



North Carolina Department of Environment and Natural Resources  
Division of Air Quality

Beverly Eaves Perdue  
Governor

B. Keith Overcash, P.E.  
Director

Dee Freeman  
Secretary

**PROPOSED**

May ?, 2010

David Constans  
Environmental Health & Safety Manager  
Trelleborg Coated Systems US, Inc  
PO Box 892  
Spartanburg, SC 29304

**SUBJECT: Air Quality Permit No. 01954T23**  
**Facility ID: 01/81/00082**  
**Trelleborg Coated Systems US, Inc**  
**Grace Advanced Materials**  
**Rutherfordton, North Carolina**  
**Rutherford County**  
**Fee Class: Title V**

Dear Mr. Constans:

In accordance with your completed Air Quality Permit Application for a permit renewal received March 31, 2006, we are forwarding herewith Air Quality Permit No. **01954T23** to Trelleborg Coated Systems US, Inc, Grace Advanced Materials, Rutherfordton, North Carolina authorizing the operation of the emission sources and associated air pollution control devices specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 2Q .0503(8) 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. **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 condition(s) of the attached permit that are applicable to that particular emission source.

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

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**Permitting Section**

1641 Mail Service Center, Raleigh, North Carolina 27699-1641

2728 Capital Blvd., Raleigh, North Carolina 27604

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Mr. David Constans  
May ?, 2010  
Page 2

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. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

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 143-215.108A(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 143-215.108A 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 May?, 2010 until April 30, 2015, 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 Ms. Jenny Kelvington, P.E. at (919) 715-6254.

Sincerely,

Donald R. van der Vaart, Ph.D., P.E.  
Chief

Enclosure

c: EPA, Region IV  
Paul Muller, Asheville Regional Office  
Central Files

**ATTACHMENT I:**

**Changes to Existing Title V Air Permit No. 01954T22:**

Page No.	Section	Description of Change(s)
Attachment II	Insignificant Activities	-reclassified seven emission sources and one control device as insignificant activities ( <b>I-2, I-CAL2, I-MILL2, I-MILL9, I-MILL10, I-MILL11, I-DWS and I-SD6</b> ) -added four existing insignificant activities to the list ( <b>I-RC1, I-RC2, I-RSM1, and I-BFR1</b> )
Cover	-	-updated permit revision numbers and all dates -removed footnote regarding permit expiration date
All	Header	-updated permit revision number
3-4	1 (List of Emission Sources)	-grouped sources under specific processes or emission types -moved seven emission sources and one control device ( <b>2, CAL2, MILL2, MILL9, MILL10, MILL11, DWS, and SD6</b> ) to list of insignificant activities. -removed four emissions sources ( <b>HAV5, RB1, RB2, and CR2</b> )
5	2.1.A	-combined Ross mixers and spreader 12 under Section 2.1.A -added reference to 15A NCAC 2D .0958, 2D .1806, 2D .1100, and 2D .1111 and 2Q .0317 in the table of standards and limitations
12	2.1.D	-combined Sections 2.1.E and 2.1.F into this section -eliminated inactive, insignificant, and removed sources ( <b>1, 2, 3, and HC3</b> ) -added reference to 15A NCAC 2D .0958, 2D .1806, and 2Q .0317 in the table of standards and limitations
13	2.1.D.3.d	-reduced VE observation frequency from daily to once a month.
14	2.1.E	-renumbered Section 2.1.G as 2.1.E -eliminated inactive, insignificant, and removed sources ( <b>MILL1, MILL2, MILL9-11, BB1, CAL2, RB1, RB2, RM5, and CR2</b> )
15	2.1.E.2.c.	-reduced VE observation frequency from daily to once a month.
16	2.1.E.3	-added 15A NCAC 2D .1100 limit for arsenic emissions.
17	2.2.A.2	-added 15A NCAC 2D .1100 limits for methyl ethyl ketone and toluene emissions
17	2.2.A.3	-added odor prohibition and control requirements under 15A NCAC 2D .1806
18	2.2.A.4	-moved the PSD avoidance condition (15A NCAC 2Q .0317) to facility wide sources. -changed frequency of VOC emission calculations from daily to once a month. -changed reporting frequency from quarterly to twice a year.
18-20	2.2.B	-added multiple emissions sources section for web coating operations -added MACT Subpart OOOO requirements for HAP emissions from web coating operations.

## ATTACHMENT II:

### Insignificant Activities Pursuant to 15A NCAC 2Q.0503(8)

Source ID Number	Emission Source Description
I-SM	Test coatings solution mixer
I-2	Natural gas/propane-fired spreader (6.0 million Btu/hr heat input) with natural gas/propane-fired smoke dissipator (7.0 million Btu/hr heat input)
I-CAL2	Calender equipped with three dusting boxes controlled by a dust collector venting indoors
I-MILL2, I-MILL9 through I-MILL11	Four rubber mills with no powder /rubber mixing.
I-DWS	Drum washing station
I-SD6	One natural gas/propane-fired smoke dissipater (7.0 million Btu/hr maximum heat input)
I-RC1 and I-RC2	Two steam heated rotary curing ovens
I-RSM1	One 55-gallon barrel mixer
I-BFR1	One buffing machine with parallel cartridge filter (ID Nos. I-BF4 and I -BF5)

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 2D .1100 "Control of Toxic Air Pollutants" or 2Q .0711 "Emission Rates Requiring a Permit".

State of North Carolina,  
Department of Environment,  
and Natural Resources

Division of Air Quality



## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
<b>01954T23</b>	1954R22	May ?, 2010	April 30, 2015

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate 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:** **Trelleborg Coated Systems US, Inc.**

**Grace Advanced Materials**

**Facility ID:** **01/81/00082**

**Facility Site Location:** **Railroad Avenue**

**City, County, State, Zip:** **Rutherfordton, Rutherford County, NC 28139**

**Mailing Address:** **Post Office Box 892**

**City, State, Zip:** **Spartanburg, South Carolina 29304**

**Application Number:** **8100082.06A**

**Complete Application Date:** **March 31, 2006**

**Primary SIC Code:** **3069**

**Division of Air Quality,** **Asheville Regional Office**

**Regional Office Address:** **2090 Highway 70**  
**Swannanoa, NC 28778**

Permit issued this the <sup>th</sup> day of May, 2010

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Donald R. van der Vaart, Ph.D., P.E., Chief, Air Permits Section  
By Authority of the Environmental Management Commission

## Table of Contents

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

SECTION 2: SPECIFIC LIMITATIONS AND CONDITIONS

2.1- Emission Source(s) Specific Limitations and Conditions (Including specific  
requirements, testing, monitoring, recordkeeping, and reporting requirements)

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

SECTION 3: GENERAL PERMIT CONDITIONS

ATTACHMENT

List of Acronyms

## 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:

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
<b>Vinyl/Silicon Coating</b>			
1 <sup>1</sup>	Natural gas/propane-fired spreader (5.0 million Btu/hr heat input)	SD7 <sup>1</sup>	Natural gas/propane-fired smoke dissipator (10.0 million Btu per hour heat input)
3 <sup>1</sup>	Natural gas/propane-fired spreader (4.5 million Btu/hr heat input)	SD3 <sup>1</sup>	Natural gas/propane-fired smoke dissipator (7.0 million Btu/hr heat input)
<b>Rubber Coating</b>			
4 through 9 <b>MACT 0000</b>	Six rubber spreaders	CD-SRS1 SRS2	Horizontal six-bed carbon adsorption unit; Vertical two-bed carbon adsorption unit
PM <b>MACT 0000</b>	Print machine	NA	NA
<b>Rubber/Silicon Coating</b>			
12 NSPS VVV <b>MACT 0000</b>	Rubber spreader	CD-SRS1 SRS2	Horizontal six-bed carbon adsorption unit; Vertical two-bed carbon adsorption unit
<b>Coating Mix Room</b>			
RM1 through RM 4 NSPS VVV <b>MACT 0000</b>	Four Ross mixers	CD-SRS1 SRS2 BF1	Horizontal six-bed carbon adsorption unit; Vertical two-bed carbon adsorption unit Cartridge-type filter (24,440 square feet of filter surface area)
BP1 <b>MACT 0000</b>	Baker Perkins mixer	CD-SRS1 SRS2	Horizontal six-bed carbon adsorption unit; Vertical two-bed carbon adsorption unit
VC1 through VC7 <b>MACT 0000</b>	Seven vertical churns		
CM1 through CM3 <b>MACT 0000</b>	Three Cowels mixers		
<b>Combustion Sources</b>			
HC4	Natural gas/propane-fired heater cure oven (5.0 million Btu/hr heat input)	SD4	Natural gas/propane-fired smoke dissipater (7.0 million Btu/hr heat input)
HAV1, HAV2, and HAV4	Three natural gas/propane-fired hot air vulcanizers (5.0 million Btu/hr heat input, each)	NA	NA
B2 (112j)	Natural gas/propane/No. 2 fuel oil-fired Clever Brooks boiler (14.7 million Btu/hr heat input)	NA	NA
B3 (112j)	Natural gas/propane/No. 2 fuel oil-fired Superior boiler (13.8 million Btu/hr heat input)	NA	NA

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
B5 NSPS Dc; 112j)	Natural gas/propane/No. 2 fuel oil-fired Hurst boiler (14.7 million Btu/hr heat input)	NA	NA
H1 NSPS Dc; 112j)	Natural gas/propane/No. 2 fuel oil-fired hot oil heater (10 million Btu/hr heat input)	NA	NA
<b>Particulate Emitting Sources</b>			
MILL1 <sup>1</sup> , MILL3 through MILL8	Seven rubber mills	BF1	Cartridge-type filter (24,440 square feet of filter surface area)
BB1 <sup>1</sup>	Banbury mixer		
CAL1	Calender equipped with three dusting boxes		
RP1	Rubber pelletizer		
RM5 <sup>1</sup>	Enclosed Ross mixer equipped with bulk material handling system		
D1 through D3	Three dusters	BF2	Cartridge type filter (37,440 square feet of filter surface area)
CR1	One compound room		
<b>Storage Tanks</b>			
ST1 through ST4	Four volatile organic compound storage tanks (10,000 gallons capacity each)	NA	NA

1. These emission sources and control devices remain on-site but are no longer in operation. A permit application is required to place any of these sources back into service.

## 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, recordkeeping, and reporting requirements as specified herein:

- A. <sup>a</sup>Four Ross mixers (ID Nos. RM1 through RM4) with one horizontal six-bed carbon adsorption unit (ID No. CD-SRS1), one vertical two-bed carbon adsorption unit (ID No. SRS2), and a cartridge-type filter (ID No. BF1)**  
<sup>b</sup>Spreader (ID No. 12) with horizontal six-bed carbon adsorption unit (ID No. CD-SRS1) and a vertical two-bed carbon adsorption unit (ID No. SRS2)

The following table provides a summary of limits and standards for the emission sources described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter <sup>a</sup>	$E=4.10P^{0.67}$ where E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
volatile organic compounds <sup>a,b</sup>	1) Operate and maintain a cover on each piece of coating mix preparation equipment 2) Operate and maintain a total enclosure around the coating operation. 3) Reduce VOC emissions to the atmosphere from the mixing and coating operations by at least 95 percent.	15A NCAC 2D .0524 (40 CFR 60, Subpart VVV)
volatile organic compounds <sup>a,b</sup>	See Multiple Emissions Section 2.2.A.1	15A NCAC 2D .0958
odors	<b>State-enforceable only</b> See Multiple Emissions Section 2.2.A.2	15A NCAC 2D .1806
volatile organic compounds <sup>a,b</sup>	See Multiple Emissions Section 2.2.A.3	15A NCAC 2Q .0317 (Avoidance of 15A NCAC 2D .0530)
total air pollutants <sup>a,b</sup>	<b>State-enforceable only</b> See Multiple Emissions Section 2.2.A.4	15A NCAC 2D .1100
hazardous air pollutants <sup>a,b</sup>	See Multiple Emissions Section 2.2.B.2	15A NCAC 2D .1111 (40 CFR 63 Subpart OOOO)

#### <sup>a</sup>1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from the four Ross mixers (**ID Nos. RM1 through RM4**) shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and

General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

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

- c. Particulate matter emissions from the four Ross mixers (**ID Nos. RM1 through RM4**) shall be controlled by the cartridge filter (**ID No. BF1**). 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 is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
  - i. a monthly 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 filter's structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the ductwork and filter are not inspected and maintained.

- d. The results of inspection and maintenance shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. the results of any maintenance performed on the filter; and
  - iv. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if records are not maintained.

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

- e. The Permittee shall submit the results of any maintenance performed on the filters within 30 days of a written request by the DAQ.
- f. 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.

**<sup>a,b</sup>2. 15A NCAC 2D .0524 NEW SOURCE PERFORMANCE STANDARDS AS PROMULGATED IN 40 CFR 60.742: VOC EMISSIONS FROM POLYMERIC COATING OPERATIONS**

- a. For each of the emission sources (**ID Nos. RM1 through RM4 and 12**), the Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 2D .0524 "New Source Performance Standards" (NSPS) as promulgated in 40 CFR 60, Subpart VVV, including Subpart A "General Provisions."
- b. The Permittee shall install, operate, and maintain a cover on each of the four Ross mixers (**ID Nos. RM1 through RM4**). [40 CFR 60.742(c)(1)]
- c. The Permittee shall reduce volatile organic compounds emitted from the Ross mixers (**ID Nos. RM1 through RM4**) by at least 95% by venting emissions to carbon adsorption units (**ID Nos. CD-SRS1 and/or SRS2**). [40 CFR 60.742(c)(1)]
- d. The Permittee shall reduce VOC emissions to the atmosphere from the spreader (**ID No. 12**) by at least 95 percent by installing, operating and maintaining a total enclosure around the coating operation and venting the captured VOC emissions from the total enclosure to carbon adsorption units (**ID Nos. CD-SRS1 and/or SRS2**). [40 CFR 60.742(b)]

**Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f) and 40 CFR 60.744]

- e. The Permittee shall install, calibrate, maintain, and operate a monitoring device that continuously indicates and records the concentration level of organic compounds in both the inlet and outlet gas stream of the carbon adsorption units (**ID Nos. CD-SRS1 and SRS2**) in accordance with the procedures described in a written protocol submitted to and approved by the Division of Air Quality. When the monitoring device reads a VOC concentration of no greater than 100 PPM in the outlet gas stream, the carbon bed shall enter the queue for the next available regeneration cycle. The monitoring device is not required to operate when carbon beds are not being used to control volatile organic compound emissions.
- f. The Permittee shall compute and record daily a three day rolling average efficiency for each individual adsorber vessel.

- g. The Permittee shall record all periods of mixing or coating operations when a required emissions control or monitoring device is malfunctioning or not in use.
- h. The Permittee shall operate, monitor, and maintain a total enclosure around the coating operation (**ID No. 12**) in accordance with a written protocol submitted to and approved by the Division of Air Quality. All three-hour coating periods during which the average total enclosure system monitor reading is greater than zero shall be recorded.
- i. The Permittee shall perform a monthly inspection of the carbon adsorbers and associated ductwork for structural integrity and leaks and record the inspection findings and any corrective measures taken.
- j. The Permittee shall retain all records of measurements and calculations for at least five years following the date of the documents. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524 if three day rolling average efficiency falls below the limits in Section 2.1.A.2.c and d above or if the records required in Sections 2.1.A.2.f, g, h, and i are not kept.

**Reporting** [15A NCAC 2Q .0508(f) and 40 CFR 60.747(d)]

- k. The Permittee shall submit a quarterly report, acceptable to the Regional Air Quality Supervisor, of all three day rolling averages for each adsorber vessel during which the efficiency fell below 95 percent, of all three-hour coating periods during which the average total enclosure system monitor reading was greater than zero, and of all periods of mixing or coating when a required emissions control or monitoring device was malfunctioning or not in use. The report shall be postmarked on or before January 30 of each calendar year for the preceding three-month period between October and December, postmarked by April 30 of each calendar year for the preceding three-month period between January and March, postmarked on or before July 30 of each calendar year for the preceding three-month period between April and June, and postmarked by October 30 of each calendar year for the preceding three-month period between July and September.
- l. If no reportable events have occurred during the quarter, the Permittee shall submit a semiannual report stating all three day rolling average control efficiencies have remained at or above 95% for each carbon adsorber during all mixing and coating operations, all three-hour average total enclosure monitor readings during coating operations were greater than zero, and no malfunctions of a monitoring device occurred. The report shall be postmarked on or before January 30 of each calendar year for the preceding six-month period between August and December and postmarked by July 30 of each calendar year for the preceding six-month period between January and June.

**B. Two natural gas/propane/No. 2 fuel oil-fired boilers (ID Nos. B2 and B3)**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	0.39 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	40 percent opacity	15A NCAC 2D .0521
hazardous air pollutants	Best Combustion Practices	15A NCAC 2D .1109 (CAA 40 CFR 112j)

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

- a. Emissions of particulate matter from the combustion of natural gas, propane, or No. 2 fuel oil that are discharged from these sources (**ID Nos. B2 and B3**) into the atmosphere shall not exceed 0.39 pounds per million Btu heat input.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 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 matter emissions from the firing of natural gas, propane, or No. 2 fuel oil in these sources (**ID Nos. B2 and B3**).

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

- a. Emissions of sulfur dioxide from these sources (**ID Nos. B2 and 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.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 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/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas, propane or No. 2 fuel oil in these sources (**ID Nos. B2 and B3**).

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

- a. Visible emissions from these sources (**ID Nos. B2 and B3**) 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.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 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/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas, propane, or No. 2 fuel oil in these sources (**ID Nos. B2 and B3**).

**4. 15A NCAC 2D .1109: CAA 112(j); CASE-BY-CASE MACT for Boilers and Process Heaters**

- a. The Permittee shall use best combustion practices when operating the affected sources (**ID Nos. B2 and B3**). The initial compliance date for this work practice standard and the associated monitoring/recordkeeping/reporting requirements is **March 9, 2013**. These conditions need not be included in the annual compliance certification until after the initial compliance date.

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

- b. To assure compliance, the Permittee shall perform an annual source inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:
  - i. inspect the burners, and clean or replace any components of the burners as necessary;
  - ii. inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and
  - iii. inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.

The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected sources are not inspected and maintained as required above.

- c. 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 of each recorded action;
  - ii. the results of each inspection; and
  - iii. the results of any maintenance performed on these sources.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if these records are not maintained.

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

- d. No reporting is required for hazardous air pollutants from the firing of natural gas, propane, or No. 2 fuel oil in these sources (**ID Nos. B2 and B3**).

**C. Natural gas/propane/No. 2 Fuel oil-fired hot oil heater (ID No. H1) and natural gas/propane/No. 2 fuel oil-fired boiler (ID No. B5)**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	( <b>ID No. H1 only</b> ) 0.37 pounds per million Btu heat input  ( <b>ID No. B5 only</b> ) 0.39 pounds per million Btu heat input	15A NCAC 2D .0503
visible emissions	20 percent opacity	15A NCAC 2D .0521
sulfur dioxide	( <b>Firing No. 2 fuel oil only</b> ) No. 2 fuel oil sulfur content shall not exceed 0.5 percent by weight.  ( <b>Firing natural gas or propane only</b> ) 2.3 pounds per million Btu heat input	15A NCAC 2D .0524 (40 CFR 60, Subpart Dc)  15A NCAC 2D .0516
hazardous air pollutants	Best Combustion Practices	15A NCAC 2D .1109 (CAA 40 CFR 112j)

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

- a. Emissions of particulate matter from the combustion of natural gas, propane, or No. 2 fuel oil that are discharged from this source (**ID No. H1**) into the atmosphere shall not exceed 0.37 pounds per million Btu heat input.
- b. Emissions of particulate matter from the combustion of natural gas, propane, or No. 2 fuel oil that are discharged from this source (**ID No. B5**) into the atmosphere shall not exceed 0.39 pounds per million Btu heat input.

**Testing** [15A NCAC 2D .2601]

- c. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General Condition JJ. If the results of this test are above the applicable limit given in Section 2.1 C.1.a or b above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0503.

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

- d. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of natural gas, propane, or No. 2 fuel oil in these sources (**ID Nos. H1 and B5**).

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

- a. Emissions of sulfur dioxide from these sources (**ID Nos. H1 and B5**) 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.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 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 .0516.

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

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas, propane, or No. 2 fuel oil in these sources (**ID Nos. H1 and B5**).

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

- a. Visible emissions from these sources (**ID Nos. H1 and B5**) 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.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

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

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas, propane, or No. 2 fuel oil in these sources.

**4. 15A NCAC 2D .0524: NEW SOURCE PERFORMANCE STANDARDS, 40 CFR 60 SUBPART Dc**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS) as promulgated in 40 CFR Part 60 Subpart Dc, including Subpart A "General Provisions."

**Emission Limitations** [15A NCAC 02D .0524]

- b. The maximum sulfur content of any fuel oil received and burned in these sources (**ID Nos. H1 and B5**) shall not exceed 0.5 percent by weight.

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

- c. In addition to any other recordkeeping required by 40 CFR 60.48c or recordkeeping requirements of the EPA, the Permittee shall record and maintain records of the amounts of fuel oil fired during each calendar month. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524 if these records are not maintained.
- d. The Permittee shall retain a copy of the fuel supplier certification for any No. 2 fuel oil fired at the affected sources (**ID Nos. H1 and B5**). The fuel supplier certification shall include the following information:
  - i. The name of the oil supplier;
  - ii. The sulfur content of the oil (in % by weight); and
  - iii. A statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60.41c.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524 if the sulfur content of the oil exceeds the limit provided in Section 2.1 C.4.b of this permit or if fuel supplier certifications are not retained as described above. [40 CFR 60.46c(d), 40 CFR 60.48c(f)]

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

- e. In addition to any other reporting required by 40 CFR 60.48c or notification requirements to the EPA, the Permittee is required to provide a semiannual summary report, acceptable to the Regional Air Quality Supervisor, of the sulfur content of the distillate fuel oil fired, 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 summary report shall include the following information:
  - i. Fuel supplier certification(s) for distillate fuel oil, as provided in Section 2.1 C.4.d of this permit;
  - ii. A certified statement signed by the owner or operator that the records of fuel supplier certification(s) submitted represents all of the fuel fired at the affected sources (**ID Nos. H1 and B5**) during the semiannual period; and
  - iii. All instances of deviations from the requirements of this permit must be clearly identified.

**5. 15A NCAC 2D .1109: CAA 112(j); CASE-BY-CASE MACT for Boilers and Process Heaters**

- a. The Permittee shall use best combustion practices when operating the affected sources (**ID Nos. H1 and B5**). The initial compliance date for this work practice standard and the associated monitoring/recordkeeping/reporting requirements is **March 9, 2013**. These conditions need not be included in the annual compliance certification until after the initial compliance date.

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

- b. To assure compliance, the Permittee shall perform an annual source inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:
- i. inspect the burners, and clean or replace any components of the burners as necessary;
  - ii. inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and
  - iii. inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.

The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected sources are not inspected and maintained as required above.

- c. 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 of each recorded action;
  - ii. the results of each inspection; and
  - iii. the results of any maintenance performed on these sources.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if these records are not maintained.

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

- d. No reporting is required for hazardous air pollutants from the firing of natural gas, propane, or No. 2 fuel oil in these sources (**ID Nos. H1 and B5**).

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

- e. No monitoring, recordkeeping, or reporting is required for particulate emissions from the firing of natural gas, propane, or No. 2 fuel oil in these sources.

**4. 15A NCAC 2D .0524: NEW SOURCE PERFORMANCE STANDARDS, 40 CFR 60 SUBPART Dc**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS) as promulgated in 40 CFR Part 60 Subpart Dc, including Subpart A "General Provisions." [15A NCAC 02D .0524]

**Emission Limitations** [15A NCAC 02D .0524]

- b. The maximum sulfur content of any fuel oil received and burned in heater (**ID No. H1**) and boiler (**ID No. B5**) shall not exceed 0.5 percent by weight.

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

- c. In addition to any other recordkeeping required by 40 CFR 60.48c or recordkeeping requirements of the EPA, the Permittee shall record and maintain records of the amounts of fuel oil fired during each calendar month. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524 if these records are not maintained.
- d. The Permittee shall retain a copy of the fuel supplier certification for any No. 2 fuel oil fired in heater (**ID No. H1**) and/or boiler (**ID No. B5**). The fuel supplier certification shall include the following information:
- i. The name of the oil supplier;
  - ii. The sulfur content of the oil (in % by weight); and,
  - iii. A statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60.41c.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524 if the sulfur content of the oil exceeds the limit provided in Section 2.1 C 4.b. of this permit or if fuel supplier certifications are not retained as described

above. [40 CFR 60.46c(d), 40 CFR 60.48c(f)]

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

- e. *Semiannual Report.* In addition to any other reporting required by 40 CFR 60.48c or notification requirements to the EPA, the Permittee is required to provide a semiannual summary report, acceptable to the Regional Air Quality Supervisor, of the sulfur content of the distillate fuel oil fired, by 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 summary report shall include the following information:
- i. Fuel supplier certification(s) for distillate fuel oil, as provided in Section 2.1 C.4.d. of this permit;
  - ii. A certified statement signed by the owner or operator that the records of fuel supplier certification(s) submitted represents all of the fuel fired in heater (**ID No. H1**) and boiler (**ID No. B5**) during the semiannual period; and,
  - iii. All instances of deviations from the requirements of this permit must be clearly identified.

**D. Two natural gas/propane-fired hot air vulcanizers (ID Nos. HAV1 and HAV2)**

**One natural gas/propane-fired heater cure oven (ID No. HC4) with natural gas/propane-fired smoke dissipator (ID No. SD4)**

**One natural gas/propane-fired hot air vulcanizer (ID No. HAV4)**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
visible emissions	20 percent opacity for sources ( <b>ID Nos. HC4, and HAV4</b> )	15A NCAC 2D .0521
	40 percent opacity for sources ( <b>ID Nos. HAV1, and HAV2</b> )	
volatile organic compounds	See Multiple Emissions Section 2.2.A.1	15A NCAC 2D. 0958
odors	<b>State-enforceable only</b> See Multiple Emissions Section 2.2.A.2.	15A NCAC 2D .1806
volatile organic compounds	See Multiple Emissions Section 2.2.A.3	15A NCAC 2Q .0317 (Avoidance of 15A NCAC 2D .0530)

**1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources (**ID Nos. HC4, HAV1, HAV2, and HAV4**) shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

$$E = 4.10 \times P^{0.67}$$

Where E = allowable emission rate in pounds per hour  
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General

Condition JJ. If the results of this test are above the limit given in Section 2.1 D.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

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

- c. The Permittee shall maintain production records such that the process rates “P” in tons per hour, as specified by the formulas contained above can be derived, and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the production records are not maintained or the types of materials and finishes are not monitored.

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

- d. 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 .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources (**ID Nos. HC4, HAV1, HAV2, and HAV4**) 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 .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General Condition JJ found in Section 3. 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 .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f) and 15A NCAC 2D .0501(c)(4)(A)]

- c. No monitoring, recordkeeping, or reporting is required for sulfur dioxide emissions from burning natural gas or propane for these sources (**ID Nos. HC4, HAV1, HAV2, and HAV4**).

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

- a. Visible emissions from heater cure oven (**ID No. HC4**) and hot air vulcanizer (**ID No. HAV4**) 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)]
- b. Visible emissions from hot air vulcanizers (**ID No. HAV4 and HAV5**) 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 .2601]

- c. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.3.a or b above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

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

- d. To assure compliance, once per month, the Permittee shall observe the emission points of each source for any visible emissions above normal. If visible emissions from this source are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and 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 .2601 (Method 9) for 12 minutes is below the limit given in Section 2.1 D.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 log (written or electronic format) on-site and made available to an authorized representative upon request. The log 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.

- E. Six rubber mills (ID Nos. MILL3 through MILL8) with a cartridge-type bagfilter (ID No. BF1; 24,440 ft<sup>2</sup> filter surface area)**  
**Rubber pelletizer (ID No. RP1) with a cartridge-type bagfilter (ID No. BF1; 24,440 ft<sup>2</sup> filter surface area)**  
**Three dusters (ID Nos. D1 through D3) with a cartridge type bagfilter (ID No. BF2; 37,440 ft<sup>2</sup> filter surface area)**  
**Compound room (ID Nos. CR1) with a cartridge type bagfilter (ID No. BF2; 37,440 ft<sup>2</sup> filter surface area)**

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

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
particulate matter	$E=4.10P^{0.67}$ where E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
visible emissions	20 percent opacity	15A NCAC 2D .0521
arsenic	<b>Affected Emission Point: Bagfilter ID No. BF2</b> <b>State Enforceable Only</b> 0.278 pounds per year	15A NCAC 2D .1100

**1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources (**ID Nos. MILL3 through MILL8, CAL1, RP1, D1 through D3, and CR1**) shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 2D .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General Condition JJ. If the results of this test are above the limit given in Section 2.1 E.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

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

- c. Particulate matter emissions from these sources (**ID Nos. MILL3 through MILL8, CAL1, RP1, D1 through D3, and CR1**) shall be controlled by one of two bagfilters (**ID Nos. BF1 and BF2**) as described above. 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 is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
  - i. a monthly visual inspection of the system ductwork and material collection unit for leaks; and
  - ii. an annual (for each 12-month period following initial inspection) internal inspection of the bagfilter's structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the ductwork and bagfilters are not inspected and maintained.

- d. The bagfilters shall be equipped with a device to continuously measure the differential pressure drop across the bagfilter. The device shall be installed in an accessible location and shall be maintained by the Permittee such that it is in proper working order at all times.
- e. The results of inspection and maintenance shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. the results of any maintenance performed on the bagfilters; and
  - iv. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if records are not maintained.

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

- f. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
- 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.

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

- a. Visible emissions from the sources above (**ID Nos. MILL3 through MILL8, CAL1, RP1, D1 through D3, and CR1**) 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 .2601]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General Condition JJ. If the results of this test are above the limit given in Section 2.1 E.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 each month, the Permittee shall observe the emission points of the above sources (**ID Nos. MILL3 through MILL8, CAL1, RP1, D1 through D3, and CR1**) for any visible emissions above normal. If visible emissions from this source are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and 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 .2601 (Method 9) for 12 minutes is below the limit given in Section 2.1 E.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 log (written or electronic format) on-site and made available to an authorized representative upon request. The log 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.

**State Enforceable Only**

**3. TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REPORTING REQUIREMENT**

Pursuant to 15A NCAC 2D .1100 "Control of Toxic Air Pollutants", and in accordance with the application for an air toxic compliance demonstration approved March 25, 2009, arsenic emissions from bagfilter (**ID No. BF2**) shall not exceed the following modeled limit:

Toxic Air Pollutant	Emission Limit
arsenic	0.278 pounds per year

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

**A. Facility Wide**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
volatile organic compounds	VOC work practice standards	15A NCAC 2D .0958
toxic air pollutants	<b>State Enforceable Only</b> Facility wide TAP limits for AAL compliance [Completion of last MACT modeling requirements pursuant to 15A NCAC 2Q .0705]	15A NCAC 2D .1100
odors	<b>State-enforceable only</b> Odorous emissions must be controlled.	15A NCAC 2D .1806
volatile organic compounds	less than 250 tons per consecutive twelve (12) month period	15A NCAC 2Q .0317 (Avoidance of 15A NCAC 2D .0530)

**1. 15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS**

- a. Pursuant to 15A NCAC 2D .0958 and 2D .0902, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day; the Permittee shall:
  - (1) store all material, including waste material, containing volatile organic compounds in tanks or in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
  - (2) clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
  - (3) store wipe rags containing volatile organic compounds in closed containers,
  - (4) not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
  - (5) transfer solvents containing volatile organic compounds used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act,
  - (6) clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding

cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act. [15A NCAC 2D .0958(c)]

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

**Monitoring**

- c. To assure compliance with paragraphs (a) and (b) above, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. If the required inspections are not conducted the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

**Recordkeeping**

- d. The results of the inspections shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
  - i. the date and time of each inspection; and
  - ii. the results of each inspection noting whether or not noncompliant conditions were observed.If the required records are not maintained the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

**Reporting**

- e. The Permittee shall submit a summary report of the observations by 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.

**State Enforceable Only**

**2. TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REPORTING REQUIREMENT**

- a. Pursuant to 15A NCAC 2D .1100 "Control of Toxic Air Pollutants" and in accordance with the application for an air toxic compliance demonstration, approved March 25, 2009, the modeled emission rates in the following table, which are based on a facility wide worst case-single source modeling scenario, shall not be exceeded.

<b>Toxic Air Pollutant</b>	<b>Facility Wide Emission Limit</b>
methyl ethyl ketone	137.9 pounds per hour 3309 pounds per day
toluene	137.9 pounds per hour 3309 pounds per day

- b. Monitoring and recordkeeping shall be conducted as specified in Section 2.2.B.1.g to l below. The Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .1100 if these requirements are not meet.

**State-Only Requirement**

**3. 15A NCAC 2D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

**15A NCAC 2Q .0317: AVOIDANCE CONDITIONS**

**4. 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of this regulation, facility wide emission sources shall discharge into the atmosphere less than 250 tons of VOCs per consecutive twelve (12) month period. [15A NCAC 02D .0530]
- b. To ensure the limit in Section 2.2.A.4.a is not exceeded, VOC emission from the mixing and application of coatings and the solvent storage tanks (**ID Nos. 4 to 9, 12, PM, RM1 to RM4, BP1, VC1 to VC7, CM1 to CM3, and ST1 to ST4**) shall discharge into the atmosphere no more than 247 tons of VOCs per consecutive twelve (12) month period. [15A NCAC 02D .0530]

**Monitoring/Recordkeeping** [15A NCAC 2D .0530]

- c. Calculations of VOC emissions per month from the mixing and application of coatings and the solvent storage tanks (**ID Nos. 4 to 9, 12, PM, RM1 to RM4, BP1, VC1 to VC7, CM1 to CM3, and ST1 to ST4**) shall be made at the end of each month and shall include the following:
  - i. the total amount of each type of uncontrolled VOC-containing material consumed during the month multiplied by the VOC content of the material;
  - ii. the total amount of each type of controlled VOC-containing material consumed during the month multiplied by the VOC content of the material times the control efficiency times the capture efficiency; and
  - iii. the monthly VOC losses from storage tanks (**ID Nos. ST1 through ST4**).
- d. The Permittee shall maintain records indicating the control efficiency of carbon adsorption units (**ID Nos. CD-SRS1 and SRS2**) as detailed in Section 2.1.A.2.f above and Section 2.2.B.1.i through l below.
- e. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the amounts of VOC containing materials or the VOC emissions are not monitored and recorded.
- f. Calculations and the total amount of VOC emissions from the mixing and application of coatings and the solvent storage tanks shall be recorded monthly in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the VOC emissions exceed the limit in Section 2.2.A.4.b above.

**Reporting** [15A NCAC 02Q .0508(f)]

- g. 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 total monthly VOC emissions from the mixing and application of coatings and the solvent storage tanks (**ID Nos. 4 to 9, 12, PM, RM1 to RM4, BP1, VC1 to VC7, CM1 to CM3, and ST1 to ST4**) for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.

**B. Web coating operations including:**

- **Ross mixers (ID Nos. RM1 through RM4),**
- **spreader (ID No. 12),**
- **rubber spreaders (ID Nos. 4 through 9),**
- **Baker Perkins mixer (ID No. BP1),**
- **vertical churns (ID Nos. VC1 through VC7),**
- **Cowels mixers (ID Nos. CM1 through CM3),**
- **print machine (ID No. PM),**
- **horizontal six-bed carbon adsorption unit (ID No. CD-SRS1), and**
- **vertical two-bed carbon adsorption unit (ID No. SRS2)**

Regulated Pollutant	Limits/Standards	Applicable Regulation
hazardous air pollutants	0.12 pounds emitted after add-on control per pound of solids applied	15A NCAC 2D .1111 (40 CFR 63, Subpart OOOO)

**1. 15A NCAC 2D .1111 MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

40 CFR Part 63 Subpart OOOO “NATIONAL EMISSIONS STANDARD FOR HAZARDOUS AIR POLLUTANTS: PRINTING, COATING, AND DYEING OF FABRICS AND OTHER TEXTILES”

**Applicability**

- a. The web coating operations shall comply with all requirements of 15A NCAC 2D .1111 "Maximum Achievable Control Technology" and 40 CFR Part 63 Subpart OOOO "National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles"[40 CFR § 63.4280].

**Definitions** [40 CFR § 63.4371]

- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR § 63.4371 shall apply.

**Regulated Materials** [40 CFR § 63.4282]

- c. This Subpart requires the Permittee to limit organic hazardous air pollutant (HAP) emissions. Organic HAP shall have the meaning as defined in 40 CFR § 63.4371 and 40 CFR § 63.4282(a).

**40 CFR Part 63 Subpart A "General Provisions"**

- d. 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 3 of 40 CFR Part 63, Subpart OOOO.

**Summary of Emission Limits** [40 CFR 63.4300(a)(3)]

- e. For web coating operations, the Permittee shall demonstrate continuous compliance with all applicable requirements of 15A NCAC 2D .1111 "Maximum Achievable Control Technology" and 40 CFR Part 63 Subpart OOOO "National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles" as an existing source. The Permittee has chosen the option of limiting organic HAP emissions with add-on controls as allowed in Table 1 to 40 CFR § 63 Subpart OOOO for existing affected sources in the Printing, Coating and Dye of Fabrics and Other Textiles Source Category. [40 CFR § 63.4290]
  - i. The Permittee shall limit organic HAP emissions to the atmosphere to no more than 0.12 pounds of organic HAP per pound of solids applied in the web coating operations.
  - ii. The Permittee shall comply with the startup, shutdown, and malfunction plan at all times the above emission limit is exceeded.
  - iii. The Permittee shall be in compliance with the operating limits of emission capture systems and control devices for the web coating operations as required by 40 CFR § 63.4292 for all averaging times.
  - iv. The Permittee shall be in compliance with the work practice standards in 40 CFR § 63.4293 at all times.

**Testing** [15A NCAC 2D .1111]

- f. If emissions testing is required, the Permittee shall comply with the general requirements for performance tests contained in 40 CFR § 63.4360. If the results of this testing are above the limit given in Section 2.2 B.1.e.i above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D 1111.

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

- g. The Permittee shall install, operate, and maintain a continuous parameter monitoring system (CPMS) for each carbon adsorption system (**ID Nos. CD-SRS1 and SRS2**), which measures the exiting organic HAP emission rate, in accordance with 40 CFR § 63.4364.
- h. The Permittee shall operate, monitor, and maintain the emission capture system in accordance with 40 CFR § 63.4361 and the DAQ approved monitoring plan. The monitoring shall ensure the capture system bypass line for spreader (**ID No. 12**) is in a closed position at all times organic HAP containing materials are used.
- i. The Permittee shall follow and maintain a written startup, shutdown, and malfunction plan, including the plans for corrective actions in the event of a malfunction of the emission capture system or a carbon adsorption system, according to the provisions in §63.6(e)(3).
- j. The Permittee shall demonstrate that, based on the amount of solids applied in the web coating operations, the effectiveness of the organic HAP emission capture system, and the controlled organic HAP emission rate, the organic HAP emission rate for the web coating operation is less than or equal to the emission limit in Section 2.2 B.1.e.i above, calculated as a rolling 12-month average emission rate. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if the emission limit is exceeded.
- k. The Permittee shall demonstrate that all emission capture systems and control devices for the web coating operations meet the operating limits required in §63.4292 and meet the work practice standards required in §63.4293. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if an operating limit is exceeded or if a required work practice standard is not followed.

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

- l. The Permittee shall collect and keep a record of all data and information, as applicable in 40 CFR § 63.4312.
- m. The records shall be in a form suitable and readily available for expeditious review, according to 40 CFR § 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- n. As specified in 40 CFR § 63.10(b)(1), the Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- o. The Permittee shall keep each record on site for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR § 63.10(b)(1). The Permittee may keep the records off site for the remaining three (3) years.[40 CFR § 63.4312 and 40 CFR § 63.4313]  
The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if the above records are not maintained.

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

- p. The Permittee shall submit semiannual compliance reports for web coating operations according to the requirements of paragraphs (a)(1) through (a)(4) of 40 CFR § 63.4311. These compliance reports shall be postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and postmarked on or before July 30 of each calendar year for the preceding six-month period between January and June. Each report shall include a summary of all monitoring and recordkeeping activities and clearly identify all instances of deviations from the requirements of this permit.
- q. If a deviation from the emission limitation, including any period when emissions bypassed the add-on control device and were diverted to the atmosphere, occurs during the reporting period, the Permittee shall include all applicable information specified in CFR § 63.4311 (a)(7) in the semiannual compliance report.
- r. The Permittee shall submit a summary report of monitoring and recordkeeping activities, clearly identifying all instances of deviations from the requirements of this permit with the semiannual reports.

### **SECTION 3 - GENERAL CONDITIONS (version 3.1)**

This section describes terms and conditions applicable to this Title V facility.

A. **General Provisions** [NCGS 143-215 and 15A NCAC 2Q .0508(i)(16)]

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(i)(9)(B)]

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)(2)]

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(e) and 2Q .0508(i)(16)]

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

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

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

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 in 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. Reporting Requirements  
Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application;
  - b. changes that modify equipment or processes; or
  - c. changes in the quantity or quality of materials processed.

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

2. 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.
3. 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.
4. 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 corrective 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 quarterly. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

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

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 2D .0535, including 15A NCAC 2D .0535(c) as follows:

1. 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 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 .0508(e) and 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(i)(4)]

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(i)(9)]

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) and 2Q .0508 (l)]

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(n)]

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:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);

3. whether compliance was continuous or intermittent; and
4. 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:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. 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(i)(8)]

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(l) 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(i)(10)]

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(i)(9)]

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(h)]

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(i)(1)]

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 .0202(b).

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

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(i)(16)]

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 or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow the procedures outlined below:

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 description of the training and air testing experience of the person directing the test;
  - b. a certification of the test results by sampling team leader and facility representative;
  - c. 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);
  - d. 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;
  - e. all field, analytical, and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
  - f. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
  - g. 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.

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 assure 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 .0522 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 .0508(i)(16)]

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.

MM. **Fugitive Dust Control Requirement** [15A NCAC 2D .0540] - STATE ENFORCEABLE ONLY

As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 2D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

NN. **Specific Permit Modifications** [15A NCAC 2Q.0501 and .0523]

1. For modifications made pursuant to 15A NCAC 2Q .0501(c)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
2. For modifications made pursuant to 15A NCAC 2Q .0501(d)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 2Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA - Air Planning Branch, 61 Forsyth St., Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:
  - a. a description of the change at the facility;
  - b. the date on which the change will occur;
  - c. any change in emissions; and
  - d. any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

OO. **Mandatory Greenhouse Gas Reporting Requirements** [15A NCAC 2Q .0508]  
**FEDERAL-ENFORCEABLE ONLY**

If the Permittee is subject to requirements of 40 CFR 98.2(a), the Permittee shall submit all required reports to the EPA Administrator in accordance with 40 CFR 98.

ATTACHMENT

**List of Acronyms**

<b>AOS</b>	Alternate Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>Btu</b>	British thermal unit
<b>CAA</b>	Clean Air Act
<b>CAIR</b>	Clean Air Interstate Rule
<b>CEM</b>	Continuous Emission Monitor
<b>CFR</b>	Code of Federal Regulations
<b>CAA</b>	Clean Air Act
<b>DAQ</b>	Division of Air Quality
<b>DENR</b>	Department of Environment and Natural Resources
<b>EMC</b>	Environmental Management Commission
<b>EPA</b>	Environmental Protection Agency
<b>FR</b>	Federal Register
<b>GACT</b>	Generally Available Control Technology
<b>HAP</b>	Hazardous Air Pollutant
<b>MACT</b>	Maximum Achievable Control Technology
<b>NAA</b>	Non-Attainment Area
<b>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAPS</b>	National Emission Standards for Hazardous Air Pollutants
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NSPS</b>	New Source Performance Standard
<b>OAH</b>	Office of Administrative Hearings
<b>PM</b>	Particulate Matter
<b>PM<sub>10</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
<b>POS</b>	Primary Operating Scenario
<b>PSD</b>	Prevention of Significant Deterioration
<b>RACT</b>	Reasonably Available Control Technology
<b>SIC</b>	Standard Industrial Classification
<b>SIP</b>	State Implementation Plan
<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>tpy</b>	Tons Per Year
<b>VOC</b>	Volatile Organic Compound