

Air Permit Review

Permit Issue Date: **date, 2011**

Region: Raleigh Regional Office
County: Wake
NC Facility ID: 9200782
Inspector's Name: Brian Bland
Date of Last Inspection: 01/20/2010
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Column & Post Inc.</p> <p>Facility Address: Column & Post Inc. 8013 Purfoy Road Fuquay-Varina, NC 27526</p> <p>SIC: 3089 / Plastics Products, Nec NAICS: 326199 / All Other Plastics Product Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 9200782.11A Date Received: 01/21/2011 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 09594/T01 Existing Permit Issue Date: 04/28/2008 Existing Permit Expiration Date: 10/31/2011</p>
<p>David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526</p>	<p>David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526</p>	<p>David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526</p>	
<p>Review Engineer: Mark Cuilla</p> <p>Review Engineer's Signature: Date: date, 2011</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 09594/T02 Permit Issue Date: date, 2011 Permit Expiration Date: date, 2016</p>	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**09594T01**) was issued on **April 28, 2008**, with an expiration date of **October 31, 2011**. The renewal application was received on **January 21, 2011**, 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 the renewal permit has been issued or denied.

There have been no modifications to the facility since the first-time Title V permit was issued.

II. Facility Description

The facility is a manufacturer of fiberglass columns and posts for houses and buildings. Products are made by filling forms with a polyester resin, a catalyst, and reinforcement such as fiberglass.

III. History/Background/Application Chronology

April 28, 2008 – Permit **09594T01** issued as a first-time Title V permit.

January 20, 2010 – Annual compliance inspection completed by Brian Bland of the RRO.

January 21, 2011 – Permit application **9200782.11A** received as a Title V permit renewal application. The application was deemed complete for processing.

March 18, 2011 – DRAFT permit sent to Permittee and RRO for comment prior to public notice and EPA review.

date, 2011 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

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

Pages	Section	Description of Changes
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed all references to Part II throughout permit
4	2.1 A.1.b	-corrected testing rule cross reference
5	2.1 A.2.b	-corrected testing rule cross reference
6-9	2.1 B	-moved former Section 2.2 B to Section 2.1 (corrected associated cross references throughout Section)
6	2.1 B (table)	-added references to facility-wide requirements to table -added MACT title
11	2.2 A.1.e 2.2 A.2.b	-updated shell reporting language -corrected testing rule cross reference
15-24	General Conditions	-updated shell conditions (v3.3)
25	List of Acronyms	-added acronyms for CAIR, NAA, and RACT

There were only minor, non-significant modifications to the equipment descriptions needed in ESM.

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart WWWW)
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0531, Sources in Nonattainment Areas, and 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart PPPP))
- 15A NCAC 2Q .0705, Existing Facilities and SIC Calls

A regulatory review for these current permit conditions will not be included in this document.

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is subject to the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW). The requirements of the Subpart are applicable to the facility's seven mixing tanks, molding area, material storage, and cleaning operations. Specific emission limits include a requirement to emit less than 87 pounds organic HAP per ton of resin used on a 12-month rolling average and less than 100 tons organic HAP per calendar year. The permit condition allows the Permittee to choose between two compliance options. Additional work practice standards, monitoring, recordkeeping, and reporting requirements are detailed in the permit condition. This permit renewal does not affect this status.

The Permittee also operates under a MACT avoidance condition for 40 CFR 63, Subpart PPPP (Surface Coating of Plastic Parts and Products). The Permittee does paint plastic parts, however, they are allowed an exemption to the applicability of this Subpart by limiting all HAP coatings to less than 100 gallons per year from its spraying operations (**ID Nos. P1 and P2**) [40 CFR 63.4481(b)]. The permit requires that the Permittee track HAP containing coatings on a monthly basis and submit summary reports of usage. This permit renewal does not affect this status.

PSD – The Permittee operates under a PSD/NSR avoidance condition limiting facility-wide volatile organic compound emissions to less than 100 tons per year. This permit condition was placed into the permit (09594R00) because the facility is located in Wake County (former ozone nonattainment area) and carried over into the first-time Title V permit. Wake County has since attained the ozone standard, however, this permit requirement must be retained. The permit condition includes monthly calculation and recordkeeping of VOC emissions and semiannual reporting requirements. This permit renewal does not affect this status.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store one or more of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no permitted control devices operating (other than dry filters on spray booths); therefore, CAM is not applicable to this facility. This permit renewal does not affect this status.

VII. Facility Wide Air Toxics

The facility is currently subject to a facility-wide modeled emission rate for styrene of less than 102.0 pounds per hour (based upon a **October 13, 2006** demonstration). The permit includes a requirement to limit styrene content of the resin to less than 38.92% by weight, calculate hourly emissions of styrene, and maintain a daily log of highest hourly emissions for each day. Quarterly reporting of these calculations and recordkeeping is also required. This permit renewal does not affect this status.

The permit also includes the shell conditions for the completion of the Last MACT/Air Toxics modeling demonstration required in 15A NCAC 2Q .0705. This condition also includes the list of NC TAPs emitted in quantities below their respective TPERs. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility:

Pollutant(s)	2008 Actual Emissions (tpy)	2009 Actual Emissions (tpy)
VOC	24.37	12.99
Total HAPs/TAPs	24.26	14.34

IX. Stipulation Review

The facility was last inspected by Brian Bland (formerly of the RRO) on **January 20, 2010**. Based on his observations the facility appeared to be in compliance with their Title V permit requirements. Dena Pittman of the RRO reviewed the file for this facility and found no additional comments related to this permit.

X. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected States/areas within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

RRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

RCO concurs with RRO's recommendation to issue the renewed air permit.