

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: Date 2006

Region: Asheville Regional Office
County: Burke
NC Facility ID: 1200021
Inspector's Name: Brendan Davey
Date of Last Inspection: 07/20/2004
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Drexel Heritage Furniture Industries, Inc. - Plant 43 Facility Address: Drexel Heritage Furniture Industries, Inc. - Plant 43 104 1st Street NW Hildebran, NC 28637 SIC: 2511 / Wood Household Furniture NAICS: 337122 / Nonupholstered Wood Household Furniture Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: 15A NCAC 2D .0614 NSPS: NA NESHAP: 15A NCAC 2D .1111 (Subparts DDDDD and DDDD) PSD: NA PSD Avoidance: NA NC Toxics: 15A NCAC 2Q .0705 112(r): NA Other: NA		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 1200021.05A Date Received: 04/12/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02769/T13 Existing Permit Issue Date: 03/10/2004 Existing Permit Expiration Date: 02/28/2006		
Justin Sergent Safety & Environmental Manager (336) 299-9351 1025 Howard Street Greensboro NC, 27403	Thomas Mangum VP of Operations (828) 438-5600 211 East Fleming Drive Morganton NC, 28655	Stanley Carter Senior Engineer (828) 438-5604 211 E Fleming Drive Morganton NC, 28655			
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2006			Comments / Recommendations: Issue 02769T14 Permit Issue Date: Date 2006 Permit Expiration Date: Date 2011		

I. Purpose of Application

Drexel Heritage furniture Industries, Inc. – Plant 43, is currently operating under permit 02769T13. This permit is set to expire on February 28, 2006. Per the requirements of the permit, an application for renewal was due by June 1, 2005. This application completes that requirement. The permit is deemed complete for processing. The Permittee did not request any modifications to the permit as part of this renewal process.

In addition to renewal of the permit, the Permittee is also completing the Part II Construction requirements in Part II, Section 2.3 which require that the facility submit a title V application for the construction and operation of boiler (ID No. ES-B3) within 12-months of commencing operation. The appropriate application forms and associated permit fee of \$834 were received.

These two actions are being taken to notice at one time.

II. Facility Description

The facility is a furniture manufacturer engaged in the manufacture of case goods and dining room wood furniture. The facility currently operates one shift per day, five and a half days per week. The facility is permitted to operate boilers, wood finishing, printing, and woodworking operations, and lumber drying kilns.

III. History/Background/Application Chronology

April 12, 2005 – Permit application **1200021.05A** was received for the renewal of the Title V permit and for the completion of permit requirements for the submittal of a complete Title V application within 12-months of commencing operation of boiler (**ID No. ES-B3**). The total application, including permit fee of \$834 was deemed complete for processing.

May 23, 2005 – Received Asheville Regional Office comments on renewal application.

September 6, 2005 – Sent Permittee email request to confirm operating equipment at the facility.

September 16, 2005 – Received email response to request for updated equipment list.

December 6, 2005 – Sent letter to facility requesting that a CAM demonstration be submitted for all applicable sources.

March 13, 2006 – Received CAM demonstration via email as requested in early letter response.

March 17, 2006 – DRAFT permit sent to Permittee, regional office and title V coordinator prior to public notice and EPA review.

Date, 2006 – DRAFT permit sent to public notice and EPA review prior to issuance.

IV. Permit Modifications/Changes

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

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	-added equipment identification numbers -added sources per regional office inspection report
Cover	-	-amended all dates and permit revision numbers -corrected regional office address
TOC	-	-updated shell titles -removed references to Part II sections
All	Header	-amended permit revision number
3-4	Equipment table	-added MACT subpart citations -added boiler descriptors -moved equipment identification numbers -removed asterisks and asterisked language -removed equipment per Permittee request
5	2.1 A (table) 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.2.d 2.1 A.2.e	-added boiler descriptor -added MACT citation -corrected cross reference -added equipment identification numbers where needed -added testing requirement per regional office request -added testing requirement per regional office request -added equipment identification numbers where needed -updated shell language -updated shell language

Page(s)	Section	Description of Change(s)
6	2.1 A.2.f 2.1 A.2.g 2.1 A.3.a 2.1 A.3.b 2.1 A.3.c 2.1 A.4.a 2.1 A.4.b 2.1 A.4.c 2.1 A.4.d	-added equipment identification numbers where needed -updated shell language -added equipment identification numbers where needed -corrected cross reference -corrected cross-references -added equipment identification numbers where needed -corrected cross reference -added equipment identification numbers where needed -added equipment identification numbers where needed
7	2.1 A.4.f 2.1 A.5.b 2.1 A.5.c 2.1 A.5.d 2.1 A.5.e	-updated shell language -corrected cross reference -updated shell language and added equipment identification numbers where needed -updated shell language -updated shell language
8	2.1 A.6 (title) 2.1 A.6.a 2.1 A.6.c 2.1 A.6.d 2.1 A.6.f 2.1 A.7	-corrected rule citation -updated shell language -added equipment identification numbers where needed -added equipment identification numbers where needed -amended quarterly reporting to semi-annually -added MACT language
9	2.1 B (title/table) 2.1 B.1.a 2.1 B.1.c 2.1 B.2.a 2.1 B.2.c 2.1 B.2.d	-added boiler descriptor, added MACT citation, and corrected cross reference -removed asterisk and asterisked language -added equipment identification numbers where needed -added equipment identification numbers where needed -added equipment identification numbers where needed -added equipment identification numbers where needed -added equipment identification numbers where needed
10	2.1 B.3.c 2.1 B.3.d	-added equipment identification numbers where needed -added clarifying language and equipment identification numbers where needed
11	2.1 B.4.c 2.1 B.4.f 2.1 C (list)	-updated shell language -modified quarterly reporting to semiannually -added equipment identification numbers where needed and removed equipment per Permittee request
12	2.1 C (table) 2.1 C.1.b 2.1 C.1.c 2.1 C.1.e 2.1 C.2.a	-corrected cross reference -updated shell language and added equipment identification numbers where needed -updated shell language and added equipment identification numbers where needed -updated shell language -added equipment identification numbers where needed
13	2.1 C.2.c 2.1 C.2.d 2.1 C.2.e 2.1 D (list)	-updated shell language and added equipment identification numbers where needed -updated shell language -updated shell language -amended description for CAM purposes
14	2.1 D.1.b 2.1 D.1.c 2.1 D.1.e 2.1 D.2.c	-update shell language -update shell language and add equipment identification numbers where needed -updated shell language -updated shell language and added equipment identification numbers where needed

Page(s)	Section	Description of Change(s)
15	2.1 D.2.d 2.1 D.2.e	-updated shell language -updated shell language
15-17	2.1 D.3	-added CAM requirements
17	2.1 E	-added MACT requirements
17-25	2.2 A	-updated shell language and added equipment identification numbers where needed
25	2.2 B	-added last MACT/air toxics demonstration requirement
26-34	General Conditions	-updated shell language
-	Part II (old Section)	-removed Part II

The following table describes the modifications to ESM as a result of this renewal process.

Current permit description(s)	Description(s) as a result of this renewal
One wood/No. 5 fuel oil/solid finishing waste fired boiler without flyash reinjection (33.2 million Btu per hour heat input capacity while burning wood or solid finishing waste; 25.2 million Btu per hour heat input capacity while firing No. 5 fuel oil; ID No. ES-B1)	One watertube design wood/No. 5 fuel oil/solid finishing waste fired boiler without flyash reinjection (33.2 million Btu per hour heat input capacity while burning wood or solid finishing waste; 25.2 million Btu per hour heat input capacity while firing No. 5 fuel oil)
One No. 5 fuel oil/natural gas-fired boiler (29.3 million Btu per hour heat input capacity; ID No. ES-B3)	One firetube design No. 5 fuel oil/natural gas-fired boiler (29.3 million Btu per hour heat input capacity)
One jove edge finishing machine (ID No. ES-FIN1-F30)	End dated per Permittee request
One screen wash station (ID No. ES-FIN1-F40)	End dated per Permittee request
One silk screen machine (ID No. ES-FIN1-F41)	End dated per Permittee request
Five roll printers installed on roll coaters (ID Nos. ES-F24, ES-F26a through F26c, and ES-F28)	End dated per Permittee request
Three dyeing ovens (two steam and one UV, respectively; ID Nos. ES-F25, ES-F27, and ES-F29)	End dated per Permittee request

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 2D .0504, Particulates from Wood Burning Indirect Heat Exchangers
- 15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .1111, Maximum Achievable Control Technology
- 15A NCAC 2Q .0317, Avoidance Conditions

No regulatory review is required for these existing permit conditions as part of the renewal process. As a result of this permit renewal, the following permit condition has been added to the permit:

- 15A NCAC 2D .0614, Compliance Assurance Monitoring
- 15A NCAC 2Q .0705, Existing Sources and SIC Calls

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

NSPS – The facility is not subject to any applicable NSPS requirements. This renewal action does not change this status.

NESHAPS/MACT – The facility is currently subject to 40 CFR 63, Subpart JJ, National Emission Standard for Wood Furniture Manufacturing Operations. This renewal action does not change this status.

As part of this renewal, the facility's sources were evaluated for additional MACT Subpart requirements. It was determined that two boilers (**ID Nos. ES-B1 and ES-B3**) are subject to 40 CFR 63, Subpart DDDDD, National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters. However, because it is an existing, small, liquid fuel-fired boiler, **ES-B3** has no requirements per 63.7506(c). Because it is an existing, large, solid fuel-fired boiler, **ES-B1** will have specific limitations and emission limits. It is required to be in compliance with this Subpart by September 13, 2007.

The following language has been placed in the permit as Section 2.1 A.7:

7. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. *The Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants from Industrial, Commercial, Institutional Boilers and Process Heaters" by September 13, 2007, for the existing, large, solid fuel-fired boiler (ID No. ES-B1).*

The facility also operates four lumber drying kilns. These kilns are subject to 40 CFR 63, Subpart DDDD, "National Emission Standards for Hazardous Air Pollutants from Plywood and Composite Wood Products Manufacturing Operations." However, while being subject to the Subpart, the kilns have no applicable requirements other than initial notification. This renewal action completes this requirement. A notation of this has been placed in Section 2.1 E.

PSD – The facility is currently subject to the following PSD Avoidance conditions:

- 64.3 tons per year sulfur dioxide limit on boiler (**ID No. ES-B1**);
- 45.25 tons per year sulfur dioxide limit on boiler (**ID No. ES-B3**); and
- 43.01 tons per year nitrogen oxides limit on boiler (**ID No. ES-B3**).

This renewal action does not change this status.

112(r) – The facility is not subject to 112(r) requirements because it does not store any of the covered chemicals. This renewal action does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and that use a control device to meet an applicable standard.

1. The boiler (**ID No. ES-B1**) is required to demonstrate compliance with the particulate standard of 15A NCAC 2D .0504 while firing wood fuel only or in combination with No. 5 fuel oil and finishing waste and the particulate standard of 15A NCAC 2D .0503 while firing No. 5 fuel oil only or in combination with finishing waste. The first option is the primary operating scenario. A CAM demonstration would be required if the pre-controlled emissions of PM₁₀ were greater than 100 tons per year. A check on potential PM₁₀ emissions from a 33.2 million Btu wood fired-boiler using the DAQ spreadsheet for woodwaste combustion indicates an estimated emission level of 44.64 tons per year uncontrolled. Therefore, a CAM demonstration is not needed for this boiler.

2. The wood working operations (**ID No. WS-WD1**) are required to demonstrate compliance with the particulate standard of 15A NCAC 2D .0512, which states “that a person shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate ductwork and properly designed collectors, or such other devices as approved by the Commission.” A CAM demonstration would be required if the pre-controlled emissions of PM₁₀ were greater than 100 tons per year. For the purposes of CAM the “operation” consists of each individual control device and its associated emissions units. The woodworking operations (**ID No. WS-WD1**) are controlled by eight bagfilters and one cyclone as described in Section 2.1 D of the permit.

In the renewal application, the Permittee submitted information that the requirements of 40 CFR 64 do not apply because estimated pre-controlled PM₁₀ emissions from each group of processes feeding an individual bagfilter do not exceed the major source threshold of 100 tons per year. The following table summarizes the original submittal:

Control Device ID	Process Description	Total Potential throughput (lbs/hr)	% PM ₁₀ *	PM ₁₀ (tpy – uncontrolled)
CD-CY1	Grinding (shaving/chipping)	662	0	0
CD-DF1	Sanding Rough Sawing Fine Sawing	1930	23.80 1.89 0.37	31.06
CD-DF2	Sanding Milling Fine Sawing	3282	23.80 0 0.37	8.2
CD-DF3	Sanding Milling Fine Sawing Molding	2382	23.80 0 0.37 0	78.8
CD-DF5	Sanding Milling Rough Sawing Planing	3048	23.80 0 1.89 0	77.9
CD-DF6	Sanding Milling Fine Sawing Molding	3048	23.80 0 0.37 0	97.4
CD-DF7	Sanding Milling Fine Sawing Rough Sawing	3003	23.80 0 0.37 1.89	95.6
CD-DF8	Sanding Milling Fine Sawing Rough Sawing Planing	2960	23.80 0 0.37 1.89 0	70.65
CD-DF9	Sanding Rough Sawing Fine Sawing	682	23.80 1.89 0.37	12

* Percent PM10 based on NC wood working emission spreadsheet (planing 0%, shaving/chipping 0%, rough sawing 1.89%, fine sawing 0.37%, milling/molding 0%, sanding 23.8%)

This demonstration does indicate that all control devices are below the major source thresholds and therefore not subject to CAM when looked at individually. However, the equipment arrangement as described in the permit application indicates to the Division that this may not be the case. As we understand the arrangement, process equipment is individually controlled but many of the control devices are grouped. For example DF5, DF6, DF7, and DF8 all “empty” into DF1. Waste collected by the combined DF1, DF2, and DF3 all “empty” into DF9. So ultimately all wood waste is captured/controlled” by DF9. Assuming a conservative 95% capture efficiency of each fabric filter, the following table represents the total tonnage each filter sees:

Control Device ID	Fed From	Estimated PM10 (tpy)	Control Efficiency	Amount Captured (tpy)
DF5	Process equipment	77.9	95	74.01
DF6	Process equipment	97.4	95	92.53
DF7	Process equipment	95.6	95	90.82
DF8	Process equipment	7.65	95	74.37
DF1	DF5, DF6, DF7, DF8		95	331.73
DF2	Process equipment	8.2	95	7.79
DF3	Process equipment	78.8	95	74.86
DF9	DF1, DF2, DF3		95	397.79

Therefore, CAM is applicable to DF9 individually as the end control device. In response to this, the Permittee has submitted the following language for inclusion in the renewed permit:

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

- a. *Per 40 CFR 64 and 15A NCAC 2D .0614, the Permittee shall comply with the following.*
- b. **Background**
 - i. Emission Unit.
 - (A) *Description. Wood working operations*
 - (B) *Identification. ID No. ES-WD1*
 - ii. Applicable Regulation, Emission Limit, and Monitoring Requirements.
 - (A) *Regulations. 15A NCAC 2D .0512 and .0521.*
 - (B) *Emission limits*
 - 1. *Adequate ductwork and properly designed collectors*
 - 2. *20 percent opacity*
 - (C) *Control Technology. One bagfilter (1,590 square feet of filter area; ID No. CD-DF9)*
- c. **Monitoring Approach.** *The key elements of the monitoring approach for particulate matter, including parameters to be monitored, parameter ranges and performance criteria are presented in the following table.*

	1	2
<i>I. Indicator</i>	<i>Visible emissions</i>	<i>Pressure drop</i>
<i>Measurement Approach</i>	<i>Visible emissions from the fabric filter will be monitored daily using EPA Reference Method 22-like procedures</i>	<i>Pressure drop across the fabric filter is measured with a differential pressure gauge</i>
<i>II. Indicator Range</i>	<i>An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement.</i>	<i>An excursion is defined as a pressure drop greater than 5 inches of water. Excursions trigger an inspection, corrective action, and a reporting requirement.</i>
<i>QIP Threshold</i>	<i>The QIP threshold is five excursions in a 6-month reporting period.</i>	<i>None selected</i>

	<i>1</i>	<i>2</i>
<i>III. Performance Criteria</i>		
<i>A. Data Representativeness</i>	<i>Measurements are being made at the emission point (fabric filter outlet)</i>	<i>Pressure taps are located at the fabric filter inlet and outlet. The gauge has a minimum accuracy of 0.5 inches of water.</i>
<i>B. Verification of Operational Status</i>	<i>NA</i>	<i>NA</i>
<i>C. QA/QC Practices</i>	<i>The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.</i>	<i>The pressure gauge is checked daily for operation.</i>
<i>D. Monitoring Frequency</i>	<i>Observations are done daily.</i>	<i>Pressure drop is monitored daily.</i>
<i>Data Collection Procedures</i>	<i>VE observations are documented by the observer.</i>	<i>Pressure gauge readings are manually recorded daily.</i>
<i>Averaging Periods</i>	<i>NA</i>	<i>NA</i>

d. Justification

- i. Background. The pollutant-specific emission unit is the wood dust system, which is used to collect and transfer the wood dust from the equipment in the plant to the dust silo. The equipment consists of saws, planers, sanders, etc. in the typical furniture manufacturing operation. The particular filter for this plan is a Pneumafil dust filter, 8.5 feet in diameter, 159 cloth bags eight feet long and can filter approximately 16,070 cubic feet per minute of air.*
- ii. Rationale for Selection of Performance Indicators. Visible emissions was selected as the performance indicator because it is a good indicator of the proper operation and maintenance of the filter unit. When the filter unit is operating properly, there will not be any visible emissions in the exhaust outlet. Any increase in visible emissions indicates reduced performance of the filter unit, therefore, the presence of visible emissions is used as a performance indicator.*

In general, filters are designed to operate at a relatively constant pressure drop. Monitoring pressure drop provides a means of detecting a change in operation that could lead to an increase in emissions. An increase in pressure drop can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged/broken, the bags are becoming blinded, or the airflow has increased. A decrease in pressure drop may indicate broken or loose bags, but this is also indicated by the presence of visible emissions, indicator No. 1. A pressure drop across the filter unit also serves to indicate that there is airflow through the control device.

- iii. Rationale for Section of Indicator Ranges. The selected indicator range is no visible emissions. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. Although Reference Method 22 applies to fugitive sources, the visible/no visible emissions observation technique of RM-22 can be applied to ducted emissions; i.e., Method 22-like observations.*

The selected QIP threshold for fabric filter visible emissions is five excursions in a 6-month reporting period. This level is 19 percent of the total visible emissions observations. If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented.

The indicator range chosen for the fabric filter pressure drop is greater than 5 inches water. An excursion triggers an inspection, corrective action, and a reporting requirement. The pressure drop is recorded daily. As the pressure drop approaches 5 inches water the bags are scheduled for replacement.

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

- e. 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.

VII. Facility Wide Air Toxics

The facility is not currently subject to any air toxics permit conditions. This renewal does not affect this status. However as part of this permit renewal, the facility, due to the fact that it is subject to multiple MACTs, becomes subject to 15A NCAC 2Q .0705, "Existing Sources and SIC Calls." This permit condition requires that a permit application be submitted demonstrating compliance with 15A NCAC 2D .1100 for all non-exempt sources facility-wide for all covered toxics. The facility is required to be in compliance with this regulation at the same time that it is required to comply with the last MACT applicable to the facility (i.e., 40 CFR Subpart DDDD). The following language has been placed in the permit in Section 2.2:

State-enforceable only

B. Applicable facility-wide sources

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
Toxic air pollutants	State-enforceable only Air Toxics Demonstration	15A NCAC 2Q .0705

1. 15A NCAC 2D .0705: EXISTING SOURCES AND SIC CALLS

- a. In accordance with 15A NCAC 2Q .0705(b), for sources at a facility subject to a MACT standard, excluding the MACT for combustion sources, a permit application shall be required demonstrating compliance with 15A NCAC 2D .1100 by the same deadline that the facility is required to comply with the last MACT applicable to the facility. The permit application shall include an evaluation for all toxic air pollutants covered under rule 15A NCAC 2D .1104 for all sources at the facility, excluding those sources exempt from evaluation under 15A NCAC 2Q .0702.

VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2004 Actual Emissions (tpy)
CO	5.83
NO _x	13.49
PM ₁₀	4.84
SO ₂	10.45
VOC	207.94
HAPs	14.13

IX. Stipulation Review

ARO notes the following permit stipulation modifications:

- 1. Stack testing – The most recent test for boiler (**ID No. ES-B1**) was conducted on February 4, 2003 and indicated compliance (0.418 pounds per million Btu versus a limit of 0.59 pounds per million Btu). This office requests a particulate compliance demonstration for the boiler within 4 years of permit renewal issuance. Agree, Section 2.1 A.2.c requires the suggested testing.

2. Insignificant activities – Saw blade grinding operation vented to one cyclone was determined to be insignificant by DAQ letter dated December 9, 2003 and should be added to the permit. *Agree, additional insignificant source will be added as suggested.*
3. Any permit condition that can now be semiannual versus quarterly per current policy should be changed. The current conditions are not consistent. *Agree, changes will be made were allowed.*
4. Some equipment has been removed from the site (flat line printing operation, silk screen machine and associated screen wash, jove edge machine). Please check if the company wishes them to remain on the air permit. *Agree, September 16, 2005 email from Permittee clarifies equipment to be end dated and removed from permit.*
5. The initial notification received July 7, 2005 indicated the watertube boiler (**ID No. ES-B1**) is subject to the boiler MACT (Subpart DDDDD). *Agree, MACT placeholder language has been added to the permit.*

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. 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. Mecklenburg County Local Program and South Carolina are affected States falling within 50 miles of the facility.

XI. Conclusions, Comments, and Recommendations

ARO recommends issuance of renewed permit and was presented with a DRAFT permit prior to notice and EPA review.

RCO concurs with the issuance of the renewed permit as amended.