

April 23, 2003

Mr. James S. Freese
Vice-President and General Manager
Carolina Apartment Products, Inc.
Post Office Box 3577
Sanford, North Carolina 27331

Dear Mr. Freese:

Subject: **Air Permit No. 09318R00**
 Carolina Apartment Products, Inc.
 Sanford, Lee County, North Carolina
 Fee Class: Title V
 Site Number: 05/53/00133

In accordance with your completed application received January 27, 2003, we are forwarding herewith Permit No. 09318 to Carolina Apartment Products, Inc., 1826 Boone Trail Road, Sanford, Lee County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Please note the records retention requirements are contained in General Condition 2 of the General Conditions and Limitations.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. Such a request will stay the effectiveness of the entire permit. This hearing request must be in the form of a written petition, conforming to G.S. 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Unless a request for a hearing is made pursuant to G.S. 150B-23, this air permit shall be final and binding.

You may request modification of your air permit through informal means pursuant to G.S. 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that the permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under G.S. 150B-23.

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Unless exempted by a condition of this permit or the regulations, construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices described in this permit must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B.

This permit shall be effective from April 23, 2003 until March 31, 2008, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact Fred Langenbach, Environmental Engineer, at 919-715-6242.

Sincerely,

Laura S. Butler, P.E.,
Chief, Permits Section

HFL
Enclosures

c: Ernie Fuller, Raleigh Regional Office
Title V File (with Review)
Central Files

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF AIR QUALITY

AIR PERMIT NO. 09318R00

Issue Date: April 23, 2003

Effective Date: April 23, 2003

Expiration Date: March 31, 2008

Replaces Permit: greenfield

To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere. In accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

Carolina Apartment Products, Inc.
1826 Boone Trail Road
Sanford, Lee County, North Carolina
Fee Class: Title V
Site Number: 05/53/00133

(the Permittee) is hereby authorized to construct and operate air emissions sources and/or air cleaning devices and appurtenances consisting of:

One (1) Cultured Marble Manufacturing Process [ID No. ES1], consisting of an open molding process with clear gel coating and polymer casting all exhausted by spray booth [ID No. ES1-EP1] and a bulk 6500 gallon marble resin above ground storage tank [ID No. ES1-EP2],

in accordance with the completed application (APPL. No. 5300133.03A) received January 27, 2003, including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environment and Natural Resources, Division of Air Quality (DAQ) and are incorporated as part of this Permit.

This Permit is subject to the following specified conditions and limitations including any **TESTING, REPORTING, OR MONITORING REQUIREMENTS:**

A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0958, .1100, .1111, Subchapter 2Q .0504(d), .0507 and .0711.

2. The Permittee shall not exceed the following limitations:

Cultured Marble Manufacturing Process (ES1) - includes spray booth (ID No. ES1-EP1), and marble resin storage tank (ID No. ES1-EP2)

Regulated Pollutant	Limits/Standards	Applicable Regulation (15A NCAC)
Hazardous Air Pollutants [HAPs] - styrene	as defined in Sections 40 CFR Parts 63.5780 through 63.5935 and Tables 1 through 15	2D .1111 [Maximum Achievable Control Technology (MACT)] (40 CFR Part 63, Subpart WWWW)
N.C. Air Toxic Pollutants (styrene)	ES1-EP1 = 27.16 pounds per hour ES1-EP2 = 0.526 pounds per hour	2D .1100 [Control of Toxic Air Pollutants]
volatile organic compounds	work practice standards	2D .0958 [Work Practices for Sources of Volatile Organic Compounds]

3. 15A NCAC 2D .1111 "MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY" - For the Cultured Marble Manufacturing Process [ID No. ES1], consisting of an open molding process with clear gel coating and polymer casting all exhausted by spray booth [ID No. ES1-EP1] and a bulk 6500 gallon marble resin above ground storage tank [ID No. ES1-EP2], the Permittee shall comply with all applicable provisions, including the notification, testing, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 2D .1111 "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart WWWW, including Subpart A "General Provisions."

4. 15A NCAC 2D .1100: Control of Toxic Air Pollutants

Pursuant to 15A NCAC 2D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limits shall not be exceeded:

Emission Sources	Toxic Air Pollutant	Emission Limits
ES1-EP1, Gel coat spraying and marble resin polymer casting	styrene	27.16 pounds per hour
ES1-EP2, marble resin storage tank	styrene	0.526 pounds per hour

Monitoring/Recordkeeping/Reporting

No monitoring, recordkeeping or reporting is required under this permit condition but will be accomplished under permit condition A3.

5. 15A NCAC 2D .0958: Work Practices for Sources of Volatile Organic Compounds

- a. Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day; the Permittee shall:
1. store all material, including waste material, containing volatile organic compounds in tanks or in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
 2. clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
 3. store wipe rags containing volatile organic compounds in closed containers,
 4. not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
 5. transfer solvents containing volatile organic compounds used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act,
 6. clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act. [15A NCAC 2D .0958(c)]

- b. When cleaning parts with a solvent containing a volatile organic compound, the Permittee shall:
1. flush parts in the freeboard area,
 2. take precautions to reduce the pooling of solvent on and in the parts,
 3. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
 4. not fill cleaning machines above the fill line,
 5. not agitate solvent to the point of causing splashing. [15A NCAC 2D .0958(d)]

6. NOTIFICATION REQUIREMENT - Within 15 days after start-up of the new Cultured Marble Manufacturing Process [ID No. ES1], the Permittee shall NOTIFY, in WRITING, the Raleigh Regional Supervisor, DAQ, of the start-up.

7. REPORTING REQUIREMENT - Pursuant to 15A NCAC 2Q .0504(d) "Option for Obtaining Construction and Operation Permit," the Permittee shall have one year from the date of beginning operation of the facility to submit a complete Title V application to the Regional Supervisor, DAQ.

8. Pursuant to 2Q .0507 "Application," the Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Title V application, shall promptly submit such supplementary facts or corrected information to:

Division of Air Quality

Physical, Courier Service & Certified Mail Address	Regular Mail Address
2728 Capital Boulevard Raleigh, NC 27604	1641 Mail Service Center Raleigh, NC 27699-1641

9. **NOTIFICATION REQUIREMENT** - As required by 15A NCAC 2D .0535, the owner or operator of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:
- a. notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
 - i. the name and location of the facility
 - ii. the nature and cause of the malfunction or breakdown
 - iii. the time when the malfunction or breakdown is first observed
 - iv. the expected duration, and
 - v. an estimated rate of emissions
 - b. notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

B. GENERAL CONDITIONS AND LIMITATIONS

1. **REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, AND REQUESTS FOR RENEWAL** shall be submitted to the:

Regional Supervisor
North Carolina Division of Air Quality
Raleigh Regional Office

Physical, Courier Service & Certified Mail Address	Regular Mail Address
3800 Barrett Drive Raleigh, NC 27609	1628 Mail Service Center Raleigh, NC 27699-1628

The Regional Supervisor may be reached by phone at 919/571-4700.

2. RECORDS RETENTION REQUIREMENT - Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. PERMIT RENEWAL REQUIREMENT - The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304 (d) and (f). Pursuant to 15A NCAC 2Q .0203 (i), no permit application fee is required for renewal of an existing air permit. The renewal request should be submitted to the Regional Supervisor, DAQ.
4. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203 (a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
5. EQUIPMENT RELOCATION - A new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
6. This permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. REPORTING REQUIREMENT - Any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

8. This permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
9. This issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.

10. This permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
11. Reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
12. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
13. Pursuant to North Carolina General Statute 143-215.3 (a) (2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
14. The Permittee must comply with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
15. PERMIT RETENTION REQUIREMENT - The Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
16. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 40 CFR Part 68 “Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r),” if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.
17. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act “Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty,” although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**

Permit issued this the 23rd day of April, 2003.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

Laura S. Butler, P.E.,
Chief, Permits Section
By Authority of the Environmental Management Commission

Air Permit No. 09318R00