

NORTH CAROLINA DIVISION OF AIR QUALITY			Region: Mooresville Regional Office County: Rowan NC Facility ID: 8000045 Inspector's Name: Jim Westmoreland Date of Last Inspection: 02/19/2009 Compliance Code: 3 / Compliance - inspection		
Air Permit Review			Permit Issue Date:		
Facility Data Applicant (Facility's Name): Freightliner Corporation Cleveland Plant Facility Address: Freightliner Corporation 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			Permit Applicability (this application only) SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:		
Contact Data			Application Data		
Facility Contact Byron Miller REM, Supervisor Env Engineering (704) 645-5146 PO Box 399 Cleveland NC, 27013	Authorized Contact Mike McCurry Plant Manager (704) 645-5100 11550 Statesville Blvd. Cleveland NC, 27013	Technical Contact Byron Miller REM, Supervisor Env Engineering (704) 645-5146 PO Box 399 Cleveland NC, 27013	Application Number: 8000045.05A Date Received: 07/18/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 04625/T26 Existing Permit Issue Date: 01/23/2004 Existing Permit Expiration Date: 05/01/2006		
Review Engineer: Jenny Sheppard Review Engineer's Signature:		Date:	Comments / Recommendations: Issue 04625/T27 Permit Issue Date: Permit Expiration Date:		

1. Purpose of Application

Freightliner Corporation Cleveland Plant is currently operating under permit 04625T26, which was issued on January 23, 2004 and, absent a timely renewal application, would have expired on May 1, 2006. The renewal application was received on July 18, 2005 or at least nine months prior to the expiration date. The existing permit continues to be effective until the issuance of this permit renewal pursuant to 15A NCAC 2Q .0513. The permit is deemed complete for processing.

On December 18, 2006, the facility submitted an application for significant modification to comply with the most stringent (40 CFR Part 63 Subpart PPPP) of the NESHAP standards applicable to the facility. The facility is subject to the following two NESHAPs:

- 1) Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart MMMM)

- 2) Plastic Parts and Products Surface Coating (40 CFR Part 63 Subpart PPPP)
This modification application is consolidated with the renewal application.

Freightliner Cleveland has submitted a reasonably available control technology (RACT) application to address a request from DAQ concerning compliance with RACT at the Cleveland facility. Additionally Freightliner requested the removal of Boiler # 4 (ES-BLR-04) from the permit as it has been decommissioned from service at the facility.

The application includes the following: a RACT regulatory applicability analysis, a Petition for Alternative Controls for RACT in accordance with 15A NCAC 2D .0952(d), Title V application forms, a RACT cost analysis with calculations, RACT/BACT/LAER Clearinghouse (RBLC) query results and an excerpt from the Federal Register.

2. Facility Description

The facility manufactures Class 6, 7, and 8 diesel trucks. Classes are based on truck weight. Class 6 between 19,501 and 26,000 pounds, Class 7 between 26,001 and 33,000 pounds, and Class 8 weighs 33,001 pounds and over.

3. Application Chronology

July 18, 2005	Application for renewal (Application No. – 8000045.05) was received in MRO. Facility submitted the following: <ul style="list-style-type: none">• Form AA, AA2, A3, A4, E5
July 21, 2005	Jim Westmoreland sent regional comments and the email is attached.
August 2, 2005	Acknowledgement letter was sent to the facility.
January 11, 2007	Application for modification (Application No. – 8000045.07A) to comply with the most stringent of the MACT standards (subpart PPPP) applicable to coating operations was received. The facility submitted the following forms: <ul style="list-style-type: none">• Form A1 and E5 No fee was required for this application. Consolidated the above application with the renewal application.
May 2, 2007	Permit amendment – Insignificant Activities
June 4, 2007	Freightliner receives letter from DAQ indicating they may be subject to the RACT requirements and may request an extension
July 7, 2007	Letter from Freightliner requesting extension as allowed by the Director
November 11, 2007	RACT application - Freightliner submitted this application for RACT after granting of extension by DAQ (see letter September 5, 2007) as applications were due August 1, 2007.
January 10, 2007	MRO permit review from Jim Westmoreland/Denise Hayes.

4. Permit History

The following list provides a very brief summary of the Title V permit revisions for this facility:

Permit No	Issuance Date	Description of revision
04625T25	February 2, 2002	Initial Title V permit
04625T26	January 23, 2004	TV-502 (b)(10) The purpose of application was as follows: <ul style="list-style-type: none">• amend size of butanol tanks• amend name of Cab Router No. 1 to CNC Router No. 1

5. Facility compliance status / Statement of compliance

This facility was last inspected by Jim Westmoreland of MRO on February 19, 2009. The facility appeared to be in compliance with all air quality requirements.

Regional comments on renewal application (8000045.05A) were received on July 21, 2005 and the email is attached.

Regional comments on significant modification (8000045.07A) were received on January 11, 2007 and the email is attached.

6. Regulatory Review

Regulatory review is given in the following table:

Emission Source ID	Applicable Regulations	
ES-BLR-5 – One natural gas-fired boiler (33.6 million Btu per hour maximum heat input)	15A NCAC 2D .0503	Particulate emissions from fuel burning indirect heat exchangers
	15A NCAC 2D .0516	Sulfur Dioxide Emissions from Combustion Sources
	15A NCAC 2D .0521	Control of Visible Emissions
	15A NCAC 2D .0524	NSPS 40 CFR PART 60 SUBPART Dc
	15A NCAC 2Q .0317 Avoidance of 15A NCAC 2D .0530	Nitrogen oxides emissions less than 40 tons per consecutive 12-month period
ES-SCAO - Spray Coating and Assembly Operations - consisting of thirty-seven (37) paint spray booths (ES-PSB-1 through ES-PSB-37), twenty-one (21) paint drying ovens (ES-PDO-1 through ES-PDO-21), sixteen (16) flash off booths (ES-FO-1 through ES-FO-16), one wax booth (ES-WB), six (6) sanding booths (ES-SB1 through ES-SB6), eighteen (18) tack booths (ES-TB1 through ES-TB18), and one paint mix room (ES-PMR), and various operations including gluing, caulking, seamseal, solvent wipe, cleanup solvent, and other non-coating sources of VOC	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0516	Sulfur Dioxide Emissions from Combustion Sources
	Federal –only requirement Formerly 15A NCAC 2D .0518 f (repealed)**	Miscellaneous volatile organic compound emissions
	15A NCAC 2D .0521	Control of Visible Emissions
	State-enforceable only 15A NCAC 2D .1806	Control and prohibition of odorous emissions
	15A NCAC 2D .0530	Prevention of significant deterioration BACT limits: 3.5 pounds VOC per gallon as applied calendar monthly avg. 1,365 tons/yr VOC
	15A NCAC 2D .0952 for 15A NCAC 2D .0934	Petition for Alternative to RACT
	15A NCAC 2Q .0317 Avoidance of 15A NCAC	Avoidance of Prevention of significant deterioration for nitrogen oxide emissions less than 40 tons per consecutive

	2D .0530	12-month period
	15A NCAC 2D .0958	Work practices for sources of volatile organic compounds
	15A NCAC 2D .1100	Toxic Air Pollutants
	15A NCAC 2D .1111***	40 CFR 63 Subpart PPPP 40 CFR 63 Subpart MMMM
ES-PT - One Pretreatment Line	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0521	Control of Visible Emissions
	15A NCAC 2D .1100	Toxic Air Pollutants
	15A NCAC 2D .1111***	40 CFR 63 Subpart PPPP 40 CFR 63 Subpart MMMM
ES-FTW - Fuel Tank Welding	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0521	Control of Visible Emissions
ES-CR1 and ES-CR2 – Two CNC Routers	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0521	Control of Visible Emissions
ES-AW and ES-5WW - Axle Welding and 5 th Wheel Welding	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0521	Control of Visible Emissions
ES-SFW, ES-LW, and ES-FRW - Welding Operations consisting of Solder Flux, Laser Welding, and Frame Rail Welding	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0521	Control of Visible Emissions
ES-FTP – Fuel Tank Polishing Operation	15A NCAC 2D .0515	Particulates from miscellaneous industrial processes
	15A NCAC 2D .0521	Control of Visible Emissions

The following stipulations are **added** to the permit as part of modification application:

*** Added MACT subpart PPPP and MMMM stipulation under Section 2.2

Added stipulation 15A NCAC 2Q .0705 –LAST MACT Toxics under Section 2.2- Refer section 8, ‘ Facility Wide Air Toxics’ for more information.

The following stipulations are **modified** as part of this renewal application:

Updated existing stipulation 15A NCAC 2D .0521 as per latest shell language

Updated existing stipulation 15A NCAC 2D .0958 as per latest shell language and moved it under Section 2.2

Avoidance of 15A NCAC 2D .0530-Avoidance of Prevention of significant deterioration for sulfur dioxide and NOx - Changed quarterly reporting requirement to semiannually

* Updated existing stipulation 15A NCAC 2D .0524. Revised recordkeeping requirements and added reporting requirements.

~Updated existing stipulation 15A NCAC 2D .0530 to include the following language and to change the reporting requirement from quarterly to semiannually:

If construction does not commence on the PSD affected sources within 18 months after the effective date of a permit pursuant to the PSD regulation, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, as determined by the Director, the permittee may be required to reevaluate its BACT analysis.

(The facility has PSD BACT limit for spray coating operations. Heather Callahan informed DAQ that the facility has not yet constructed all the sources under this group.)

** Removed 15A NCAC 2D .0518 f, repealed condition from the permit.

15A NCAC 2D .1400 - Nitrogen Oxides

As defined in 2D .1402(d), the Cleveland manufacturing plant, because it is located in Rowan County and would appear to have the potential to emit over 100 tpy of NO_x. The facility however has previously accepted a practically enforceable limit to keep ALL NO_x sources below 40 tons per year per 12-month rolling average. The limit was taken during the course of a PSD NSR review. (The PSD NSR permit also featured BACT VOC throughput and emissions limits for the coatings).

To summarize, Freightliner is not a major source of NO_x and has adequately demonstrated compliance with the NO_x RACT requirements of 2D .1400. As such a RACT avoidance condition of 100 tpy was not required.

15A NCAC 2D .0900 - Volatile Organic Compounds

As defined in 2D .0902(f), the Cleveland manufacturing plant, because it is located in Rowan County and has the potential to emit over 100 tpy of VOC, is an affected facility for RACT rules under 2D .0900.

15A NCAC 2D .0934 - Coating of Miscellaneous Metal Parts and Products

(b) This Rule applies to application areas, flashoff areas, ovens and other processes that are used in the coating of metal parts and products of the following types of manufacturing plants:

(7) any other manufacturing plant that coats metal parts or products.

The Cleveland Freightliner facility is defined as an affected facility for this rule. The sources subject to this rule are contained within the Spray Coating and Assembly Operations consisting of:

Spray Coating and Assembly Operations consisting of thirty-seven (37) paint spray booths (ES-PSB-1 through ES-PSB-37), twenty-one (21) paint drying ovens (ES-PDO-1 through ES-PDO-21), sixteen (16) flash off booths (ES-FO-1 through ES-FO-16), one wax booth (ES-WB), six (6) sanding booths (ES-SB1 through ES-SB6), eighteen tack booths (ES-TB1 through ES-TB18), one paint mix room (ES-PMR), and various operations including gluing, caulking, seamseal, solvent wipe, cleanup solvent, and other non-coating sources of VOC.

The following emission limitations apply to the spray coating and assembly operations that apply paints/coatings to the truck bodies and frames:

(d) With the exception stated in Paragraph (e) of this Rule, emissions of volatile organic compounds from any coating line subject to this Rule shall not exceed:

(3) 6.7 pounds of volatile organic compounds per gallon of solids delivered to a coating applicator that applies extreme performance coatings;

(e) Any source which has chosen to control emissions of volatile organic compounds under Rule .0518(e) of this Subchapter and which has installed air pollution control equipment in accordance with an air quality permit in order to comply with this Rule before December 1, 1989, may comply with the limits contained in this Paragraph instead of those contained in Paragraph (d) of this Rule. Emissions of volatile organic compounds from any coating line subject to this Rule shall no exceed:

(3) 3.5 pounds of volatile organic compounds per gallon of coating, excluding water and exempt compounds, delivered to a coating applicator that applies extreme performance coatings;

The rule also states that, *"Whenever more than one of the aforementioned emission limitations may apply to a process, then the least stringent emission limitation shall apply to the process."*

Trinity Consultant's application indicates this RACT rule was written in 1980. The EPA has acknowledged that RACT rules may be dated. EPA has also indicated that sources that have undergone PSD BACT or LAER, (40CFR 51.166) review and applied these standards are considered superior to RACT. However permitting authorities must consider subsequent BACT LAER determinations to see if they are outdated. The DAQ advised Trinity Consultants to review the RACT/BACT/LAER Clearinghouse database (RBLC) to see what the latest controls that are installed on sources similar to Freightliner Cleveland.

Trinity found the only BACT method of control approved since Freightliner's 2001 PSD permit was for a Regenerative Thermal Oxidizer (outside of limits on VOC containing material (e.g. Freightliner's permit has a 1,365 tons per year of volatile organic compounds per consecutive 12-month period and a 3.5 lb VOC per gallon limit on coatings)). A cost analysis was performed regarding the capital investment in equipment installation and operation of an RTO and was found to be prohibitively expensive. The costs effectiveness for installation on the emissions units ranges from \$19,295 to \$48,661 per ton of VOC reduction.

Trinity indicated since these controls were not cost effective they would petition the DAQ for alternative controls for VOC RACT as allowed by 2D .0952 and as follows:

15A NCAC 02D .0952 - Petition For Alternative Controls For RACT

(c) If the owner or operator of any source of volatile organic compounds subject to the requirements of this Section, can demonstrate that compliance with rules in this Section would be technologically or economically infeasible, he may petition the Director to allow the use of alternative operational or equipment controls for the reduction of volatile organic compound emissions. Petition shall be made for each source to the Director.

As a result of the rule not reflecting current operations as the standards outlined in 2D .0934 and the implementation of RACT controls would be economically infeasible Freightliner has opted to petition for alternative operational RACT controls. (Section 5 of the application contained all the elements necessary to address the petition as required by 2D .0952(d)).

Proposed Alternative Controls for RACT

EPA has acknowledged that application of a VOC MACT (40 CFR Subpart 63) is usually considered superior to the application of RACT. Freightliner Cleveland is subject to and in compliance with 40 CFR Subpart PPPP with an emissions limit of 0.16 kg (0.16 lb) organic HAP emitted per kg(lb) coating solids used in a 12-month period. Freightliner has demonstrated that the MACT standards are adequate to demonstrate compliance with RACT.

Conclusions for RACT Requirements and Other Requested Changes to the Permit

Freightliner has demonstrated compliance with both the NOx and the VOC RACT standards. VOC RACT was thoroughly and appropriately addressed with the MACT as the proposed alternative control. Additional add-on controls will not be required in order to reduce VOC emissions. All sources of VOCs were required to undergo a review for RACT. Those sources not subject to the MACT regulations were determined to be "exempt" from RACT as emissions were less than 15 lb/day each as allowed by 2D .0902

7. NSPS, NESHAPS/MACT, PSD, attainment status, 112(r), CAM

NSPS – Boiler ES-BLR-05 is subjected to NSPS Subpart Dc. This renewal application and modification application does not change this status.

NESHAPS/MACT –

As part of the modification, the facility's sources were evaluated for MACT Subpart requirements.

MACT Subpart PPPP and MMMM

The facility's Spray Coating and Assembly Operations - consisting of thirty-seven (37) paint spray booths (ES-PSB-1 through ES-PSB-37), twenty (21) paint drying ovens (ES-PDO-1 through ES-PDO-21), sixteen (16) flash off booths (ES-FO-1 through ES-FO-16), one (1) wax booth (ES-WB), six (6) sanding booths (ES-SB1 through ES-SB6), eighteen (18) tack booths (ES-TB1 through ES-TB18), one (1) paint mix room (ES-PMR), and various operations including gluing, caulking, seamseal, solvent wipe, cleanup solvent, and other non-coating sources of VOC and one Pretreatment Line (ID No. ES-PT) are subject to the following two MACTs.

- 1) Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart MMMM)
- 2) Plastic Parts and Products Surface Coating (40 CFR Part 63 Subpart PPPP)

This facility coats both metal and plastic parts. The coating operation is operated in such a manner that the facility cannot track the amount of coating applied to plastic versus metal. For ease of compliance the facility decided to comply with the more stringent of the two MACTs.

The permit application for MACT compliance gives reference to the meeting between John Cassia and Heather Callahan from Freightliner, Dale Overcash and Dana Norvell from Trinity Consultants and Don VanderVaart, William Willets and Mike Aldridge of NCDAQ that was held on October 12, 2006 where it was decided that the facility will be in compliance by complying with the more stringent of the two MACTs.

Existing versus new sources

This facility is an existing facility under both subparts MMMM and PPPP as defined under 40 CFR 63.4482. The facility has PSD BACT limit for spray coating operations and as per Heather Callahan the facility has not yet constructed all the sources under this group. These sources will not be considered as new sources as this facility coats plastic and metal part and also all coating operations at the facility falls under general category. The facility informed DAQ that these new sources will be used to perform general category coating and hence will not be considered as new sources for MACT.

Note that if the facility uses these new sources to perform coating in a subcategory other than general use coating then they will be considered as new sources for MACT.

Notification of compliance status date for MACT Subpart MMMM is earlier than MACT Subpart PPPP. Also first semiannual compliance period for MACT Subpart MMMM starts earlier than for MACT Subpart PPPP. In permit application the facility mentioned that they will follow MACT subpart MMMM for the above two dates. Note that the facility needs to submit separate compliance notifications for Subpart MMMM and PPPP and it is included in the permit.

Demonstration showing more stringent MACT

The sources that are affected by MACTs PPPP and MMMM are existing sources and the facility uses general use coating.

General use emission limits in terms of MMMM

MMMM – 2.6 lb HAP/gal of solids

PPPP - 0.16 lb HAP/lb solids * 10.5 lb solids/gal solids = **1.7** lb HAP/gal solids

General use emission limits in terms of PPPP

MMMM - 2.6 lb HAP/gal solids * gal solids/12.5 lb solids = 0.21 lb HAP/lb solids

PPPP - **0.16** lb HAP/lb solids

Compliance options

There are three compliance options under these two MACTs.

- 1) Complaint Coatings

- 2) Emission rate without add-on controls
- 3) Emission rate with add –on controls

The facility does not have a control device in order to comply with the MACTs. Hence compliance options 1 and 2 are put in the permit. The Permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The Permittee may use different compliance options for different coating operations, or at different times on the same coating operation. The Permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the Permittee may not use different compliance options at the same time on the same coating operation.

Attainment status - Rowan County is in non-attainment for ozone. Facility was subject to a RACT review for VOC and NOx emissions. Facility will be in compliance with the RACT standards upon issuance of this permit.

PSD – Spray Coating and Assembly Operations are subjected to PSD BACT limit. These sources cannot discharge into the atmosphere more than 1,365 tons per year of volatile organic compounds per consecutive 12-month period.

Boiler 5 (ES-BLR-5), has a PSD avoidance condition for nitrogen oxides limiting their emissions less than 40 tons per year per consecutive 12 month period.

This application does not change PSD status of the facility.

112(r) –The facility is not subject to 112(r) requirements because it does not store any of the covered chemicals. This application 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 potential pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard.

The facility has four bagfilters (CD-BH1, CD-BH2, CD-BH3, and CD-BH4 with 4,400, 383, 2,480, and 383 square feet of filter are) and two cyclones (ID Nos. CD-CY2 and CD-CY4 both 30 inches in diameter) maximum potential emissions from the emission sources connected to these control devices are as follows (Particulate only from these sources):

Emssion Source	Potential Uncontrolled Emissions (Tons per year)
ES-FTW	0.7
ES-CR1	5.98
ES-CR2	5.98
ES-FTP	0.1

Because potential, uncontrolled emissions from emission sources are less than the major source threshold, CAM does not apply.

8. Facility Wide Air Toxics

Last MACT/air toxics demonstration

As a result of being subject to MACT subparts PPPP and MMMM, the facility is required to comply with 15A NCAC 2Q .0705. This regulation required that the Permittee submit a permit application 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, excluding the combustion MACT. The compliance date for the last MACT (MACT Subpart PPPP) was April 19, 2007.

The facility previously modeled compliance with all NC Air Toxics in a PSD application submitted in May 2001. The PSD Permit was issued on Sept. 28, 2001 and was permit No. 004625T23.

9. Facility Emissions Review

The following table represents actual emissions for year 2007 and it is taken from emissions inventory of the facility:

Pollutant(s)	2005 Actual Emissions (tpy)
CO	8.46
NO _x	10.07
PM-10	10.52
SO ₂	0.06
VOC	280.09
Largest HAP	>10
Total HAP	>25

10. Stipulation Review/ 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 ID Numbers
Cover	-	-amended all dates and permit revision numbers -updated language as per latest shell document -added insignificant activities per applicant's request dated May 2, 2007
TOC	-	-updated shell titles
All	Header	-amended permit revision number
3, 4	Equipment Table	-updated shell titles -added MACT Subpart designation to sources
5	2.1 A	-added testing and reporting requirement -updated monitoring/recordkeeping requirement
6	2.1 B	-added reference to stipulation 40 CFR 63 Subpart PPPP and 40 CFR 63 Subpart MMMM -add Petition for Alternative to RACT 15A NCAC 2D .0952 for 15A NCAC 2D .0934
7	2.1 B	-removed repealed condition 2D. 0518
7	2.1 B.3	-updated monitoring requirement as per latest shell language
8	2.1 B.5	-updated stipulation 15A NCAC 2D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION -changed reporting requirement from quarterly to semiannually
8	2.1 B.6	-updated stipulation 15A NCAC 2D .0958 as per latest shell language
9	2.1 C	-added reference to stipulation 40 CFR 63 Subpart PPPP and 40 CFR 63 Subpart MMMM
9	2.1 C.2.c	-updated monitoring requirements as per latest shell language
11	2.1 D.2.c	-updated monitoring requirements as per latest shell language
13	2.1 E.2.c	-updated monitoring requirements as per latest shell language
14	2.1 G.2.c	-updated monitoring requirements as per latest shell language
15	2.1 H.2.c	-updated monitoring requirements as per latest shell language
18	2.2.A.1.d	-changed reporting requirement from quarterly to semiannually
19	2.2 B	- added stipulation Petition for Alternative to RACT 15A NCAC 2D .0952 for 15A NCAC 2D .0934 added stipulation 15A NCAC 2D .1806 and 15A NCAC 2Q .0705 under this section
22-32	2.2 D	-added stipulation 40 CFR 63 Subpart PPPP and 40 CFR 63 Subpart MMMM
32	2.2 E	-added stipulation 15A NCAC 2Q .0705: EXISTING SOURCES AND SIC CALLS for TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT
33-41	General Conditions	-updated general conditions as per latest shell language

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

To be completed later

12. Conclusions, Comments, and Recommendations

All applicable DAQ air requirements should be met. I recommend issuance of the air permit.