

REVISED 10/15/96

INITIAL TITLE V AIR PERMIT APPLICATION REVIEW

APPLICANT:	SITE LOCATION:	COUNTY:	
GDX Automotive	Salisbury	Rowan	
TECHNICAL CONTACT:	PHONE:	RESPONSIBLE OFFICIAL:	TITLE:
Scott Razzino	(704) 638-8724	David Maggs	Plant Manager
REVIEW ENGINEER:	SIGNATURE:	DATE:	
Jenny Sheppard/Susan McCarthy, contractor	DRAFT	August 1, 2005	
REGIONAL CONTACT:	REGIONAL OFFICE:	SIC CODE:	
Jim Westmoreland	Mooresville	3061	
APPLICATION NUMBER:	EXISTING PERMIT NUMBER:	NEW PERMIT NUMBER:	
8000145.05A	08383R04	08383T05	

I. Introduction

The U.S. Environmental Protection Agency (EPA) has given interim approval to North Carolina's Title V operating permits program effective on December 15, 1995. This EPA approval triggered the requirements for Title V facilities to submit permit applications to the Division of Air Quality (DAQ). Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA.

This Initial Title V Air Permit Application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the DRAFT Title V operating permit. The primary source of information used to construct the DRAFT permit is the above referenced air permit application.

II. Background Information

The DRAFT Title V operating permit will replace an existing Air Quality Construction and Operation Permit No. 08383R04, which was issued on April 14, 2004 and is currently scheduled to expire on December 31, 2008.

Pursuant to 15A NCAC 2Q .0506, GDX Automotive submitted its initial Title V application to the DAQ on April 13, 1998. The application was considered complete for processing on June 4, 2003. The DRAFT permit is required to go to public notice pursuant to 15A NCAC 2Q .0521.

History:

GDX Automotive was issued their initial Title V permit on January 13, 2004 (Air Permit No. 08383T03). The applicant contested this permit with the Office of Administrative Hearings

(OAH) on February 13, 2004. GDX officials met with DAQ representatives on March 11, 2004, resolved some of the issue, and indicated their intention to apply for eight varnish spray booths. Also, GDX was anxious to add those eight varnish spray booths, knowing that Rowan County would soon be declared as non-attainment for PSD purposes.

On April 14, 2004, DAQ issued a .0300 permit, Air Permit No. 08383R04 to GDX Automotive. This permit included the eight spray booths and resolved issues contested by the applicant with the OAH. On April 15, 2004, Rowan County was declared as non-attainment for PSD purposes.

Now, since issues are resolved, the Title V air permit will be issued to the facility.

III. Facility Description

GDX Automotive manufactures custom-made automotive weather stripping for many different makes and models of automobiles. Rubber is extruded into long strips, and an adhesive is applied. GDX uses approximately 500 different recipes for automotive weather stripping. Manufacturing takes place two shifts per day (approximately 16 hours per day) and five days per week.

IV. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on its latest inspection of March 4, 2005 by Jim Westmoreland of the Mooresville Regional Office, the facility was in compliance with all applicable requirements. In addition, a review of IBEAM shows that there have been no violations in the last five years. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the Initial Title V Operating Permit is being issued:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES1	-Forty-four (44) thermal vulcanizers consisting of: <ul style="list-style-type: none"> • Ten (10) natural gas vulcanizers (682,992 btu/hr maximum heat input each), • Nine (9) natural gas vulcanizers (170,748 	NA	N/A

	<p>vulcanizers (170,748 btu/hr maximum heat input each),</p> <ul style="list-style-type: none"> • Thirteen (13) infrared (electric) vulcanizers, • Ten (10) UHF electric/natural gas vulcanizers (170,748 btu/hr maximum heat input each), and • Two (2) Liquid Curing Medium (LCM) vulcanizers. <p>- Four (4) drying/curing (electric) ovens</p> <p>- One (1) rubber pellet loading system</p>	<p>NA</p> <p>NA</p>	<p>N/A</p> <p>Five (5) bagfilters (26.91 square feet of surface area, each)</p>
ES2	<p>Eight (8) polyvinyl chloride (PVC) extrusion lines including:</p> <ul style="list-style-type: none"> • eight (8) extruders, • four (4) combining lines, and • 12 PVC line glue stations. 	<p>NA</p>	<p>NA</p>
ES3	<p>Thirteen (13) adhesive spray or low friction solvent spray cabinets</p>	<p>NA</p>	<p>NA</p>
ES4	<p>Twenty-three (23) varnish spraying cabinets</p>	<p>NA</p>	<p>*Wet scrubber system</p>
ES5	<p>Final finishing department</p>	<p>NA</p>	<p>NA</p>

VI. Emission Source-by-Source Evaluation

A. ES-1 Emission Sources including:

Forty-four (44) thermal vulcanizers consisting of:

- Ten (10) natural gas vulcanizers (682,992 Btu/hr maximum heat input, each),
- Nine (9) natural gas vulcanizers (170,748 Btu/hr maximum heat input, each),
- Thirteen (13) infrared (electric) vulcanizers (170,748 Btu/hr maximum heat input, each), and
- Two (2) Liquid Curing Medium (LCM) vulcanizers,

Four (4) drying/curing (electric) ovens, and

One (1) rubber pellet loading system controlled by five bagfilters (26.91 square feet of surface area each)

1. Description

The nineteen natural gas vulcanizers (682,992 Btu/hr maximum heat input, each) provide the “initial heat” to the process after the flock is applied to the strips. The liquid curing medium (LCM) vulcanizers are liquid salt baths that operate at very high temperatures. The rubber pellet loading system and associated bagfilters are currently not in use, according to the MRO inspector, Jim Westmoreland.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	$E=4.10P^{0.67}$ where E = allowable emission rate in lbs/hour P = process weight in tons per hour	15A NCAC 2D .0515
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
visible emissions	20 percent opacity	15A NCAC 2D .0521
VOCs	Less than 250 tons per year – See Section VII A.	15A NCAC 2Q .0317
VOCs	Work practice standards – See Section VII.B.	15A NCAC 2D .0958(c)
VOCs	Best Available Control Technology (BACT) standards -See Section VII.C.	15A NCAC 2D .0958(e)
toxic air pollutants	State-enforceable only – See Section VII.D.	15A NCAC 2D .1100
odors	State-enforceable only – See Section VII.E.	15A NCAC 2D .1806

a. **2D .0515 “Particulates from Miscellaneous Industrial Processes”**

(1) Regulatory Analysis

The allowable emission rate for this source (ID No. ES-1), namely the rubber pellet loading system, is:

$$E = 4.10 P^{0.67}$$

where E= allowable particulate emission rate in lbs/hour, and
P = process rate in tons/hour

The rubber pellet loading system, controlled by five bagfilters, is the primary source in ES-1 that is subject to this regulation, when in operation. The process rate for this source is 14,138 pounds per hour (7.069 tons/hour). Thus, the allowable emission rate is:

$$E = 4.10(7.069)^{0.67} = 15.2 \text{ lbs/hour}$$

The actual before and after control emission rates were determined by source compliance testing, and the emission rates as shown in the table below demonstrate compliance with this regulation.

Table I. (shows the emissions of particulate matter from Source ES-1)

Sources ID Nos.	Process rate lbs/hour	⁵¹⁵ PM. Allowable rate lbs/hour	Before controls PM emissions rate lbs /hr	After controls PM emissions rate lbs /hr
ES-1	14,138	15.2	10.39	0.2

⁵¹⁵ - Allowable emission of particulate matter based on 2D .0515

PM- Potential emission of particulate matter based on source testing

(2) Monitoring Requirements

At this time, the rubber pellet loading system not in operation. However, if and when this source resumes operation, particulate matter emissions from this source shall be controlled by the five bagfilters (26.91 square feet of filter area each). To assure compliance, the Permittee shall perform inspections and maintenance (I&M) as recommended by the manufacturer. In addition to the manufacturer’s I&M recommendations, or if there are no manufacturer’s I&M recommendations, as a minimum, the I&M requirement shall include the following:

- i. a monthly visual inspection of the system ductwork and material

collection unit for leaks (during any month the rubber pellet loading system is in operation); and

- ii. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters' structural integrity (during any year that this rubber pellet loading system operates).

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the ductwork and bagfilters are not inspected and maintained.

(3) Recordkeeping Requirements

The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:

- i. the date and time of each recorded action;
- ii. the results of each inspection;
- iii. the results of any maintenance performed on the bagfilters; and
- iv. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if these records are not maintained.

(4) Reporting Requirements

A summary report of the monitoring/recordkeeping shall be submitted to DAQ by July 30 and January 30 of each year. In addition, the Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.

b. 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"

(1) Regulatory Analysis

The ten (10) natural gas vulcanizers (682,992 btu/hr maximum heat input, each) and the nine (9) natural gas vulcanizers (170,748 btu/hr maximum heat input, each) are sources of combustion which discharge through a stack and therefore are subject to 2D .0516(a). Allowable emissions of sulfur dioxide from these sources while firing natural gas shall not exceed 2.3 pounds per million Btu heat input. The AP-42 emission factor for total sulfur dioxide emissions from natural gas combustion is 0.6 pounds of sulfur dioxide per million cubic feet combusted [ref: AP-42 Table 1.4-2; July 1998]. Assuming a heating value of 1,020 Btu per cubic foot, this equates to:

$$\frac{0.6 \text{ lb sulfur dioxide}}{1,000,000 \text{ cubic ft}} \times \frac{1 \text{ cuft}}{1,020 \text{ Btu}} \times \frac{1,000,000 \text{ Btu}}{\text{million Btu}} = 0.0006 \frac{\text{pounds}}{\text{million Btu heat input}}$$

Thus, compliance is indicated with natural gas.

(2) Monitoring/Recordkeeping/Reporting Requirements

Since potential sulfur dioxide emissions are less than the allowable, no monitoring, recordkeeping or reporting are required. Stack testing is not required.

c. 2D .0521 “Control of Visible Emissions”

(1) Regulatory Analysis

Visible emissions from the sources in ES-1 shall not exceed 20 percent opacity when averaged over a six-minute period for sources established after July 1, 1971.

(2) Monitoring Requirements

To assure compliance the Permittee will either observe the emission points of the sources once a month for visible emissions above normal or perform a Method 9. Monthly observations should provide a reasonable assurance of compliance. The Permittee will establish what normal emissions are through recordkeeping.

(3) Reporting Requirements

Reporting requirements include a summary report of the monthly visible emission stack observation results by July 30 and January 30 of each year.

B. Eight (8) polyvinyl chloride (PVC) extrusion lines (ID No. ES-2) including:

- **Eight (8) extruders**
- **Four (4) combining lines, and**
- **Twelve (12) PVC line glue stations**

1. Description

In the PVC extrusion lines (ID No. ES-2), natural gas is used to sinter and heat the metal, which is then coated with PVC.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
visible emissions	20 percent opacity	15A NCAC 2D .0521
VOCs	Less than 250 tons per year -See Section VII A.	15A NCAC 2Q .0317
VOCs	Work practice standards – See Section VII.B.	15A NCAC 2D .0958(c)
VOCs	Best Available Control Technology (BACT) standards -See Section VII.C.	15A NCAC 2D .0958(e)
toxic air pollutants	State-enforceable only – See Section VII.D.	15A NCAC 2D .1100
odors	State-enforceable only – See Section VII.E.	15A NCAC 2D .1806

a. 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

(1) Regulatory Analysis

The PVC extrusion lines are sources of combustion, which discharge through a stack and therefore is subject to 2D .0516(a). Allowable emissions of sulfur dioxide from these sources while firing natural gas shall not exceed 2.3 pounds per million Btu heat input. The AP-42 emission factor for total sulfur dioxide emissions from natural gas combustion is 0.6 pounds of sulfur dioxide per million cubic feet combusted [ref: AP-42 Table 1.4-2; July 1998]. Assuming a heating value of 1,020 Btu per cubic foot, this is calculated to be:

$$\frac{0.6 \text{ lb sulfur dioxide}}{1,000,000 \text{ cubic ft}} \times \frac{1 \text{ cuft}}{1,020 \text{ Btu}} \times \frac{1,000,000 \text{ Btu}}{\text{million Btu}} = 0.0006 \frac{\text{pounds}}{\text{million Btu heat input}}$$

Thus, compliance is indicated with natural gas.

(2) Monitoring/Recordkeeping/Reporting Requirements

Since potential sulfur dioxide emissions are less than the allowable, no monitoring, recordkeeping or reporting are required. Stack testing is not required

b. 2D .0521 “Control of Visible Emissions”

(1) Regulatory Analysis

Since the PVC extrusion lines (ID No. ES-2) were established after July 1, 1971, they are subject to 2D .0521(d). Per this regulation, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. The latest inspection report did not cite any opacity exceedances.

(2) Monitoring Requirements

To assure compliance the Permittee will either observe the emission points of these sources once a month for visible emissions above normal or perform a Method 9. Monthly observations should provide a reasonable assurance of compliance. The Permittee will establish what normal emissions are through recordkeeping.

(3) Reporting Requirements

Reporting requirements include a summary report of the monthly visible emission stack observation results by July 30 and January 30 of each year.

C. Spraying and Finishing Operations including

- **Thirteen (13) adhesive spray or low friction solvent spray cabinets (ID No. ES-3)**
- **Twenty-three (23) varnish spraying cabinets (ID No. ES-4), and**
- **Final finishing department (ID No. ES-5)**

1. Description

The adhesive or low friction spray cabinets are capable of either spraying the adhesive or using a “drip and wipe” method. The varnish spray cabinets use HVLP nozzles, per the BACT requirement.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
visible emissions	20 percent opacity	15A NCAC 2D .0521
VOCs	Less than 250 tons per year -See Section VII A.	15A NCAC 2Q .0317
VOCs	Work practice standards – See Section VII.B.	15A NCAC 2D .0958(c)
VOCs	Best Available Control Technology (BACT) standards -See Section VII.C.	15A NCAC 2D .0958(e)
toxic air pollutants	State-enforceable only – See Section VII.D.	15A NCAC 2D .1100
odors	State-enforceable only – See Section VII.E.	15A NCAC 2D .1806

a. 2D .0521 “Control of Visible Emissions”

(1) Regulatory Analysis

Since sources (ID Nos. ES-3 through ES-5) were established after July 1, 1971, they are subject to 2D .0521(d). Per this regulation, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. The latest inspection report did not cite any opacity exceedances.

(2) Monitoring Requirements

To assure compliance, the Permittee will either observe the emission points of the sources once a month for visible emissions above normal or perform a Method 9. Monthly observations should provide a reasonable assurance of compliance. The Permittee will establish what normal emissions are through recordkeeping.

(3) Reporting Requirements

Reporting requirements include a summary report of the monthly visible emission stack observation results by July 30 and January 30 of each year.

VII. Multiple Emission Source Limits

Facility-Wide Affected Sources

The above emission sources are subject to these multiple emission source limits and/or standards:

Regulated Pollutant	Limits/Standards	Applicable Regulation
VOCs	Less than 250 tons per year	15A NCAC 2D .0530
VOCs	Work practice standards	15A NCAC 2D .0958(c)
VOCs	Best Available Control Technology (BACT) standards	15A NCAC 2D .0958(e)
toxic air pollutants	State-enforceable only – Control of Toxic Air Pollutants	15A NCAC 2D .1100
odors	State-enforceable only - odorous emissions must be controlled	15A NCAC 2D .1806

A. 15A NCAC 2D .0530 “PREVENTION OF SIGNIFICANT DETERIORATION”

(1) **Regulatory Analysis**

In order to avoid the applicability of PSD, the facility has a limit for the entire facility, keeping the discharge of VOCS below 250 tons per year.

(2) **Monitoring Requirements**

The applicant shall calculate the facility-wide monthly emissions of VOCs by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. The facility will be in noncompliance with this part of the regulation if this method is not followed.

(3) **Recordkeeping Requirements**

Calculations of the facility-wide monthly emissions of VOCs shall be recorded in a logbook and made available to DAQ, upon request. Copies of the monthly emissions log must be kept for a minimum of three years.

(4) **Reporting Requirements**

The Permittee shall submit a summary report of monitoring and recordkeeping activities within 30 days after each calendar year quarter, due and postmarked on or

before January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 for the calendar year for the preceding three-month period between July and September. The report shall contain the following:

- The monthly VOC emissions for the previous 14 months. The emissions shall be calculated for each of the 12-month periods over the previous 14 months.

B. 15A NCAC 2D .0958(c) “WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS”

(1) Regulatory Analysis

To ensure compliance with the regulation, the applicant while using volatile organic compounds (VOCs) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOCs are greater than 15 pounds per day; shall implement management practices as mentioned in the permit including:

- a) Store all material, including waste material, containing volatile organic compounds in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
- b) Clean up spills as soon as possible using proper safety procedures,
- c) Store wipe rags in closed containers,
- d) Not clean sponges, fabric, wood, paper products, and other absorbent materials,
- e) Drain solvents used to clean supply lines and other coating equipment into closable containers immediately after use,
- f) Clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent and closing the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be poured into a closed container.

(2) Monitoring Requirements

To ensure compliance, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds and note whether the conditions VII.(B)(1)(a) through (f) are met.

(3) Recordkeeping Requirements

The results of the inspections shall be maintained in a logbook and be made available to DAQ upon request.

(4) Reporting Requirements

Reporting requirements include a summary report of the results of the monthly inspection of the operations and processes utilizing volatile organic compounds, noting whether conditions VII(B)(1) are met. The VOC reports are due by July 30 and January 30 of each year.

C. 15A NCAC 2D .0958(e) “WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS”

(1) Regulatory Analysis

As required by 15A NCAC 2D .0958(e) "Work Practices for Sources of Volatile Organic Compounds," the Permittee shall operate control equipment which meets the requirements of best available control technology (BACT) as defined in 15A NCAC 2D .0530 "Prevention of Significant Deterioration."

All spray applications shall use High Volume/Low Pressure (HVLP) techniques to minimize the release of VOCs. This requirement is also incorporated for the new spray booths and the applicant had requested that the “drip and wipe” process be considered as part of the HVLP technique since it ensures 100% transfer efficiency. The decision of the branch was that this “drip and wipe” process is part of the HVLP technique. Failure to use this technique for the spray booths shall be deemed to be in noncompliance with 15A NCAC 2D .0958

(2) Monitoring/ Recordkeeping/ Reporting Requirements

During the last permit revision (Air Permit No. 08383R04), it was decided remove the monitoring requirements, as per the suggestion of the regional office.

STATE-ENFORCEABLE ONLY

D. 15A NCAC 2D .1100 “CONTROL OF TOXIC AIR POLLUTANTS”

(1) Regulatory Analysis

Pursuant to 15A NCAC 2D .1100 "Control of Toxic Air Pollutants," and in accordance with the approved application for an air toxic compliance demonstration, the following permit limits shall not be exceeded:

EMISSION SOURCE(S)	TOXIC AIR POLLUTANT(S)	EMISSION LIMIT(S) Lbs/day	EMISSION LIMIT(S) lbs/hr
Entire Facility	xylene	860.16	342.273
Source (ES-2)	methyl ethyl ketone	435.36	18.14
Source (ES-3)	methyl isobutyl ketone	62.16	2.59
Sources (ES-3 and ES-4)	toluene	225.91	9.41

Source (ES-4)	benzene	-	-
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(2) Monitoring/ Recordkeeping Requirements

The amount of xylene, methyl ethyl ketone, methyl isobutyl ketone, and toluene released from all sources shall be determined on a daily basis using a mass balance. Records of the amount of product used (in gallons) containing the constituent shall be recorded. The percent (%) by weight times the product used (gallons) times the percent (%) of constituent released into the atmosphere will be used to determine the amount of constituent emitted.

The amount of benzene released from all sources shall be determined on an annual basis using a mass balance. Records of the amount of product used (in gallons) containing the constituent shall be recorded. The percent (%) by weight times the product used (gallons) times the percent (%) of constituent released into the atmosphere will be used to determine the amount of constituent emitted.

(3) Reporting Requirements

For compliance purposes, within 30 days after each calendar year, regardless of the actual emissions, the following shall be reported to the Regional Supervisor, DAQ:

- a. The single highest, daily emissions rate of xylene, methyl ethyl ketone, methyl isobutyl ketone, and toluene, and also the single highest, hourly emissions rate for each of the individual TAPs for that particular day.
- b. The amount of benzene released on an annual basis shall be reported to the Regional Office, for the proceeding year.

STATE-ENFORCEABLE ONLY

E. 15A NCAC 2D .1806 “CONTROL AND PROHIBITION OF ODOROUS EMISSIONS”

(1) Regulatory and Monitoring Requirements

The facility is required to implement management practices, or install and operate odor control equipment, sufficient to prevent odorous emissions from the facility.

(2) Reporting and Recordkeeping Requirements

No reporting or recordkeeping shall be required for compliance with this regulation.

VIII. MACT Applicability and Requirements

Based on a review of the facility's current operations and emission sources, the facility is not subject to any promulgated or proposed MACT standards.

IX. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

X. Other Applicable Requirements

None

XI. General Conditions

The "General Conditions" section of the Title V Operating Permit lists additional applicable rule requirements that the permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, severability, etc.

XII. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified.

List of Insignificant Activities

Emission Source I.D.	Emission Source Description	Insignificant Regulation	Applicability
IN-1	Four non-halogenated parts washers	15A NCAC 2Q .0503 (8)	< 5 tpy of any criteria pollutant and < 1,000 lbs/y of any HAPs
IN-2	Cyrogenic Machine	15A NCAC 2Q .0503 (8)	< 5 tpy of any criteria pollutant and < 1,000 lbs/y of any HAPs

Although each insignificant activity is not listed in the Title V permit, a general condition is placed in the Title V permit stating that all insignificant activities shall comply with the applicable requirements. Those sources which qualify for exemption from permitting under

regulation 2Q .0102(b)(2) will be attached to the cover letter of the permit.

XIII. Public Notice

Pursuant to 15A NCAC 2Q. 0521, a notice of the draft Title V Operating 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.

XIV. Recommendations

GDX Automotive's initial Title V application has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The DAQ has made a preliminary determination that the facility is complying or will achieve compliance as specified in the draft permit with all applicable requirements. Therefore, the DAQ is proposing to issue the Title V Operating Permit upon completion of the public comment period and the EPA review.