

## Air Permit Review

Permit Issue Date: **date, 2011**

**Region:** Mooresville Regional Office  
**County:** Stanly  
**NC Facility ID:** 8400012  
**Inspector's Name:** Jim Westmoreland  
**Date of Last Inspection:** 07/15/2010  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> Michelin Aircraft Tire Company</p> <p><b>Facility Address:</b> Michelin Aircraft Tire Company 40589 South Stanly School Road Norwood, NC 28128</p> <p><b>SIC:</b> 3011 / Tires And Inner Tubes <b>NAICS:</b> 326211 / Tire Manufacturing (except Retreading)</p> <p><b>Facility Classification: Before:</b> Title V    <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V    <b>After:</b> Title V</p>			<p><b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> 15A NCAC 2D .1111 (40 CFR 63, Subparts ZZZZ and JJJJJ) <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b></p>
<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 8400012.11A <b>Date Received:</b> 01/24/2011 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 05835/T17 <b>Existing Permit Issue Date:</b> 08/30/2010 <b>Existing Permit Expiration Date:</b> 09/30/2011</p>
<p>Donald Matthews Safety and Environmental Manager (704) 474-7726 40589 South Stanly School Road Norwood, NC 28128</p>	<p>Randy Stroman Plant Manager  40589 South Stanly School Road Norwood, NC 28128</p>	<p>Donald Matthews Safety and Environmental Manager (704) 474-7726 40589 South Stanly School Road Norwood, NC 28128</p>	
<b>Review Engineer:</b> Mark Cuilla		<b>Comments / Recommendations:</b>	
<b>Review Engineer's Signature:</b>		Issue 05835/T18	
<b>Date:</b> <b>date, 2011</b>		<b>Permit Issue Date:</b> <b>date, 2011</b>	
		<b>Permit Expiration Date:</b> <b>date, 2016</b>	

### I. Purpose of Application

This permitting action is for renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**05835T17**) was issued on **August 30, 2010**, with an expiration date of **September 30, 2011**. The renewal application was received on **January 24, 2011**. This submittal date was not at least nine months prior to the expiration date. Therefore, the permit shield extended to timely submittals is not applicable to this submittal. If the permit is not issued prior to the original expiration date, the permit may expire. All terms and conditions of the existing permit shall remain in effect until either the renewal permit has been issued or denied or the eclipse of the original expiration date, whichever is earlier.

### II. Facility Description

The facility is an aircraft tire manufacturer.

### III. History/Background/Application Chronology

**September 5, 2002** – Permit **05835T13** issued as a first-time Title V permit.

**October 31, 2006** – Permit **05835T14** issued as a Title V renewal.

**February 8, 2007** – Permit **05835T15** issued as an administrative amendment.

**March 6, 2008** – Permit **05835T16** issued as a name change.

**July 15, 2010** – MRO completed annual facility inspection.

**August 30, 2010** – Permit **05835T17** issued as a minor modification for new retreading operation (**ID No. ES-13**).

**January 24, 2011** – Permit application **8400012.11A** received. Application deemed complete for processing. Note that application was not submitted nine months prior to permit expiration date. In order to be timely and have the permit shield extended, the application would have to have been submitted prior to **December 30, 2010**.

**March 17, 2011** – Received an email from Ms. Ginger Ellis of Regulatory Strategies (representing Michelin Aircraft Tires) confirming the existence of an unpermitted emergency generator. See Section VI of this Document for a discussion.

**March 28, 2011** – DRAFT permit sent to Permittee and MRO for comment prior to public notice and EPA review. [The Permittee provided comments on draft permit and review via email on April 18, 2011. Those comments were incorporated as requested. The MRO provided comments on the draft permit and associated review via email on March 30, 2011. Those comments were incorporated as requested.](#)

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

### IV. Permit Modifications/Changes and ESM Discussion

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

Page No.	Section	Description of Change
Attachment	Insignificant activities	-added new emergency generator per Permittee with associated asterisked language
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3	Equipment table	-added NSPS and MACT designations where necessary
4	2.1 B (table) 2.1 B.1.a	-added NSPS emission limit reference to table -added ID numbers

Page No.	Section	Description of Change
5	2.1 B.1.b 2.1 B.1.c  2.1 B.1.d 2.1 B.2.a 2.1 B.2.b 2.1 B.2.c	-corrected testing rule cross reference -updated shell monitoring/recordkeeping language for uncontrolled sources of particulate matter -added “no reporting” language -added ID numbers -corrected testing rule cross reference -updated shell monitoring/recordkeeping language for visible emissions
6	2.1 B.3 2.1 B.3.c	-corrected rule citation -corrected testing rule cross reference
7	2.1 B.3.e 2.1 C.1.a 2.1 C.1.b	-updated shell reporting language -added ID numbers -corrected testing rule cross reference
7-8	2.1 C.1.c	-added ID numbers and updated shell language
8	2.1 C.2.a 2.1 C.2.b 2.1 C.2.c	-added ID numbers -corrected testing rule cross reference -added ID numbers
9	2.1 D (table)  2.1 D.1.a 2.1 D.1.b	-added MACT (Subpart JJJJJ) reference as new applicable requirement -added ID numbers -corrected testing rule cross reference
10	2.1 D.1.c 2.1 D.2.a 2.1 D.2.b 2.1 D.2.c 2.1 D.2.d 2.1 D.3.a 2.1 D.3.b 2.1 D.3.c	-added ID numbers -added ID numbers -corrected testing rule cross reference -corrected cross reference -added reporting language cross reference -added ID numbers -corrected testing rule cross reference -added ID numbers
11	2.1 D.4.b	-corrected testing rule cross reference
11-12	2.1 D.4.c-h	-added detailed monitoring/recordkeeping/reporting language for No. 6 fuel oil firing and “no monitoring/recordkeeping/reporting” language for natural gas firing
12	2.1 E (table)	-added MACT (Subpart ZZZZ) reference as new applicable requirement -added MACT (Subpart JJJJJ) reference as new applicable requirement
13	2.1 E.1.b 2.1 E.1.c 2.1 E.2.a 2.1 E.2.b 2.1 E.2.c	-corrected testing rule cross reference -added ID numbers -added ID numbers -corrected testing rule cross reference -added ID numbers
13-16	2.1 E.3	-added MACT (Subpart ZZZZ) detailed permit condition language
17	2.1 F.1.b 2.1 F.1.c 2.1 F.2.a 2.1 F.2.b 2.1 F.2.c	-corrected testing rule cross reference -added ID numbers and updated shell language -added ID numbers -corrected testing rule cross reference -added ID numbers

Page No.	Section	Description of Change
18	2.1 G (table) 2.1 G.1.b	-added cross references to Section 2.2 requirements for NC Air Toxics -corrected testing rule cross reference
19	2.1 G.1.c 2.1 G.2.a 2.1 G.2.b 2.1 G.2.c 2.2 A.1.a	-added ID numbers and updated shell language -added ID numbers -corrected testing rule cross reference -added ID numbers -amended 2D .0958 shell language to remove 15 pound per day limitation
20	2.2 A.1.e	-updated shell language
21	2.2 B.1.a	-modified toxics monitoring/recordkeeping/reporting language to remove specific monthly recordkeeping requirements per Permittee request
23-33	General Conditions	-updated shell conditions (v3.4)
34	List of Acronyms	-added Acronym for CAIR per current shell

Except for the addition of a new emergency generator (**ID No. I-EG1**), there were only minor, non-significant modifications to the equipment descriptions needed in TVEE.

## 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 .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart BBB)
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants
- 15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these current permit conditions will not be included in this document. However, as part of this permit renewal, applicability of the current sources to area source GACT requirements of 40 CFR 63 was evaluated. It was determined that the facility does operate an emergency generator (**ID No. ES-5**). This permitted source is subject to 15A NCAC 2D .1111 (40 CFR 63, Subpart ZZZZ) as discussed in Section VI of this Document below. [In addition, the Permittee operates two natural gas/No. 6 fuel oil fired boilers \(ID Nos. ES-4A and ES-4B\). These permitted sources are subject to 15A NCAC 2D .1111 \(40 CFR 63, Subpart JJJJJ\) as discussed in Section VI of this Document below.](#)

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

**NSPS** – The Permittee operates two green tire spray booths (**ID Nos. ES-2**) subject to New Source Performance Standards (40 CFR 60, Subpart BBB) for the Rubber Tire Manufacturing Industry. Volatile organic compounds from these sources are limited to 1.2 grams of VOC per tire sprayed with an inside green tire spray per month and 9.3 grams of VOC per tire sprayed with an outside green tire spray per month. To ensure compliance (per 60.543(b)(4)), the Permittee is limited to using water based sprays containing less than 1 percent by weight of VOC. The Permittee is required to maintain records of spray formulations or Method 24 analysis conducted to verify VOC content. Semiannual reporting of these records is required. This permit renewal does not affect this status.

As discussed below, the Permittee has indicated that it now operates one propane-fired emergency generator (**ID No. I-EG1**). This source is subject to NSPS for new spark ignition stationary internal combustion engines (40 CFR 60, Subpart JJJJ) by virtue of its requirement to comply with the area source GACT (40 CFR 63, Subpart ZZZZ). Compliance with ZZZZ is indicated through compliance with the NSPS. The following summarizes the requirements of this generator under the NSPS (Note..language has been tailored to only include requirements for certified engines. It is assumed that the Permittee has chosen to purchase a certified engine for compliance purposes.):

### 60.4233 – What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?

(d) Owners and operators of stationary SI ICE with a maximum engine power greater than 19kW (25 Hp) and less than 75 kW (100 Hp) must comply with the emission standards in Table 1 of this Subpart for their emergency stationary SI ICE (from Table 1: NO<sub>x</sub> = 10 g/HP-hr and CO = 387 g/HP-hr).

### 60.4234 – How long must I meet the emission standards if I am the owner or operator of a stationary SI internal combustion engine?

Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in 60.4233 over the entire life of the engine.

### 60.4237 – What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?

(c) If you are the owner or operator of an emergency stationary SI ICE that is less than 130 Hp, was built on or after July 1, 2008, and does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter upon startup of your emergency engine.

### 60.4243 – What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?

(b) If you are the owner or operator of a stationary SI internal combustion engine and must comply with the emission standards specified in 60.4233(d) or (e), you must demonstrate compliance according to one of the methods specified in paragraphs (b)(1) or (2) of this Section.

(1) purchasing an engine certified according to procedures specified in this Subpart, for the same model year and demonstrating compliance according to one of the methods specified in paragraph (a) of this section.

(2) purchasing a non-certified engine and demonstrating compliance with the emission standards specified in 60.4233(d) or (e) and according to the requirements specified in 60.4244, as applicable, and according to paragraphs (b)(2)(i) and (ii) of this Section.

(d) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted toward the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

60.4245 – What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?

(a) owners and operators of all stationary SI ICE must keep records of the information in paragraphs (a)(1) through (a)(4) of this section.

(1) all notifications submitted to comply with this Subpart and all documentation supporting any notification.

(2) maintenance conducted on the engine.

(3) if the stationary SI ICE is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90, 1048, 1054, and 1060, as applicable.

(b) For all stationary SI emergency ICE greater than 25 Hp and less than 130 Hp manufactured on or after July 1, 2008, that do not meet the standards applicable to non-emergency engines, the owner or operator of must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

**NESHAPS/MACT/GACT** – The facility is classified as a Title III minor facility; therefore, applicability to the area source GACTs must be included in this permit renewal review. [The Permittee operates equipment subject to the following area source GACTs.](#)

1. One diesel-fired emergency generator (900kW, 1,260 Hp; **ID No. ES-5**) is subject to [40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines](#). This source is permitted because potential emissions of NOx exceed 5 tons per year (based on generator output and 0.5% sulfur diesel fuel – using DAQ large diesel engine emissions spreadsheet). According to the latest EPA spreadsheet summary, the following requirements are applicable to this existing, emergency compression ignition, greater than 500 Hp source located at an area source of HAP emissions:  
Date constructed – Before **June 12, 2006**  
Compliance date – **May 3, 2013**  
Emission Limitations – 63.6603 (Table 2d)
  - change oil and filter every 500 hours of operation or annually whichever comes first,
  - inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and
  - inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Operating Limitations – NA  
Fuel Requirements – NA  
Performance Tests – NA  
Monitoring/Installation/Collection/Operation/Maintenance Requirements – 63.6625(e), (f), (h), and (i)  
Initial Compliance – NA  
Continuous Compliance – 63.6605 and 63.6640  
Notification Requirements – NA  
Recordkeeping Requirements – 63.6655 (except 63.6655(c))  
Reporting Requirements – 63.6650 (except 63.6650(g))  
General Provisions – Yes

The following language has been added to the permit as Section 2.1 E.3:

**3. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

- a. *For this source (ID No. ES-5), the Permittee shall demonstrate compliance by **May 3, 2013** with all applicable requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR 63 Subpart ZZZZ “National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).”*

***Emission and Operating Limitations [40 CFR 63.6603 and Table 2d]***

- b. *For this existing, emergency compression ignition (diesel-fired) emergency generator, greater than 500 Hp located at an area source of hazardous air pollutants (HAPs), the Permittee must meet the following requirements, except during periods of startup:*
- i. *change oil and filter every 500 hours of operation or annually, whichever comes first;*
  - ii. *inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and*
  - iii. *inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.*

***Monitoring, installation, collection, operation, and maintenance requirements [40 CFR 63.6625]***

- c. *The Permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop his own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.*
- d. *The Permittee must install a non-resettable hour meter if one is not already installed.*
- e. *The Permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to this subpart apply.*
- f. *The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to this subpart. The analysis program must at a minimum analyze the following three parameters:*
- i. *Total Base Number,*
  - ii. *viscosity, and*
  - iii. *percent water content.*

*The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 days or before commencing operation, whichever is later. The Permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.*

***Continuous Compliance Requirements [40 CFR 63.6605 and 63.6640]***

- g. The Permittee must operate the emergency stationary RICE according to the following requirements. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. If the Permittee does not operate the engine according to the requirements below, the engine will not be considered an emergency engine under this Subpart and will need to meet all requirements for non-emergency engines.*

  - i. There is no time limit on the use of emergency stationary RICE in emergency situations.*
  - ii. The Permittee may operate the emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.*
  - iii. The Permittee may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that the Permittee may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph, as long as the power provided by the financial arrangement is limited to emergency power.*

**Recordkeeping Requirements [40 CFR 63.6655]**

- h. The Permittee must keep the following records:*
  - i. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv), if applicable.*
  - ii. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment, if applicable.*
  - iii. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii), if applicable.*
  - iv. Records of all required maintenance performed on the air pollution control and monitoring equipment, if applicable.*
  - v. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.*
- i. The Permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the source was operated and maintained according to the Permittee's own maintenance plan.*
- j. The Permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the Permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.*

**Reporting Requirements [40 CFR 63.6650]**

- k. The Permittee must submit each semiannual Compliance report 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. The Compliance report must contain the following information:*
  - i. Company name and address.*
  - ii. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.*
  - iii. Date of report and beginning and ending dates of the reporting period.*
  - iv. the number, duration, and a brief description for each type of malfunction, if any, which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken during a malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct the malfunction.*
  - v. If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period.*
- l. For each deviation from an emission or operating limitation that occurs for a source where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in paragraphs (k)(i) through (v) above and the following information:*
  - i. The total operating time of the source at which the deviation occurred during the reporting period.*
  - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.*

- m. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority.*
2. One propane-fired emergency generator (36 Hp, 20 kW; **ID No. I-EG1**) is subject to 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This source is included on the list of insignificant activities because potential emissions of all criteria pollutants are each less than 5 tons per year (based on converted million Btu per hour size – using DAQ LPG-fired combustion source emissions spreadsheet). According to the latest EPA spreadsheet summary, MACT compliance for this new (Date constructed – On or after **June 12, 2006**), emergency spark ignition, less than 500 Hp source located at an area source of HAP emissions is demonstrated by complying with the requirements of 40 CFR Part 60, Subpart JJJJ (spark ignition) as applicable and as described in the NSPS section above.

To address the cases where insignificant activities subject to a MACT or GACT have to be acknowledged in the permit as being applicable to the respective subpart, DAQ has created a new web page titled “Regulatory Guide for Insignificant/Permit Exempt Activities.” The link to this site is as follows:

<http://daq.state.nc.us/permits/insig/>

Asterisked language, including this link, has been added to the insignificant activities table of the renewed permit. Once the Permittee accesses this link he will be able to get the regulatory guide for the subject MACT/GACT, NSPS, and/or NCAC affected sources (in this case, the emergency generator).

3. Two natural gas/No. 6 fuel oil-fired boilers (29.3 million Btu per hour heat input each; **ID Nos. ES-4A and ES-4B**) is subject to 40 CFR 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers. These sources are categorized as existing oil-fired boilers. As such they are subject to the following requirements:

**Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

*Note..This permit condition is being written for Michelin Aircraft Tires. Permitted equipment includes 2 natural gas/No. 6 fuel oil fired boilers (29.3 million Btu per hour heat input, each; **ID Nos. ES-4A and ES-4B**) with no associated control devices. Per 63.11195(e) “A gas-fired boiler as defined in this subpart is not subject to this subpart and to any requirements in this subpart.” Therefore, these conditions apply because the facility is permitted to fire No. 6 fuel oil in these sources.*

**63.11196 - What are my compliance dates?**

- (a) The Permittee must achieve compliance with the applicable provisions as follows:
  - (1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, the Permittee must achieve compliance with the work practice or management standard no later than **March 21, 2012**.
  - (3) If the existing affected boiler is subject to the energy assessment requirement, the Permittee must achieve compliance with the energy assessment requirement no later than **March 21, 2014**.

**Emission Limits, Work Practice Standards, Emission Reduction Measures, and Management Practices**

**63.11201 - What standards must I meet?**

- (b) The Permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after **January 1, 2008** that meets the requirements in Table 2 to this subpart satisfies the energy assessment portion of this requirement.
- (d) These standards apply at all times.

**General Compliance Requirements**

**63.11205 - What are my general requirements for complying with this subpart?**

- (a) At all times the Permittee must operate and maintain any affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Initial Compliance Requirements**

**63.11210 - What are my initial compliance requirements and by what date must I conduct them?**

- (c) For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, the Permittee must demonstrate initial compliance no later than the compliance date that is specified in 63.11196 and according to the applicable provisions in 63.7(a)(2).

**63.11214 - How do I demonstrate initial compliance with the work practice standard, emission reduction measures, and management practice?**

- (b) If you own or operate an existing oil-fired boiler, the Permittee must conduct a performance tune-up according to 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.
- (c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, the Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report.

## **Continuous Compliance Requirements**

### **63.11223 - How do I demonstrate continuous compliance with the work practice and management practice standards?**

- (a) For affected sources subject to the work practice standard or the management practices of a tune-up, the Permittee must conduct a biennial performance tune-up according to paragraphs (b) of this section and keep records as required in 63.11225(c) to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
- (b) The Permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in the following:
  - (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months).
  - (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
  - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
  - (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
  - (5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).
  - (6) Maintain onsite and submit, if requested by the Administrator, biennial report containing the following information:
    - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.
    - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
    - (iii) The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.
  - (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

### **63.11225 - What are my notification, reporting, and recordkeeping requirements?**

- (a) The Permittee must submit the following notifications:
  - (1) All of the notifications in 63.7(b); 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply to you by the dates specified in those sections.
  - (2) Per 63.9(b)(2), the Initial Notification no later than 120 calendar days after **May 20, 2011** or within 120 days after the source becomes subject to the standard.
  - (4) The Notification of Compliance Status in accordance with 63.9(h) no later than 120 days after the applicable compliance date specified in 63.11196. In addition to the information required in 63.9(h)(2), your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
    - (i) "This facility complies with the requirements in 63.11214 to conduct an initial tune-up of the boiler."
    - (ii) "This facility has had an energy assessment performed according to 63.11214(c)."
    - (iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

- (b) The Permittee must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the following information. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section:
  - (1) Company name and address.
  - (2) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
  - (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
  - (4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under 241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of 241.3, and the total fuel usage amount with units of measure.
- (c) The Permittee must maintain the following records:
  - (1) As required in 63.10(b)(2)(xiv), a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
  - (2) Records to document conformance with the work practices, emission reduction measures, and management practices required by 63.11214 as follows:
    - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
    - (ii) Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by you or EPA, and the total fuel usage amount with units of measure. If you combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in 241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under 241.3(c), you must keep a record that documents how the fuel satisfies the requirements of the petition process.
  - (4) Records of the occurrence and duration of each malfunction of the boiler.
  - (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (d) Your records must be in a form suitable and readily available for expeditious review, according to 63.10(b)(1). As specified in 63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. You must keep each record onsite for at least 2 years after the date of each recorded action according to 63.10(b)(1). You may keep the records off site for the remaining 3 years.

- (g) If you intend to switch fuels, and this fuel switch may result in the applicability of a different subcategory or a switch out of subpart JJJJJJ due to a switch to 100 percent natural gas, you must provide 30 days prior notice of the date upon which you will switch fuels. The notification must identify:
- (1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice.
  - (2) The currently applicable subcategory under this subpart.
  - (3) The date on which you became subject to the currently applicable standards.
  - (4) The date upon which you will commence the fuel switch.

Table 2 to Subpart JJJJJJ of Part 63 – Work Practice Standards, Emission Reduction Measures, and Management Practices [As stated in 63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:]

<b>If your boiler is in this subcategory</b>	<b>You must meet the following</b>
3. Existing oil	Conduct a tune-up of the boiler biennially as specified in 63.11223.
4. Existing oil (units with heat input capacity of 10 million Btu per hour and greater).	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after <b>January 1, 2008</b>, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. The energy assessment must include:</p> <ol style="list-style-type: none"> <li>1. a visual inspection of the boiler system.</li> <li>2. an evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.</li> <li>3. inventory of major systems consuming energy from affected boiler(s).</li> <li>4. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.</li> <li>5. a list of major energy conservation measures.</li> <li>6. a list of the energy savings potential of the energy conservation measures identified.</li> <li>7. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.</li> </ol>

Because there are no permit conditions currently approved by the DAQ Permit Workgroup (process has begun) for this permit condition, the following placeholder language has been added as Section 2.1 D.5 of the renewed permit:

**5. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

- a. For these sources (**ID Nos. ES-4A and ES-4B**), the Permittee shall demonstrate compliance by the dates specified in 40 CFR 63.11196 with all applicable requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR 63 Subpart JJJJJ “National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers.”

**PSD** – The Permittee operates two natural gas/No. 6 fuel oil-fired boilers (**ID Nos. ES-4A and ES-4B**) subject to a Prevention of Significant Deterioration avoidance limit of less than 250 tons sulfur dioxide combined. To ensure that this limit is not exceeded, the Permittee shall limit No. 6 fuel oil fired in these boilers to less than 1 million gallons per consecutive 12-month period. The Permittee is required to record monthly fuel usage and keep fuel certifications of sulfur content. Semi-annual reporting of the recordkeeping activities is also required. This permit renewal does not affect this status.

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

**CAM** – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The following table indicates the current emission source/control device relationships:

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
<b>ES-3</b>	One tire sidewall grinding operation	<b>CD-1</b>	One RotoClone (61.6 cubic foot hopper capacity, American Air Filter RotoClone Type D Size 20)
<b>ES-13</b>	One tire retreading operation including: -Radial and bias tire buffing; -Dissolution application booth; -Tire building; -Curing presses; and -Touch-up paint	<b>RD1</b>	One simple cyclone (35 inches in diameter)

The following table outlines the specific permit conditions for each source/control device arrangement and if the control device is installed to comply with that requirement:

<b>Emission Source ID No(s).</b>	<b>Control Device ID No(s).</b>	<b>Permit Condition(s)*</b>	<b>Control Equipment Installed to Meet Permit Limit?</b>
<b>ES-3</b>	<b>CD-1</b>	15A NCAC 2D .0515	Particulate matter. Yes
<b>ES-13</b>	<b>RD1</b>	15A NCAC 2D .0515	Particulate matter. Yes

\* The following permit conditions, where applicable, are not included in the CAM analysis:

1. 15A NCAC 2D .0521 – This regulation limits visible emissions to specific opacity levels based on equipment manufacture date. Visible emissions are not criteria pollutants subject to CAM analysis.
2. 15A NCAC 2D .1100 and 15A NCAC 2Q .0711– These regulations define State-enforceable emission limits for toxic air pollutants. These emission limits are not criteria pollutants subject to CAM analysis.
3. 15A NCAC 2D .0958 – This regulation defines work practices for sources of volatile organic compound emissions. Work practices are not emission limits subject to CAM analysis.

Tire sidewall grinding operation (ID No. ES-3): This source was reviewed for permit condition applicability during the first-time Title V permit (**05835T13**) process. At that time, the Permittee estimated uncontrolled potential particulate emissions based on confidential tire processing numbers and assumed all PM was PM<sub>10</sub> as follows:

$$(\# \text{ tires/year}) \times (\# \text{ lbs PM/tire}) = 19,962.8 \text{ pounds PM/yr (9.98 tons/yr)}$$

This estimate indicates that CAM is not applicable to this control device as the total is less than CAM applicability thresholds of 100 tons per year.

Tire retreading operation (ID No. ES-13): This source was reviewed for permit condition applicability during a minor modification (**05835T17**) process. At that time, the Permittee estimated uncontrolled potential particulate emissions based on confidential tire processing numbers as follows:

$$(\# \text{ tires/year retreaded}) \times (\# \text{ lbs PM/tire}) / 2000 \text{ pounds/ton} = 1,492.85 \text{ tons/yr}$$

This estimate indicates that CAM is applicable to this control device. However at the time of permit modification, the Permittee also provided results of a rubber size analysis completed for this source. That analysis indicated that there was no particulate less than 10 microns; indicating that CAM is not applicable to this control device. While reviewing this document prior to public notice, the Permittee acknowledged that it does not want to assume that the original rubber analysis is correct for CAM applicability because it was taken on a sample. They would prefer to use a conservative estimate and assume that at least 5% of the PM is PM<sub>10</sub> (based on process knowledge). This estimate equates to potential pre-control emissions of 74.64 tons per year. This conservative approach still indicates that CAM is not applicable to this control device.

## VII. Facility Wide Air Toxics

The Permittee is subject to both source-specific modeled emission rates for benzene, 1,3-butadiene, cadmium, and nickel per 15A NCAC 2D .1100 and facility-wide toxic permit emission rates (TPERs) for acrolein, acrylonitrile, aniline, carbon disulfide, chlorobenzene, n-hexane, methylene chloride, phenol, styrene, toluene, vinyl chloride, and xylene per 15A NCAC 2Q .0711. To ensure compliance with the modeled emission rates for the source-specific limits, the Permittee shall record monthly the emission totals for each 12-month period ending on that month. No reporting is required for these two permit conditions. This permit renewal does not affect this status.

## VIII. Facility Emissions Review

There is no change in emissions for this renewal.

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

Pollutant(s)	2008 Actual Emissions (tpy)	2009 Actual Emissions (tpy)
CO	3.77	3.12
NO <sub>x</sub>	5.96	4.14
PM <sub>10</sub>	0.6	0.51
SO <sub>2</sub>	0.35	0.29
VOC	48.14	30.93
Total HAPs/TAPs	1.21	0.92

## IX. Stipulation Review

The facility was last inspected by Jim Westmoreland of the MRO on **July 15, 2010**. Based on his observations, the facility appeared to be in compliance with the applicable air quality regulations. He did not indicate any necessary permit language modifications.

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

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The State of South Carolina and The Mecklenburg County Local Program are affected areas within 50 miles of this facility.

## XI. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

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

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