

DRAFT

Date, 2006

Mr. Stanley Carter

Senior Engineer

Drexel Heritage Furnishings, Inc. – Plant 43

211 East Fleming Drive

Morganton, North Carolina 28655

Dear Mr. Carter:

SUBJECT: **Air Quality Permit No. 02769T14**
 Facility ID: 1200021
 Drexel Heritage Furnishings, Inc. – Plant 43
 Hildebran, North Carolina
 Burke County
 Fee Class: Title V

In accordance with your completed Air Quality Permit Application for **renewal of your Title V permit** received **April 12, 2005**, we are forwarding herewith Air Quality Permit No. **02769T14** to Drexel Heritage Furnishings, Inc. – Plant 43, 1st Street, N.W., Hildebran, North Carolina, authorizing the operation, as outlined in Part I, and the construction, as outlined in Part II, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 2Q .0503 have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3 of Part I. **The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.**

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the conditions of the attached permit that are applicable to that particular emission source.

Mr. Stanley Carter
date, 2006
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If any parts, requirements, or limitations contained in this Air Quality 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. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with **both** the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 **and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641**. 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 NCGS 150B-23, this Air Quality Permit shall be final and binding.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 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 this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of GS 143-215-108(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of GS 143-215.108 and may subject the Permittee to civil or criminal penalties as described in GS 143-215.114A and 143-215.114B.

This Air Quality Permit shall be effective from **date, 2006** until **date, 2011**, 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 Mark J. Cuilla, E.I.T., at (919) 733-1499.

Sincerely yours,

Donald D. Redmond, Jr.
Acting Chief

Enclosure

cc: Gregg Worley, EPA Region 4 with review
Asheville Regional Office
Central Files

ATTACHMENT

Insignificant Activities under 15A NCAC 2Q .0503(8) under Permit No. **02769T14**

Emission Source Description	Insignificant Regulation	Basis for Exemption
Parts washers (ID No. IES-F44 and IES-F45)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
Two diesel fuel tanks (275 and 290 gallons capacity, respectively; ID No. I-DieselTanks)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
Two above-ground propane tanks (1000 and 57 gallons capacity, respectively; ID No. I-PropaneTanks)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
Bleaching operations including a bleach booth and drying oven (ID No. I-Bleach)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
One No. 5 fuel oil tank (30,000 gallons capacity; ID No. I-FuelOilTank)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
One standing lubricating oil tank (200 gallons capacity; ID No. I-LubeTank)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
One alcohol tank (500 gallon capacity; ID No. I-ES-51)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
One thinner tank (2000 gallons capacity; ID No. I-ES-52)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
Two bulk fuel tanks (250,000 gallons capacity each; ID No. I-BulkFuel)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
One diesel fire pump (ID No. I-FirePump)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
Five finishing material bulk storage tanks (4,000 gallons capacity each; ID No. IES-F31-F35)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS
One saw blade-grinding operation vented to one simple cyclone (ID No. I-SB)	15A NCAC 2Q .0503(8)	Potential emissions do not exceed 5 tons per year of criteria pollutants or 1,000 pounds per year of any HAPS

ATTACHMENT

The following table lists all modifications associated with this permit action:

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	-added equipment identification numbers -added sources per regional office inspection report
Cover	-	-amended all dates and permit revision numbers -corrected regional office address
TOC	-	-updated shell titles -removed references to Part II sections
All	Header	-amended permit revision number
3-4	Equipment table	-added MACT subpart citations -added boiler descriptors -moved equipment identification numbers -removed asterisks and asterisked language -removed equipment per Permittee request
5	2.1 A (table) 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.2.d 2.1 A.2.e	-added boiler descriptor -added MACT citation -corrected cross reference -added equipment identification numbers where needed -added testing requirement per regional office request -added testing requirement per regional office request -added equipment identification numbers where needed -updated shell language -updated shell language
6	2.1 A.2.f 2.1 A.2.g 2.1 A.3.a 2.1 A.3.b 2.1 A.3.c 2.1 A.4.a 2.1 A.4.b 2.1 A.4.c 2.1 A.4.d	-added equipment identification numbers where needed -updated shell language -added equipment identification numbers where needed -corrected cross reference -corrected cross-references -added equipment identification numbers where needed -corrected cross reference -added equipment identification numbers where needed -added equipment identification numbers where needed
7	2.1 A.4.f 2.1 A.5.b 2.1 A.5.c 2.1 A.5.d 2.1 A.5.e	-updated shell language -corrected cross reference -updated shell language and added equipment identification numbers where needed -updated shell language -updated shell language
8	2.1 A.6 (title) 2.1 A.6.a 2.1 A.6.c 2.1 A.6.d 2.1 A.6.f 2.1 A.7	-corrected rule citation -updated shell language -added equipment identification numbers where needed -added equipment identification numbers where needed -amended quarterly reporting to semi-annually -added MACT language
9	2.1 B (title/table) 2.1 B.1.a 2.1 B.1.c 2.1 B.2.a 2.1 B.2.c 2.1 B.2.d	-added boiler descriptor, added MACT citation, and corrected cross reference -removed asterisk and asterisked language -added equipment identification numbers where needed -added equipment identification numbers where needed -added equipment identification numbers where needed -added equipment identification numbers where needed -added equipment identification numbers where needed
10	2.1 B.3.c 2.1 B.3.d	-added equipment identification numbers where needed -added clarifying language and equipment identification numbers where needed

Page(s)	Section	Description of Change(s)
11	2.1 B.4.c 2.1 B.4.f 2.1 C (list)	-updated shell language -modified quarterly reporting to semiannually -added equipment identification numbers where needed and removed equipment per Permittee request
12	2.1 C (table) 2.1 C.1.b 2.1 C.1.c 2.1 C.1.e 2.1 C.2.a	-corrected cross reference -updated shell language and added equipment identification numbers where needed -updated shell language and added equipment identification numbers where needed -updated shell language -added equipment identification numbers where needed
13	2.1 C.2.c 2.1 C.2.d 2.1 C.2.e 2.1 D (list)	-updated shell language and added equipment identification numbers where needed -updated shell language -updated shell language -amended description for CAM purposes
14	2.1 D.1.b 2.1 D.1.c 2.1 D.1.e 2.1 D.2.c	-update shell language -update shell language and add equipment identification numbers where needed -updated shell language -updated shell language and added equipment identification numbers where needed
15	2.1 D.2.d 2.1 D.2.e	-updated shell language -updated shell language
15-17	2.1 D.3	-added CAM requirements
17	2.1 E	-added MACT requirements
17-25	2.2 A	-updated shell language and added equipment identification numbers where needed
25	2.2 B	-added last MACT/air toxics demonstration requirement
26-34	General Conditions	-updated shell language
-	Part II (old Section)	-removed Part II



Division of Air Quality

AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
02769T14	02769T13	date, 2006	date, 2011

Until such time as this permit expires or is modified or revoked, the below named Permittee is authorized to operate, as outlined in Part I, and to construct, as outlined in Part II, the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 2D and 2Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 2Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

Permittee: **Drexel Heritage Furnishings, Inc. –
Plant 43**

Facility ID: 1200021

Facility Site Location: 104 1st Street, N.W.
City, County, State, Zip: Hildebran, Burke County, North Carolina 28637
Mailing Address: 211 East Fleming Drive
City, State, Zip: Morganton, North Carolina 28655

Application Number: 1200021.05A
Complete Application Date: April 12, 2005
Renewal Application Due Date: date nine months prior to expiration of permit
Primary SIC Codes: 2511

Division of Air Quality,
Regional Office Address: Asheville Regional Office
2090 US Highway 70
Swannanoa, North Carolina 28778

Permit issued this the xxth day of xxxx, 2006

Donald D. Redmond, Jr., Acting Chief, Air Permits Section
By Authority of the Environmental Management Commission

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(Including specific requirements, testing, monitoring, record keeping, and reporting requirements)

2.2- Multiple Emission Source(s) Specific Limitations and Conditions
(Including specific requirements, testing, monitoring, record keeping, and reporting requirements)

SECTION 3: GENERAL PERMIT CONDITIONS

ATTACHMENT

List of Acronyms

PART II -

This permit does not include a Part II.

PART I

The Division of Air Quality (DAQ), the United States Environmental Protection Agency (EPA), and citizens as defined under the Federal Clean Air Act have the authority to enforce the terms, conditions, and limitations contained in Part I of this permit unless otherwise specified.

Under Title 15A NCAC 2Q, the operation of emission source(s) and associated air pollution control device(s) and appurtenances listed in Part I of this permit is based on plans, specifications, operating parameters, and other information as submitted in the Air Quality Permit Application.

SECTION 1 - PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-B1 (MACT, Subpart DDDDD)	One watertube design wood/No. 5 fuel oil/solid finishing waste fired boiler without flyash reinjection (33.2 million Btu per hour heat input capacity while burning wood or solid finishing waste; 25.2 million Btu per hour heat input capacity while firing No. 5 fuel oil)	CD-B1	One Zurn multicyclone (35 nine-inch diameter tubes)
ES-B3 (MACT, Subpart DDDDD)	One firetube design No. 5 fuel oil/natural gas-fired boiler (29.3 million Btu per hour heat input capacity)	NA	NA
ES-FIN1 (MACT, Subpart JJ)	<u>One wood furniture finishing operation including:</u> -25 dry filter-type spray booths (Nos. F1 through F11, F13 through F18, and FM1 through FM8) -five drying ovens (Nos. F20 through F23 and one unnumbered "no#") -one wash-off tank (No. F12) -two dip tanks (Nos. F38 and F39) -five day tanks (150, 150, 150, 150, and 75 gallons capacity, respectively; Nos. F46 through F50) -gluing operations (No. G1) -two wash/dip tanks (ID Nos. ES-F42 and ES-F43)	NA	NA

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
WS-WD1	<u>Woodworking operations including:</u> Woodworking Woodwaste collection Transfer Hogging	CD-CY-1 CD-DF1	One cyclone (11.5 feet in diameter) and one bagfilter (4,998 square feet of filter area)
		CD-DF2 CD-DF3	Two bagfilters (3,825 square feet of filter area each)
		CD-DF5 CD-DF6	Two bagfilters (7,106 square feet of filter area each)
		CD-DF7 CD-DF8	Two bagfilters (8,294 and 6,900 square feet of filter area, respectively)
		CD-DF9	One bagfilter (1,590 square feet of filter area)
EP-DK-1 through EP-DK-4 (MACT, Subpart DDDD)	Four lumber drying kilns	NA	NA

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

2.1 - Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, record keeping, and reporting requirements as specified herein:

- A. **One watertube design wood fuel/No. 5 fuel oil/finishing waste-fired boiler without flyash reinjection (ID No. ES-B1) and associated multicyclone (ID No. CD-B1)**

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	POS – firing wood only or in combination with No. 5 fuel oil and finishing waste $E_c = [(0.54)(Q_w) + (0.37)(Q_o)]/Q_t$ Where E_c =emission limit in pounds per million Btu per hour Q_w =actual wood heat input rate in million Btu per hour Q_o =actual other fuel heat input rate in million Btu per hour	15A NCAC 2D .0504
	AOS – firing No. 5 fuel oil and/or finishing waste 0.37 pounds per million Btu heat input	
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Visible emissions	40 percent opacity	15A NCAC 2D .0521

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur dioxide	Less than 64.3 tons per year	15A NCAC 2Q .0317 (PSD Avoidance)
Hazardous air pollutants	Industrial, Commercial, Institutional Boilers and Process Heaters MACT	15A NCAC 2D .1111 (40 CFR 63, Subpart DDDDD)

1. ALTERNATIVE OPERATING SCENARIOS [15A NCAC 2Q .0508(p)]

- a. The Permittee, contemporaneously with making a change from one alternative operating scenario to another, shall record in a logbook (written or electronic format) the scenario under which it is operating. [15A NCAC 2Q .0508(p)]

POS – firing wood fuel only or in combination with No. 5 fuel oil and finishing waste

2. 15A NCAC 2D .0504: PARTICULATES FROM WOODBURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from this source (**ID No. ES-B1**) shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0504]

$$E_c = \frac{[(0.54)(Q_w) + (0.37)(Q_f)]}{(Q_w + Q_f)} \text{ pounds per million Btu}$$

Where: Q_w = actual wood heat input rate in Btu per hour
 Q_f = actual other fuel heat input rate in Btu per hour.

Testing [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(3) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0504.
- c. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the wood fuel-fired boiler (**ID No. ES-B1**) for particulate matter with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in Section 3 – General Condition JJ. Testing shall be completed and the results submitted by **[date 4 years from permit issuance]** unless an alternate date is approved by the DAQ. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0504.

Monitoring [15A NCAC 2Q .0508(f)]

- d. Particulate matter emissions from this boiler (**ID No. ES-B1**) shall be controlled by the multicyclone (**ID No. CD-B1**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer’s inspection and maintenance recommendations, or if there **are** no manufacturer’s inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement must include the following:
 - i. a monthly external visual inspection of the system ductwork and material collection unit for leaks; and
 - ii. an annual (**for each 12 month period from initial inspection**) internal inspection of the multicyclone’s structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0504 if the multicyclone and ductwork **are** not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- e. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. a report of any maintenance performed on the multicyclone; and

- iv. any variance from manufacturer's recommendations, if any, and corrections made.
The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0504 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- f. Within 30 days of a written request from the DAQ, the Permittee shall submit a report of any maintenance performed on the multicyclone **(ID No. CD-B1)**.
- g. The Permittee shall submit a summary report of monitoring and recordkeeping activities **postmarked on or before** January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

AOS-firing No. 5 fuel oil only or in combination with finishing waste

3. 15A NCAC 2D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from the combustion of No. 5 fuel oil or finishing waste, that are discharged from this source **(ID No. ES-B1)** into the atmosphere shall not exceed 0.37 pounds per million Btu heat input. [15A NCAC 2D .0503(a)]

Testing [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(3) and General Condition JJ. If the results of this test are above the limit given in Section **2.1 A.3.a** above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0503.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. See Section **2.1 A.2.d, e, f, and g** above.

4. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source **(ID No. ES-B1)** shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

Testing [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ. If the results of this test are above the limit given in Section **2.1 A.4.a** above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of wood fuel in this source **(ID No. ES-B1)**.
- d. The maximum sulfur content of any No. 5 fuel oil received and burned in this source **(ID No. ES-B1)** shall not exceed 2.1 percent by weight. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516 if the sulfur content of the fuel oil exceeds this limit. [15A NCAC 2Q .0508(bb)]
- e. To assure compliance, the Permittee shall monitor the sulfur content of the No. 5 fuel oil by using fuel oil supplier certification per shipment received. The results of the fuel oil supplier certifications shall be recorded in a logbook (written or electronic format) on a quarterly basis and include the following information:
 - i. the name of the fuel oil supplier;
 - ii. the maximum sulfur content of the fuel oil received during the quarter;
 - iii. the method used to determine the maximum sulfur content of the fuel oil; and
 - iv. a certified statement signed by the responsible official that the records of fuel oil supplier certification submitted represent all of the No. 5 fuel oil fired during the reporting period.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516 if the sulfur content of the oil is not monitored and recorded.

Reporting [15A NCAC 2Q .0508(f)]

- f. The Permittee shall submit a summary report of the fuel oil supplier certifications **postmarked on or before** January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

5. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-B1**) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not 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 90 percent opacity. [15A NCAC 2D .0521(c)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section **2.1 A.5.a** above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a day the Permittee shall observe the emission points of this source (**ID No. ES-B1**) for any visible emissions above normal. **The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period.** If visible emissions from this source (**ID No. ES-B1**) are observed to be above normal, the Permittee shall either:
- i. **take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below or**
 - ii. **demonstrate that the percent opacity from the emission points of the emission source (**ID No. ES-B1**) in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 A.5.a above.**
- If the **above-normal emissions are not corrected per i above or if the demonstration in ii above cannot be made**, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.**

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations **postmarked on or before** January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**6. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS
for 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid the applicability of 15A NCAC 2D .0530(a) for major sources and major modifications, the emission source (ID No. ES-B1) shall discharge into the atmosphere less than 64.3 tons of sulfur dioxide per consecutive 12-month period. [15A NCAC 2D .0530]

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f)]

- b. To assure compliance, the Permittee shall monitor the sulfur content of the No. 5 fuel oil by using fuel oil supplier certification per shipment received. Records of the fuel certification shall be kept on site and made available to DAQ personnel upon request. The results of the fuel oil supplier certifications shall be recorded in a logbook (written or electronic format) on a quarterly basis and include the following information:
- the name of the fuel oil supplier;
 - the maximum sulfur content of the fuel oil received during the quarter;
 - the method used to determine the maximum sulfur content of the fuel oil; and
 - a certified statement signed by the responsible official that the records of fuel oil supplier certification submitted represent all of the No. 5 fuel oil fired during the reporting period.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the sulfur content of the oil is not monitored and recorded.
- c. The total SO₂ emissions from this source (ID No. ES-B1) shall be less than 64.3 tons per consecutive twelve-month period, as calculated by the following equation:

$$\frac{(\text{Gallons No. 5 fuel oil combusted}) \times (157\text{S}/1000 \text{ gallons})}{(2000 \text{ pounds per ton})} < 64.3 \text{ tons of SO}_2$$

Where S = percent sulfur by weight of the No. 5 fuel oil

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the total SO₂ emissions exceed the allowable as calculated using the above formula.

- d. For compliance purposes, the Permittee shall record monthly and total quarterly the SO₂ emissions from this source (ID No. ES-B1). The Permittee shall be deemed in noncompliance if the monthly and quarterly total SO₂ emissions are not recorded.
- e. Calculations of SO₂ emissions will be made at the end of each month. A log (written or electronic) will be kept of the monthly SO₂ calculations and a running twelve-month total of SO₂ emissions. The Permittee shall be deemed in noncompliance if the log of monthly and twelve-month total calculated SO₂ emissions is not kept.

Reporting [15A NCAC 2Q .0508(f)]

- f. The Permittee shall submit a semi-annual report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
- the gallons of No. 5 fuel oil combusted in the source (ID No. ES-B1) and the total sulfur dioxide emissions from the source (ID No. ES-B1) for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.
 - a copy of the fuel certification for each shipment of No. 5 fuel oil with the sulfur content by weight delivered during the previous six-month period.

7. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. The Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants from Industrial, Commercial, Institutional Boilers and Process Heaters" by September 13, 2007, for the existing, large, solid fuel-fired boiler (ID No. ES-B1).

B. One firetube design No. 5 fuel oil/natural gas-fired boiler (ID No. ES-B3)

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.37 pounds per million Btu heat input	15A NCAC 2D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Sulfur dioxide	Less than 45.25 tons per year	15A NCAC 2Q .0317 (PSD Avoidance)
Nitrogen oxides	Less than 43.01 tons per year	15A NCAC 2Q .0317 (PSD Avoidance)
Hazardous air pollutants	No applicable requirements per 40 CFR 63.7506(c)	15A NCAC 2D .1111 (40 CFR 63, Subpart DDDDD)

1. 15A NCAC 2D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from the combustion of natural gas and No. 5 fuel oil that are discharged from this source (**ID No. ES-B3**) into the atmosphere shall not exceed 0.37 pounds per million Btu heat input. [15A NCAC 2D .0503(a)]

Testing [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(3) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0503.

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of natural gas or No. 5 fuel oil in this source (**ID No. ES-B3**).

2. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source (**ID No. ES-B3**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

Testing [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in this source (**ID No. ES-B3**).
- d. The maximum sulfur content of any No. 5 fuel oil received and burned in this source (**ID No. ES-B3**) shall not exceed 2.1 percent by weight. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516 if the sulfur content of the fuel oil exceeds this limit.
- e. To assure compliance, the Permittee shall monitor the sulfur content of the No. 5 fuel oil by using fuel oil supplier certification per shipment received. The results of the fuel oil supplier certifications shall be recorded in a logbook (written or electronic format) on a quarterly basis and include the following information:
 - i. the name of the fuel oil supplier;
 - ii. the maximum sulfur content of the fuel oil received during the quarter;
 - iii. the method used to determine the maximum sulfur content of the fuel oil; and
 - iv. a certified statement signed by the responsible official that the records of fuel oil supplier certification

submitted represent all of the No. 5 fuel oil fired during the period.
The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516 if the sulfur content of the oil is not monitored and recorded.

Reporting [15A NCAC 2Q .0508(f)]

- f. The Permittee shall submit a summary report of the fuel oil supplier certifications postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-B3**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not 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. [15A NCAC 2D .0521(d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas in this source (**ID No. ES-B3**).
- d. To assure compliance, once a day **while firing No. 5 fuel oil** the Permittee shall observe the emission points of this source (**ID No. ES-B3**) for any visible emissions above normal. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If visible emissions from this source (**ID No. ES-B3**) are observed to be above normal, the Permittee shall either:
- i. take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 B.3.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- e. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- f. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS
for 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid the applicability of 15A NCAC 2D .0530(g) for major sources and major modifications, this source (**ID No. ES-B3**) shall discharge into the atmosphere less than 45.25 tons of sulfur dioxide total, per consecutive 12-month period. [15A NCAC 2D .0530]
- b. In order to avoid the applicability of 15A NCAC 2D .0530(g) for major sources and major modifications, this source (**ID No. ES-B3**) shall discharge into the atmosphere less than 43.01 tons of nitrogen oxides total, per consecutive 12-month period. [15A NCAC 2D .0530]

Testing [15A NCAC 2D .0501(c)(4)]

- c. If emissions testing is required, the Permittee shall perform such testing in accordance with **15A NCAC 2D .0501(c)(4) and** General Condition JJ. If the results of this test are above the limits given in Section 2.1 B.4.a **and b** above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

Monitoring/Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The Permittee shall keep monthly records of the amount of fuel used and the sulfur content, including certification of the fuel, in a logbook (written or in electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the sulfur content of the fuel is not monitored.
- e. The use of fuel in this source (ID No. ES-B3) shall be limited such that sulfur dioxide emissions shall not exceed 45.25 tons for any consecutive 12-month period. Calculations shall be made monthly and recorded in a logbook (written or in electronic format), according to the following formula:

$$X = Y \times 0.6 \frac{\text{pounds sulfur dioxide}}{\text{million cubic feet}} + Z \times \frac{157 \text{ pounds sulfur dioxide}}{1000 \text{ gallons fuel oil}} \times S$$

Where: X = the total actual emissions of sulfur dioxide in pounds
Y = the total amount of natural gas use in the source in cubic feet
Z = the amount of No. 5 fuel oil used in the source in gallons
S = the percent sulfur in the No. 5 fuel oil

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the above records are not kept or if the sulfur dioxide emissions exceed the limit in Section 2.1 B.4.a above.

Reporting [15A NCAC 2Q .0508(f)]

- f. **The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:**
 - i. **the monthly sulfur dioxide emission for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months;**
 - ii. **the monthly quantities of natural gas and No. 5 fuel oil consumed for the previous 17 months; and**
 - iii. **the average sulfur content of the fuel oil.**

C. Furniture Finishing Operations (ID No. ES-FIN1) including:

- twenty-five dry filter-type spray booths (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**)
- five drying ovens (**Nos. F20 through F23 and unnumbered "no#"**)
- one wash-off tank (**No. F12**)
- two dip tanks (**Nos. F38 and F39**)
- five day tanks (**Nos. F46 and F50**)
- two wash/dip tanks (**Nos. F42 and F43**)

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	Adequate duct work and properly designed collectors	15A NCAC 2D .0512
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Hazardous air pollutants	See Section 2.2 A	15A NCAC 2D .1111 (40 CFR 63, Subpart JJ)

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from the spray booths (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**) shall be controlled by dry filters or baffles and/or adequate ductwork. To assure compliance, the Permittee shall perform inspections and maintenance. As a minimum, the inspection and maintenance program shall include:
 - i. weekly inspection of the spray booths' dry type filters noting the condition; and
 - ii. annual (**for each 12-month period following the initial inspection**) inspection of the associated ductwork noting structural integrity.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the filters and ductwork are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the spray booths (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**) shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of maintenance performed on any filters.**The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.**

Reporting [15A NCAC 2Q .0508(f)]

- d. The Permittee shall submit the results of any maintenance performed on the filters or ductwork within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities **postmarked on or before** January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the furniture finishing operations including the spray booths (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not 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. [15A NCAC 2D .0521(d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of these sources (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**) for any visible emissions above normal. If visible emissions from these sources (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**) are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below or
 - ii. demonstrate that the percent opacity from the emission points of the emission sources (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**) in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 C.2.a above.

If the **above-normal emissions are not corrected per i above or if the demonstration in ii above cannot be made**, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations **postmarked on or before** January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

D. Woodworking Operations (ID No. ES-WD1) consisting of separate group processes controlled by associated cyclone (ID No. CD-CY1) and bagfilters (ID Nos. CD-DF1 through CD-DF3 and CD-DF5 through DF9)

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	Adequate ductwork and properly designed collectors	15A NCAC 2D .0512
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Particulate matter	(ID No. CD-DF9 only) Compliance Assurance Monitoring	15A NCAC 2D .0614

1. 15A NCAC 2D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 2Q .0508(f)]

- b. Particulate matter emissions from this source (**ID No. ES-WD1**) shall be controlled by cyclone (**ID No. CD-CY1**) and eight bagfilters (**CD-DF1 through CD-DF3 and CD-DF5 through CD-DF9**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
- i. monthly external inspection of the ductwork, cyclone, and bagfilters noting the structural integrity; and
 - ii. annual (**for each 12-month period following the initial inspection**) internal inspection of the bagfilters noting the structural integrity and the condition of the filters.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if the filters and ductwork are not inspected and maintained.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of inspection and maintenance for the cyclones (**ID No. CD-CY1**) and bagfilters (**CD-DF1 through CD-DF3 and CD-DF5 through CD-DF9**) shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of maintenance performed on any control device.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0512 if these records are not maintained.**

Reporting [15A NCAC 2Q .0508(f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities **postmarked on or before** January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-WD1**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not 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. [15A NCAC 2D .0521(d)]

Testing [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a week the Permittee shall observe the emission points of this source (**ID No. ES-WD1**) for any visible emissions above normal. If visible emissions from this source (**ID No. ES-WD1**) are observed to be above normal, the Permittee shall either:
- i. **take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below or**
 - ii. demonstrate that the percent opacity from the emission points of the emission source (**ID No. ES-WD1**) in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 D.2.a above.
- If the **above-normal emissions are not corrected per i above or if the demonstration in ii above cannot be made**, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

Recordkeeping [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521 if these records are not maintained.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

3. 15A NCAC 2D .0614: COMPLIANCE ASSURANCE MONITORING

- a. Per 40 CFR 64 and 15A NCAC 2D .0614, the Permittee shall comply with the following.

b. Background

i. Emission Unit.

- (A) Description. Wood working operations
- (B) Identification. **ID No. ES-WD1**

ii. Applicable Regulation, Emission Limit, and Monitoring Requirements.

- (A) Regulations. 15A NCAC 2D .0512 and 2D .0521.
- (B) Emission limits
 - 1. Adequate ductwork and properly designed collectors
 - 2. 20 percent opacity
- (C) Control Technology. One bagfilter (1,590 square feet of filter area; **ID No. CD-DF9**)

- c. **Monitoring Approach.** The key elements of the monitoring approach for particulate matter, including parameters to be monitored, parameter ranges and performance criteria are presented in the following table.

	1	2
I. Indicator	Visible emissions	Pressure drop
Measurement Approach	Visible emissions from the fabric filter will be monitored daily using EPA Reference Method 22-like procedures	Pressure drop across the fabric filter is measured with a differential pressure gauge
II. Indicator Range	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a pressure drop greater than 5 inches of water. Excursions trigger an inspection, corrective action, and a reporting requirement.
QIP Threshold	The QIP threshold is five excursions in a 6-month reporting period.	None selected

	1	2
III. Performance Criteria		
A. Data Representativeness	Measurements are being made at the emission point (fabric filter outlet)	Pressure taps are located at the fabric filter inlet and outlet. The gauge has a minimum accuracy of 0.5 inches of water.
B. Verification of Operational Status	NA	NA
C. QA/QC Practices	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.	The pressure gauge is checked daily for operation.
D. Monitoring Frequency	Observations are done daily.	Pressure drop is monitored daily.
Data Collection Procedures	VE observations are documented by the observer.	Pressure gauge readings are manually recorded daily.
Averaging Periods	NA	NA

d. **Justification**

- i. **Background.** The pollutant-specific emission unit is the wood dust system, which is used to collect and transfer the wood dust from the equipment in the plant to the dust silo. The equipment consists of saws, planers, sanders, etc. in the typical furniture manufacturing operation. The particular filter for this plan is a Pneumafil dust filter, 8.5 feet in diameter, 159 cloth bags eight feet long and can filter approximately 16,070 cubic feet per minute of air.
- ii. **Rationale for Selection of Performance Indicators.** Visible emissions was selected as the performance indicator because it is a good indicator of the proper operation and maintenance of the filter unit. When the filter unit is operating properly, there will not be any visible emissions in the exhaust outlet. Any increase in visible emissions indicates reduced performance of the filter unit, therefore, the presence of visible emissions is used as a performance indicator.

In general, filters are designed to operate at a relatively constant pressure drop. Monitoring pressure drop provides a means of detecting a change in operation that could lead to an increase in emissions. An increase in pressure drop can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged/broken, the bags are becoming blinded, or the airflow has increased. A decrease in pressure drop may indicate broken or loose bags, but this is also indicated by the presence of visible emissions, indicator No. 1. A pressure drop across the filter unit also serves to indicate that there is airflow through the control device.

- iii. **Rationale for Section of Indicator Ranges.** The selected indicator range is no visible emissions. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. Although Reference Method 22 applies to fugitive sources, the visible/no visible emissions observation technique of RM-22 can be applied to ducted emissions; i.e., Method 22-like observations.

The selected QIP threshold for fabric filter visible emissions is five excursions in a 6-month reporting period. This level is 19 percent of the total visible emissions observations. If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented.

The indicator range chosen for the fabric filter pressure drop is greater than 5 inches water. An excursion triggers an inspection, corrective action, and a reporting requirement. The pressure drop is recorded daily. As the pressure drop approaches 5 inches water the bags are scheduled for replacement.

Reporting [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

E. Lumber Drying kilns (ID Nos. EP-DK1 and EP-DK4)

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Hazardous air pollutants	Plywood and Composite Wood Products Manufacturing No applicable requirements other than initial notification submittal requirements	15A NCAC 2D .1111 (40 CFR 63, Subpart DDDD)

2.2 - Multiple Emission Source(s) Specific Limitations and Conditions

A. Affected Source - All facilities subject to 40 CFR Part 63 Subpart JJ: NATIONAL EMISSIONS STANDARD FOR WOOD FURNITURE MANUFACTURING OPERATIONS

One Furniture Finishing Operation (ID No. ES-FIN1) including:

- twenty-five dry filter-type spray booths (Nos. F1 through F11, F13 through F18, and FM1 through FM8)
- five drying ovens (Nos. F20 through F23, and unnumbered “no#”)
- one wash-off tank (No. F12)
- two dip tanks (Nos. F38 and F39)
- five day tanks (Nos. F46 through F50)
- gluing operations (No. G1)
- two wash/dip tanks (Nos. F42 and F43)

APPLICABILITY

- 1. The wood furniture manufacturing operation (ID No. ES-FIN1) shall comply with all requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR Part 63 Subpart JJ “National Emission Standards for Wood Furniture Manufacturing Operations.” [40 CFR 63.800]

DEFINITIONS AND NOMENCLATURE [40 CFR 63.801]

- 2. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.801 shall apply.

REGULATED POLLUTANTS [40 CFR 63.801]

- 3. Volatile Hazardous Air Pollutant (VHAP) and Volatile Organic Compound (VOC) shall have the meaning as defined in 40 CFR 63.801.

40 CFR Part 63 Subpart A “GENERAL PROVISIONS”

- 4. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A “General Provisions” according to the applicability of Subpart A to such sources, as identified in Table 1 of 40 CFR Part 63, Subpart JJ.

SUMMARY OF EMISSION LIMITS

- 5. The following table provides a summary of emission limits:

SUMMARY OF EMISSION LIMITS

Emission Point	Existing Source
<u>Finishing Operations</u>	
(a) Achieve a weighted average VHAP content across all coatings (Maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied); or	1.0 ^a
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied): -stains -washcoats -sealers -topcoats -basecoats -enamels -thinners (maximum % HAP allowable); or	1.0 ^a 1.0 ^{ab} 1.0 ^a 1.0 ^a 1.0 ^{ab} 1.0 ^{ab} 10.0
(c) As an alternative, use control device; or	1.0 ^c
(d) Use any combination of (a), (b), and (c)	1.0
<u>Cleaning Operations</u>	
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8
<u>Contact Adhesives</u>	
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria: i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates ii. For foam adhesives use products that meet flammability requirements iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	NA ^d 1.8 1.0
(b) Use a control device	1.0 ^e

^a The limits refer to the VHAP content of the coating, as applied.

^b Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated on-site by thinning other finishing materials. If they are formulated on-site, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent HAP by weight.

^c The control device must operate at an efficiency that is equivalent to or no greater than 1.0 kilogram/pound for existing sources of VHAP being emitted from the affected emission source per kilogram/pound solids used.

^d There is no limit on the VHAP content of these adhesives.

^e The control device must operate at an efficiency that is equivalent to or no greater than 1.0 kilogram/pound for existing sources of VHAP emitted per kilogram/pound of solids used.

WORK PRACTICE STANDARDS

6. The facility shall adhere to the work practice standards as specified by 40 CFR 63.803.
 - a. **Work Practice Implementation Plan** - The Permittee shall prepare, maintain, and follow a written Work Practice Implementation Plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards specified in items (b) through (l) below.

- b. **Operator training** - All personnel involved in finishing, contact adhesive, cleaning, and wash-off operations shall be trained. New personnel shall be trained prior to performing their job duties. Those personnel hired before the compliance date shall be trained within six months of the compliance date. As a minimum, all personnel shall receive annual refresher training.
- c. **Inspection and maintenance plan** - A written leak inspection and maintenance plan shall be followed. This plan shall specify:
 - i. an inspection schedule for all equipment used to transfer or apply coatings, regulated contact adhesives, or organic HAP solvents. The minimum inspection frequency for each piece of equipment is once per month;
 - ii. methods for documenting the date and results of each inspection and any repairs made; and
 - iii. the time frame between identifying and repairing a leak which adheres to, as a minimum, an attempt at repair within five days of leak detection and final repairs within 15 days of detection unless new equipment must be purchased. If new equipment must be purchased, the leak must be repaired within three months of discovery.
- d. **Cleaning and wash-off solvent accounting system** - An accounting system shall be maintained to record:
 - i. the quantities and types of organic HAP solvent used per month for cleaning and wash-off operations;
 - ii. the number of pieces washed off, and the reason for the wash-off; and
 - iii. the quantity of spent solvent from each wash-off and cleaning operation and whether it is recycled on-site or disposed off-site.
- e. **Chemical composition of cleaning and wash-off solvents** - The compounds listed in Table 4 of Subpart JJ shall not be used in wash-off or cleaning operation.
- f. **Spray booth cleaning** - Spray booths and spray booth components other than conveyors, continuous coaters and their enclosures, and metal filters, shall not be cleaned with solvent containing more than 8 percent by weight VOC unless the spray booth is being refurbished. Refurbish means to replace the spray booth coating or to replace other protective material used to cover the booth. If the spray booth is being refurbished, no more than 1.0 gallon of organic HAP solvent shall be used to prepare the booth prior to applying booth coating. Organic HAP solvents with greater than 8.0 percent VOCs may be used to clean conveyors, continuous coaters and their enclosures, and metal filters.
- g. **Storage requirements** [63.803(g)] - All affected sources shall use normally closed containers for storing finishing, cleaning, wash-off materials, and contact adhesives.
- h. **Application equipment requirements** [63.803(h)] - The use of conventional air spray guns to apply finishing materials shall be limited to the following circumstances:
 - i. to apply finishes that have a VOC content of no greater than 1.0 lb VOC/lb solids, as applied;
 - ii. for touch up and repair under the following circumstances:
 - (A) the touch up and repair occurs after the completion of the finishing operation; or
 - (B) the touch up and repair occurs after the application of stain and before the application of any type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons;
 - iii. when spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - iv. when emissions from the finishing application station are directed to a control device;
 - v. the conventional air spray gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - vi. in special circumstances in which the conventional air spray gun is used to apply stain on a part for which it is economically infeasible to use any other spray technology. These special circumstances require approval from the Director and must meet the criteria as defined in 40 CFR 63.803(h).
- i. **Line cleaning** [63.803(i)] - All affected sources shall pump or drain all organic HAP solvent used for line cleaning into normally closed containers.
- j. **Gun cleaning** [63.803(j)] - All affected sources shall collect all organic HAP solvent used to clean spray guns into normally closed containers.
- k. **Wash-off operations** [63.803(k)] - Emissions from wash-off operations shall be controlled by the following:
 - i. the use of normally closed tanks for wash-off; and
 - ii. minimization of dripping by tilting or rotating the part to drain as much solvent as possible.

1. **Formulation assessment plan** [63.803(l)] - The Permittee shall prepare and maintain with the Work Practice Implementation Plan a formulation assessment plan that includes the following:
 - i. identifies VHAPs from Table 5 of Subpart JJ that are being used in the finishing operations;
 - ii. establishes a baseline level of usage by the affected source for each VHAP identified in Table 5 of Subpart JJ. The baseline usage level shall be the highest annual usage from calendar years 1994, 1995, or 1996. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16;
 - iii. tracks the annual usage for each VHAP identified in Table 5 of Subpart JJ;
 - iv. requires that exceedance of the baseline level (as stated in item 2, above) for any VHAP identified in Table 5 of Subpart JJ, after November 1998 be reported in writing to the DAQ. The report shall describe and quantify the increase, and shall explain the reason(s) for the exceedance of the baseline level; and
 - v. if after November 1998 an affected source uses a VHAP of potential concern from Table 6 of Subpart JJ, and a baseline has not been previously established for that VHAP, the baseline will be established as the de minimus level, based on 70 year exposure levels and data in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. If the usage of such VHAP exceeds the de minimus level, the reason for exceedance shall be reported to the DAQ.

AVERAGING COMPLIANCE OPTION

7. Finishing operations (**Nos. F1 through F11, F13 through F18, FM1 through FM8, F12, F38, F39, F42, F43, and F46 through F50**) are utilizing the averaging compliance option.
 - a. **Emission Limits** - The Permittee shall comply with all provisions per 40 CFR 63.802 as applicable to the finishing operations (**Nos. F1 through F11, F13 through F18, FM1 through FM8, F12, F38, F39, F42, F43, and F46 through F50**). The weighted average VHAP content across all coatings, as applied, shall not exceed 1.0 kg VHAP per kg solids (1.0 lb VHAP per lb solids).
 - b. **Work Practice Standards** - Refer to Section 2.2 A.6, above.
 - c. **Compliance Procedures and Monitoring Requirements** - The Permittee shall demonstrate that the monthly average VHAP content for all finishing materials used at the facility is no greater than 1.0 kg VHAP per kg solids (1.0 lb VHAP per lb of solids), as applied. The average VHAP content (E) shall be calculated by the following equation:

$$E = \frac{(\sum M_{cn} C_{cn} + \sum S_n W_n)}{(\sum M_{cn})}$$

Where: M_c = the mass of solids in a finishing material (c), in kilograms;
 C_c = the VHAP content of a finishing material (c), in kilograms of volatile hazardous air pollutants per kilogram of coating solids (kg VHAP/kg solids (lb VHAP/lb solids)), as supplied;
 S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials;
and
 W = the amount of solvent, in kilograms, added to finishing materials during the monthly averaging period.

- d. **Performance Test Method** - EPA Method 311 (40 CFR Part 63 Appendix A) shall be used in conjunction with formulation data to determine the VHAP content of liquid coatings. Formulation data shall be used to identify the VHAP present in the coating. EPA Method 311 shall then be used to quantify those VHAP. If the coating does not release the VOC or VHAP byproducts during the cure, for example, all the VOC and VHAP present in the coating is solvent, then batch formulation information shall be accepted.

- e. **Recordkeeping Requirements** - The Permittee shall fulfill all recordkeeping requirements of 40 CFR 63.10, according to the applicability criteria in 40 CFR 63.800(d). In accordance with 40 CFR 63.10(b)(10), all records shall be maintained for a period of five years and, at a minimum, the most recent two years of data shall be retained on-site. The Permittee shall maintain files of all required information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. Required recordkeeping includes, but is not limited to, the following:
 - i. per 40 CFR 63.10(b)(xiv), the owner or operator shall maintain records of all documentation supporting initial notifications and notifications of compliance status;
 - ii. per 40 CFR 63.806(b), the owner or operator shall maintain:
 - (A) a certified product data sheet for each thinner and each finishing material; and
 - (B) records of the VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material; and
 - iii. the owner or operator shall maintain records of all compliance certifications submitted and all other information submitted with compliance certifications and/or compliance status reports.
- f. **Reporting Requirements** - In addition to any other notification requirements to the EPA, the Permittee is required to NOTIFY the Regional Supervisor, DAQ in **writing** of the following:
 - i. **Notification of compliance status** - Per 40 CFR 63.807(b), a notification of compliance status shall be submitted no later than 60 days after the compliance date. The report shall include the results of the averaging calculation (Equation 1) for the **entire** first month (the calendar month which includes the initial compliance date); and
 - ii. **Continuous compliance demonstrations** - The owner or operator shall submit semiannual reports covering the previous six months of wood furniture manufacturing operations. The first report shall be submitted within 30 calendar days after the end of the first six-month period. The first six-month period shall include the six full calendar months following the initial compliance date's calendar month. Subsequent reports shall be submitted within 30 calendar days after the end of each six-month period following the first six-month period. The reports shall include:
 - (A) the results of the averaging calculation (Equation 1) for each month in the six-month period; and
 - (B) a compliance certification signed by a responsible official of the company that owns or operates the affected source which states:
 - (1) whether the affected source was in compliance; or, if the affected source was not in compliance, the measures taken to bring the affected source into compliance; and
 - (2) that the value of E, as calculated using Equation 1, was less than 1.0 for each month during the period, or should otherwise identify those months during which the value of E exceeded 1.0.

COMPLIANCE COATINGS

- 8. Finishing operations (**Nos. F1 through F11, F13 through F18, FM1 through FM8, F12, F38, F39, F42, F43, and F46 through F50**) are utilizing compliant coatings compliance option.
 - a. **Emission Limits** - The Permittee shall comply with all provisions per 40 CFR 63.802 as applicable to the finishing operations (**Nos. F1 through F11, F13 through F18, FM1 through FM8, F12, F38, F39, F42, F43, and F46 through F50**). All thinners, stains, washcoats, sealers, topcoats, basecoats, and enamels used at the facility shall meet the emission limitations as stated in the table below:

Regulated Material	Emission Limitation
Thinners	10 percent by weight VHAP
stains, washcoats, sealers, topcoats, basecoats, and enamels	1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied

- b. **Work Practice Standards** - Refer to Section 2.2 A.6 above.
- c. **Compliance Procedures and Monitoring Requirements**
 - i. **Noncontinuous coaters** - The Permittee shall demonstrate that only compliant thinners are used. The Permittee shall demonstrate that all stains, washcoats, sealers, topcoats, basecoats, and enamels are compliant, as applied.

- (A) The VHAP content of each thinner shall not exceed 10.0 percent by weight;
 - (B) The VHAP content of each stain, sealer, and topcoat shall not exceed 1.0 kg per kg solids, as applied;
 - (C) The VHAP content of each washcoat, basecoat, and enamel not formulated on-site shall not exceed 1.0 kg per kg solids, as applied; and
 - (D) Each washcoat, basecoat, or enamel formulated on-site shall be formulated with a compliant coating [subject to (B) or (C) above] and thinners containing no more than 3.0 percent VHAP by weight.
- ii. **Continuous Coaters** - The Permittee shall demonstrate that only compliant thinners are used. The Permittee shall demonstrate that all stains, washcoats, sealers, topcoats, basecoats, and enamels are compliant, as applied. Compliance may be demonstrated via one of the following methods:
- (A) using thinners containing no more than 10.0 percent VHAP by weight and compliant coatings (stains, sealers, washcoats, topcoats, basecoats, and enamels no more than 1.0 kg VHAP per kg solids (1.0 lb VHAP per lb of solids)) and maintaining the VHAP content of the coating in the reservoir such that it does not exceed 1.0 kg VHAP per kg solids (1.0 lb VHAP per lb solids); or
 - (B) **if the continuous coater is used to apply washcoats, basecoats, or enamels**, using thinners containing no more than 3.0 percent by weight VHAP and washcoats, basecoats, or enamels with VHAP contents no more than 1.0 kg VHAP per kg solids (1.0 lb VHAP per lb of solids); or
 - (C) using compliant coatings (stains, sealers, washcoats, topcoats, basecoats, and enamels) with no more than 1.0, compliant thinners (no more than 10 percent by weight VHAP), and monitoring the viscosity (at some standard temperature) of the material in the coating reservoir such that it is never less than the viscosity (at the same standard temperature) of the compliant coating (stains, sealers, washcoats, topcoats, basecoats, and enamels) with less than 1.0 originally added to the reservoir PRIOR to addition of thinner.
- d. **Performance Test Method** - EPA Method 311 (40 CFR Part 63 Appendix A) shall be used in conjunction with formulation data to determine the VHAP content of liquid coatings. Formulation data shall be used to identify VHAP present in the coating. EPA Method 311 shall then be used to quantify those VHAP. If the coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted.
- e. **Recordkeeping Requirements** - The Permittee shall fulfill all recordkeeping requirements of 40 CFR 63.10, according to the applicability criteria in 40 CFR 63.800(d). In accordance with 40 CFR 63.10(b)(10), all records shall be maintained for a period of five years and, at a minimum, the most recent two years of data shall be retained on-site. The Permittee shall maintain files of all required information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. Required recordkeeping includes, but is not limited to, the following:
- i. per 40 CFR 63.10(b)(xiv), the owner or operator shall maintain records of all documentation supporting initial notifications and notifications of compliance status;
 - ii. per 40 CFR 63.806(b), the owner or operator shall maintain:
 - (A) a certified product data sheet for each thinner and each finishing material subject to an emission limit; and
 - (B) records of the VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material subject to an emission limit.
 - iii. if the facility is using continuous coaters and the viscosity method of compliance [as specified under Section 2.2 A.c.iii.(C) above], the owner or operator shall maintain records of:
 - (A) solvent and coating additions to the continuous coater reservoir;
 - (B) viscosity measurements; and
 - (C) data demonstrating that viscosity is an appropriate parameter for demonstrating compliance; and
 - iv. the owner or operator shall maintain records of all compliance certifications submitted and all other information submitted with compliance certifications and/or compliance status reports.
- f. **Reporting Requirements** - In addition to any other notification requirements to the EPA, the Permittee is required to NOTIFY the Regional Supervisor, DAQ in **writing** of the following:
- i. **Notification of compliance status** - Per 40 CFR 63.807(b), a notification of compliance status shall be submitted no later than 60 days after the compliance date. The report shall include:
 - (A) a statement indicating whether the stains, washcoats, sealers, topcoats, basecoats, enamels, and

thinners being used are compliant;

(B) **if the facility is using continuous coaters**, a statement indicating whether:

- (1) compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or
- (2) compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used, the viscosity of the coating in the reservoir is being monitored, and compliant thinners are being used. In this case, the report should include data which demonstrates that viscosity is an appropriate parameter for demonstrating compliance.

ii. Continuous compliance demonstrations - The owner or operator shall submit semiannual reports covering the previous six months of wood furniture manufacturing operations. The first report shall be submitted within 30 calendar days after the end of the first six-month period. The first six-month period shall include the six full calendar months following the initial compliance date's calendar month. Subsequent reports shall be submitted within 30 calendar days after the end of each six-month period following the first six-month period. The reports shall include:

(A) a compliance certification signed by a responsible official of the company that owns or operates the affected source which states:

- (1) whether the affected source was in compliance; or, if the affected source was not in compliance, the measures taken to bring the affected source into compliance;
- (2) that all stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners used each day in the semiannual period have been compliant, as applicable, or otherwise identifies the periods of noncompliance and the reason(s) for noncompliance;
- (3) **if the facility is using continuous coaters**,
 - (a) that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, have been used; or
 - (b) that compliant coatings and compliant thinners have been used, and that the viscosity of the coating in the reservoir is no less than the viscosity of the initial compliant coating; or
 - (c) otherwise identifies the periods of noncompliance and the reason(s) for noncompliance.

CONTACT ADHESIVES

9. Contact Adhesive Operations (**No. G1**)

a. Emission Limits - The Permittee shall comply with all provisions per 40 CFR 63.802 as applicable to the contact adhesive operations (**No. G1**). All **nonaerosol** contact adhesives applied to porous surfaces shall meet the emission limits as stated in the table below:

Regulated Material	Emission Limitation
contact adhesives used in products which meet flammability requirements per California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from Local, State, or Federal fire regulatory agencies.	1.8 kg VHAP per kg solids (1.8 lb VHAP per lb solids), as applied
all other contact adhesives	1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied

b. Work Practice Standards - Refer to Section 2.2 A.6, above.

c. Compliance Procedures and Monitoring Requirements

- i. The Permittee shall demonstrate that only compliant contact adhesives are used. The Permittee shall demonstrate that all **nonaerosol** contact adhesives applied to porous surfaces are compliant, as applied.
 - (A) the VHAP content of each contact adhesive which meets flammability requirements shall not exceed 1.8 lb per lb (or kg VHAP/kg) solids, as applied; and
 - (B) the VHAP content of each contact adhesive which does not meet flammability requirements shall

not exceed 1.0 lb VHAP/lb (or kg VHAP/kg) solids, as applied.

- d. **Performance Test Method** - EPA Method 311 (40 CFR Part 63 Appendix A) shall be used in conjunction with formulation data to determine the VHAP content of liquid coatings. Formulation data shall be used to identify the VHAP present in the coating. EPA Method 311 shall then be used to quantify those VHAP. If the coating does not release the VOC or HAP byproducts during the cure, for example, all the VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted.
- e. **Recordkeeping Requirements** - The Permittee shall fulfill all recordkeeping requirements of 40 CFR 63.10, according to the applicability criteria in 40 CFR 63.800(d). In accordance with 40 CFR 63.10(b)(10), all records shall be maintained for a period of five years and, at a minimum, the most recent two years of data shall be retained on-site. The Permittee shall maintain files of all required information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. Required recordkeeping includes, but is not limited to, the following:
 - i. per 40 CFR 63.10(b)(xiv), the owner or operator shall maintain records of all documentation supporting initial notifications and notifications of compliance status;
 - ii. per 40 CFR 63.806(b), the owner or operator shall maintain:
 - (A) a certified product data sheet for each contact adhesive subject to an emission limit; and
 - (B) records of the VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each contact adhesive subject to an emission limit; and
 - iii. the owner or operator shall maintain records of all compliance certifications submitted and all other information submitted with compliance certifications and/or compliance status reports.
- f. **Reporting Requirements** - In addition to any other notification requirements to the EPA, the Permittee is required to NOTIFY the Regional Supervisor, DAQ in **writing** of the following:
 - i. **Notification of compliance status** - Per 40 CFR 63.807(b), a notification of compliance status shall be submitted no later than 60 days after the compliance date. The report shall include a statement indicating whether contact adhesives are being used and whether the contact adhesives used are **compliant** contact adhesives. The statement should indicate that **compliant** contact adhesives are being used for all **nonaerosol** contact adhesive applications unless the contact adhesives are being used solely on nonporous substrates.
 - ii. **Continuous compliance demonstrations** - The Permittee shall submit semiannual reports covering the previous six months of wood furniture manufacturing operations. The first report shall be submitted within 30 calendar days after the end of the first six-month period. The first six-month period shall include the six full calendar months following the initial compliance date's calendar month. Subsequent reports shall be submitted within 30 calendar days after the end of each six-month period following the first six-month period. The reports shall include a compliance certification signed by a responsible official of the company that owns or operates the affected source which states:
 - (A) that compliant contact adhesives have been used each day in the semiannual period, or should otherwise identify each day noncompliant contact adhesives were used; or
 - (B) otherwise identifies the periods of noncompliance and the reason(s) for noncompliance.

STRIPPABLE SPRAY BOOTHS

- 10. Strippable spray booth coating applications (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**)
 - a. **Emission Limits** - The Permittee shall comply with all provisions per 40 CFR 63.802 as applicable to strippable spray booth coatings (**Nos. F1 through F11, F13 through F18, and FM1 through FM8**). All strippable spray booth coatings shall meet the emission limit as stated in the table below:

Regulated Material	Emission Limitation
strippable spray booth coatings	0.8 kg VOC per kg solids, as applied

- b. **Work Practice Standards** - Refer to Section 2.2 A.6, above.
- c. **Compliance Procedures and Monitoring Requirements**
The VOC content of each strippable spray booth coating shall not exceed 0.8 kg per kg solids, as applied.

- d. **Performance Test Method** - EPA Method 24 (40 CFR Part 63 Appendix A) shall be used in conjunction with formulation data to determine the VOC content of liquid coatings. If the coating does not release the VOC byproducts during the cure, for example, all the VOC present in the coating is solvent, then batch formulation information shall be accepted.
- e. **Recordkeeping Requirements** - The Permittee shall fulfill all recordkeeping requirements of 40 CFR 63.10, according to the applicability criteria in 40 CFR 63.800(d). In accordance with 40 CFR 63.10(b)(10), all records shall be maintained for a period of five years and, at a minimum, the most recent two years of data shall be retained on-site. The Permittee shall maintain files of all required information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. Required recordkeeping includes, but is not limited to, the following:
 - i. per 40 CFR 63.10(b)(xiv), the owner or operator shall maintain records of all documentation supporting initial notifications and notifications of compliance status;
 - ii. per 40 CFR 63.806(b), the owner or operator shall maintain:
 - (A) a certified product data sheet for each strippable spray booth coating; and
 - (B) records of the VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable spray booth material; and
 - iii. the Permittee shall maintain records of all compliance certifications submitted and all other information submitted with compliance certifications and/or compliance status reports.
- f. **Reporting Requirements** - In addition to any other notification requirements to the EPA, the Permittee is required to NOTIFY the Regional Supervisor, DAQ in **writing** of the following:
 - i. **Notification of compliance status** - Per 40 CFR 63.807(b), a notification of compliance status shall be submitted no later than 60 days after the compliance date. The report shall include a statement indicating whether compliant strippable spray booth coatings are being used.
 - ii. **Continuous compliance demonstrations** - The Permittee shall submit semiannual reports covering the previous six months of wood furniture manufacturing operations. The first report shall be submitted within 30 calendar days after the end of the first six-month period. The first six-month period shall include the six full calendar months following the initial compliance date's calendar month. Subsequent reports shall be submitted within 30 calendar days after the end of each six-month period following the first six-month period. The report shall include a compliance certification signed by a responsible official of the company that owns or operates the affected source which states that compliant strippable spray booth coatings have been used each day in the semiannual period, or should otherwise identify each day noncompliant materials were used.

State-enforceable only

B. Applicable facility-wide sources

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Toxic air pollutants	State-enforceable only Air Toxics Demonstration	15A NCAC 2Q .0705

1. 15A NCAC 2D .0705: EXISTING SOURCES AND SIC CALLS

- a. In accordance with 15A NCAC 2Q .0705(b), for sources at a facility subject to a MACT standard, excluding the MACT for combustion sources, a permit application shall be required demonstrating compliance with 15A NCAC 2D .1100 by the same deadline that the facility is required to comply with the last MACT applicable to the facility. The permit application shall include an evaluation for all toxic air pollutants covered under rule 15A NCAC 2D .1104 for all sources at the facility, excluding those sources exempt from evaluation under 15A NCAC 2Q .0702.

SECTION 3 - GENERAL CONDITIONS

This section describes terms and conditions applicable to this Title V facility. All references to the “permit” in this section apply only to Part I of the permit.

- A. **General Provisions** [NCGS 143-215 and 15A NCAC 2Q .0508(aa)]
1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 2D and 2Q.
 2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.
 3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
 4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
 5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
 6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.
- B. **Permit Availability** [15A NCAC 2Q .0507(k) and .0508(aa)]
The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of Department of Environment and Natural Resources upon request.
- C. **Severability Clause** [15A NCAC 2Q .0508(i)]
In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.
- D. **Submissions** [15A NCAC 2Q .0507(c)]
Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance
North Carolina Division of Air Quality
1641 Mail Service Center
Raleigh, NC 27699-1641

E. **Duty to Comply** [15A NCAC 2Q .0508(j)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

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 pollution control device(s) and appurtenances.

G. **Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 2Q .0514]

The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 2Q .0514.

2. Transfer of Ownership or Operation **and Application Submittal Content** [15A NCAC 2Q .0524 **and 2Q .0505**]

The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 2Q .0524 **and 2Q .0505**.

3. Minor Permit Modifications [15A NCAC 2Q .0515]

The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 2Q .0515.

4. Significant Permit Modifications [15A NCAC 2Q .0516]

The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 2Q .0516.

5. Reopening for Cause [15A NCAC 2Q .0517]

The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 2Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Section 502(b)(10) Changes [15A NCAC 2Q .0523(a)]

a. **“Section 502(b)(10) changes” means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.**

b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:

- i. the changes are not a modification under Title I of the Federal Clean Air Act;
- ii. the changes do not cause the allowable emissions under the permit to be exceeded;
- iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
- iv. the Permittee shall attach the notice to the relevant permit.

c. The written notification shall include:

- i. a description of the change;
- ii. the date on which the change will occur;
- iii. any change in emissions; and
- iv. any permit term or condition that is no longer applicable as a result of the change.

d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.

2. Off Permit Changes [15A NCAC 2Q .0523(b)]

The Permittee may make changes in the operation or emissions without revising the permit if:

- a. the change affects only insignificant activities and the activities remain insignificant after the change; or
- b. the change is not covered under any applicable requirement.

3. Emissions Trading [15A NCAC 2Q .0523(c)]
To the extent that emissions trading is allowed under 15A NCAC 2D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 2Q .0523(c).

I.A. Reporting Requirements for Excess Emissions and Permit Deviations [15A NCAC 2D .0535(f) and 2Q .0508(f)(2)]

“**Excess Emissions**” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200 or .1400 of Subchapter 2D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 2Q .0700. (*Note: Definitions of excess emissions under 2D .1110 and 2D .1111 shall apply where defined by rule.*)

“**Deviations**” – **for the purposes of this condition**, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions **as well as excess emissions as defined above lasting less than four hours**.

Excess Emissions

1. If a source is required to report excess emissions under NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or the operating permit provides for periodic (*e.g.*, quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
2. If the source is not subject to NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or these rules do NOT define “excess emissions,” the Permittee shall report excess emissions in accordance with 15A NCAC 2D .0535 as follows:
 - a. Pursuant to 15A NCAC 2D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
 - i. notify the Regional Supervisor or Director 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 provide:
 - name and location of the facility;
 - nature and cause of the malfunction or breakdown;
 - time when the malfunction or breakdown is first observed;
 - expected duration; and
 - estimated rate of emissions;
 - ii. notify the Regional Supervisor or Director immediately when corrected measures have been accomplished; and
 - iii. **submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 2D .0535(f)(3).**

Permit Deviations

3. Pursuant to 15A NCAC 2Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
 - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 2D .0535 on the next business day after becoming aware of the deviation. A written report shall be submitted within two business days to the Regional Supervisor and shall include the probable cause of such deviation and any corrective actions or preventative actions taken. All reports of deviations from permit requirements shall be certified by a responsible official.

I.B. Other Requirements under 15A NCAC 2D .0535

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 2D .0535.

1. **15A NCAC 2D .0535(c).** Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 2D .0535(c)(1) through (7).
2. **15A NCAC 2D .0535(g).** Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that the excess emissions are unavoidable.

J. **Emergency Provisions** [40 CFR 70.6 (g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

1. An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3 below are met.
3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
 - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - b. the permitted facility was at the time being properly operated;
 - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
 - d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

K. **Permit Renewal** [15A NCAC 2Q .0513(b)]

This permit is issued for a fixed term of five years for facilities subject to Title IV requirements and for a term not to exceed five years in the case of all other facilities. This permit shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete renewal application is submitted at least nine months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 2Q .0512(b)(1), this permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.

L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 2Q.0508(k)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. **Duty to Provide Information (submittal of information)** [15A NCAC 2Q.0508(n)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 2Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 2Q .0508(f)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 2Q .0508(t)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street, Atlanta, GA 30303) postmarked on or before **March 1** a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions limitations, standards, or work practices. **It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year.** The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

- a. the identification of each term or condition of the permit that is the basis of the certification;
- b. the compliance status **(with the terms and conditions of the permit for the period covered by the certification)**;
- c. whether compliance was continuous or intermittent; and
- d. the method(s) used for determining the compliance status of the source **during the certification** period.

Q. **Certification by Responsible Official** [15A NCAC 2Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

R. **Permit Shield for Applicable Requirements** [15A NCAC 2Q .0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
 - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
 - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
 - c. the applicable requirements under Title IV; or
 - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 2Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 2Q .0515.

S. **Termination, Modification, and Revocation of the Permit** [15A NCAC 2Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

- a. the information contained in the application or presented in support thereof is determined to be incorrect;
- b. the conditions under which the permit or permit renewal was granted have changed;
- c. violations of conditions contained in the permit have occurred;
- d. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
- e. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

T. **Insignificant Activities** [15A NCAC 2Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

U. **Property Rights** [15A NCAC 2Q .0508(m)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

V. **Inspection and Entry** [15A NCAC 2Q .0508(r) and NCGS 143-215.3(a)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
 - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
 - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized 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.

W. **Annual Fee Payment** [15A NCAC 2Q .0508(o)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 2Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environment and Natural Resources. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 2Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 2Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 2Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. **Confidential Information** [15A NCAC 2Q .0107 and 2Q .0508(n)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 2Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 2Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 2Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 2Q .0100 and .0300.

AA. **Standard Application Form and Required Information** [15A NCAC 2Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 2Q .0505 and .0507.

BB. **Financial Responsibility and Compliance History** [15A NCAC 2Q .0507(d)(4)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 2Q .0501(e)]

1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 2Q .0508(g)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. **Prevention of Accidental Releases “General Duty” Clause - Section 112(r)(1) - FEDERALLY-ENFORCEABLE ONLY**

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.

FF. **Title IV Allowances** [15A NCAC 2Q .0508(h)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee’s emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. **Air Pollution Emergency Episode** [15A NCAC 2D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee’s previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 2D .0300.

HH. **Registration of Air Pollution Sources** [15A NCAC 2D .0200]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 2D .0200(b).

II. **Ambient Air Quality Standards** [15A NCAC 2D .0501(e)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 2D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. **General Emissions Testing and Reporting Requirements** [15A NCAC 2Q .0508(aa)]

If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ in support of a permit application, the Permittee shall perform such testing in accordance with the appropriate EPA reference method(s) as approved by the DAQ and follow the procedures outlined below. The Permittee must request **in writing** and receive approval from the DAQ for an alternate test method or procedure.

1. The Permittee shall submit a completed Protocol Submittal Form to the DAQ Regional Supervisor at least 45 days prior to the scheduled test date. A copy of the Protocol Submittal Form may be obtained from the Regional Supervisor.
2. The Permittee shall notify the Regional Supervisor of the specific test dates at least 15 days prior to testing in order to afford the DAQ the opportunity to have an observer on-site during the sampling program.
3. During all sampling periods, the Permittee shall operate the emission source(s) under maximum normal operating conditions or alternative operating conditions as deemed appropriate by the Regional Supervisor or his delegate.
4. The Permittee shall submit **two** copies of the test report to the DAQ. The test report shall contain at a minimum the following information:
 - a. a certification of the test results by sampling team leader and facility representative;
 - b. a summary of emissions results and text detailing the objectives of the testing program, the applicable state and federal regulations, and conclusions about the testing and compliance status of the emission source(s);
 - c. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics should be included as necessary;
 - d. all field, analytical, and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
 - e. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
 - f. documentation of facility operating conditions during all testing periods and an explanation relating these operating conditions to maximum normal operation. If necessary, provide historical process data to verify maximum normal operation.
5. The testing requirement(s) shall be considered satisfied only upon written approval of the test results by the DAQ.
6. The DAQ will review emission test results with respect exclusively to the specified testing objectives as proposed by the Permittee and approved by the DAQ. The use of the test results beyond the stated objectives remains subject to the approval of the DAQ.

KK. Reopening for Cause [15A NCAC 2Q .0517]

1. A permit shall be reopened and revised under the following circumstances:
 - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
 - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
 - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - d. the Director or EPA determines that the permit must be revised or revoked to ensure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 2Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 2Q .0507, .0521, or .1806 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 2Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

LL. **Reporting Requirements for Non-Operating Equipment** [15A NCAC 2Q.508(f)]

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. During operation the monitoring recordkeeping and reporting requirements as prescribed by the permit shall be implemented within the monitoring period.

ATTACHMENT

List of Acronyms

AOS	Alternate Operating Scenario
BACT	Best Available Control Technology
Btu	British thermal unit
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CAA	Clean Air Act
DAQ	Division of Air Quality
DENR	Department of Environment and Natural Resources
EMC	Environmental Management Commission
EPA	Environmental Protection Agency
FR	Federal Register
GACT	Generally Available Control Technology
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
NCAC	North Carolina Administrative Code
NCGS	North Carolina General Statutes
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
OAH	Office of Administrative Hearings
PM	Particulate Matter
PM₁₀	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
POS	Primary Operating Scenario
PSD	Prevention of Significant Deterioration
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
tpy	Tons Per Year
VOC	Volatile Organic Compound