



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

Michael F. Easley, Governor

William G. Ross, Jr., Secretary
B. Keith Overcash, P.E., Director

July 1, 2008

Mr. Tim Gwennap
Plant Manager
Wilsonart International, Inc.
Post Office Box 249
Fletcher, North Carolina 28732

Dear Mr. Gwennap:

SUBJECT: Air Quality Permit No. 03716T19
Facility ID: 4500259
Wilsonart International, Inc.
Fletcher, North Carolina
Henderson County
Fee Class: Title V

In accordance with your completed Air Quality Permit Applications for the modification and renewal of a Title V permit received July 31, 2006, and for an administrative amendment (toxics demonstration) to a Title V permit, received December 5, 2005, we are forwarding herewith Air Quality Permit No. 03716T19 to Wilsonart International, Inc., Cane Creek Industrial Park, Fletcher, North Carolina, authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 2Q .0503(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 of Part I. **The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.**

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

Permitting Section

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

2728 Capital Blvd., Raleigh, North Carolina 27604

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Mr. Tim Gwennap
July 1, 2008
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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 **July 1, 2008** until **June 30, 2013**, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Please note the attached summary table, which outlines the changes made to the permit. Should you have any questions concerning this matter, please contact Mr. David F. Putney, PE, at (919) 733-2051.

Sincerely yours,

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

Enclosure

c: Gregg Worley, EPA Region IV
Asheville Regional Office
Central Files

The following table describes the modifications to the current permit as part of the modification process.

Old Page(s)	New Page(s)	Condition/Item	Description of Change(s)
Part I			
Global	Global	N/A	<ul style="list-style-type: none"> • Change permit revision number to T19 • Change the issuance/effective dates of the permit • Amend the application number and complete date • Update monitoring associated with 2D .0521
3 - 4	3 - 4	Equipment List	<ul style="list-style-type: none"> • Reflect that MACT JJJ applies to melamine treaters and phenolic treater processes; • Remove NSPS Kb for the 3 phenolic resin storage tanks; • Remove the asterisks and associated language for ES-BIN, CD-FCC and CD-ESP; • Change descriptions of the laminate material and waste handling system and the phenolic treater processes for clarity and correctness; • Move ES-PhRI and ES-Platebuffer to insignificant activities list and show existence of wet scrubber; • Remove multicyclone CD-MC; and • Add emergency generator ES-EmGen
5 - 9	5 - 7	2.1 A	<ul style="list-style-type: none"> • Combine all five boilers (ES-BLR1 through ES-BLR5) into Section 2.1 A; • Modify table to reflect applicability of 2D .1100 and 2Q .0705 (for ES-BLR3 and ES-BLR4 only); and 2Q .0317 (for all five boilers - ES-BLR1 through ES-BLR5); • Remove multicyclone CD-MC; and • Correct boiler heat inputs and 2D .0503 limits
5 - 6	N/A	2.1 A.1	<ul style="list-style-type: none"> • Remove MRR requirements for CD-MC; and • Modify the boiler 2D .0503 PM emission limits
6	N/A	2.1 A.1.d (03716T18)	Remove requirement to establish “normal” ranges and the MRR requirements associated with inlet and outlet temperatures of electrostatic precipitator CD-ESP
N/A	8	2.1 B	Add a permit section for ES-EmGen
9	9	2.1 C	<ul style="list-style-type: none"> • Modify the descriptions of the two phenolic treater processes for clarity and correctness; • Correct the maximum rated heat inputs for boilers ES-BLR3 and ES-BLR4; and • Modify table to reflect applicability of 2D .1100
11	10 - 11	2.1 C.3	Update section addressing 2D .0958 to include MRR
10 - 11	20 - 21	2.1 C.3.a-f (03716T18)	Move MRR requirements associated with 2Q .0317 (PSD avoidance for VOCs) to Section 2.2 A.4 and modify the associated MRR
12	12	2.1 D	<ul style="list-style-type: none"> • Modify the descriptions of the laminate material sanders and flyash waste storage silo for clarity and to more accurately reflect these operations; and • Modify table to reflect applicability of 2D .0614 (Compliance Assurance Monitoring)

Old Page(s)	New Page(s)	Condition/Item	Description of Change(s)
N/A	14	2.1 D.3	Add the requirements of rule 2D .0614 (i.e. CAM) for the four laminate material sanders to permit
14	15	2.1 E	Modify table to reflect applicability of 2D .1100 and 2Q .0317 (PSD avoidance for VOCs)
14 - 15	16 - 17	2.1 F	Replace the storage tanks' MRR requirements with the flyash waste transfer operation MRR requirements since: <ul style="list-style-type: none"> • The tanks are not considered subject to 2D .0521; • Tanks ES-STP1 through ES-STP3 are no longer considered subject to 2D .0524 (NSPS Kb); and • 2D .1100 and 2D .1806 are addressed facility-wide in Sections 2.2 A.1 and A.2, respectively
16	N/A	2.1 G.2.c (03716T18)	Remove requirement to establish "normal" for visible emissions from ES-BIN
17 - 18	18 - 21	2.2 A	Modify section to address those regulations that apply to facility-wide sources
17 - 18	18 - 19	2.2 A.1	Modify section to include requirements for 2D .1100 (NC toxics) and move requirements of 2Q .0317 (PSD avoidance for SO ₂) to Section 2.2 A.3
N/A	19	2.2 A.2	Add section for requirements of 2D .1806 (odorous emissions)
17 - 18	19 - 20	2.2 A.3	Include requirements of 2Q .0317 (PSD avoidance for SO ₂) in this section and modify the MRR requirements
10 - 11	20 - 21	2.2 A.4	Add section for the MRR requirements of 2Q .0317 (PSD avoidance for VOCs)
N/A	22 - 26	2.2 B	Add MRR requirements associated with rule 2D .1111 (MACT Subpart JJJ) for the two melamine treaters and the two phenolic treater processes
19	N/A	2.2 C (03716T18)	Remove this section of permit (the requirements of rule 2D .1806 were moved to Section 2.2 A.2)
19 - 26	27 - 34	3	Update General Conditions to current shell
Part II			
28 - 30	N/A	Sections 1-3	Remove Part II of permit

Note: Condition/Item is as listed in Permit No. 03716T19 unless otherwise stated.

Insignificant Activities Per 15A NCAC 2Q .0503(8)

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
I-PhRI	One phenolic resin ink tank	N/A	N/A
I-Platebuffer	One plate buffer	CD-WS	One wet scrubber
I-ES-DEGR	One non-halogenated cleaner degreaser	N/A	N/A
I-S-85	One S-85 treater (paper treated in dip-tank solution)	N/A	N/A

1. Because an activity is exempted from being required to have a permit or permit modification 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
03716T19	03716T18	July 1, 2008	June 30, 2013

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:

Wilsonart International, Inc.

Facility ID:

4500259

Facility Site Location:

Cane Creek Park

City, County, State, Zip:

Fletcher, Henderson County, North Carolina, 28732

Mailing Address:

P.O. Box 249

City, State, Zip:

Fletcher, Henderson County, North Carolina, 28732

Application Number:

4500259.06A

Complete Application Date:

July 31, 2006

Primary SIC Code:

3089

Division of Air Quality,

Asheville Regional Office

Regional Office Address:

2090 US Highway 70

Swannanoa, North Carolina, 28778

Permit issued this the 1st day of July, 2008.

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

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PART I

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(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

PART II

This permit does not contain a Part II

PART I

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

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

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

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

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-BLR1	One natural gas/No. 2 fuel oil-fired boiler (48.5 million Btu per hour maximum heat input rate)	NA	NA
ES-BLR2	One natural gas/No. 2 fuel oil-fired boiler (46.5 million Btu per hour maximum heat input rate)	NA	NA
ES-BLR3	One natural gas/No. 2 fuel oil/ phenolic treater fumes-fired boiler (15.65 million Btu per hour maximum heat input rate)	NA	NA
MACT JJJJ ES-TRT1	One phenolic treater process consisting of: <ul style="list-style-type: none"> • One double coater; • Three day tanks (250 gallon capacity, each); and • One enclosed steam-heated convection oven section 	ES-BLR3	One natural gas/No. 2 fuel oil/ phenolic treater fumes-fired boiler (15.65 million Btu per hour maximum heat input rate)
ES-BLR4	One natural gas/No. 2 fuel oil/ phenolic treater fumes-fired boiler (23.0 million Btu per hour maximum heat input rate)	NA	NA
MACT JJJJ ES-TRT2	One phenolic treater process consisting of: <ul style="list-style-type: none"> • One double coater; • Two day tanks (250 gallon capacity, each); and • One enclosed steam-heated convection oven section 	ES-BLR4	One natural gas/No. 2 fuel oil/ phenolic treater fumes-fired boiler (23.0 million Btu per hour maximum heat input rate)
ES-BLR5	One natural gas/No. 2 fuel oil/laminate waste-fired boiler (19.6 million Btu per hour maximum heat input rate)	CD-ESP	One electrostatic precipitator (3,360 square feet of total collection plate area)
ES-BIN	One flyash transfer and storage operation	CD-FCC	One cartridge filter (810 square feet of filter area)
MACT JJJJ ES-MTR1	One melamine resin treater consisting of one coating station and one enclosed steam-heated convection oven section	NA	NA
MACT JJJJ ES-MTR2	One melamine resin treater consisting of one coating station and one enclosed steam-heated convection oven section	NA	NA

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
CAM ES-LSWC	One laminate sanding waste collection system	CD-BF1	One bagfilter (2,712 square feet of filter area)
		CD-BF2	One bagfilter (1,846square feet of filter area)
		CD-BF3	One bagfilter (3,014 square feet of filter area)
		CD-BF4	One bagfilter (3,016 square feet of filter area)
ES-BF5	One laminate waste storage silo	CD-BF5	One bagfilter (460 square feet of filter area)
ES-C5	One carpenter shop	CD-C5	One simple cyclone (56 inches in diameter)
ES-PR1 through ES-PR7	Seven laminate presses	NA	NA
ES-STM1 through ES-STM4	Four melamine resin storage tanks (6,000 gallons storage capacity, each)	NA	NA
ES-STP1 through ES-STP3	Three phenolic resin storage tanks (20,000 gallons storage capacity, each)	NA	NA
ES-STD1	One No. 2 fuel oil storage tank (30,000 gallons storage capacity)	NA	NA
ES-STD2 and ES-STD3	Two No. 2 fuel oil storage tanks (100,000 gallons each)	NA	NA
ES-STIA1	One isopropyl alcohol storage tank (3,000 gallons storage capacity) associated with application process associated with Phenolic Treaters Nos. 1 and 2;	NA	NA
MACT ZZZZ ES-EmGen	One natural gas-fired emergency generator (100 kW maximum rated power output)	NA	NA

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

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

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

- A. Two natural gas/No. 2 fuel oil-fired boilers (48.5 and 46.5 million Btu per hour maximum heat input rates, ID Nos. ES-BLR1 and ES-BLR2, respectively);**

Two natural gas/No. 2 fuel oil/phenolic treater fumes-fired waste heat boilers (15.65 and 23.0 million Btu per hour maximum heat input rates, ID Nos. ES-BLR3 and ES-BLR4, respectively); and

One natural gas/No. 2 fuel oil/laminate waste-fired boiler (19.6 million Btu per hour maximum heat input rate, ID No. ES-BLR5) and associated electrostatic precipitator (3,360 square feet of collection plate area, ID No. CD-ESP)

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	ES-BLR1: 0.34 pounds per million Btu ES-BLR2, ES-BLR3 and ES-BLR4: 0.30 pounds per million Btu ES-BLR5: 0.33 pounds per million Btu	15A NCAC 2D .0503
Sulfur dioxide	2.3 pounds per million Btu	15A NCAC 2D .0516
	See Section 2.2 A.3 Less than 250 tons emitted per consecutive 12-month period, facility-wide	15A NCAC 2Q .0317 to avoid 15A NCAC 2D .0530
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Volatile Organic Compounds	See Section 2.2 A.4 Less than 250 tons emitted per consecutive 12-month period, facility-wide	15A NCAC 2Q .0317 to avoid 15A NCAC 2D .0530
Toxic Air Pollutants	State-enforceable only - See Section 2.2 A.1 Only ES-BLR3 and ES-BLR4	15A NCAC 2D .1100 and 15A NCAC 2Q .0705
Odorous emissions	State-enforceable only See Section 2.2 A.2	15A NCAC 2D .1806

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

- a. Emissions of particulate matter from the combustion of natural gas and No.2 fuel oil that are discharged from these sources into the atmosphere shall not exceed the following limits: [15A NCAC 2D .0503(a)]

ES-BLR1: 0.34 pounds per million Btu heat input;
ES-BLR2, ES-BLR3 and ES-BLR4: 0.33 pounds per million Btu heat input; and
ES-BLR5: 0.30 pounds per million Btu heat input.

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

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

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

- c. Particulate matter emissions from boiler **ES-BLR5** shall be controlled by electrostatic precipitator **CD-ESP**. To assure compliance, the Permittee shall perform inspections and maintenance on **CD-ESP** as recommended by the equipment manufacturer. In addition to the equipment manufacturer's inspection and maintenance recommendations, or if there are no equipment manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
- i. An annual (for each 12 month period from initial inspection) internal inspection of the electrostatic precipitator for structural integrity; and
 - ii. A monthly external visual inspection of the system ductwork and material collection unit for leaks.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0503 if the electrostatic precipitator is not inspected and maintained.

- d. To ensure that optimum control efficiency is maintained, once per day the Permittee shall monitor the following operational parameters of **CD-ESP** in each field or section for values outside the normal operating range:
- i. Primary and secondary voltages; and
 - ii. Primary and secondary currents.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0503 if the electrostatic precipitator operational parameters are not monitored.

The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If the operational parameters of **CD-ESP** are observed to be outside the normal ranges, the Permittee shall either:

- iii. Take appropriate action to bring the operational parameters back within the normal ranges as soon as practicable and within the monitoring period and record the action(s) taken as provided in the recordkeeping requirements below, or
- iv. Demonstrate that the particulate emissions from the emission point of ES-BLR5 are below the limit given in Section 2.1 A.1.a above.

If the operational parameters of **CD-ESP** are not corrected per iii. above or if the demonstration in iv. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0503.

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

- e. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. The normal range of values for each operational parameter in Section 2.1 A.1.d.i and ii above;
 - ii. The values of each electrostatic precipitator operational parameter;
 - iii. The date and time of each recorded action;
 - iv. The results of each inspection;
 - v. A report of any maintenance performed on the electrostatic precipitator; and
 - vi. Any variance from electrostatic precipitator manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0503 if these records are not maintained.

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

- f. Within 30 days of a written request from the DAQ, the Permittee shall submit a report of any maintenance performed on the electrostatic precipitator.
- 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 .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from these sources (**ID Nos. ES-BLR1 through ES-BLR5**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

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

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ found in Section 3 of this permit. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.

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

- c. No monitoring, reporting or recordkeeping of sulfur dioxide emissions from the firing of natural gas, No. 2 fuel oil, laminate waste or phenolic treater fumes in the boilers (**ID Nos. ES-BLR1 through ES-BLR5**) is required to show compliance with 15A NCAC 2D .0516.

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

- a. Visible emissions from these sources (**ID Nos. ES-BLR1 through ES-BLR5**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521(d)]

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

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

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

- c. To assure compliance, once a day the Permittee shall observe the emission point of boiler 5 (**ID No. ES-BLR5**) for any visible emissions above normal. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If visible emissions from this source 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 .0501(c)(8) (Method 9) for 12 minutes is below the limit given in Section 2.1 A.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)]

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

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

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

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

B. One natural gas-fired emergency generator (100 kW maximum rated power output, ID No. ES-EmGen);

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur dioxide	2.3 pounds per million Btu	15A NCAC 2D .0516
	See Section 2.2 A.3 Less than 250 tons emitted per consecutive 12-month period, facility-wide	15A NCAC 2Q .0317 to avoid 15A NCAC 2D .0530
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Hazardous Air Pollutants	Maximum Achievable Control Technology (No applicable requirements)	15A NCAC 2D .1111 (40 CFR 63, Subpart ZZZZ)
Odorous emissions	State-enforceable only See Section 2.2 A.2	15A NCAC 2D .1806

1. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

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

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

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ found in Section 3. 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 .0516.

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

- c. No monitoring, recordkeeping, or reporting of sulfur dioxide emissions from the firing of natural gas in emergency generator ID No. **ES-EmGen** is required to show compliance with 15A NCAC 2D .0516.

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

- a. Visible emissions from emergency generator ID No. **ES-EmGen** shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521(d)]

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

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ found in Section 3 of this permit. 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 or reporting is required for visible emissions from the firing of natural gas in emergency generator ID No. **ES-EmGen** is required to show compliance with 15A NCAC 2D .0521.

3. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (40 CFR 63, SUBPART ZZZZ)

- a. For emergency generator ID No. ES-EmGen, Environmental Management Commission Standard 15A NCAC 2D .1111 "Maximum Achievable Control Technology" (pursuant to 40 CFR 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines) includes **no applicable requirements**.

C. One phenolic treater process (ID No. ES-TRT1) consisting of:

- One double coater;
- Three day tanks (250 gallon capacity, each); and
- One enclosed steam-heated convection oven section exhausting to a natural gas/No. 2 fuel oil/phenolic treater fumes-fired waste heat boiler (15.65 million Btu per hour maximum heat input, ID No. ES-BLR3);

One phenolic treater process (ID No. ES-TRT2) consisting of:

- One double coater;
- Two day tanks (250 gallon capacity, each); and
- One enclosed steam-heated convection oven section exhausting to a natural gas/No. 2 fuel oil/phenolic treater fumes-fired waste heat boiler (23.0 million Btu per hour maximum heat input, ID No. ES-BLR4);

Two melamine resin treaters (ID Nos. ES-MTR1 and ES-MTR2), each consisting of one coating station and one enclosed steam-heated convection oven section

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	$E = 4.10P^{0.67}$ 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
Volatile organic compounds	Work practice standards	15A NCAC 2D .0958
	See Section 2.2 A.4 Less than 250 tons emitted per consecutive 12-month period, facility-wide	15A NCAC 2Q .0317 to avoid 15A NCAC 2D .0530
Toxic Air Pollutants	State-enforceable only See Section 2.2 A.1	15A NCAC 2D .1100 and 15A NCAC 2Q .0705
Odorous emissions	State-enforceable only See Section 2.2 A.2	15A NCAC 2D .1806
Hazardous Air Pollutants	See Section 2.2 B Maximum Achievable Control Technology	15A NCAC 2D .1111 (40 CFR 63, Subpart JJJJ)

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

- a. Emissions of particulate matter from the phenolic treater processes (ID Nos. ES-TRT1 and ES-TRT2) and the melamine resin treaters (ID Nos. ES-MTR1 and ES-MTR2) 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 .0501(c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ found in Section 3 of this permit. If the results of this test are above the limit given in Section 2.1 C.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 which specify the types of materials and finishes processed 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. No reporting is required for particulate matter emissions from the two phenolic treater processes (ID Nos. ES-TRT1 and ES-TRT2) or the two melamine resin treaters (ID Nos. ES-MTR1 and ES-MTR2).

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

- a. Visible emissions from the two melamine resin treaters (ID Nos. ES-MTR1 and ES-MTR2) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521(d)]

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

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

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

- c. No monitoring, recordkeeping or reporting is required for visible emissions from the two melamine resin treaters (ID Nos. ES-MTR1 and ES-MTR2).

3. 15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

- a. Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day (i.e. the two phenolic treater processes, ID Nos. ES-TRT1 and ES-TRT2, and the two melamine resin treaters, ID Nos. ES-MTR1 and ES-MTR2); the Permittee shall:
 - i. 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,
 - ii. Clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
 - iii. Store wipe rags containing volatile organic compounds in closed containers,
 - iv. Not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
 - v. 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,
 - vi. 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:
 - i. Flush parts in the freeboard area,
 - ii. Take precautions to reduce the pooling of solvent on and in the parts,
 - iii. 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,
 - iv. Not fill cleaning machines above the fill line,
 - v. Not agitate solvent to the point of causing splashing. [15A NCAC 2D .0958(d)]

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

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

- d. The results of the inspections shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. The date and time of each 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 rule 15A NCAC 2D .0958.

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

- 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.

D. One laminate sanding waste collection system (ID No. ES-LSWC) and four associated bagfilters (2712, 1846, 3014 and 3016 square feet of filter area; ID Nos. CD-BF1 through CD-BF4, respectively);

One laminate waste storage silo (ID No. ES-BF5) and one associated bagfilter (460 square feet of filter area, ID No. CD-BF5); and

One carpenter shop (ID No. ES-C5) and one associated simple cyclone (56 inches in diameter, ID No. CD-C5)

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	$E=4.10P^{0.67}$ Where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
	Compliance Assurance Monitoring	15A NCAC 2D .0614
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Odorous emissions	State-enforceable only See Section 2.2 A.2	15A NCAC 2D .1806

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

a. Emissions of particulate matter from the laminate sanding waste collection system (**ID No. ES-LSWC**), the laminate waste storage silo (**ID No. ES-BF5**) and the carpenter shop (**ID No. ES-C5**) 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 .0501(c)(3)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ found in Section 3 of this permit. 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. Particulate matter emissions from the laminate sanding waste collection system (**ID No. ES-LSWC**) shall be controlled by the associated bagfilters (**ID Nos. CD-BF1 through CD-BF4**). Particulate matter emissions from the laminate waste storage silo (**ID No. ES-BF5**) shall be controlled by the associated bagfilter (**ID No. CD-BF5**). Particulate matter emissions from the carpenter shop (**ID No. ES-C5**) shall be controlled by the associated simple cyclone (**ID No. CD-C5**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the equipment manufacturers. In addition to the manufacturers’ inspection and maintenance recommendations, or if there is no manufacturers’ 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 units for leaks; and
- ii. An annual (for each 12 month period following the initial inspection) internal inspection of each bagfilter for structural integrity.

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

d. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:

- i. The date and time of each recorded action;

- ii. The results of each inspection;
- iii. The results of any maintenance performed on the cyclone and bagfilters; and
- iv. Any variance from manufacturers' recommendations, if any, and corrections made.

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

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

- e. The Permittee shall submit the results of any maintenance performed on the cyclone or bagfilters 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.

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

- a. Visible emissions from the laminate sanding waste collection system (**ID No. ES-LSWC**), the laminate waste storage silo (**ID No. ES-BF5**) and the carpenter shop (**ID No. ES-C5**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521(d)]

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

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

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

- c. To assure compliance, once a month the Permittee shall observe the emission points of the laminate sanding waste collection system (**ID No. ES-LSWC**), the laminate waste storage silo (**ID No. ES-BF5**) and the carpenter shop (**ID No. ES-C5**) for any visible emissions above normal. The monthly observations must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources 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 sources in accordance with 15A NCAC 2D .0501(c)(8) (Method 9) for 12 minutes is below the limit given in Section 2.1 D.2.a above.

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

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

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

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

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

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

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

- a. For the laminate sanding waste collection system (**ID No. ES-LSWC**), the Permittee shall comply with 40 CFR Part 64 and 15A NCAC 2D .0614 and shall assure that these emission sources comply with the emission limits of 15A NCAC 2D .0515 and 2D .0521 by complying with the following:

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

- b. Particulate matter emissions from the laminate sanding waste collection system (**ID No. ES-LSWC**) shall be controlled by associated bagfilters (**ID Nos. CD-BF1 through CD-BF4**). To assure compliance the Permittee shall:
- i. Perform inspections and maintenance on the bagfilters as recommended by the equipment manufacturers. In addition to the manufacturers' inspection and maintenance recommendations, or if there is no manufacturers' inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
 - A. A monthly visual inspection of the system ductwork and bagfilters for leaks; and
 - B. An annual internal inspection of each bagfilter for structural integrity.
 - ii. 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:
 - A. The date and time of each recorded action;
 - B. The results of each inspection;
 - C. The results of any maintenance performed on the bagfilters; and
 - D. Any variance from manufacturers' recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0614 if the ductwork and bagfilters are not inspected and maintained or if these records are not maintained.

- c. Visible emissions from the laminate sanding waste collection system (**ID No. ES-LSWC**) shall be controlled by associated bagfilters (**ID Nos. CD-BF1 through CD-BF4**). To assure compliance the Permittee shall:
- i. Conduct a six-minute Method 22-like observation of the emission points of these sources for visible emissions once per day. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The observer shall be familiar with Method 22 and follow Method 22-like procedures. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If any visible emissions are observed then an excursion has occurred. In the event of an excursion the Permittee shall take appropriate action to correct the excursion as soon as practicable and within the monitoring period.
 - ii. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - A. The date and time of each recorded action;
 - B. The results of each Method 22-like observation noting those sources with excursions along with any corrective actions taken to reduce visible emissions; and
 - C. The results of any corrective actions performed.
 - iii. If six or more excursions are observed during a consecutive 6-month period then the Permittee shall develop a Quality Improvement Plan in accordance with 40 CFR §64.8.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0614 if the Method 22-like observations are not conducted or if these records are not maintained.

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

- d. 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. Seven laminate presses (ID Nos. ES-PR1 through ES-PR7)

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Toxic Air Pollutants	State-enforceable only See Section 2.2 A.1	15A NCAC 2D .1100 and 15A NCAC 2Q .0705
Odororous emissions	State-enforceable only See Section 2.2 A.2	15A NCAC 2D .1806
Volatile organic compounds	See Section 2.2 A.4 Less than 250 tons emitted per consecutive 12-month period, facility-wide	15A NCAC 2Q .0317 to avoid 15A NCAC 2D .0530

1. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from the seven laminate presses (**ID Nos. ES-PR1 through ES-PR7**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521(d)]

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

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ found in Section 3 of this permit. 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 .0521.

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

- c. To assure compliance, once a month the Permittee shall observe the emission points of the seven laminate presses (**ID Nos. ES-PR1 through ES-PR7**) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from this source are observed to be above normal, the Permittee shall either:
- 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
 - Demonstrate that the percent opacity from the emission points of the emission sources in accordance with 15A NCAC 2D .0501(c)(8) (Method 9) for 12 minutes is below the limit given in Section 2.1 E.1.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/Reporting [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- The date and time of each recorded action;
 - 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
 - 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.

F. One flyash waste transfer and storage operation (ID No. ES-BIN) and associated cartridge filter (810 square feet of filter area, ID No. CD-FCC)

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	$E = 4.10P^{0.67}$ 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
Odorous emissions	State-enforceable only See Section 2.2 C	15A NCAC 2D .1806

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

- a. Emissions of particulate matter from the flyash waste transfer and storage operation (ID No. ES-BIN) 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 .0501(c)(3)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ found in Section 3 of this permit. If the results of this test are above the limit given in Section 2.1 F.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 flyash waste transfer and storage operation (ID No. ES-BIN) shall be controlled by cartridge filter (ID No. CD-FCC). 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:
- A monthly visual inspection of the system ductwork and material collection unit for leaks; and
 - An annual (for each 12 month period following the initial inspection) internal inspection of the cartridge filter's structural integrity.

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

- d. 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:
- The date and time of each recorded action;
 - The results of each inspection;
 - The results of any maintenance performed on the cartridge filter; and
 - Any variance from manufacturer's recommendations, if any, and corrections made.

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

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

- e. The Permittee shall submit the results of any maintenance performed on the cartridge filter 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.

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

- a. Visible emissions from the flyash waste transfer and storage operation (ID No. ES-BIN) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521(d)]

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

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

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

- c. To assure compliance, once a month the Permittee shall observe the emission points of the flyash waste transfer and storage operation (ID No. ES-BIN) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. 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 .0501(c)(8) (Method 9) for 12 minutes is below the limit given in Section 2.1 F.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/Reporting [15A NCAC 2Q .0508(f)]

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

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

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

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

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

A. Facility-wide affected sources

Regulated Pollutant	Limits/Standards	Applicable Regulation
Toxic Air Pollutants	State-enforceable only Modeled emission rates	15A NCAC 2D .1100 and 15A NCAC 2Q .0705
Odorous emissions	State-enforceable only Odorous emissions must be controlled	15A NCAC 2D .1806
Sulfur dioxide	Less than 250 tons emitted per consecutive 12-month period, facility-wide	15A NCAC 2Q .0317 to avoid 15A NCAC 2D .0530
Volatile organic compounds	Less than 250 tons emitted per consecutive 12-month period, facility-wide	15A NCAC 2Q .0317 to avoid 15A NCAC 2D .0530

STATE-ENFORCEABLE ONLY

1. 15A NCAC 2D .1100 CONTROL OF TOXIC AIR POLLUTANTS; and 15A NCAC 2Q .0705 EXISTING FACILITIES and SIC CALLS for TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT

- a. As of December 5, 2005 emissions of toxic air pollutants have been demonstrated on a facility-wide basis (excluding those sources exempt under 15A NCAC 2Q .0702 "Exemptions") that each of the toxic air pollutants (TAPs) emitted from all sources at the facility are either below its respective toxic permit emission rates (TPER) listed in 15A NCAC 2Q .0711 - "Emission Rates Requiring a Permit" or the TAPs are in compliance with 15A NCAC 2D .1100 "Control of Toxic Air Pollutants" as described in the table below.
 - i. Table of TAPs subject to 15A NCAC 2D .1100:

Toxic Air Pollutant	CAS Number	Toxic Air Pollutant Emission Rate	
		Pounds per hour	Pounds per day
Phenol	108-95-2	9.670	232.1
Glycol ether	110-80-5	5.212	125.1
Formaldehyde	50-00-0	3.975	95.4

Monitoring/Recordkeeping/Reporting Requirements

- ii. No monitoring, recordkeeping or reporting requirements apply for emissions of TAPs because, according to the demonstration submitted by the Permittee on December 5, 2005, this facility complies with the limits of 15A NCAC 2D .1100 at potential emission rates.
- b. The facility shall be operated and maintained in such a manner that any new, existing or increased actual emissions of any TAP listed in 15A NCAC 2Q .0711 or in this permit from all sources at the facility (excluding those sources exempt under 15A NCAC 2Q .0702 "Exemptions"), including fugitive emissions and emission sources not otherwise required to have a permit, will not exceed its respective TPER listed in 15A NCAC 2Q .0711 without first obtaining an air permit to construct or operate.
- c. PRIOR to exceeding any of the TPERs listed in 15A NCAC 2Q .0711, the Permittee shall be responsible for obtaining an air permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D .1100 "Control of Toxic Air Pollutants".
- d. The Permittee shall maintain at the facility records of operational information sufficient for demonstrating to the Division of Air Quality staff that actual TAPs are less than the rate listed in 15A NCAC 2Q .0711.
- e. The TPER table listed below is provided to assist the Permittee in determining when an air permit is required pursuant to 15A NCAC 2Q .0711 and may not represent all TAPs being emitted from the facility. This table will be updated at such time as the permit is either modified or renewed.

Toxic Air Pollutant	CAS Number	Toxic Permit Emission Rate (TPER)		
		Pounds per hour	Pounds per day	Pounds per year
No toxic air pollutants (TAPs) are listed in this table because, according to the demonstration submitted by the Permittee on December 5, 2005, the only sources of TAPs that are emitted at rates below their TPERs qualify as "combustion sources" as defined at 15A NCAC 2Q .0703(6) and, therefore, are currently deferred from the NC toxics program per 15A NCAC 2Q .0702(a)(18).				

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

- a. 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.

3. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS to avoid 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

- a. In order to avoid applicability of 15A NCAC 2D .0530(g) for major sources and major modifications, facility-wide emissions of sulfur dioxide into the atmosphere shall be less than 250 tons per consecutive 12-month period, total. [15A NCAC 2D .0530]

Operational Restrictions

- b. To assure compliance with the emission limit of Section 2.2 A.3.a, above, the following restrictions shall apply:
 - i. The total usage of No. 2 fuel oil in the boilers (**ID Nos. ES-BLR1 through ES-BLR5**) shall not exceed 6,900,000 gallons per consecutive twelve month period; and
 - ii. The No. 2 fuel oil sulfur content shall not exceed 0.5 percent by weight.

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

- c. If emissions testing is required, the Permittee shall perform such testing in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ found in Section 3 of this permit. If the results of this test are above the limit given in Section 2.2 A.3.a, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

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

- d. The total number of gallons of No. 2 fuel oil burned in the boilers shall be monitored and recorded monthly in a logbook (written or electronic format) maintained on-site and made available to an authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the No. 2 fuel oil usage is not monitored and recorded or if the monitoring indicates an exceedance of the limit in Section 2.2 A.3.b.i of this permit.
- e. Within 30 days of the end of each calendar month, the sulfur content of the No. 2 fuel oil consumed in the boilers and the sulfur dioxide emissions from the boilers during the previous twelve consecutive months shall be calculated and recorded in a logbook (written or electronic format) maintained on-site and made available to an authorized representative upon request. The Permittee shall calculate the sulfur dioxide emissions using the following formula:

$$SO_2 = \sum_{j=1}^{12} \left[(142)(S_{j,wt\%})(G_j) \left(\frac{ton}{2,000\ pounds} \right) \right]$$

- Where: SO_2 = Total sulfur dioxide emissions from the boilers resulting from combustion of No. 2 fuel oil during the previous twelve consecutive months, in units of tons;
- $S_{j,wt\%}$ = Highest weight percent of sulfur in the No. 2 fuel oil burned in the boilers during month "j" (e.g. if the highest sulfur content of the fuel oil was 0.5% by weight then $S_{j,wt\%} = 0.5$);
- G_j = The total number of gallons of No. 2 fuel oil burned in the boilers, combined, during month "j" in units of thousands of gallons (e.g. if 500,000 gallons of No. 2 fuel oil were burned in the boilers during the month then $G = 500$)

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the sulfur dioxide emissions from the boilers are not calculated and recorded or if the calculations indicate an exceedance of the limit in Section 2.2 A.3.a of this permit.

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

- f. The Permittee shall submit a 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. All instances of deviations from the requirements of this permit must be clearly identified. The report shall contain the following:
- The highest No. 2 fuel oil sulfur content and the monthly sulfur dioxide emissions from the boilers for each of the previous 17 months;
 - The total sulfur dioxide emissions from the boilers during each of the consecutive 12-month periods ending during the reporting period;
 - The monthly quantities of No. 2 fuel oil consumed in the boilers for the previous 17 months; and
 - The total monthly quantities of No. 2 fuel oil consumed in the boilers during each of the consecutive 12-month periods ending during the reporting period.

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

- a. In order to avoid applicability of 15A NCAC 2D .0530(g) for major sources and major modifications, facility-wide emissions of volatile organic compounds (VOCs) into the atmosphere shall be less than 250 tons per consecutive 12-month period, total. [15A NCAC 2D .0530]

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

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ found in Section 3 of this permit. If the results of this test are above the limit given in Section 2.2 A.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

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

- c. To assure compliance with the emission limit of Section 2.2 A.4.a, above, the melamine resin treaters (ES-MTR1 and ES-MTR2), the phenolic treater processes (ID Nos. ES-TRT1 and ES-TRT2) and the presses (ID Nos. ES-PR1 through ES-PR7) shall be operated such that the VOC emissions from these sources are less than 235 tons per consecutive 12-month period as follows:
- Within 30 days of the end of a calendar month, the Permittee shall calculate the VOC emissions from the melamine resin treaters for that calendar month utilizing the following equation:

$$VOC_{MT,k} = \sum_{i=1}^n [(M_{i,k})(C_{i,k})] \left[\frac{1}{2,000} \right] + \sum_{j=1}^m [(M_{j,k})(C_{j,k})] \left[\frac{1}{2,000} \right]$$

Where: $VOC_{MT,k}$ = Emissions of volatile organic compounds from the melamine resin treaters during calendar month “k”, in units of tons;

n = Total number of materials processed during calendar month “k” through ES-MTR1;

M_i = The amount of material “i” processed during calendar month “k” through ES-MTR1, in units of pounds;

C_i = The VOC content of material “i” expressed as a fraction (i.e. if material “i” contains 12% VOCs by weight, then $C_i = 0.12$);

m = Total number of materials processed during calendar month “k” through ES-MTR2;

M_j = The amount of material “j” processed during calendar month “k” through ES-MTR2, in units of pounds; and

C_j = The VOC content of material “j” expressed as a fraction (i.e. if material “j” contains 12% VOCs by weight, then $C_j = 0.12$)

- Within 30 days of the end of a calendar month, the Permittee shall calculate the VOC emissions from the phenolic treater processes for that calendar month utilizing the following equation:

$$VOC_{PT,k} = \sum_{i=1}^n [(M_{i,k})(C_{i,k})(1-RE_{TRT1})] \left[\frac{1}{2,000} \right] + \sum_{j=1}^m [(M_{j,k})(C_{j,k})(1-RE_{TRT2})] \left[\frac{1}{2,000} \right]$$

Where: $VOC_{PT,k}$ = Emissions of volatile organic compounds from the phenolic treater processes during

- calendar month “k”, in units of tons;
- n = Total number of materials processed during calendar month “k” through ES-TRT1;
- M_i = The amount of material “i” processed during calendar month “k” through ES-TRT1, in units of pounds;
- C_i = The VOC content of material “i” expressed as a fraction (i.e. if material “i” contains 12% VOCs by weight, then C_i = 0.12);
- RE_{TRT1} = Overall reduction efficiency of capture/control system for ES-TRT1:
 = 0.9906 if ES-TRT1 is operated in compliance with the applicable capture and control requirements of Section 2.2 B.1.e of this permit; or
 = 0; otherwise
- m = Total number of materials processed during calendar month “k” through ES-TRT2;
- M_j = The amount of material “j” processed during calendar month “k” through ES-TRT2, in units of pounds;
- C_j = The VOC content of material “j” expressed as a fraction (i.e. if material “j” contains 12% VOCs by weight, then C_j = 0.12); and
- RE_{TRT2} = Overall reduction efficiency of capture/control system for ES-TRT2:
 = 0.9598 if ES-TRT2 is operated in compliance with the applicable capture and control requirements of Section 2.2 B.1.e of this permit; or
 = 0; otherwise

- iii. Within 30 days of the end of a calendar month, the Permittee shall calculate the VOC emissions from the presses for that calendar month utilizing the press VOC emission factor provided in application 4500259.06A (i.e. 0.0001 pounds of VOC emitted per square foot of laminate pressed). The Permittee may modify this emission factor administratively upon becoming aware of a more representative emission factor via any source acceptable to DAQ. The monthly press VOC emissions shall be calculated using the following equation:

$$\text{VOC}_{\text{PR},k} = \left[0.0001 \left(\frac{\text{lb VOC}}{\text{ft}^2 \text{ pressed}} \right) \right] \left[P_k \left(\text{ft}^2 \text{ pressed} \right) \right]$$

Where: P_k = The total square feet of laminate material processed through all seven presses, combined, during calendar month “k”

- iv. Within 30 days of the end of a calendar month, the Permittee shall calculate the VOC emissions from the melamine resin treaters, the phenolic treater processes and the presses for the consecutive 12-month period that ended with that calendar month by summing the monthly VOC emissions from those sources, as calculated in Sections 2.2 A.4.c.i, ii and iii of this permit, over that consecutive 12-month period.
- v. Calculations of VOC emissions from the melamine resin treaters, the phenolic treater processes and the presses shall be made Sections 2.2 A.4.c.i through iv of this permit and recorded monthly in a logbook (written or electronic format) maintained on-site and made available to an authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if those VOC emissions are not monitored and recorded or if the calculated VOC emissions exceed the limit in Section 2.2 A.4.c of this permit.
- Reporting** [15A NCAC 2Q .0508(f)]
- d. The Permittee shall submit a 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. All instances of deviations from the requirements of this permit must be clearly identified. The report shall contain the following:
- i. The monthly VOC emissions from the melamine resin treaters, the phenolic treater processes and the presses for each of the previous 17 months; and
 - ii. The VOC emissions from the melamine resin treaters, the phenolic treater processes and the presses during each of the consecutive 12-month periods ending during the reporting period.

B. One phenolic treater process (ID No. ES-TRT1) consisting of:

- One double coater;
- Three day tanks (250 gallon capacity, each); and
- One enclosed steam-heated convection oven section exhausting to a natural gas/No. 2 fuel oil/phenolic treater fumes-fired waste heat boiler (15.65 million Btu per hour maximum heat input, ID No. ES-BLR3);

One phenolic treater process (ID No. ES-TRT2) consisting of:

- One double coater;
- Two day tanks (250 gallon capacity, each); and
- One enclosed steam-heated convection oven section exhausting to a natural gas/No. 2 fuel oil/phenolic treater fumes-fired waste heat boiler (23.0 million Btu per hour maximum heat input, ID No. ES-BLR4);

Two melamine resin treaters (ID Nos. ES-MTR1 and ES-MTR2), each consisting of one coating station and one enclosed steam-heated convection oven section

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
Hazardous Air Pollutants	Maximum Achievable Control Technology	15A NCAC 2D .1111 (40 CFR 63, Subpart JJJJ)

1. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (40 CFR 63, SUBPART JJJJ)

Applicability [40 CFR §63.3290 and §63.3300]

- a. For the collection of all web coating lines, as defined in 40 CFR 63.3310 [i.e. the two melamine resin treaters (ID Nos. **ES-MTR1 and ES-MTR2**) and the two phenolic treater processes (**ID Nos. ES-TRT1 and ES-TRT2**)], the Permittee shall comply with all requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR 63, including Subpart JJJJ “National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating,” and Subpart A “General Provisions.”

Standards [40 CFR §63.3320(b)]

- b. In accordance with §63.3320(b) the Permittee shall limit organic Hazardous Air Pollutant (HAP) emissions from the affected sources such that the organic HAP emissions are:
- i. No more than 5 percent of the organic HAP applied for each month (95 percent reduction); or
 - ii. No more than 4 percent of the mass of coating materials applied for each month; or
 - iii. No more than 20 percent of the mass of coating solids applied for each month; or
 - iv. Operate a thermal oxidizer to control the organic HAP emissions such that the outlet organic HAP concentration is no greater than 20 parts per million by volume by compound on a dry basis and the efficiency of the capture system is 100 percent.

Compliance for the Melamine Resin Treaters [40 CFR §63.3370(c)(3) and §63.3370(c)(5)(ii)]

- c. Compliance with the standards in Section 2.2 B.1.b of this permit for the melamine resin treaters is demonstrated on a monthly basis if the Permittee:
- i. Performs the monitoring required by Sections 2.2 B.1.f.i and ii of this permit; and
 - ii. That monitoring indicates that the monthly average organic HAP content of all as-applied coating materials utilized in the two melamine resin treaters is no more than 0.04 kg organic HAP per kg coating material applied.

Compliance for the Phenolic Treater Processes [40 CFR §63.3370(h), §63.3370(k) and §63.3370(l)]

- d. Compliance with the standards in Section 2.2 B.1.b of this permit for the phenolic treater processes is demonstrated on a monthly basis if the Permittee:
- i. Complies with the capture and control requirements of Section 2.2 B.1.e of this permit;
 - ii. Performs the monitoring required by Sections 2.2 B.1.f.i, iii, iv, v and vi of this permit; and

- iii. That monitoring indicates that the monthly organic HAP emission rate, calculated in accordance with Section 2.2 B.1.f.v of this permit, from each phenolic treater process is less than the allowable organic HAP emission rate, calculated in accordance with Section 2.2 B.1.f.vi of this permit, for that phenolic treater process.

Capture and Control Requirements [40 CFR §63.3350]

- e. To assure compliance, the Permittee shall comply with the following:
- i. For the phenolic treater processes' capture systems:
 - (A) The capture system for phenolic treater process ES-TRT1 shall be operated in accordance with Section 2.2 B.1.f.iii of this permit at all times that ES-TRT1 is operated;
 - (B) The capture system for phenolic treater process ES-TRT2 shall be operated in accordance with Section 2.2 B.1.f.iii of this permit at all times that ES-TRT2 is operated;
 - (C) The capture duct gas flow rate for the capture system of ES-TRT1 shall be greater than or equal to 8,998 standard cubic feet per minute at all times ES-TRT1 is operating; and
 - (D) The capture duct gas flow rate for the capture system of ES-TRT2 shall be greater than or equal to 13,452 standard cubic feet per minute at all times ES-TRT2 is operating
 - ii. For the phenolic treater processes' control systems:
 - (A) Operate the control system for phenolic treater process ES-TRT1 (i.e. boiler ES-BLR3) and the associated continuous temperature monitoring system (CTMS) installed in the combustion zone of boiler ES-BLR3 in accordance with Section 2.2 B.1.f.iv of this permit and the equipment manufacturer's specifications at all times that ES-TRT1 is operating except for during malfunctions, repairs and/or required quality assurance or control activities (e.g. calibration checks or zero and span adjustments);
 - (B) Operate the control system for phenolic treater process ES-TRT2 (i.e. boiler ES-BLR4) and the associated CTMS installed in the combustion zone of boiler ES-BLR4 in accordance with Section 2.2 B.1.f.iv of this permit and the equipment manufacturer's specifications at all times that ES-TRT2 is operating except for during malfunctions, repairs and/or required quality assurance or control activities (e.g. calibration checks or zero and span adjustments);
 - (C) The valid 3-hour average combustion temperature values for boiler ES-BLR3 shall be greater than or equal to 1,352 degrees Fahrenheit (°F) at all times ES-TRT1 is operating; and
 - (D) The valid 3-hour average combustion temperature values for boiler ES-BLR4 shall be greater than or equal to 1,397 °F at all times ES-TRT2 is operating.

Monitoring [40 CFR §63.3350]

- f. To assure compliance, the Permittee shall perform the following monitoring:
- i. For each material processed through the melamine resin treaters and the phenolic treater processes, monitor the following parameters:
 - (A) Organic HAP content;
 - (B) Volatile matter content;
 - (C) Solids content; and
 - (D) Material usage.
 - ii. For each melamine resin treater, within 30 days of the end of each calendar month, calculate the monthly average organic HAP content of all as-applied coating materials utilized in each of the melamine resin treaters for that calendar month using Equation 4 of §63.3370(c)(3), repeated below for convenience:

$$H_L = \frac{\sum_{i=1}^p C_{hi} M_i + \sum_{j=1}^q C_{hj} M_j - M_{wret}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j} \quad \text{Eq. 4}$$

- Where: H_L = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg.
- p = Number of different coating materials applied in a month.
- C_{hi} = Organic HAP content of coating material, i , as-purchased, expressed as a mass fraction, kg/kg.
- M_i = Mass of as-purchased coating material, i , applied in a month, kg.
- q = Number of different materials added to the coating material.
- C_{hij} = Organic HAP content of material, j , added to as-purchased coating material, i , expressed as a mass fraction, kg/kg.
- M_{ij} = Mass of material, j , added to as-purchased coating material, i , in a month, kg.
- M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.

iii. For the phenolic treater processes' capture systems:

- (A) The monitoring required in the site-specific monitoring plan (Plan), including:
- (1) Capture duct gas flow rate monitoring once per operating shift;
 - (2) Pitot tube visual inspection, Pitot tube line purge, and pressure transducer calibration once per month;
 - (3) Thermocouple calibration and Pitot tube leak check once per quarter; and
 - (4) Pitot tube geometric calibration once per Pitot tube (this is a characteristic of the Pitot tube which should not change over the life of the tube);
- (B) The Permittee must maintain the Plan on-site; review and update the Plan at least annually; and make the Plan available to an authorized representative upon request; and
- (C) The Permittee shall perform periodic inspections and maintenance on the capture systems in accordance with the Plan. As a minimum, the Permittee shall perform an annual internal inspection of each capture system to ensure structural integrity.

iv. For the phenolic treater processes' control systems (i.e. boilers ES-BLR3 and ES-BLR4):

- (A) Perform periodic inspections and maintenance on the control systems as recommended by the manufacturers;
- (B) Perform periodic inspections and maintenance on the CTMS installed in the combustion zones of ES-BLR3 and ES-BLR4 as recommended by the manufacturers. As a minimum, the Permittee shall successfully calibrate or replace each CTMS at least once every three months;
- (C) Continuously monitor and record the combustion chamber temperatures of boilers ES-BLR3 and ES-BLR4 and process the data as follows:
- (1) Collect valid temperature monitoring data from at least 90 percent of the hours during which the associated boiler operated. For an hour of temperature monitoring data to be valid that data must consist of a minimum of four equally spaced successive cycles of CTMS operation;
 - (2) Calculate the hourly average of all recorded temperature readings. For an hourly average temperature value to be valid, that value must be determined from at least three of the four equally spaced data values from that hour;
 - (3) Calculate the rolling 3-hour average of all recorded temperature readings for each operating period. For a 3-hour average temperature value to be valid, that value must be determined from at least two of the three hourly averages for that 3-hour period;
 - (4) Temperature monitoring data recorded during system malfunctions, repairs or required quality assurance or control activities (e.g. calibration checks or zero and span adjustments) shall not be used for purposes of demonstrating compliance with the standards in Section 2.2 B.1.b of this permit; and

(5) Except as provided in immediately preceding item (4), all valid temperature monitoring data must be included when assessing compliance with the standards in Section 2.2 B.1.b of this permit.

- v. For each phenolic treater process, within 30 days of the end of each calendar month, calculate the monthly organic HAP emission rate from that phenolic treater process for that calendar month in accordance with Equation 12 of §63.3370(i)(viii), repeated below for convenience:

$$H_e = (1 - R) \left(\sum_{i=1}^p C_{ahi} M_i \right) - M_{vret} \quad \text{Eq. 12}$$

Where: H_e = Total monthly organic HAP emitted, kg.

R = Overall organic HAP control efficiency, percent.

p = Number of different coating materials applied in a month.

C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i , expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i , applied in a month, kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in this section.

- vi. For each phenolic treater process, within 30 days of the end of each calendar month, calculate the allowable organic HAP emission rate for that phenolic treater process for that calendar month in accordance with Equation 13a of §63.3370(l)(v), repeated below for convenience:

$$H_a = 0.20 \left[\sum_{i=1}^p M_i G_i C_{si} \right] + 0.04 \left[\sum_{i=1}^p M_i (1 - G_i) + \sum_{j=1}^q M_{Lj} \right] \quad \text{Eq. 13a}$$

Where: H_a = Monthly allowable organic HAP emissions, kg.

p = Number of different coating materials applied in a month.

M_i = Mass of as-purchased coating material, i , applied in a month, kg.

G_i = Mass fraction of each coating material, i , which was applied at 20 mass percent or greater coating solids content, on an as-applied basis, kg/kg.

C_{si} = Coating solids content of coating material, i , expressed as a mass fraction, kg/kg.

q = Number of different materials added to the coating material.

M_{Lj} = Mass of non-coating-solids-containing coating material, j , added to coating-solids-containing coating materials which were applied at less than 20 mass percent coating solids content, on an as-applied basis, in a month, kg.

- vii. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 and 40 CFR Part 63, Subpart JJJJ if the monitoring required by Sections 2.2 B.1.f.i through vi of this permit is not conducted or if that monitoring indicates a(n) exceedance(s) of the standards in Section 2.2 B.1.b of this permit.

Recordkeeping [40 CFR §63.10 and §63.3410]

- g. The Permittee shall maintain records of the monitoring required by Sections 2.2 B.1.f.i through vi of this permit in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. In addition, the logbook shall include:
- i. The results of inspection and maintenance of boilers ES-BLR3 and ES-BLR4 and the associated capture systems performed pursuant to Sections 2.2 B.1.f.iii (A) and (C) and 2.2 B.1.f.iv (A) of this permit, including:
- (A) The dates and results of each inspection;
 - (B) The results of any maintenance performed on the control systems or capture systems; and
 - (C) The date and time of each corrective action.

- ii. The results calibrations and/or replacements of the CTMS associated with boilers ES-BLR3 and ES-BLR4 conducted pursuant to Section 2.2 B.1.f.iv (B) of this permit, including:
 - (A) The dates and results of each attempt to calibrate the system(s);
 - (B) The results of any maintenance performed on the system(s); and
 - (C) The dates and times of each replacement of the system(s).

The Permittee will be deemed in noncompliance with both 15A NCAC 2D .1111 and 40 CFR Part 63, Subpart JJJJ if these records are not maintained.

Reporting [40 CFR §63.9, §63.10 and §63.3400]

- h. The Permittee shall perform the following reporting:
 - i. The Permittee shall submit a semiannual continuous compliance report acceptable to the Regional Supervisor by January 30 of each calendar year for the preceding six-month period between July and December and by July 30 of each calendar year for the preceding six-month period between January and June. The semiannual continuous compliance report shall include either:
 - (A) A statement that the facility was in continuous compliance with the monitoring requirements and emissions limitations of 40 CFR Part 63, Subpart JJJJ and Section 2.2 B of this permit during the reporting period; or
 - (B) A statement that the facility was not in continuous compliance with the monitoring requirements and emissions limitations of 40 CFR Part 63, Subpart JJJJ and Section 2.2 B of this permit during the reporting period. In this case, a list of all instances of deviations from the requirements of 40 CFR Part 63, Subpart JJJJ and/or Section 2.2 B of this permit must be clearly identified including:
 - (1) The total operating time of each affected source during the reporting period;
 - (2) Information on the number, duration and cause of deviations (including unknown cause, if applicable), and the corrective action taken; and
 - (3) Information on the number of CTMS downtime incidents, if applicable, and the duration and cause (including unknown cause, if applicable) of the CTMS downtime incident(s), other than downtime associated with CTMS calibration checks or zero and span adjustments.
 - ii. The Permittee shall submit startup, shutdown and malfunction reports to the Regional Supervisor in accordance with §63.10(d)(5) and 63.3400(g) except that a separate startup, shutdown and malfunction report is not required if the relevant information is included with the semiannual continuous compliance reports submitted pursuant to Section 2.2 B.1.h.i of this permit.

SECTION 3 - GENERAL CONDITIONS

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

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

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. **Section 502(b)(10) Changes [15A NCAC 2Q .0523(a)]**
 - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
 - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
 - i. the changes are not a modification under Title I of the Federal Clean Air Act;
 - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
 - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
 - iv. the Permittee shall attach the notice to the relevant permit.
 - c. The written notification shall include:
 - i. a description of the change;
 - ii. the date on which the change will occur;
 - iii. any change in emissions; and
 - iv. any permit term or condition that is no longer applicable as a result of the change.
 - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
2. **Off Permit Changes [15A NCAC 2Q .0523(b)]**
The Permittee may make changes in the operation or emissions without revising the permit if:
 - a. the change affects only insignificant activities and the activities remain insignificant after the change; or
 - b. the change is not covered under any applicable requirement.
3. **Emissions Trading [15A NCAC 2Q .0523(c)]**
To the extent that emissions trading is allowed under 15A NCAC 2D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 2Q .0523(c).

I.A. Reporting Requirements for Excess Emissions and Permit Deviations

[15A NCAC 2D .0535(f) and 2Q .0508(f)(2)]

“**Excess Emissions**” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 2D; or by a permit condition; or that exceeds an emission limit established

in a permit issued under 15A NCAC 2Q .0700. (Note: Definitions of excess emissions under 2D .1110 and 2D .1111 shall apply where defined by rule.)

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

Excess Emissions

1. If a source is required to report excess emissions under NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
2. If the source is not subject to NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 2D .0535 as follows:
 - a. Pursuant to 15A NCAC 2D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
 - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
 - name and location of the facility;
 - nature and cause of the malfunction or breakdown;
 - time when the malfunction or breakdown is first observed;
 - expected duration; and
 - estimated rate of emissions;
 - ii. notify the Regional Supervisor or Director immediately when 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)(3)]

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(e)]

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

JJ. **General Emissions Testing and Reporting Requirements** [15A NCAC 2Q .0508(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, the Permittee shall perform such testing in accordance with the appropriate EPA reference method(s) as approved by the DAQ and follow the procedures outlined below. The Permittee must request **in writing** and receive approval from the DAQ for an alternate test method or procedure.

1. The Permittee shall submit a completed Protocol Submittal Form to the DAQ Regional Supervisor at least 45 days prior to the scheduled test date. A copy of the Protocol Submittal Form may be obtained from the Regional Supervisor.
2. The Permittee shall notify the Regional Supervisor of the specific test dates at least 15 days prior to testing in order to afford the DAQ the opportunity to have an observer on-site during the sampling program.
3. During all sampling periods, the Permittee shall operate the emission source(s) under maximum normal operating conditions or alternative operating conditions as deemed appropriate by the Regional Supervisor or his delegate.
4. The Permittee shall submit **two** copies of the test report to the DAQ. The test report shall contain at a minimum the following information:
 - a. a certification of the test results by sampling team leader and facility representative;
 - b. a summary of emissions results and text detailing the objectives of the testing program, the applicable state and federal regulations, and conclusions about the testing and compliance status of the emission source(s);
 - c. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics should be included as necessary;
 - d. all field, analytical, and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;

- e. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
 - f. documentation of facility operating conditions during all testing periods and an explanation relating these operating conditions to maximum normal operation. If necessary, provide historical process data to verify maximum normal operation.
5. The testing requirement(s) shall be considered satisfied only upon written approval of the test results by the DAQ.
 6. The DAQ will review emission test results with respect exclusively to the specified testing objectives as proposed by the Permittee and approved by the DAQ. The use of the test results beyond the stated objectives remains subject to the approval of the DAQ.

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

1. A permit shall be reopened and revised under the following circumstances:
 - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
 - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
 - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - d. the Director or EPA determines that the permit must be revised or revoked to 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).

ATTACHMENT

List of Acronyms

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