NORTH CAROLINA DIVISION OF						Region: Winston-Salem Regional Office		
AIR QUALITY						County: Davidson		
Application Review					NC Facility ID: 2900268			
Application Review						Inspector's Name: Jim Hafner		
Issue Date:	April 29-2025					Date of Last Inspection: 08/14/2024		
Issue Date. I	April 29, 2023					Compliance Code: 3 / Compliance - inspection		
		Facility	Data			Perm	it Applical	oility (this application only)
Applicant (Facility's Name): Kurz Transfer Products, LP Facility Address:						SIP: 02D .0515, .0516, .0521, .1100, .1111, .1806, 02Q .0317 NSPS: NSPS JJJJ		
Kurz Transfe	r Products, LP	50				NESHAP: MACT JJJJ, ZZZZ, and DDDDD		
4939 North N	NC Highway I	50				PSD: Minor		
Lexington, N	C 27295					PSD Avoidance : Yes, for VOC		
SIG 2754 /	a '10	·				NC Toxics: No		
SIC: 2/54/0	Commercial Pi	inting, Gravure	. ,.			112(r): No		
NAICS: 32	3111 / Comme	ercial Gravure Pi	rinting			Other:		
		C	от.·и т.					
Facility Clas	silication: Be	Title V Aftern	Title V					
Fee Classific	ation: Before	Canta at	Title v					
		Contact	Data			Application Data		
Facility	Contact	Authorized	Contact	Technical	Contact	Angliastica Namban 2000268 24D		
						Applicati Doto Doc	oived: 00/	00/202 <i>4</i>
LaRue Cribb		Thomas Hertlein		Gary Butler		Application Types Departure		
Plant & EHS	Manager	CEO		EHS Manager		Application Type: Kenewal		
(336) 397-17	50	(704) 927-380	6	(704) 927-3845		Application Schedule: 1 V-Kenewal		
4939 North N	VC Highway	11836 Patterso	n Road	11836 Patterso	rson Road		Exist	ing Permit Data
150		Huntersville, N	IC 28078	Huntersville, 1	NC 28078		Permit Nu	mber: 06542/128
Lexington, N	IC 27295	-				Existing	xisting Permit Issue Date: 05/24/2024	
-						Existing	Permit Ex	piration Date: 07/31/2025
Total Actu	al emissions ii	n TONS/YEAR	:					
СҮ	SO2	NOX	VOC	CO	PM10	То	tal HAP	Largest HAP
2023		1.14	20.14	0.9700			0.6036	0.5790 [Toluene]
2022	0.0100	1.63	19.64	1.37			0.8074	0.7733 [Toluene]
2021	0.0100	2.65	26.90	2.22	0.010)	0.9930	0.9391 [Toluene]
2020	0.0100	1.30	24.56	1.09			1.23	1.20 [Toluene]
2019	0.0100	1.32	27.14	1.10			1.86	1.83 [Toluene]
Review Engineer: Conzuela Cogdell					Comm	ents / Rec	ommendations:	
8				Issue 06542/T29				
Review Eng	ineer's Signat	ture: Consult & 1	outill Date:	04/30/2025	Permit Issue Date: April 29, 2025			
Review Engineer 5 Signature, Grigue O. Gaal Date.				Permit Expiration Date: March 31 2030				

1. Introduction and Purpose of Application

Kurz Transfer Products, LP (Kurz) operates a hot stamping foils manufacturing plant in Lexington, Davidson County, North Carolina. The facility currently operates under Title V Permit No. 06542T28 issued May 24, 2024. The primary operations at Kurz are rotogravure processes where various coating materials are applied onto a polyester film substrate.

This permit application is for a permit renewal without modification. The renewal application was received on September 9, 2024, or at least six 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.

2. Chronology

Date	Description			
September 09, 2024	TV Renewal Application was received and assigned Application No. 2900268.24B.			
September 30, 2024	A fluorinated chemicals questionnaire was submitted to Kurz and returned to DAQ the same day. All answers to the questionnaire were "No" and confirmed during most recent inspection. The completed questionnaire is included as ATTACHMENT B to this review document.			
November 6, 2024	An ADD INFO request for an E6 form was sent to Kurz.			
November 8, 2024	E6 form was returned completed.			
January 29. 2025	First Draft of Permit and Statement of Basis forward to Supervisor J. Voelker for comments			
February 14, 2025	First Draft with supervisor Comments returned to review engineer			
February 21, 2025	Draft Permit and Statement of Basis Forward to Facility, Regional Office and			
1 cortaily 21, 2020	Compliance Section for review and comments			
February 26, 2025	Comments from Facility Received			
February 27, 2025	Comments from Regional Office Received			
February 28, 2025	Comments from Compliance Section Received			
February 28, 2025	TVEE updated for IAK801 description			
March 7, 2025	TVEE updated and approved			
March 7, 2025	Final Draft forwarded for Public Notice and EPA Comment			
	Date of publication for Public Notice: March 14, 2025			
March 11 2025	Public Comment period ends: April 14, 2025			
March 11, 2023	EPA Comment period ends: April 28, 2025			
March 13, 2025	Public Notice Posted: <u>https://www.deq.nc.gov/news/events/public-comment-period-intent-issue-air-quality-permit-kurz-transfer-products-lp-0</u>			
April 14, 2025	Public Comment Period ends. No comments received			
April 28, 2025	EPA comment period ends. No comments received			

3. Permit History Since Last Renewal

The following outline provides a permitting history of the subject facility since the last permit renewal. Descriptive language is quoted directly from the respective air permit review documents.

Permit Revision T28 issued 05/24/2024 for 501(b)(2) Part II Application (Nos. 23B and 24A)

Purpose of Application: Application No. 2900268.23B

At this time, Kurz is submitting Part 2 Title V Air Quality Permit Application as required by Section 2.2 A.3 of Permit No. 6542T26¹ permit consistent with 15A NCAC 02Q .0501(b)(2), (c)(2) and 02Q .0504(c). In addition, Kurz is requesting the following modifications to Permit No. 6542T27¹:

- 1. Addition of a federally enforceable, facility-wide emissions limitation of volatile organic compounds (VOC) to less than 250 tons per year
- 2. Removal of VOC emissions limitation of 244 tons per year for Emission Source ID Nos. ES01, ES02, ES03, ES05, ES07, and ES09
- 3. Removal of VOC emissions limitation of 40 tons per year for Emission Source ID No. ES10
- 4. Removal of the operating restriction in Section 2.2 A.2.a.i. Removal of this condition will allow Emission Source ID No. ES10 to exhaust to RTO-1 as a back-up operating scenario.
- 5. Removal of the operating restriction in Section 2.2 A.2.a.ii. Removal of this condition will allow Emission Source ID Nos. ES01, ES02, ES03, ES05, ES07, and ES09 to exhaust to RTO-3.

Application No. 2900268.24A

At this time, Kurz is submitting Part 2 Title V Air Quality Permit Application as required by Section 2.2 A.3 of the current permit (revision no. T27) consistent with 15A NCAC 02Q .0501(b)(2), (c)(2) and 02Q .0504(c). In addition, Kurz is requesting the following modifications to Permit No. 6542T27:

- 1. Addition of a federally enforceable, facility-wide emissions limitation of volatile organic compounds (VOC) to less than 250 tons per year
- 2. Removal of VOC emissions limitation of 244 tons per year for Emission Source ID Nos. ES01, ES02, ES03, ES05, ES07, and ES09
- 3. Removal of VOC emissions limitation of 40 tons per year for Emission Source ID Nos. ES10 and ES11
- 4. Removal of the operating restriction in Section 2.2 A.2.a.i. Removal of this condition will allow Emission Source ID Nos. ES10 and ES11 to exhaust to RTO-1 as a back-up operating scenario.
- 5. Removal of the operating restriction in Section 2.2 A.2.a.ii. Removal of this condition will allow Emission Source ID Nos. ES01, ES02, ES03, ES05, ES07, and ES09 to exhaust to RTO-3.

Note that these requests are identical to those in application no. 2900268.23B above except for the additional reference to ES11 (i.e., the new kettle washer) in Items 3 and 4.

Application No. 2900268. 23B and .24A consolidation

Given the nature of the modifications addressed in these two applications, it was decided to consolidate these applications and process as a single TV permit modification with the goal of issuing a single permit (revision no. T28).

¹ This permit application was received August 3, 2023, while operating under permit revision no. T26. Kurz is currently operating under permit revision no. T27 which was issued on November 17, 2023, in response to application no. 2900268.23C.

Permit Revision T27 issued 11/27/2023 for 501(b)(2) Part I Application (No. 23C)

Purpose of Application:

Kurz is submitting this application to request an air permit to construct and operate one additional kettle washer. The new kettle washer will be identified as ID No. ES11, will be located next to the existing permitted kettle washer (ID No. ES09) and will exhaust to either regenerative thermal oxidizer RTO-1 (backup scenario) or RTO-3 (primary scenario).

It will be shown that this project is a significant modification as defined under the TV permitting rules (15A NCAC 02Q .0500). However, the modification will not contradict or contravene any existing TV permit conditions, this application will be processed at Kurz's request under the state-only permitting rules (15A NCAC 02Q .0300) and consistent with 15A NCAC 02Q .0501(b)(2) and 02Q .0504.

Permit Revision T26 issued 06/14/2023 for 501(b)(2) Part I Application (No. 23A)

Purpose of Application:

The purpose of this application is to request an air permit to construct and operate two new coating lines that will exhaust to a new regenerative thermal oxidizer (ID No. RTO-3). Kurz is also requesting the ability to operate the new and existing coating lines exhausting to either the new RTO or the existing RTO (ID No. RTO-1). This is fully described in Section III of the review.

It will be shown that this project is a significant modification as defined under the TV permitting rules (15A NCAC 02Q .0500). However, as the final permit application request, which includes requesting operating restrictions, does not contradict or contravene any existing permit conditions, this application will be processed at Kurz's request under the state-only permitting rules (15A NCAC 02Q .0300) and consistent with 15A NCAC 02Q .0501(b)(2) and 02Q .0504.

Permit Revision T25 issued 08/11/2020 for Renewal with Modification Application (No. 16B)

Purpose of Application:

The purpose of this application is to renew the air permit, update temperature limits for two RTOs, remove outdated permit conditions and to process the second step TV application for kettle washer pursuant to 15A NCAC 02Q .0504.

4. Changes Implemented in Revised Permit

Page No.	Section	Description of Changes	
NA	Cover Letter	• Updated cover letter date, header, permit number etc.	
NA	Throughout	• Updated dates, permit number etc.	
4	2.1 A.4	 MACT 02D .1111 Condition Corrected the recordkeeping requirement at Section 2.1 A.4.o.iv as follows to reflect the original intent of the condition when drafted for permit revision No. T28 (i.e., fixed an erroneous reference) and to highlight the recordkeeping requirement was added pursuant to 15A NCAC 02Q .0508(f) to facilitate practical enforceability From: iv. maintain for each RTO and, if applicable, each operating scenario as defined in Section 2.1 A.5.b below, the following records consistent with iv above: (A) the 3-hour average temperature limits applicable over the previous 5 years; and (B) the date of the performance test on which each 3-hour average temperature limit in i above was established. To: iv. maintain for each RTO and, if applicable, each operating scenario as defined in Section 2.1 A.5.b below, the following records consistent with v below: (A) the 3-hour average temperature limits applicable over the previous 5 years; and (B) the date of the performance test on which each 3-hour average temperature limit in i above was established. To: iv. maintain for each RTO and, if applicable, each operating scenario as defined in Section 2.1 A.5.b below, the following records consistent with vi below: (A) the 3-hour average temperature limits applicable over the previous 5 years; and (B) the date of the performance test on which each 3-hour average temperature limit in Section 2.1 A.4.i above was established. [15A NCAC 02Q .0508(f)] To the recordkeeping requirement at Section 2.1 A.4.o.v, added reference to 15A NCAC 02Q .0508(f) to highlight that the recordkeeping requirement was added pursuant to 15A NCAC 02Q .0508(f) to facilitate practical enforceability. Corrected the existing reporting condition at Section 2.1 A.4.p.iv as follows to reflect the original intent of the condition when drafted for permit revision No. T28 (i.e	
		A.4.o.v and vi above. To: The summary report shall also include the information in Section 2.1 A.4.o.iv and v above. [15A NCAC 020.0508(f)]	
15	Section 2.2 A 3	• A permit condition addressing the "Disclosure of Information Polating	
13	Section 2.2 A.3	• A permit condition addressing the "Disclosure of information Relating to Emissions of Fluorinated Chemicals [15A NCAC 02Q. 0308(a);	

Page No.	Section	Description of Changes	
		15A NCAC 02Q.0309(b)" was added to permit. This permit conditio	
		is state enforceable only.	
17	Section 4	• General Conditions (GC) version 7.0 (08/21/2023) updated to version 8.0 (07/10/2024). Changes include:	
		-modification to GC D to only require one copy of documents, reports, etc. except as otherwise specified.	

5. Regulatory Review

The following sources appear in Section 1 of the existing permit. All other sources at the facility are insignificant activities because of size or production rate as defined at 15A NCAC 02Q .0503(8) and appear in Section 3 of the permit. The following regulatory discussion applies to the sources in Section 2.1 A only unless explicitly stated otherwise.

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES01 MACT JJJJ	Coating operations consisting of two coating lines (LM06 and LM81) operating within a permanent total enclosure (PTE-1)		
ES05 MACT JJJJ	One coating line (LM84) operating within a permanent total enclosure (PTE-2)		
ES02	Mixing operations consisting of seven to 20 mixing stations operating within a permanent total enclosure (PTE-1)	RTO-1	One natural gas-fired regenerative thermal
ES03	Parts cleaning tank operating within a permanent total enclosure (PTE-1)		oxidizer (16 million Btu per hour maximum heat input
ES07	Parts cleaning tank operating within a permanent total enclosure (PTE-2)	OR	rate)
ES09	One automated kettle washer with integral solvent recovery condenser	RTO-3	OR
ES10 MACT JJJJ	Coating operations consisting of two coating lines (LM802 and LM803) operating within a permanent total enclosure (PTE-4)		One natural gas-fired regenerative thermal oxidizer (12 million Btu per
ES11	One automated kettle washer with integral solvent recovery condenser		hour maximum heat input rate)
ES08 MACT JJJJ	One coating line (LM801) operates within a permanent total enclosure (PTE-3)	RTO-2	One natural gas-fired regenerative thermal oxidizer (5.0 million Btu per hour maximum heat input rate)

As seen in Section 3 above, the existing permit (revision no. T28, issued on May 24, 2024, less than one year ago) was issued in response to a significant modification that was subjected to Title V public notice procedures. As this facility is primarily a VOC, HAP and TAP emitting facility from the use of coating lines and related requirements, practically all the permit conditions in the permit at that time were subjected to substantial review and revision.

As such, it will be shown that all the testing and monitoring, recordkeeping and reporting requirements in the existing permit (except for the correction of a few typographical errors) are still deemed adequate to meet the TV permitting requirements pursuant to 15A NCAC 02Q .0508.

To provide additional detail to the analysis of the applicable regulations below and minimize redundancy, the permit review for Permit No. T28 will be included in this document as ATTACHMENT A and referenced as necessary.

15A NCAC 02Q .0508(j)(1): OPERATING SCENARIOS

This rule requires:

- (j) A permit shall state the terms and conditions for reasonably anticipated operating scenarios identified by the applicant in the application. These terms and conditions shall:
 - (1) require the permittee, contemporaneously by making a change from one operating scenario to another, to record in a log at the permitted facility a record of the operating scenario in which it is operating.

As discussed, and resolved in the previous applications, Kurz requested the flexibility to route the emission sources presented in Table IV to either RTO-3 or RTO-1, as needed. By design only RTO-3 can handle the total exhaust flow from all the emission sources. Once the modifications in Permit Revision No. T28 are completed (see ATTACHMENT A), the intent is for RTO-1 to only operate as a backup.

To allow for the practical enforceability of the conditions addressing MACT JJJJ and PSD AVOIDANCE, a permit condition was included at Section 2.1 A.5 as follows:

15A NCAC 02Q .0508(j)(1): OPERATING SCENARIOS

- a. The Permittee, contemporaneously with making a change from one operating scenario to another, shall record in a logbook (written or electronic format) the scenario under which it is operating.
- b. An operating scenario is defined for purposes of this condition as follows: For each emission source in Table 2.1 A above, the RTO that is controlling its emissions.

The implications of this operating scenario tracking and recordkeeping are discussed fully in ATTACHMENT A (Section IV, Regulatory review 15A NCAC 02D .1111 Maximum Achievable Control Technology).

No changes are necessary to the existing permit condition. Continued compliance is expected.

15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

(40 CFR 63 Subpart JJJJ – "National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating")

As previously discussed during Kurz's two-part significant modification process MACT JJJJ defines the affected source as the collection of "all web coating lines at the facility" and as a result it was concluded that all web coating lines, regardless of construction date are "considered existing affected sources." See the full discussion in the permit review for Permit Revision No. T28 included in ATTACHMENT A.

MACT JJJJ was revised effective July 9, 2020. The revised rule clarified that for affected sources using capture and control systems for compliance with the emission standards (which is the compliance option chosen by the Permittee for all web coating lines), deviations of the capture and control system parameters alone were not

violations of the emission standards. The emission standard is determined monthly. Other substantial changes to the rule affecting this facility include:

- Changes associated with the vacatur of the MACT startup, shutdown and malfunction (SSM) provisions at 40 CFR 63.6. Starting July 9, 2021, the Permittee must be in compliance with the standards at all times. The vacatur had many other implications in this rule (and hence to the permit conditions) including the recordkeeping and reporting requirements.
- Five-year testing cycle: For Thermal Oxidizers, the rule now requires 5-year periodic testing.
- Electronic reporting: the rule revised the electronic reporting requirements.
- Revised temperature sensor validation procedures
- The option to use of a "Control Destruction Efficiency Curve" pursuant to §63.3360(e)(4),

As detailed in ATTACHMENT A, the existing permit contains all relevant applicable requirements included in the 2020 revision.

At the time of this renewal, the modifications permitted in Permit Revision No. T28 have not been completed and the initial testing milestones at Section 2.1 A.4.m.ii have not been met. Thus, they will remain in the revised permit, Other than a few erroneous references and clarifications, no substantial changes are necessary to the existing permit condition. Continued compliance is expected with this rule.

15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

The current permit contains a facility-wide condition for VOC at section 2.2 A.2. For each of the other regulated NSR pollutants the facility-wide PTE is less than 250 tpy. Thus, with the inclusion of the PSD avoidance limit for VOC, the facility is considered to be a PSD minor source.

This facility-wide limit was established in Permit Revision No. T28 (see ATTACHMENT A). ATTACHMENT A contains an exhaustive discussion on the establishment of the emission limit, monitoring and recordkeeping approach taken to ensure the facility-wide VOC emissions do not exceed 250 tpy.

Note from the header table above the highest VOC emissions for the previous five years was approximately 27 tons for calendar year 2019. This is well below the 250 tpy threshold.

No changes are necessary to the existing permit condition. Continued compliance is expected.

6. NSPS, NESHAP, PSD, Attainment Status, 112(r), Toxics, CAM and PFAS

<u>NSPS</u>

The following New Source Performance Standards (NSPS) apply to this renewal.

40 CFR Part 60 Subpart JJJJ – "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" applies to the emergency generators (ID Nos. IES-EG and IES-EG-2)

The Environmental Protection Agency (EPA) has finalized amendments to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE), the New Source Performance Standards (NSPS) for Stationary Compression Ignition (CI) Internal Combustion Engines, and the NSPS for Stationary Spark Ignition (SI) Internal Combustion Engines; to add electronic reporting provisions. The addition of electronic reporting provisions will provide simplified reporting by sources and enhance the availability of data on sources to EPA and the public. In addition, a small number of clarifications and corrections to these rules are being finalized to provide clarification and correct inadvertent and other minor errors in the Code of Federal Regulations (CFR), particularly related to tables. This final rule became effective on August 30, 2024. The two engines (ID Nos. IES-EG and IES-EG-2) are subject to the rule change and are insignificant activities pursuant to 15A NCAC 02Q .0503(8). As such, they are simply listed in Section 3 of the permit. It is the Permittee responsibility to be aware of all applicable compliance requirements for insignificant activities. No changes will be made to the existing permit.

NESHAP/MACT

The facility is a major source of HAP emissions. The coating lines are subject to 40 CFR 63, Subpart JJJJ – "National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating." See discussion in Section 5 above.

40 CFR 63, Subpart DDDDD – "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" applies to the boiler (ID No. IES06) which is an insignificant activity pursuant to 15A NCAC 02Q .0503(8).

40 CFR 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines:

The two engines (ID Nos. IES-EG and IES-EG-2) are subject to 40 CFR 63, Subpart ZZZZ, "Reciprocating Internal Combustion Engines." These engines, both of which are located at a major source of HAP and were constructed after June 12, 2006, are considered new emergency engines under this regulation [40 CFR 63.6590(a)(2)(iii)]. Compliance with MACT Subpart ZZZZ is achieved by complying with the requirements of NSPS Subpart JJJJ as applicable [40 CFR 63.6590(c)(1)]

PSD/Attainment Status

Davidson County is in attainment for all pollutants.

For major stationary sources located in areas designated as attainment with respect to a specific regulated criteria pollutant, the requirements of the PSD program (40 CFR Part 51.166, as incorporated into 15A NCAC 02D .0530) apply. Major stationary sources are those sources with the potential to emit (as defined at 40 CFR 51.166(b)(4)) of either 100 or 250 tons per year or more of a regulated New Source Review (NSR) pollutant. For sources in the specific categories listed in 40 CFR 51.166(b)(1)(i), the potential to emit threshold is 100 tons per year. Kurz is not in one of the categories listed in 40 CFR 51.166(b)(1)(i) and therefore is a "250 tpy source."

The facility is considered to be a PSD minor source. See further discussion in Section 5 above (i.e., 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION)

Davidson County has triggered the minor source baseline date for $PM_{2.5}$, PM_{10} and NO_x . There are no emissions increases associated with this simple renewal.

<u>CAM</u>

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meet all three following criteria:

- The unit is subject to any (non-exempt: e.g., pre-November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- The unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutants that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

Kurz has completed significant modifications to their facility since their last TV Renewal; therefore, a review of CAM was considered in prior modifications.

• <u>Permit 06542/T26 Modification:</u>

The modifications addressed in this application did not trigger a CAM review at that time. Each new source and modified existing sources (i.e., pollutant specific emissions units, or PSEUs) have potential pre-control device emissions of greater than 100 tpy of VOC and 10/25 tpy for individual/total HAP. Since each PSEU has post-control emissions less than these thresholds, these sources are considered "other PSEUs." Pursuant to 40 CFR 64.5(b), CAM applicability for "other PSEUs" will be addressed during the 2025 TV permit renewal.

• <u>Permit 06542/T27 Modification:</u>

The modification addressed did not trigger CAM review.

• <u>TV Renewal Permit 06542/T28</u>

CAM plan is due as part of the application for the initial permit and/or significant permit revision if permit application is not complete by 4/20/98. Significant modifications occurred post 1998. Also, for "other PSEUs" CAM review is required as part of a Title V permit renewal (See 40 CFR 64.5(b)). Therefore, consider the following:

Kurz only uses controls to comply with the following regulations:

1. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (40 CFR 63 Subpart JJJJ – "National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating")

This rule is included in Section 2.1 A.4 of the existing permit and addresses HAP emissions. Kurz is exempted from the CAM rule with respect to this rule because MACT JJJJ meets the exemption at 15A NCAC 02D .0614(b)(1)(A) which states:

(b) The following exemptions to this Rule shall apply.

(1) Exempt emission limitations or standards. The requirements of this Rule shall not apply to any of the following emission limitations or standards

(A) emission limitations or standards proposed by the Administrator of the Environmental Protection Agency after November 15, 1990, pursuant to section 111 or 112 of the federal Clean Air Act.

2. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

This permit condition at Section 2.2 A.2 of the existing permit and is effectively a VOC emissions cap. Kurz is exempted from the CAM rule with respect to this emissions cap because it meets the exemption at 15A NCAC 02D .0614(b)(1)(E) which states:

(b) The following exemptions to this Rule shall apply.

(1) Exempt emission limitations or standards. The requirements of this Rule shall not apply to any of the following emission limitations or standards

(E) an emissions cap that is approved pursuant to the rules of Subchapters 02D and 02Q of this Chapter and incorporated in a permit issued pursuant to 15A NCAC 02Q .0500.

In summary, CAM requirements do not apply.

112r - Risk Management Program (RMP) (15A NCAC 2D .2100)

The Permittee states on Form A3 from application number 2900268.24A received January 8, 2024, that no chemicals are stored at the facility above the 112(r) thresholds. They are only subject to the General Duty requirements contained in the General Condition.

Toxics (State enforceable only)

15A NCAC 02Q .0700: TOXIC AIR POLLUTANT PROCEDURES 15A NCAC 02D .1100: CONTROL OF TOXIC AIR POLLUTANTS

The regulations at 15A NCAC 02Q .0700 require, with some exceptions, a permit to emit any toxic air pollutant (TAP) at levels greater than the TAP permitted emission rate (TPER) specified in 15A NCAC 02Q .0711. These regulations include the procedural rules used to comply with the TAP control requirements found at 15A NCAC 02D .1100. 15A NCAC 02D .1104 contains Acceptable Ambient Levels (AALs) for each TAP. Generally, a facility must conduct a dispersion modeling analysis to demonstrate that each TAP emitted above its respective TPER will not result in the respective AAL being exceeded beyond the facility's premises. Collectively, these "toxics" rules are state-enforceable only and are not subject to the TV requirements found at 15A NCAC 02Q .0500.

Kurz emits several TAPs. However, all sources of TAPs are MACT affected sources and as such meet the toxics permitting exemption at 15A NCAC 02Q .0702(a)(27). Pursuant 15A NCAC 02Q .0706(c), sources meeting the exemption set forth in 15A NCAC 02Q .0702(a)(27) shall be reviewed by the DAQ pursuant to G.S. 143-215.107(a)(5)b to ensure they do not pose an "an unacceptable risk to human health." The DAQ has performed this review numerous times in the past, the most recent being prior to the issuance of permit revision nos. T26 and T27 discussed at length in the ATTACHMENT A (see ATTACHMENT A for full discussion). In summary, it was determined during those reviews that all TAPs were expected to be emitted either below their respective TPER, or, in the case of MEK and 2,4-Toluene Diisocyanate (TDI), be emitted at rates that would result in impacts below their respective AALs.

A review of the previous five years' emission inventory confirms that the actual emissions reported are indeed below the rates included in these previous analyses. As this renewal will not result in an increase in TAP emissions, no further review is necessary.

No changes are necessary to the existing permit.

7. Facility Emissions Review

The facility-wide potential emissions have not changed because of this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the previous five years reporting periods are provided in the header of this permit review. See discussion of TAPs in Section 6 above.

8. Compliance Status

DAQ has reviewed the compliance status of Kurz. The most recent inspection was conducted on August 14, 2024, by Jim Hafner of the WSRO. It was noted in the compliance inspection report issued on August 30, 2024, that "based on records review and the site visit on August 14, 2024, Kurz Transfer Products, LP appears to be operating in compliance with all Air Quality standards and regulation".

Within the last five years of compliance history, on March 6, 2020, the facility was issued their only Notice of Violation/Notice for Recommendation for Enforcement for failing to submit their Annual Compliance Certification on time. The report was due by March 1, 2020, as required by General Condition 3.P of Air Permit No. 06542T24, concerning 15A NCAC 02Q .0508(n). The Annual Compliance Certification was received on March 12, 2020, and revised on March 20, 2020. A civil penalty (Case No. 2020-024) of \$2,253 was assessed on March 6, 2020

9. 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 people 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 provided to the public under 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility.-The current NC permitting policy is to provide notice to all local programs in NC and all contiguous states regardless of their status as an affected state under 02Q .0522.

10. Other Regulatory Considerations

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.

11. Recommendations

The permit renewal application for Kurz Transfer Products, LP has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined 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. 06542T29.

ATTACHMENT A

Permit review for permit no. 06542T28 (Application no. 2900268.23B and 2900268.24A)

ATTACHMENT B

Fluorinated Chemicals Questionnaire Response Received September 30, 2024