

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: MM/DD/YYYY

Region: Fayetteville Regional Office
County: Cumberland
NC Facility ID: 2600058
Inspector's Name: Robert Kennedy
Date of Last Inspection: 05/04/2007
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Purolator Filters NA, LLC Facility Address: Purolator Filters NA, LLC 3200 Natal Road Fayetteville, NC 28306 SIC: 3714 / Motor Vehicle Parts & Accessories NAICS: 336399 / All Other Motor Vehicle Parts Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: yes NSPS: na NESHAP: MACT, Subpart M PSD: na PSD Avoidance: na NC Toxics: yes 112(r): Other: renewal
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Numbers: 2600058.06B and C Date Received: 03/31/2006 Application Type: Renewal/Modification Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 01757/T17 Existing Permit Issue Date: 06/09/2006 Existing Permit Expiration Date: 12/31/2006
Steve Ross Environmental Manager (910) 426-4280 3200 Natal Road Fayetteville NC, 28306	Mark Godwin Director of Operations (910) 426-4217 3200 Natal Road Fayetteville NC, 28306	Steve Ross Environmental Manager (910) 426-4280 3200 Natal Road Fayetteville NC, 28306	
Review Engineer: Jenny Kelvington/Joseph Voelker Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 01757/T18 Permit Issue Date: MM/DD/YYYY Permit Expiration Date: 11/30/2011	

1. Purpose of Application

This permitting action is the consolidated renewal (2600058.06C) and modification (2600058.06B) of an exiting Title V permit pursuant to 2Q .0513. The existing Title V permit (01757T17) was issued to Purolator Filters NA, LLC (Purolator) on June 9, 2006 and was scheduled to expire on December 31, 2006. The renewal application was received on March 31, 2006, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until they renewal permit has been issued or denied.

As part of the renewal and modification application, Purolator has requested the following permit changes:

- a. Update the emission source identification numbers:
 - Change oil filter line identification number from ESOL4 to ESOL5
 - Change oil filter line identification number from ESOL5 to ESOL4
 - Change oil filter line identification number from ESOL6 to ESOL7
 - Change heavy duty oil filter line identification number from ESHD to ESOL6

- Change air filter line identification number from ESAL1 to ESAL4
- Change air filter line identification number from ESAL3 to ESRADIAL2
- Change air filter line identification number from ESAL4 to ESAL6
- Change air filter line identification number from ESAL7 to ESPOLY2
- Change air filter line identification number from ESAL8 to ESAL5

These changes have been incorporated into the revised permit.

- b. Update the source descriptions to show electric ovens have replaced natural gas-fired ovens:
- ESOL3 – Two electric ovens have replaced the natural gas-fired “Pre-gel” and “Final Cure” ovens.
 - ESOL5 – Two electric ovens have replaced the natural gas-fired “Pre-gel” and “Final Cure” ovens.
 - ESOL7 – Two electric ovens have replaced the natural gas-fired “Pre-gel” and “Final Cure” ovens.

These changes have been incorporated into the revised permit.

- c. Update the source description for ESOL2 and ESOL3 to show the electrostatic spray booths and cure ovens have been replaced with powder type spray paint booths.

This change has been incorporated into the revised permit.

- d. Remove the following sources whose operations have been dismantled:
- Platisol radial air filter line (ID No. ESAL2)
 - Polyurethane panel air filter line (ID No. ESAL6)

These changes have been incorporated into the revised permit.

- e. Add a natural gas-fired humidification oven rated at 0.136 mmBtu/hr to the polyurethane panel air filter line (ID No. ESPOLY2)

This changes has been included in the revised permit. See discussion in Section 8 of this review.

- f. Add the following insignificant activity
- Mold release operation (ID No. IS-MR1) associated with air filter line (ID No. ESAL4)

This source has been added to the list of insignificant activities. Potential emissions from this activity are less than 5 tons of VOCs per year.

- g. Reduce the VE monitoring frequency for paper dust collection system (ID No. ESOLDC) from weekly to quarterly.

The VE monitoring will be required monthly, instead of quarterly, as discussed in Section 8 of this review.

- h. Add emission limits for methyl isobutyl ketone and toluene in accordance with the air toxic compliance demonstration in place of the TPER limits for these air pollutants.

This change has been included in the revised permit. See discussion in Section 8 of this review.

2. Facility Description

The facility manufactures automotive oil filters, air filters, and fuel filters for original manufacturers (Toyota, Ford, Chrysler, etc.) and for the aftermarket (Purolator, Penske, etc.).

3. Application Chronology

March 31, 2006	Application 2600058.06B was received for TV minor modification and assigned to Mike Benson, Environmental Engineer, RCO.
March 31, 2006	Application 2600058.06C was received for renewal and assigned to Mike Benson.
April 5, 2006	Acknowledgement letter was sent to the facility.
May 18, 2006	Robert Kennedy, Environmental Engineer, FRO completed the regional review and recommended issuance of the permit.
June 9, 2006	Permit No. 01757T17 was issued to Purolator for a name change.
July 17, 2006	Jamie Sellman, Meteorologist, AQAB, reviewed the air toxic modeling and found it to adequately demonstrate compliance with the Acceptable Ambient Levels (AALs) for the six toxics modeled on a source by source basis.
August, 2006	Application 2600058.06B was reassigned to Bob Wooten, Environmental Engineer, RCO.
August 31, 2006	Bob Wooten sent Mark Godwin, Site Manager, an "additional information request" regarding ESOL1.
Sept 12, 2006	Bob Wooten sent Mark Godwin a second "additional information request" concerning sources ESOL1-ESOL7, ESCBA, ESOLDC, ESPOLY2, and ESAL5.
Nov 6, 2006	Kevin Scott, Sr. Project Engineer, with Arcadis, on behalf of Purolator, submitted MSDS's for the powder paint.
Nov 12, 2006	Kevin Scott submitted the additional information requested in the September 12, 2006 letter.
January 2, 2007	Permit applications (2600058.06B and 2600058.06C) were reassigned to Jenny Kelvington, Environmental Engineer, RCO.
January 9, 2007	Kevin Scott submitted additional information regarding the printing/labeling of filters.
May 4, 2007	Robert Kennedy (FRO) along with Rob Fisher and Jenny Kelvington (RCO) met with Steve Ross, Engineering Services Manager, to tour the facility. VE observations for the paper dust collection system were reviewed and all agreed that the new permit should relax VE monitoring to monthly.
September 19, 2007	Permit application was reassigned to Joe Voelker (JMV)
November 12, 2007	Email received from Kevin Scott (consultant) explaining the delay in the revised modeling submittal
December 12, 2007	Revised modeling received in the RCO
January 7, 2008	Memo issued by the AQAB stating the "modeling analysis adequately demonstrates compliance with the AALs for the all TAPs on a source by source basis".
January 18, 2008	JMV requested the Permittee to summarize the modeling data for inclusion in the air permit
January 30, 2008	Information requested on January 18, 2008 was received via email by JMV
March 10, 2008	Corrected TAP tables were received in the RCO
April 16, 2008	Draft permit was sent to the FRO and the Permittee for review and comment
April 18, 2008	Robert Kennedy from the FRO suggested 2D.1100 reporting frequency be reduced and suggested some numbering changes.
May 8, 2008	<p>Comments from the Permittee were limited to:</p> <ul style="list-style-type: none"> ▪ Would it be possible to put the toxics reporting schedule on the same semi-annual basis as the others? (Yes, these were changed) ▪ Do MSDSs from the vendor/supplier qualify as acceptable information from which to base the calculations under Section 2.1.A.5(c) characterizing VOHAP and %BV solids ? (Yes, per condition 2.1.A.5.(c)(i)(A)(4).

4. Permit History

Permit No.	Issuance Date	Description of Revision
01757T15	January 9, 2002	Initial TV Permit
01757T16	February 21, 2002	Modification to add ESOL6 and remove ESAL5
01757T17	June 9, 2006	Name Change

5. Facility Compliance Status

Mr. Robert Kennedy of the Fayetteville Regional Office (FRO) inspected the facility on May 4, 2007, with a follow-up visit on May 15, 2007 to re-inspect the VOC work practices related to open drums and rags, and the bagfilter inspection records. Mr. Kennedy found that the facility appeared to be operating in compliance with all applicable air quality requirements.

The DAQ has issued one notice of violation (NOV) to Purolator in the past five years. On June 7, 2004, an NOV was sent to the facility for exceeding the daily toluene TPER of 98 pounds during the month of February 2004 without first performing a compliance demonstration and obtaining a permit to exceed the limit. With this application, Purolator has performed a compliance demonstration that establishes a permit limit for toluene at maximum unrestricted operating conditions. Compliance with all air toxic emission limits is expected at the revised permitted levels.

Purolator has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

6. Facility Emissions Review

The following is an emission summary for the facility-wide emissions. Actual emissions have been copied from the 2005 emissions data as included in the I-BEAM, while the potential emissions have been taken from the permit application.

Pollutant	Potential Emissions tons/year	Actual 2005 Emissions tons/year
PM	10.79	2.31
PM-10	7.52	1.90
PM-2.5	3.27	1.90
SO ₂	0.10	<1.0
NO _x	17.20	5.98
CO	14.41	4.98
VOC	1217.00	306.43
Single HAP (Toluene)	26.04	10.09
Single HAP (Polycyclic Organic Matter, POM)	302.40	Not Reported (Expected actual 14.65)
Aggregate HAP	499.22	26.65

Actual VOC and HAP emissions are expected to be less than 2005 levels since Purolator has changed to powder paint for most of its oil filter coating operations.

7. Facility Wide Air Toxics

Air toxics are emitted from the following:

- The case bottom assembly emits methyl ethyl ketone (MEK).
- The paper used in air and fuel filters emits formaldehyde.
- The paper used in oil filters emits formaldehyde and phenol.
- The Plastisol used in air, fuel, and oil filters emits diethyl hexyl phthalate (DEHP).
- The wet paint used for oil filters emits formaldehyde, MEK, methyl isobutyl ketone (MIBK), and toluene.
- The ovens emit benzene, hexane, and other toxics listed above from the combustion of natural gas only.

Combustion sources are exempt from NC air toxics regulations.

The facility performed a compliance demonstration to show the estimated maximum unrestricted emission rates for MEK, formaldehyde, phenol, DEHP, MIBK, and toluene do not exceed acceptable ambient levels (AALs). Ms. Jamie Sellman reviewed the air quality dispersion modeling analysis and found that it adequately demonstrates compliance with AALs for all six air toxics on a source-by-source basis for the oil, fuel, and air filter lines. According to Ms. Sellman in a memo dated July 17, 2006, "The modeling analysis indicated that the maximum impacts ranged from 1% (MEK) to 68% (DEHP) of appropriate AALs." These revised limits have been incorporated in the permit.

Additionally, MEK is emitted from the case bottom assembly process. In the case bottom assembly process, gasket material containing 68% MEK is applied and consequently, up to 7.75 pounds of MEK are emitted per hour. The previous compliance determination established the permit limit for MEK emissions from the case bottom assembly at 7.75 lb/hr. This limit was to remain unchanged.

However, during draft permit review the facility thought the modeling submitted did not represent the facility adequately. The facility subsequently submitted a revised modeling analysis that was reviewed by Mark Yoder of the AQAB and approved via a memo dated January 7, 2008. The six TAPs discussed above were modeled on a source-by-source basis. Each emission source had multiple emission points. As a result the table of TAP emission limits has enlarged significantly. The modeled emission rates for all the TAPs excluding DEHP were scaled by a factor of 2. DEHP was scaled by 1.1.

The following table lists the % AAL vs. the appropriate TAP and averaging period.

TAP	Averaging Period, (hours)	%AAL
Formaldehyde	1	9.5
Phenol	1	5.6
Toluene	1	3.3
	24	14.0
MEK	1	2.5
	24	23.1
MIBK	1	8.9
	24	34.6
DEHP	24	97.0

With the exception of DEHP the margin of compliance is relatively large considering the emission rates modeled were double the expected actual emission rates. For DEHP, the margin is close at 97% but does represent a margin of 10% over the expected actual emissions.

The current permit requires the facility to test for phenol concentrations in the filter paper media when greater than 1.1% per manufacturer's datasheet. This was originally included at a time when the data sheets supplied by the manufacturer were fairly vague and tended to overstate the phenol concentration. Thus, at the direction of the regional office this requirement was placed into the permit to trigger a reexamination of the TAP emissions if the phenol concentrations exceeded 1.1%. Based on discussions with the facility this has not happened in recent memory. When this issue was raised with the regional office it was decided to let this condition remain for compliance assurance.

The permit also requires reporting of VOC and TAP emissions from each of the modeled sources on a quarterly basis. The stipulation will be reworked to ensure these emissions are also addressed as recordkeeping requirements to facilitate determination of ongoing compliance. Because of the relatively low margin of compliance, DEHP recordkeeping will be strengthened to include calculation of daily emissions.

The reporting frequency was changed from quarterly to semiannually at the request of the regional compliance inspector. There has not be a compliance issue associated with 2D.1100 that requires reporting on a quarterly basis.

8. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0515, Particulates from miscellaneous industrial processes
15A NCAC 2D .0516, Sulfur dioxide emissions from combustion sources
15A NCAC 2D .0521, Control of visible emissions
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 2D .1100, Toxic Air Pollutants
15A NCAC 2D .1111, MACT, Subpart M
15A NCAC 2D .1806, Control of Odors
15A NCAC 2Q .0317, Avoidance of 15A NCAC 2D .0530 [PSD]
15A NCAC 2Q .0711, Toxic Air Pollutants

The following monitoring, recordkeeping, and reporting conditions for the specific regulations have been modified as a result of the permit renewal and modification.

15A NCAC 2D .0521, Control of Visible Emissions

The applicant has requested that the frequency of VE observations be reduced for the paper dust collection system. Currently, the facility is required to perform VE monitoring every week. During the site inspection on May 4, 2007, no visible emissions were observed from the bagfilter controlling the particulate emissions from this source during its operation. In addition, I reviewed the VE logbook that included a weekly photograph of the bagfilter in operation, and found no incidences of VE above normal. The reduction in VE monitoring is a reasonable request. However, because the facility is required to perform monthly I&M on the bagfilter, VE observations will be required monthly rather than quarterly to keep both on the same schedule.

15A NCAC 2Q .0711, Toxic Air Pollutant Emission Rates Requiring a Permit

The existing permit establishes hourly and daily TPERs for MIBK and toluene. Purolator has performed a compliance demonstration to establish higher permit limits for each of these TAPs under 2D .1100. Since all TAPs emitted from the facility are either included under 2D .1100 or emitted only from combustion sources, the TPER requirement is removed from the permit.

15A NCAC 2D .1100, Toxic Air Pollutants

See Section 7.

15A NCAC 2D .1111, MACT, Subpart M

NESHAP, Subpart M "Surface Coating for Miscellaneous Metal Parts and Products" applies to the metal coating operations. Since the labeling of the oil filters requires a coating to be applied to the metal housing and more than 250 gallons of paint are used each year, the MACT applies to the oil filter lines. For the air and fuel filter lines, no significant amount of coating is applied to metal during labeling or any other time. Therefore, the MACT does not apply to these lines.

Purolator is considered an existing source, and therefore, the final compliance date for Subpart MMMM was January 2, 2007. Purolator has indicated it uses and will continue to use “the emission rate without add-on controls” compliance option for the entire affected facility, which are the seven oil filter lines. The coatings used at Purolator fall within the general use category and thus, as an existing source, Purolator must demonstrate compliance with the **2.6 lb HAP/gal solids emission limit** on a monthly basis. A MACT condition has been added to the permit requiring the facility to comply with 15A NCAC 2D .1111 “Maximum Achievable Control Technology” as promulgated in 40 CFR 63, Subpart MMMM.

Purolator has changed all but one of its oil filter lines from a solvent based paint containing HAPs to a powder paint that is HAP free. In evaluating compliance with the HAP emission limit, Mr. Robert Kennedy (FRO) was informed in a telephone conversation on May 4, 2006 with Mr. Len Lazarus, EPA Compliance Lead for Subpart MMMM, that Purolator may calculate the HAPs per gallon of coating applied using all of the powder paint usage in the denominator and that paints and inks used in lettering the oil filters must be included as HAPs in the numerator and solids in the denominator of the calculation if the facility used more than 50 gallons per year of marker coatings. For the month of April 2007, Purolator averaged 0.26 lb HAP/gal solids emissions for all the coatings applied to metal in its oil filter operations. Continued compliance is expected.

9. NSPS, NESHAPS, PSD, Attainment Status, 112(r), and CAM

NSPS

New source performance standards do not apply to this facility. The existing fire pump and emergency generator (ID Nos. IS-FP1 and IS-EG1) were constructed prior to the applicability date for 60 Subpart III.

NESHAP/MACT

NESHAP, Subpart MMMM “Surface Coating for Miscellaneous Metal Parts and Products” applies to the metal coating operations in the oil filter lines. The existing emergency generator (ID No. IS-EG1) is subject to the RICE MACT. However, pursuant to 40 CFR 63.6590(b)(3), there are no applicable requirements.

PSD and Non-Attainment NSR

The facility is a major source for PSD, as implemented through 15A NCAC 2D .0530, and has taken several permit limits to avoid being subject to PSD review.

- Cumberland County is in attainment for criteria pollutants. On March 27, 2008 EPA designated Cumberland County as attaining the 1997 8-hour ozone standard.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in this rule.

CAM

The bagfilter controlling particulate emissions from the paper dust collection system is the only control device at the site required to achieve compliance with an emission standard. Uncontrolled particulate emissions from the paper dust collection system are below 100 tons per year. Therefore, CAM does not apply.

10. Summary of Permit Changes

The following describes the current changes made to the existing permit 01757T17:

Current Section	Description of Change(s)
Insignificant Activities	<ul style="list-style-type: none"> • Removed three powder paint spray booths ESHD, ESOL4, and ESOL5 and include in oil filter line descriptions. • Removed one natural gas-fired steam generator (1.0 million Btu per hour maximum heat capacity). • Removed three natural gas brazen ovens. • Added ID No. IS-B1 for the natural gas-fired steam generator. • Added ID No. IS-FP1 for the diesel-fueled fire pump. • Added ID No. IS-EG1 for the diesel-fired emergency generator. • Add the mold release operation (ID No. IS-MR1) associated with air filter line (ID No. ESAL4).
Cover	<ul style="list-style-type: none"> • Amended all dates and permit revision numbers. • Updated language per latest shell document.
Table of Contents	<ul style="list-style-type: none"> • Removed Part II.
All Headers	<ul style="list-style-type: none"> • Updated permit number throughout permit.
Equipment Table	<ul style="list-style-type: none"> • Removed footnote stating the permit shield in General Condition R does not apply and compliance certification described in General Condition P is not required. • Revised formatting for oil, fuel, and air filter manufacturing operations. • Updated the descriptions for oil filter lines ESOL2 and ESOL3 to show conversion to powder paint spray booths. • Added powder paint spray booths and Subpart MMMM into the description of the oil filter lines. <ul style="list-style-type: none"> • Changed oil filter line identification number from ESOL4 to ESOL5. • Changed oil filter line identification number from ESOL5 to ESOL4. • Changed oil filter line identification number from ESOL6 to ESOL7. • Changed heavy duty oil filter line identification number from ESHD to ESOL6. • Changed air filter line identification number from ESAL1 to ESAL4 and changed descriptor from <i>one Polyurethane Panel Air Filter Line (ID No. ESAL1, 960 units per hour design capacity) with one natural gas-fired burner (1.25 million Btu per hour heat input capacity) to One polyurethane conical air filter line (960 units per hour design capacity) with one electric heat set oven and one 1.25 million BTU per hour natural gas-fired cure oven.</i> Upon review by permittee the final descriptor was changed to <i>One polyurethane conical air filter line (960 units per hour design capacity) with one 0.137 million BTU per hour natural gas humidification oven and one 1.25 million BTU per hour natural gas-fired cure oven and one gas heat set oven.</i> Note that this change may not be documented in the review correctly as it was made after a draft review by the Permittee. <ul style="list-style-type: none"> • Changed air filter line identification number from ESAL3 to ESRADIAL2. • Changed air filter line identification number from ESAL4 to ESAL6. • Changed air filter line identification number from ESAL7 to ESPOLY2 and changed descriptor from <i>one Polyurethane Panel Air Filter Line (ID No. ESAL7, 960 units per hour design capacity)</i> to <i>One polyurethane panel air filter line with one 0.137 million BTU per hour natural gas humidification oven, one electric heat set oven, and one 1.25 million BTU per hour natural gas-fired cure oven.</i> Note that this change may not be documented in the review correctly as it was made after a draft review by the Permittee. Upon review by Permittee it was changed to <i>One polyurethane panel air filter line with one oven, one electric heat set oven, and one 1.25</i>

Current Section	Description of Change(s)
	<p style="text-align: center;"><i>million BTU per hour natural gas-fired cure oven</i></p> <ul style="list-style-type: none"> • Changed air filter line identification number from ESAL8 to ESAL5 and changed descriptor from <i>one Platisol Panel Air Filter Line (ID No. ESAL8, 3000 units per hour design capacity)</i> to <i>One Platisol panel air filter line (3,000 units per hour design capacity) with one electric heat set oven and one 1.25 million BTU per hour natural gas-fired cure oven</i> <p>Upon review by Permittee the descriptor was changed to <i>One Platisol panel air filter line (3,000 units per hour design capacity) with one electric heat set oven and one 1.25 million BTU per electric IR oven</i></p> <p style="text-align: center;">Note that this change may not be documented in the review correctly as it was made after a draft review by the Permittee.</p> <ul style="list-style-type: none"> • Updated the source descriptions to show electric ovens have replaced most of the natural gas-fired ovens for ESOL3, ESOL5, and ESOL7. • Removed the platisol radial air filter line (ID No. ESAL2) and the polyurethane panel air filter line (ID No. ESAL6) . • Added a natural gas-fired humidification oven rated at 0.136 mmBtu/hr to the polyurethane panel air filter line (ID No. ESPOLY2).
2.1.A 2.1.A. Table 2.1.A. Table 2.1.A.4.g 2.1.A.5	<ul style="list-style-type: none"> • Updated source descriptions and identification numbers. • Corrected section reference for VOC work practices. • Removed the reference for toxic air pollutant emissions subject to 2Q .0711. • Changed the reporting frequency for PSD avoidance from quarterly to twice a year. • Added MACT Subpart MMMM requirements for the oil filter lines.
2.1.B.2.c	<ul style="list-style-type: none"> • Reduced VE observations for the paper dust collector from weekly to once a month and removed the requirement to establish normal in first 30 days following permit issuance.
2.2.A 2.2.A.2 (formerly 2.2.A.3)	<ul style="list-style-type: none"> • Removed the 2Q .0711 requirement for toxic air pollutant emissions. • Revised the emission limits under 2D .1100 • Added recordkeeping requirements to correspond to the existing reporting requirements. The requirements were also made more specific to facilitate compliance determination. The DEHP requirements were strengthened to a daily because of a low margin of compliance (97% of AAL) • Changed the reporting requirements from quarterly to annually by request of the regional compliance inspector during draft permit review.
General Conditions	<ul style="list-style-type: none"> • Updated the general conditions with the latest shell 2.20
N/A	<ul style="list-style-type: none"> • Eliminated Part II

11. Conclusions, Comments, and Recommendations

- The draft permit was sent to FRO for review and comments on 6/11/2007. FRO (Robert Kennedy) responded on 6/29/07 via e-mail noting a few typographical errors and requesting that the VE observation language be updated to the latest shell and for either the third compliance option to be added or the compliance coatings option be deleted for the MACT. *The typographical errors have been corrected, the VE language updated, and the compliant coatings option removed from the permit.*
- The draft permit was sent to the Permittee for review and comments on 6/11/2007. The facility has made no comments.
- A revised draft permit (for the 2D.1100 revision) was sent to the Permittee and the FRO on April 04/16/2008 (see chronology).