

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Mooresville Regional Office
County: Rowan
NC Facility ID: 8000045
Inspector's Name: Jim Westmoreland
Date of Last Inspection: 02/08/2011
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Daimler Trucks North America - Cleveland Plant Facility Address: Daimler Trucks North America - Cleveland Plant 11550 Statesville Boulevard Cleveland, NC 27013 SIC: 3711 / Motor Vehicles And Car Bodies NAICS: 33612 / Heavy Duty Truck Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 8000045.11A Date Received: 01/20/2011 Application Type: Modification Application Schedule: PSD Existing Permit Data Existing Permit Number: 04625/T29 Existing Permit Issue Date: 12/13/2010 Existing Permit Expiration Date: 08/30/2014
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Review Engineer: Gautam Patnaik Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue 04625/T30 Permit Issue Date: Permit Expiration Date:	

1. Facility Description

This facility manufactures heavy-duty diesel trucks.

2. Purpose of Application

Daimler Trucks North America submitted a PSD application to obtain Actuals Plantwide Applicability Limitations (PAL) for VOC, NO_x, and CO_{2e} emissions. There are no sources being added, modified, or removed.

3. Actual PALs

An option under both NSR and PSD rule is that a facility can request multiple PALs. The applicant is submitting this application to request PALs for VOC, NO_x, and GHG (as CO_{2e}) emissions for all

operations at their facility. On May 13, 2010, the U.S. EPA issued the final Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule that established an approach to addressing greenhouse gas emissions from stationary sources under the Clean Air Act (CAA) permitting programs. This final rule sets thresholds for greenhouse gas (GHG) emissions that define when permits under the PSD and Title V Operating Permit programs are required for new and existing industrial facilities.

This facility is currently a major stationary source under the PSD rules because potential emissions of VOC exceed the major source threshold of 250 TPY.. Rowan County is designated as non-attainment for the 8-hour ozone standard

The PAL is a component of both the PSD and NA-NSR regulations; because of the non-attainment designation given to Rowan County, the facility request for PAL will be evaluated in accordance with Non Attainment -NSR regulations in 15A NCAC 02D .0531 (Sources in Non Attainment Areas) and since the provisions of the PAL are already in place in the 40 CFR 51.166(w) the applicant is requesting that the PAL limits in their permit for VOC, NO_x, and GHG (as CO₂e) emissions, in adherence to these regulations.

The applicant is not adding any new sources or modifying any sources with this application. The PAL provisions as implemented through 2D .0531 are included in 40 CFR 51.166 “Actuals PAL.” The “Contents of the PAL Permit” are coded in Section 40 CFR §51.166(w)(7). The applicant fulfilled all the requirements for a PAL application as required by 40 CFR § 51.166 (w)(3) (i) to (iii). The application provided a list of all emissions units at the facility for the required pollutant indicating their status based on their potential to emit and also listed all the Federal, State, emission limitations, work practices standards that apply to each of the sources. The calculations of the baseline and the calculation procedures for monitoring as requirements by 40 CFR § 51.166 (w)(3) (ii) and (iii) are discussed below under each NSR pollutant.

VOC Emissions

Determination of Baseline and Emissions limits

The procedure to set a 10-year actuals PAL level as described by 40 CFR § 51.166 (w)(6) is “the actuals PAL level for a major stationary source shall be established as the sum of the baseline actual emissions of the PAL pollutant for each emissions unit at the source; plus an amount equal to the applicable significant level for the PAL pollutant under paragraph (b)(23) of this section or under the Act, whichever is lower. When establishing the actuals PAL level, for a PAL pollutant, only one consecutive 24-month period must be used to determine the baseline actual emissions for all existing emissions units. However, a different consecutive 24-month period may be used for each different PAL pollutant.”

While the federal rules allow a 10 year look-back to establish baseline actual emissions, the NC DAQ rules 15A NCAC 2D .0531(a)(1) allows a 5-year lookback period with a Director discretion to allow up to 10 years of the operator demonstrates that the selected baseline period is more representative of normal source operation. The applicant used data from 2004 to 2009 and found that the highest VOC emissions occurred from January 2005 to December 2006.

As per the applicant “Prior to April 2007, Daimler Trucks (as Freightliner) experienced an unprecedented amount of pre-buys due to an EPA-mandated engine change that was going to cost customers significantly more money to purchase a truck. As a result, in meeting the demand of these orders, the use of coatings and paints for truck cabs and parts also peaked during this period. The period in which Daimler received this order was between 2004 CY and 2006 CY, where 2005 CY was the height of filling the orders for trucks. Furthermore, many economic analysts have cited late 2007 as the beginning of the recent recession. During this recent economic downturn Daimler – like many other manufacturing companies – has experienced low production since 2007, which has only been amplified by the fact that they have received a reduced number of orders due to the significant number of orders received prior to 2007 CY.” DAQ agrees with the this decision that the facility records from January 2005 to December 2006 do represent the normal source operation of this facility. Hence, it will allow the selected time period (January 2005 to December 2006) for determining baseline actual emissions.

Thus, this 24 month was selected for determining baseline actual emissions. All emissions units at the facility were installed prior to the look-back period and are considered existing sources and no new sources have been added or constructed and none have been removed in the look-back period.

The emissions from all sources of VOC emissions in the facility are as mentioned in the table below, with all emissions in tons per year:

Source Description	2004	2005	2006	2007	2008	2009
Spray Painting/Coating & Miscellaneous Sources ES-SCAO - Spray Coating and Assembly Operations consisting of: - 37 paint spray booths (ES-PSB-1 through ES-PSB-37) - 21 paint drying ovens (ES-PDO-1 through ES-PDO-21) - 16 flash off booths (ES-FO-1 through ES-FO-16) - one wax booth (ES-WB) - six sanding booths (ES-SB1 through ES-SB6) - 18 tack booths (ES-TB1 through ES-TB18) - one paint mix room (ES-PMR) - various operations including gluing, caulking, seamseal, solvent wipe, cleanup solvent and other non-coating sources of VOC	438.60	757.63	605.46	279.24	346.94	189.92
Combustion Sources - Boiler No. 1 – Office Boiler, natural gas-fired (0.94 million Btu per hour maximum heat input, ID No. ES-BLR-1); - Boiler No. 2 – natural gas-fired (6.28 million Btu per hour maximum heat input, ID No. ES-BLR-2); - Boiler No. 3 – natural gas-fired (8.37 million Btu per hour maximum heat input, ID No. ES-BLR-3); - Boiler No. 4 –natural gas-fired (5.14 million Btu per hour maximum heat input, ID No. ES-BLR-4); - Boiler No. 5 –natural gas-fired (33.6 million Btu per hour maximum heat input, ID No. ES-BLR-5); And - Boiler No. 6 –natural gas-fired (3.38 million Btu per hour	0.70	0.68	0.70	0.55	0.71	0.36

Source Description	2004	2005	2006	2007	2008	2009
maximum heat input, ID No. ES-BLR-6) - Miscellaneous combustion sources (ID No. IES-12)						
Storage Tanks - IES-1 - One 10,000 gallon antifreeze tank - IES-2, IES-3, and IES-4 - Three 10,000 gallon diesel fuel tanks - IES-5 - One 4,000 gallon butanol tank - IES-6, IES-7, IES-8, and IES-9 - Four 10,000 gallon purge tanks	0.45	0.46	0.65	0.30	0.04	0.02
Other Sources: - IES-10 and IES-11, Two distillation units - IES-14 Five 125 gallon bulk tanks for new mix room - IES-15 Two 55 gallon piggable tanks for new mix room	0.00	0.00	0.00	0.00	0.00	0.00
Total	439.7	758.8	606.8	280.1	347.7	190.3

The actual calendar year 2005 VOC emissions were 758.8 tons per year and the actual calendar year 2006 VOC emissions were 606.8 tons per year. The baseline actual emissions for the two year period, as defined by the rule, were 682.8 tons per year of VOC. There were no emission source shutdowns or newly constructed emission sources from which emissions would have to be quantified or calculated. The PAL request = (baseline + significant) = (682.8 + 40) tons of VOC per year = **722.8 tons of VOC per rolling 12-months period**. This limit for VOC emissions is stipulated in Section 2.3 A. a., of the modified permit.

Effective and Expiration Date of the PAL

The effective date for this PAL shall be on the date the permit is issued and as per 40 CFR §51.166(w)(8)(i) cannot be more than 10 years. Any PAL permit not renewed in accordance with 40 CFR §51.166(w)(10) shall expire at the end of the PAL effective period. The effective and expiration date for the VOC is stipulated in Section 2.3 A. a. iv) and v), of the modified permit.

As required by 40 CFR §51.166(w)(7)(v), once the PAL permit expires, the applicant is subject to the requirements in 40 CFR §51.166(w)(9). Upon PAL permit expiration, DAQ shall decide whether and how the PAL allowable emissions will be distributed and issue a revised permit incorporating allowable limits for each PAL emissions unit, as appropriate. 40 CFR §51.166(w)(12)(ix) requires all data used to establish the PAL pollutant must be re-validated through performance testing or other scientifically valid means approved by DAQ every 5 years after issuance of the PAL.

Monitoring and Record keeping

The applicant shall record monthly the natural gas burned in the boilers (ID Nos. ES-BLR-1, through ES-BLR-6), miscellaneous combustion source (ID No. ES-12), and paint drying ovens (ES-PDO-1 through ES-PDO-21). The applicant shall record daily the VOC containing material used in the spray-coating and assembly operations (ES-SCAO), the amount collected in waste drums, record

monthly all VOC-containing materials purchased, and shall be in violation with New Source Review (NSR) requirements and in noncompliance with 2D .0530 and/or 2D .0531 if the amount of materials used, reclaimed, and purchased are not recorded. The reason for citing the dual regulations 2D .0530 and/or 2D .0531 is to ensure when the County gets back into compliance the permit language need not be revised.

As per the requirements of 40 CFR §51.166(w)(12)(ii)(a) and §51.166(w)(12) the applicant shall use mass balance calculations for activities using coatings or solvents and emission factors to calculate the monthly VOC emissions from the boilers (ID Nos. ES-BLR-1, through ES-BLR-6), miscellaneous combustion source (ID No. ES-12), and paint drying ovens (ES-PDO-1 through ES-PDO-21) specified in Section 2.3 A. h., through j., of the modified permit.

Miscellaneous VOC Emission Sources - By conservative estimation the annual VOC emissions from the one (10,000 gallon) antifreeze tank (IES-1), three (10,000 gallon) diesel fuel tanks (IES-2, IES-3, and IES-4), one (4,000 gallon) butanol tank (IES-5), four (10,000 gallon) purge tanks (IES-6, IES-7, IES-8, and IES-9), two distillation units (IES-10 and IES-11), five (125 gallon) bulk tanks for new mix room (IES-14), and two (55 gallon) piggable tanks for new mix room (IES-15) will not exceed 1 ton per year. In order to avoid having to track actual VOC emissions from these very small sources, the applicant has agreed to assume actual emissions from these sources exceed their combined potential emissions for each reporting period. The emission rate will be assumed to be 1 ton per rolling 12-Month period, combined, as stipulated in Section 2.3. A. j., of the modified permit. This estimation helps the facility to not run the cumbersome TANKS program to calculate VOC emissions from tanks.

Calculations and the total amount of facility wide VOC emissions shall be recorded monthly in a logbook and retained in an electronic format as per 40 CFR §51.166(w)(7)(viii) for a period of 5 years from the date of such record per 40 CFR §51.166(w)(13)(i). Following the requirements of 40 CFR §51.166(w)(7)(viii) and 40 CFR §51.166(w)(13)(ii) the applicant shall retain a copy of the following records, for the duration of the PAL effective period plus 5 years:

- i. A copy of the PAL permit application and any applications for revisions to the PAL; and
- ii. Each annual certification of compliance pursuant to Title V and the data relied on in certifying the compliance.

Reporting

[15A NCAC 2Q .0508(f), and §51.166(w)(7)(ix) and §51.166(w)(14)]

The applicant shall submit semi-annual monitoring reports to DAQ meeting the requirements in §51.166(w)(14)(i) through (iii). The applicant shall submit semi-annual report containing information required in paragraphs 40 CFR §51.166(w)(14)(i)(a) through (g) and stipulated in the Section 2.3. A. o., of the modified permit. Note this does not include requirements by 40 CFR §51.166(w)(14)(i)(e), since it requires the number, duration, and cause of any deviations. The facility as a result of having conducting material balances and the fact it operates no VOC control devices, does not expect to have any deviations.

NO_x Emissions

The PAL is a component of both the PSD and NSR regulations. The facility previously obtained a NO_x PSD avoidance limit, Section 2.2 A., of the current permit. The facility is requesting removal of the NO_x PSD avoidance limit and a PAL in this application in accordance with PSD regulations 40 CFR §51.166 and 15A NCAC 2D .0531. .

Determination of Baseline and Emissions limits

The facility will use calendar years 2005 and 2006 as the two year period for establishing the baseline emissions for the existing sources. Utilizing the same procedure as for the VOC emissions above, the applicant used data from 2004 to 2009 and found that the highest NO_x emissions occurred from January 2005 to December 2006. Thus, this 24 month was selected for determining baseline actual emissions. All emissions units at the facility were installed prior to the look-back period and are considered existing sources and no new sources have been added/constructed and none have been removed in the look-back period.

The emissions from all sources of NO_x emissions in the facility are from combustion sources as mentioned in the table below, with all emissions in tons per year:

Source Description	2004	2005	2006	2007	2008	2009
Spray Painting/Coating & Miscellaneous Sources ES-SCAO - Spray Coating and Assembly Operations consisting of: - 21 paint drying ovens (ES-PDO-1 through ES-PDO-21)	0.0	0.0	0.0	0.0	0.0	0.0
Combustion Sources - Boiler No. 1 – Office Boiler, natural gas-fired (0.94 million Btu per hour maximum heat input, ID No. ES-BLR-1); - Boiler No. 2 – natural gas-fired (6.28 million Btu per hour maximum heat input, ID No. ES-BLR-2); - Boiler No. 3 – natural gas-fired (8.37 million Btu per hour maximum heat input, ID No. ES-BLR-3); - Boiler No. 4 –natural gas-fired (5.14 million Btu per hour maximum heat input, ID No. ES-BLR-4); - Boiler No. 5 –natural gas-fired (33.6 million Btu per hour maximum heat input, ID No. ES-BLR-5); And - Boiler No. 6 –natural gas-fired (3.38 million Btu per hour maximum heat input, ID No. ES-BLR-6) - Miscellaneous combustion sources (ID No. ES-12)	12.73	12.37	12.67	10.07	12.83	6.46
Total	12.7	12.4	12.7	10.1	12.8	6.5

The actual calendar year 2005 NO_x emissions were 12.4 tons per year and the actual emissions for calendar year 2006 NO_x emissions were 12.7 tons per year. The baseline actual emissions for the two year period, as defined by the rule, was 12.5 tons of NO_x emissions per year. There were no emission source shutdowns or newly constructed emission sources from which emissions would have to be quantified or calculated. The PAL request = (baseline + significant) = (12.5 + 40) tons of NO_x per

year = 52.5 tons of NO_x per rolling 12-months period. This NO_x emissions limit is stipulated in Section 2.3 B. a., of the modified permit.

Effective and Expiration Date of the PAL

The effective date for this PAL shall be on the date the permit is issued and as per regulations and procedures outlined for NO_x PAL above, this NO_x PAL cannot be more than 10 years. Any PAL permit not renewed shall expire at the end of the PAL effective period and once the PAL permit expires, the applicant is subject to the requirements in 40 CFR §51.166(w)(9). The effective and expiration date for the NO_x PAL is stipulated in Section 2.3 B. a. iv) and v), of the modified permit.

As required by 40 CFR §51.166(w)(7)(v), once the PAL permit expires, the applicant is subject to the requirements in 40 CFR §51.166(w)(9). Upon PAL permit expiration, DAQ shall decide whether and how the PAL allowable emissions will be distributed and issue a revised permit incorporating allowable limits for each PAL emissions unit, as appropriate. 40 CFR §51.166(w)(12)(ix) requires all data used to establish the PAL pollutant must be re-validated through performance testing or other scientifically valid means approved by DAQ every 5 years after issuance of the PAL.

Monitoring and Record keeping

The applicant shall record monthly the natural gas burned in the boilers (ID Nos. ES-BLR-1, through ES-BLR-6), miscellaneous combustion source (ID No. ES-12), and paint drying ovens (ES-PDO-1 through ES-PDO-21). As per the requirements of 40 CFR §51.166(w)(12)(ii)(a) and §51.166(w)(12)(vi) the applicant will use emission factors to calculate the monthly NO_x emissions from the natural gas-fired boilers (ID Nos. ES-BLR-1, through ES-BLR-6), miscellaneous combustion source (ID No. ES-12), and paint drying ovens (ES-PDO-1 through ES-PDO-21) by calculating the monthly emissions as follows:

NO_x emissions (tons/month) = (100.0 lb/106 scf x C scf/month)/2000 lbs/ton

Where,

C = natural gas usage in standard cubic feet per month.

The applicant shall determine facility wide NO_x emissions per month using the emissions calculations as specified above and specified in 2.3 B. g., of the modified permit. Calculations and the total amount of facility wide NO_x emissions shall be recorded monthly in a logbook. The applicant shall retain on site a copy of all records necessary to determine compliance with the PAL for 5 years from the date of such record.

Reporting

[15A NCAC 2Q .0508(f), and §51.166(w)(7)(ix) and §51.166(w)(14)]

The applicant shall submit semi-annual monitoring reports to DAQ and meeting the requirements in §51.166(w)(14)(i) through (iii). The applicant shall submit semi-annual report containing information required in paragraphs 40 CFR §51.166(w)(14)(i)(a) through (g). and stipulated in the Section 2.3. B. l., of the modified permit. Note this does not include requirements by 40 CFR §51.166(w)(14)(i)(e), since it requires the number, duration, and cause of any deviations. The facility has no NO_x control devices and thus no deviations are expected.

Green House Gas (GHG) Emissions

The Green House Gases (GHG) are pollutants that trap heat in the atmosphere and some believe are associated with climate change. Under EPA rulemaking the “Tailoring rule” issued on June 3, 2010, and codified in: “<http://www.gpo.gov/fdsys/pkg/FR-2010-06-03/pdf/2010-11974.pdf#page=1>” covers applicability of PSD and Title V to GHG emissions starting January 2, 2011. Under this rule GHGs are a single air pollutant defined as the aggregate group of the following six gases:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Sulfur hexafluoride (SF₆)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)

The emissions of these GHGs from the facility are mainly emissions of CO₂, CH₄, and N₂O emissions from the facility combustion sources. The GHG emissions are measured in terms of CO₂ equivalent (CO₂e) and is based on the relative global warming potential (GWP) of the GHGs.

The CO₂e is measured as per the equation below:

$$\text{CO}_2\text{e} = \text{Sum of } [(\text{mass of the GHG}) \times (\text{its GWP})]$$

Where

GWP = global warming potential.

(GWPs of CO₂ = 1, CH₄ = 21, and N₂O = 310)

These ratios may be revised and are set in Table A-1 of the GHG reporting rule. (Subpart A of 40 CFR Part 98.)

The PAL is a component of both the PSD and NSR regulations. The facility is requesting a PAL in this application in accordance with PSD regulations 40 CFR §51.166 and 15A NCAC 2D .0531.

The facility will use calendar years 2005 and 2006 as the two year period for establishing the baseline emissions for the existing sources.

Determination of Baseline and Emissions limits

Utilizing the same procedure as for the VOC emissions above, the applicant used data from 2005 to 2009 and found that the highest CO₂e emissions occurred from January 2005 to December 2006. Thus, this 24 month that was selected for determining baseline actual emissions. All emissions units at the facility were installed prior to the look-back period and are considered existing sources and no new sources have been added/constructed and none have been removed in the look-back period.

The emissions from all sources of CO₂e emissions in the facility are as mentioned in the table below:

Pollutant / Gas usage	2005	2006	2007	2008	2009
Natural Gas Usage (ft ³)	247,407,953	253,381,248	201,322,301	256,550,625	129,108,743

Pollutant / Gas usage	2005	2006	2007	2008	2009
CO ₂ -pounds/yr	29,702,338.31	30,419,456.90	24,169,566.98	30,799,953.60	15,500,033.51
CH ₄ – pounds/yr	560.21	573.74	455.86	580.91	292.34
N ₂ O- pounds/yr	56.02	57.37	45.59	58.09	29.23
CH ₄ - (Pounds CO ₂ e/yr)	11,764.41	12,048.45	9,573.01	12,199.15	6,139.21
N ₂ O - (Pounds CO ₂ e/yr)	17,366.51	17,785.80	14,131.58	18,008.27	9,062.64
Total CO ₂ e (tons/yr)	14,866	15,225	12,097	15,415	7,758

The actual calendar year 2005 CO₂e emissions were 14,866 tons per year and the actual emissions for calendar year 2006 CO₂e emissions were 15,225 tons per year. The baseline actual emissions for the two year period, as defined by the rule, was 15,045 CO₂e tons per year. There were no emission source shutdowns or newly constructed emission sources from which emissions would have to be quantified or calculated. 40 CFR §51.166(b)(48)(iii) defines significant for GHGs as “for the pollutant GHGs, an emissions increase shall be based on tpy CO₂e, and shall be calculated assuming the pollutant GHGs is a regulated NSR pollutant, and “significant” is defined as 75,000 tpy CO₂e.” The PAL request = (baseline + significant) = (15,045 + 75,000) CO₂e tons per year = 90,045 CO₂e tons per rolling 12-months period. This CO₂e emissions limit is stipulated in Section 2.3 C. a., of the modified permit.

Effective and Expiration Date of the PAL

The effective date for this PAL shall be on the date the permit is issued and as per regulations and procedures outlined for CO₂e PAL above, this CO₂e cannot be more than 10 years. Any PAL permit not renewed shall expire at the end of the PAL effective period and once the PAL permit expires, the applicant is subject to the requirements in 40 CFR §51.166(w)(9). The effective and expiration date for the CO₂e PAL is stipulated in Section 2.3 C. a. iv) and v), of the modified permit.

As required by 40 CFR §51.166(w)(7)(v), once the PAL permit expires, the applicant is subject to the requirements in 40 CFR §51.166(w)(9). Upon PAL permit expiration, DAQ shall decide whether and how the PAL allowable emissions will be distributed and issue a revised permit incorporating allowable limits for each PAL emissions unit, as appropriate. 40 CFR §51.166(w)(12)(ix) requires all data used to establish the PAL pollutant must be re-validated through performance testing or other scientifically valid means approved by DAQ every 5 years after issuance of the PAL.

Monitoring and Record keeping

The applicant shall record monthly the natural gas burned in the boilers (ID Nos. ES-BLR-1, through ES-BLR-6), miscellaneous combustion source (ID No. ES-12), and paint drying ovens (ES-PDO-1 through ES-PDO-21). As per the requirements of 40 CFR §51.166(w)(12)(vi) the applicant will use emission factors to calculate the monthly CO₂e emissions from the natural gas-fired boilers (ID Nos. ES-BLR-1, through ES-BLR-6), miscellaneous combustion source (ID No. ES-12), and paint drying ovens (ES-PDO-1 through ES-PDO-21) by calculating the monthly emissions using the following equations:

$$\begin{aligned} \text{CO}_2 \text{ (pounds/month)} &= \text{Natural Gas usage (scf/month)} / 8.32 \\ \text{CH}_4 \text{ (pounds/month)} &= \text{Natural Gas usage (scf/month)} / 441634.3 \\ \text{N}_2\text{O (pounds/month)} &= \text{Natural Gas usage (scf/month)} / 4416421.7 \\ \text{CO}_2\text{e (pounds/month)} &= [\text{CO}_2 \text{ (pounds/month)}] + [\text{CH}_4 \text{ (pounds/month)} \times 21] + \\ &\quad [\text{N}_2\text{O (pounds/month)} \times 310] \\ \text{CO}_2\text{e (tons/month)} &= [\text{CO}_2\text{e (pounds/month)}] / 2000 \text{ lbs/ton} \end{aligned}$$

Calculations and the total amount of facility wide CO₂e emissions shall be recorded monthly in a logbook. The applicant shall retain on site a copy of all records necessary to determine compliance with the PAL for 5 years from the date of such record.

Reporting

[15A NCAC 2Q .0508(f), and §51.166(w)(7)(ix) and §51.166(w)(14)]

The applicant shall submit semi-annual monitoring reports to DAQ and meeting the requirements in 40 CFR §51.166(w)(14)(i) through (iii). The applicant shall submit semi-annual report containing information required in paragraphs 40 CFR §51.166(w)(14)(i)(a) through (g), and stipulated in the Section 2.3. C. 1., of the modified permit. Note this does not include requirements by 40 CFR §51.166(w)(14)(i)(e), since it requires the number, duration, and cause of any deviations. The facility as a result of having no CO₂e control devices, does not expect to have any deviations.

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

NSPS

Not applicable to the proposed change.

NESHAP/MACT

Not applicable to the proposed change.

PSD

Refer to Section 4 for complete details.

Attainment Status

Rowan County is non attainment for for the 8-Hour Ozone Standard (See Section 3 of the review)

112(r)

This facility is NOT subject to Section 112(r) of the Clean Air Act.

CAM

Not Applicable.

5. Facility Wide Air Toxics

There is no increase in emissions thus toxics review is not required.

6. Statement of Compliance

The facility was last inspected by Mr. Jim Westmoreland of the Mooresville Regional Office on 02/08/2011. Based on his observation this facility appeared to be in compliance with the applicable air quality regulations.

7. Table of Changes:

Table of changes made in Air Quality Permit No. 04625T30)

Page(s)	Section	Description of Change(s)
	2.2 A.	Removed of the NO _x PSD avoidance limit
20 through 34	2.2 A. through D.	Renumbering references to 2D .0952, 2Q .0701(c), MACT Subpart PPPP, MACT MMMM, and 2Q .0705
35 through 37	2.3 A.	VOC PAL
37 through 39	2.3 B.	NO _x PAL
39 through 41	2.3 C.	GHG PAL (as CO ₂ e)
42 through 51	General Conditions	Updated