

NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date:

Region: Mooresville Regional Office
County: Alexander
NC Facility ID: 0200037
Inspector's Name: Joe Foutz
Date of Last Inspection: 07/12/2023
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Shurtape Technologies, LLC - Stony Point Plant</p> <p>Facility Address: Shurtape Technologies, LLC - Stony Point Plant 8510 Highway 90 West Stony Point, NC 28678</p> <p>SIC: 2672 / Paper Coated And Laminated, Nec NAICS: 322222 / Coated and Laminated Paper Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 02D .0521, .0524 NSPS: 40 CFR 60 Subpart RR NESHAP: NA PSD: NA PSD Avoidance: 02Q .0317 NC Toxics: NA 112(r): NA Other: NA</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 0200037.23A Date Received: 04/04/2023 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04648/T12 Existing Permit Issue Date: 12/12/2018 Existing Permit Expiration Date: 11/30/2023</p>
Kathleen Fortney (828) 267-8050 PO Box 1530 Hickory, NC 28603	Troy McKasson Plant Manager (828) 267-8922 8510 NC 90 Stony Point, NC 28678	Kathleen Fortney (828) 267-8050 PO Box 1530 Hickory, NC 28603	

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	---	---	128.88	---	0.0100	0.0181	0.0181 [Toluene]
2020	---	---	159.69	---	0.0100	0.0181	0.0181 [Toluene]
2019	---	---	196.96	---	0.0100	0.0181	0.0181 [Toluene]
2018	---	---	195.18	---	0.0100	0.0181	0.0181 [Toluene]
2017	---	---	149.20	---	0.0100	0.0181	0.0181 [Toluene]

<p>Review Engineer: Eric L. Crump, P.E.</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p>Comments / Recommendations:</p> <p>Issue 04648/T13 Permit Issue Date: Permit Expiration Date:</p>
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1. Purpose of Application

Shurtape Technologies, LLC - Stony Point Plant (hereinafter referred to as Shurtape) is a manufacturer of pressure sensitive tape located in Stony Point, Alexander County, North Carolina. The facility currently operates under Title V Permit No. 04648T12 with an expiration date of November 30, 2023. Shurtape has applied for renewal of their Title V air quality permit. The renewal application was received on April 4, 2023, which is at least six months prior to the expiration date as required by General Condition 3.K of the current permit. Therefore, the current permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the current permit shall remain in effect until the renewal permit has been issued or denied.

In permit application No. 0200037.23A, Shurtape stated their intent to remove two boilers (Nos. I-31-BLR-1 and I-31-BLR-2) from the facility and requested their removal from the permit during this renewal. As reported in the 2022 facility compliance inspection report, both boilers have been out of service for many years. The same inspection report notes that a storage tank (No. I-31-ST-4) has been removed from the facility, and should therefore be removed from the permit.

2. Facility Description

Shurtape manufactures pressure sensitive (i.e., adhesive) tape. Its products are used for sealing, seaming, bonding, masking, coating, surface finishing and refurbishing. No printing is done onsite. The facility operates 24 hours per day, seven days per week, 50 weeks per year.

3. Application Chronology

December 12, 2018	Division of Air Quality (DAQ) issues Permit No. 04648T12 to Shurtape as a Title V renewal.
April 4, 2023	DAQ receives permit renewal application No. 0200037.23A from Shurtape.
September 13, 2023	Draft permit and review sent for DAQ supervisory review.
September 14, 2023	DAQ supervisor provides comments on draft permit and review.
September 22, 2023	DAQ sends draft permit to Shurtape, Stationary Source Compliance Branch (SSCB) and Mooresville Regional Office (MRO) for review and comment.
September 22, 2023	DAQ receives comments on draft permit from MRO.
September 29, 2023	DAQ receives comments on draft permit from Shurtape.
September 29, 2023	DAQ receives comments on draft permit from SSCB.
xxx	Permit renewal notice published, 30-day public notice and comment period begins, and 45-day EPA comment period begins.
xxx	30-day public notice and comment period ends.
xxx	45-day EPA comment period ends.

4. Changes to Permit and Title V Equipment Editor (TVEE) Discussion

The following table summarizes changes made to the current Shurtape permit in this permit renewal:

Page No.	Section	Description of Changes
Cover and throughout	---	<ul style="list-style-type: none"> Updated all dates and permit revision numbers Updated all limits/standards summary tables to current standard format
Insignificant Activities List	Attachment	Moved to Section 3 of permit
2	Table of Contents	<ul style="list-style-type: none"> Changed Section 3 from “General Conditions” to “Insignificant Activities per 15A NCAC 02Q .0503(8)” Added new Section 4, “General Conditions”
3	List of Acronyms	Relocated here (formerly last page of permit)
5	2.1 A.2	<ul style="list-style-type: none"> Updated section to reflect the most current stipulations for 15A NCAC 02D .0524 and 40 CFR Part 60 Subpart RR Added equations from 40 CFR 63.443 for computing weighted average of the mass of solvent used per mass of coating solids applied
7	2.1 A.3	Updated section to reflect the most current stipulations for 15A NCAC 02D .0530
9	3	<ul style="list-style-type: none"> Section 3 is now “Insignificant Activities per 15A NCAC 02Q .0503(8)” Deleted source ID Nos. I-31-BLR-1, I-31-BLR-2, and I-31-ST-4 from list of insignificant activities
10-17	4	Updated General Conditions to version 7.0 dated August 21, 2023

The following changes have been made to the TVEE:

Sources Deleted:

Source ID No.	Source Description
I-31-BLR-1	One natural gas - fired boiler (up to 2.93 million Btu per hour maximum heat input capacity)
I-31-BLR-2	One natural gas - fired boiler (up to 2.76 million Btu per hour maximum heat input capacity)
I-31-ST-4	One up to 12,000 gallon storage tank

Sources Revised:

Device ID No.	Former TVEE Description	Revised Description
21	one tape calender with adhesive release agent application process [NSPS Subpart RR]	One tape calender with adhesive release agent application process [NSPS RR]
22	one film co-extrusion/tape calender with an adhesive release agent application process [NSPS Subpart RR]	One film co-extrusion/tape calender with adhesive release agent application process [NSPS RR]

5. Description of Changes and Estimated Emissions

As discussed above in Section 1 of this permit review, two boilers at the Shurtape facility (ID Nos. I-31-BLR-1 and I-31-BLR-2) have been out of service for many years. Shurtape has stated their intent to remove the boilers from the facility and has requested their removal from the permit during this renewal. In addition, the 2022 facility compliance inspection report notes that a storage tank (ID No. I-31-ST-4) has been removed from the facility and should also be removed from the permit. All three of these sources are classified as insignificant activities under 15A NCAC 02Q .0503(8) because for each source the emissions would not violate any applicable emissions standard, the potential uncontrolled criteria pollutant emissions are no more than five tons per year and its potential uncontrolled HAP emissions are below 1000 pounds per year. As such, their removal will result in a small reduction in overall potential facility emissions.

6. Regulatory Review

Shurtape is subject to the following state regulations, in addition to the requirements in the General Conditions:

15A NCAC 02D .0521, Control of Visible Emissions. This rule establishes opacity limits for visible emissions generated by fuel burning operations and industrial processes where visible emissions are expected to occur (except during startups, shutdowns, and malfunctions approved according to procedures in 15A NCAC 02D .0535, Excess Emissions Reporting and Malfunctions). The rule establishes opacity limits for visible emissions from sources based on the date the sources were manufactured.

Because the calenders at Shurtape (Nos. 21 and 22) were manufactured after July 1, 1971, this rule limits them to 20 percent opacity averaged over a six-minute period. The six-minute averaging periods may not exceed 20 percent more than once in any hour, and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. Because of the nature of tape and film processing with the calenders, exceedances of the opacity limits are unlikely; therefore no monitoring, recordkeeping, or reporting is required for visible emissions from these sources. This permit renewal does not affect this status. Continued compliance is expected.

15A NCAC 02D .0524, New Source Performance Standards. See Section 8 of this review.

15A NCAC 02D .0530, Prevention of Significant Deterioration. See Section 9 of this review.

15A NCAC 02Q .0317, Avoidance Conditions. Under this rule, the owner or operator of a facility may ask DAQ to place terms and conditions in that facility's permit to avoid the applicability of certain regulatory requirements. DAQ may require monitoring, recordkeeping, and reporting as needed to provide assurance that the avoidance conditions are being met. The Shurtape permit has avoidance conditions for 15A NCAC 02D .0530, Prevention of Significant Deterioration, which are discussed in Section 9 of this review.

Note: The permit has been updated to reflect the most current stipulations for all applicable regulations.

7. National Emission Standards for Hazardous Air Pollutants (NESHAPS): Maximum and/or Generally Achievable Control Technology (MACT/GACT)

Shurtape is an area source as defined in 40 CFR Part 63.2 with regard to hazardous air pollutants (HAPs) because it has been determined that the facility does not have the potential to emit 10 tons per year or more of any single HAP or 25 tons per year or more of any combination of HAPs. This permit renewal does not affect this status.

40 CFR Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating: The Shurtape facility does fall within the source category for this MACT standard. However, this standard is not applicable to either the tape calender with adhesive release agent application process (No. 21) or the film co-extrusion/tape calender with an adhesive release agent application process (No. 22), because they are not major sources of HAPs. This is noted in a permit shield in Section 2.2 of the permit. This permit renewal does not affect this status.

40 CFR Part 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources: The facility has two natural gas/oil-fired boilers (Nos. I-31-BLR-1 and I-31-BLR-2). As discussed in Sections 1 and 5 of this review, these boilers have been listed as insignificant activities, and have been out of service for years. Shurtape intends to remove them from the facility and has asked that they be removed from the permit. For these reasons, these sources are not subject to Subpart JJJJJ.

8. New Source Performance Standards (NSPS)

The following sources at Shurtape are subject to 40 CFR Part 60, Subpart RR, Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations:

- One tape calender with adhesive release agent application process (No. 21)
- One film co-extrusion/tape calender with an adhesive release agent application process (No. 22)

Under Subpart RR, when the VOC input to a calendar exceeds 45 megagrams (50 tons) as specified in 60.440(b), each calendar must meet one of the following emission standards:

- discharge not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or
- demonstrate a 90 percent overall VOC emission reduction as calculated over a calendar month; or
- demonstrate the percent overall VOC emission reduction specified in 40 CFR 60.443(b) as calculated over a calendar month.

Monthly calculations of the weighted average of the mass of solvent used per mass of coating solids applied—must be performed and recorded. Shurtape must also keep records of all coatings used and the VOC contents (based on the results of testing using Reference Method 24 or manufacturers' formulation data). Semiannual reporting is required.

This permit renewal does not affect the status of Shurtape with regard to this NSPS. Continued compliance is expected.

9. New Source Review (NSR)/Prevention of Significant Deterioration (PSD)

Alexander County is in attainment of all national ambient air quality standards. The county has triggered increment tracking under PSD for SO₂. However, this permit renewal does not reflect an increase or decrease in emissions, and therefore does not consume or expand increments for any pollutants.

As established in a previous permit modification (K. Godwin, Permit No. 04648T10, 8/12/2013), Shurtape has a condition under 15A NCAC 02Q .0317, Avoidance Conditions in their permit to avoid the applicability of 15A NCAC 02D .0530, Prevention of Significant Deterioration. Under this condition, the calenders at the facility (Nos. 21 and 22) shall discharge less than 292.7 tons of VOC per consecutive 12-month period. Shurtape is required to calculate monthly VOC emissions by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. The calculations must be recorded monthly in a logbook, and semiannual reporting is required. This permit renewal does not affect this status. Continued compliance is expected.

10. Risk Management Plan (RMP) Requirements

40 CFR Part 68 requires stationary sources storing more than threshold quantities of regulated substances to develop a RMP in accordance with Section 112(r) of the Clean Air Act. The RMP lists the potential effects of a chemical accident at the facility, steps the facility is taking to prevent an accident, and emergency response procedures to be followed if an accident should occur.

Shurtape 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 the 112(r) status of the facility.

11. Compliance Assurance Monitoring (CAM)

The CAM rule (15A NCAC 02D .0614) applies to each pollutant specific emissions unit located at a facility required to obtain a Title V, Part 70 or 71 permit if it meets all of the following criteria:

- It is subject to an emission limitation or standard, and
- It uses a control device to achieve compliance, and
- It has potential pre-control emissions that equal or exceed the major source threshold (i.e., either 100 tons per year (tpy) for criteria pollutants, 10 tpy of any individual HAP, or 25 tpy of any combination of HAP).

The following emission limitations or standards are exempted from the CAM rule:

- NSPS or NESHAP standards proposed after November 15, 1990;
- Stratospheric ozone protection requirements under Title VI of the Clean Air Act
- Acid rain program requirements;
- Emission limitations or standards or other requirements that apply solely under an approved emissions trading program approved under the rules of Subchapters 02D and 02Q of Chapter 15A and incorporated in a permit issued under 15A NCAC 02Q .0500;
- An emissions cap that is approved under the rules of Subchapters 02D and 02Q of Chapter 15A and incorporated in a permit issued under 15A NCAC 02Q .0500;
- Emission limitations or standards for which a permit issued under 15A NCAC 02Q .0500 specifies a continuous compliance determination method, as defined in 40 CFR 64.1—unless the

applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (e.g., a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this CAM rule would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).

- Certain municipally owned utility units, as defined in 40 CFR 72.2.

Please note that the emission unit is not exempted from the CAM rule if nonexempt emission limitations or standards (e.g., a state rule or an older NSPS emission limits) apply to the emissions unit.

CAM was determined in a preceding permit review (U. Patel, Permit No. 04648T12, 12/12/2018) to not be apply to any sources at Shurtape because no emission source at the facility requires emission controls to comply with emission standards. This is noted in a permit shield in Section 2.2 of the permit. This permit renewal does not affect this status.

12. Facility-wide Air Toxics Review

Shurtape has not been subject to emission limits for NC air toxics. Since the previous permit renewal, there have been no modifications or changes at the facility that would result in an increase in potential facility-wide emissions. Therefore, an air toxics evaluation is not warranted at this time.

13. Facility Emissions Review

The table in the header page of this review summarizes emissions Shurtape has reported in the annual emissions inventories for the years 2017 through 2021 after application of required emission controls. As shown, VOC emissions increased to 197 tons in 2019, but had decreased to 129 tons in 2021. Emissions of PM and HAPs have remained steady, with toluene being the largest individual HAP emitted.

14. Compliance History and Status

The following chronology dates from when the Shurtape permit was last renewed on December 12, 2018.

April 3, 2019	Denise Hayes, Mooresville Regional Office (MRO) conducts facility compliance inspection. Facility appeared to be operating in compliance with all permit requirements.
May 13, 2020	Denise Hayes, MRO conducts partial facility compliance inspection via WebEx due to COVID-19 restrictions. Facility appeared to be operating in compliance with all permit requirements.
February 17, 2021	Denise Hayes, MRO conducts partial facility compliance inspection via WebEx and GoPro live streaming due to COVID-19 restrictions. Facility appeared to be operating in compliance with all permit requirements.
March 10, 2022	James Vanwormer, MRO conducts facility compliance inspection. Facility appeared to be operating in compliance with all permit requirements.

In summary, Shurtape appears to have been in compliance with all permit requirements since their last permit renewal, with no enforcement actions required. Continued compliance is expected.

15. 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 .0518(b), the U.S. EPA will have a 45-day review period. In general, as agreed by DAQ and EPA Region 4, EPA's 45-day review period will run concurrent with the 30-day comment period unless advised otherwise. 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.

Virginia and South Carolina are affected states within 50 miles of the facility. The Mecklenburg County Department of Environmental Protection and the Forsyth County Office of Environmental Assistance and Protection are affected local programs within 50 miles of the facility.

Notice of the DRAFT Title V Permit to Affected States ran from XXXX, 2023, to XXXX, 2023. ***Insert discussion of any comments received from Affected States or Local Programs.***

Public Notice of the DRAFT Title V Permit ran from XXXX, 2023, to XXXX, 2023. ***Insert discussion of any public comments received.***

The U.S. EPA's 45-day review period ran concurrent with the 30-day Public Notice, from XXXX, 2023, to XXXX, 2023. ***Insert discussion of any comments received from EPA and U.S. EPA Region 4 regarding the DRAFT Title V Permit.***

16. Other Regulatory Considerations

The following items were not required in Permit Application No. 0200037.23A:

- Professional Engineer's seal
- Zoning consistency determination
- Permit fee.

EPA has promulgated a rule (88 FR 47029, July 21, 2023), with an effective date of August 21, 2023, removing the emergency affirmative defense provisions in operating permits programs, codified in both 40 CFR 70.6(g) and 71.6(g). EPA has concluded that these provisions are inconsistent with the EPA's current interpretation of the enforcement structure of the CAA, in light of prior court decisions¹. Moreover, per EPA, the removal of these provisions is also consistent with other recent EPA actions involving affirmative defenses² and will harmonize the EPA's treatment of affirmative defenses across different CAA programs.

¹ NRDC v. EPA, 749 F.3d 1055 (D.C. Cir. 2014).

² In newly issued and revised New Source Performance Standards (NSPS), emission guidelines for existing sources, and NESHAP regulations, the EPA has either omitted new affirmative defense provisions or removed existing affirmative defense provisions. See, e.g., National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants; Final Rule, 80 FR 44771

As a consequence of this EPA action to remove these provisions from 40 CFR 70.6(g), states and local agencies that have adopted similar affirmative defense provisions in their Part 70 operating permit programs will need to revise their Part 70 programs (regulations) to remove these provisions. In addition, individual operating permits that contain Title V affirmative defenses based on 40 CFR 70.6(g) or similar state regulations will need to be revised.

NCDAQ has not adopted these discretionary affirmative defense provisions in its Title V regulations (15A NCAC 02Q .0500). Instead, DAQ has chosen to include them directly in individual Title V permits as General Condition J.

Per EPA, DAQ is required to promptly remove such impermissible provisions, as stated above, from individual Title V permits, after August 21, 2023, through normal course of permit issuance. This has been done with this permit renewal.

17. Recommendations

DAQ has reviewed the permit application(s) for Shurtape Technologies, LLC - Stony Point Plant located in Stony Point, Alexander County 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. DAQ recommends the issuance of Air Permit No. 04648T13 upon completion of the public participation and EPA review periods.

(July 27, 2015); National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Final Rule, 80 FR 72789 (November 20, 2015); Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units; Final Rule, 81 FR 40956 (June 23, 2016).