

## Air Permit Review

Permit Issue Date: October ??, 2010

**Region:** Mooresville Regional Office  
**County:** Gaston  
**NC Facility ID:** 3600224  
**Inspector's Name:** Joseph Foutz  
**Date of Last Inspection:** 03/10/2010  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> American &amp; Efird Plants #5 &amp; #15</p> <p><b>Facility Address:</b> American &amp; Efird Plants #5 &amp; #15 601 American Street &amp; 20 American Street Mt Holly, NC 28120</p> <p><b>SIC:</b> 2284 / Thread Mills <b>NAICS:</b> 313113 / Thread Mills</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>			<p><b>SIP:</b> N/A <b>NSPS:</b> N/A <b>NESHAP:</b> N/A <b>PSD:</b> N/A <b>PSD Avoidance:</b> N/A <b>NC Toxics:</b> N/A <b>112(r):</b> N/A <b>Other:</b> 15A NCAC 2D .1109 <i>[112(j) – Part 2 MACT Hammer for Boilers &amp; Process Heaters]</i></p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 3600224.09A <b>Date Received:</b> 09/11/2009 <b>Application Type:</b> 112(j) Part I <b>Application Schedule:</b> TV-Significant</p> <p style="text-align: center;"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 06691/T15 <b>Existing Permit Issue Date:</b> 08/15/2008 <b>Existing Permit Expiration Date:</b> 07/31/2013</p>
<p>John Eapen Vice President of Env Health and Safety (704) 951-2578 P O Box 507 Mount Holly, NC 28120</p>	<p>John Eapen Vice President of Env Health and Safety (704) 951-2578 P O Box 507 Mount Holly, NC 28120</p>	<p>John Eapen Vice President of Env Health and Safety (704) 951-2578 P O Box 507 Mount Holly, NC 28120</p>	
<p><b>Review Engineer:</b> Brian Bland</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>		<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 06691/T16 <b>Permit Issue Date:</b> 10/??/2010 <b>Permit Expiration Date:</b> 07/31/2013</p>	

**I. Purpose of Application**

American & Efird Plants #5 & #15 is located in Mount Holly, Gaston County, North Carolina. Application No. 3600224.09A, received September 11, 2009, is a Part 2 MACT "Hammer" application for three (3) No. 2 fuel oil / natural gas-fired boilers (2 units rated at 33.475 MMBtu/hr and 1 unit rated at 14.7 MMBtu/hr).

**II. Permit Modifications/Changes**

The following table describes the modifications to the current permit.

Page(s)	Section	Description of Change(s)
1	Cover Page	-Updated permit revision number and permit issuance date.
3	Pre-Section 1	-Remove introductory text
3 - 33	All, Header	-Updated permit revision number.
3	Section 1	-Added "2D .1100Case-by-Case MACT" designation to boilers ES15-1, ES15-3 and ES15-4
5	Section 2.1.A, Table	-Added 15A NCAC 2D .1109 to list of applicable regulations
7	Section 2.1 A 5	-Add Section to include 112(j) MACT Hammer requirements applicable to the affected boilers.
24 - 33	Section 3	-Updated General Conditions

### III. Regulatory Review

1. **15A NCAC 2D .1109 –Case-by-Case MACT** – On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General’s office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT “hammer” provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On September 14, 2009, the NC DAQ received a Part 2 MACT “Hammer” application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ’s recommendations.

No control technologies for the control of CO, metals, Hg, or HCl were identified for natural gas or No. 2 fuel oil-fired boilers in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA’s AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas combustion sources of this size, consistent with the provisions in CAA § 112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boiler as follows:

*To assure compliance, the Permittee shall perform an annual boiler inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:*

- i. Inspect the burner, and clean or replace any components of the burner as necessary;*
- ii. Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,*
- iii. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.*

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

In addition, the Permittee will be required to record the results of the annual inspection in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

### IV. Draft Permit Review Summary

<REGIONAL CONTACT> of the Mooresville Regional Office was provided a draft permit and draft permit review document on <DATE>. <SUMMARY OF COMMENTS>.

<FACILITY CONTACT> of American & Efird Plants #5 & #15 was provided a draft permit for review on <DATE>. <SUMMARY OF COMMENTS>.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on <DATE>. <SUMMARY OF COMMENTS>.

### V. Recommendations

This permit modification application for American & Efird Plants #5 & #15 located in Mount Holly, Gaston County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.