13, 2020 Permit application 4900195.20A received for a Title V renewal of the Title V Air Permit

- September 1, 2020 Ownership/name change application No. 4900195.20B was received and considered incomplete due to the absence of the \$60 application fee. This application was considered complete on September 4, 2020.
- September 14, 2020 The Permits Section requested that the Mooresville Regional Office, provide comments on the updated renewal and review. The Regional Office did not have any comments.
- September 15, 2020 The Permits Section requested that the Stationary Compliance Section provide comments on the updated renewal and review. Comments were received and included in the permit.
- September 16, 2020 The Permits Section requested that the facility provide comments on the updated renewal. The Permittee did not have any comments about the draft permit.
- September XX, 2020 DRAFT permit sent to public notice and EPA for review prior to issuance. The 30-day public comment period ended XXXXXX XX, 2020 with the receipt of no comments. The 45-day EPA review period ended XXXXXXXX XX, 2020 with the receipt of no comments.

IV. Permit Modifications/Changes and ESM Discussion

The following table lists all modifications associated with this permit:

Page No(s).	Section	Description of Change(s)
Cover Letter	Cover Letter	Used current shell language, updated permit numbers, dates, etc. Deleted two insignificant sources - IMP-1 (Two Metallic Painter Production Lines) and IGF (Non-VOC glue filling operations)
All	All	Used current shell language, updated permit numbers, dates, etc.
6	2.1 B.1.c and d	Separated Monitoring and Recordkeeping conditions
7	2.1 B.2.c and d	Separated Monitoring and Recordkeeping conditions
8, 9	2.1 C.2.c and d	Separated Monitoring and Recordkeeping conditions
9, 10	2.1 C.3.c and d	Separated Monitoring and Recordkeeping conditions
12	2.3 A.1.a. through d	Updated rule references and updated condition language
13-22	3.0 General Conditions	Updated General Conditions with latest version (5.5, 08/25/2020)
23	ATTACHMENT List of Acronyms	Updated with latest version

There were changes made to the Title V Equipment Editor (TVEE) under this permit renewal.

V. Regulatory Review

The facility is currently subject to the following regulations:

- a. 15A NCAC 02D .0515, "Particulates from Miscellaneous Industrial Processes"
- b. 15A NCAC 02D .0516, "Sulfur Dioxide Emissions from Combustion Sources"
- c. 15A NCAC 02D .0521, "Control of Visible Emissions"
- d. 15A NCAC 02D .1111, "Maximum Achievable Control Technology" (40 CFR Part 63 Subpart ZZZZ – NESHAP for Stationary Reciprocating Internal Combustion Engines (GACT))
- e. 15A NCAC 02D .1208, "Other Incinerators" – In accordance with 02D .1208(a)(2), incinerator (ID No. ES-I8) is exempt from paragraphs (b)(6) through (b)(9) and (c) of 02D .1208.
- f. 15A NCAC 02D .1806, "Control and Prohibition of Odorous Emissions"
- g. 15A NCAC 02D .2100, "Risk Management Program" – [Section 112(r)]

A review for each applicable regulation is not included in this document, as the facility's status with respect to these regulations has not changed. For a discussion of MACT, CAM, and PSD requirements, see Section 6. The permit will be updated to reflect the most current conditions for all applicable regulations.

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

NSPS – The facility is not currently subject to any new source performance standards. This permit action does not affect this status.

NESHAPS/MACT – The facility is subject to Area Source MACT Subpart ZZZZ.

40 CFR Part 63 Subpart ZZZZ

The diesel-fired emergency engine (**ID No. IES1**) was constructed before December 19, 2002 and is considered an existing source under 40 CFR MACT Subpart ZZZZ. The diesel-fired emergency engine (**ID No. IES1**) has the potential to emit less than five tons per year (tpy) of criteria pollutants; therefore, the engine is exempt from permitting per 15A NCAC 02Q .0503(8), and the engine is currently listed in the insignificant activities list.

PSD – The facility is not currently subject to any prevention of significant deterioration requirements. This permit action does not affect this status.

112(r) – The facility's isopentane underground storage tank (**ID No. IT-1**) is subject to Section 112(r) of the Clean Air Act and shall comply with all applicable requirements in accordance with 40 CFR Part 68. The Permittee is required to revise and update the Risk Management Plan (RMP) submitted under 40 CFR 68.150 according to the requirements specified in 68.190(b)(2) through (b)(7). This permit action does not affect this status. The Permittee submitted one administrative update to the RMP on February 21, 2017. As part of this permit renewal, the 112(r) language has been modified to indicate the facility is required to stay current with the regulations. The RMP is required to be updated by December 17, 2020.

RACT – The 3A Front Street facility is not located in an area of ozone nonattainment. Therefore, RACT does not apply.

CAM – 40 CFR 64 requires that a Continuous Assurance Monitoring plan (CAM) be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and that use a control device to meet an applicable standard. CAM was found not to be applicable for all control devices at this facility because potential uncontrolled emissions were below the applicability threshold. This permit action does not affect this status.

VII. Facility Wide Air Toxics (State Enforceable Only)

The Toxic Air Pollutants emissions shall not exceed rates which cause acceptable ambient levels to be exceeded per 15A NCAC 02D .1100 and 15A NCAC 02Q .0711. This permit renewal does not affect this status

VIII. Facility Emissions Review

The table above (in the review summary) represents the criteria pollutant (plus total HAP) from the latest available reviewed facility emissions inventory (2018). Based on the emissions inventory, the actual emissions of all HAPs are below the Title V applicability thresholds. There is no change in emissions for this renewal.

IX. Compliance Status

There were two Notices of Deficiency (NOD) and two Notices of Violation (NOV) issued within the past five years for this facility. In each case, the facility responded promptly in writing and the issues were resolved. The facility's responses are captured in IBEAM.

An NOD was issued on October 8, 2015 for failure to update the 112(r) Risk Management Plan (RMP) by the required date. The facility updated their plan on December 17, 2015. The anniversary date for updating the RMP is December 17, 2020.

An NOV was issued March 27, 2018, for a 112(r) violation for not maintaining a hazard review and correct operating procedures (40 CFR 68.50(c) and 40 CFR 68.52 respectively). The facility responded to the NOV on May 7, 2018, stating that all 2014 PHA recommendations are verified as completed and signed by the responsible person. The operating procedures have been updated to include consequences of deviation.

An NOD was issued on August 9, 2018, for failure to report in a timely manner, the semi-annual report by June 30, 2018. The facility responded to the NOD on August 20, 2018.

As a result of the most recent inspection on November 8, 2019 by Emily Supple of the Mooresville Regional Office, an NOV was issued on December 23, 2019, for not recording incinerated wastes per Specific Condition and Limitation No. 2.2 C.3(d)(ii)(B). The facility responded to the NOV January 16, 2020 explaining that this information is captured in the daily Lamination Production log in the Trim Scrap calculation column.

X. Public Notice/EPA 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 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. Mecklenburg County and Forsyth County are affected local programs within 50 miles of the facility.

EPA's 45 Day Review period

Ms. Kelly Fortin (U.S. EPA, Region IV) was provided a PROPOSED permit for review on XXXXXX XX, 2020. EPA 45- day review period ended on XXXXXX XX, 2020. No comments were offered or received.

Public Notice

The 30-day public notice of the proposed permit was posted on the NCDAQ website on XXXXX XX, 2020. No comments were offered or received.

XI. Other Regulatory Considerations

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this renewal.
- Since application no. 4900195.20 is a renewal and application no. 4900195B is an ownership/name change, no emission increases were noted for PSD increment tracking purposes.

XII. Recommendations

The permit renewal application for 3A Front Street (formerly known as Sanford - Statesville) in Statesville, Iredell County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 06639T16.