

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2010**

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100804
Inspector's Name: Robert Barker
Date of Last Inspection: 08/26/2009
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Mickey Truck Bodies Inc Facility Address: Mickey Truck Bodies Inc 1305 Trinity Avenue High Point, NC 27261 SIC: 3714 / Motor Vehicle Parts & Accessories NAICS: 336211 / Motor Vehicle Body Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4100804.10A Date Received: 01/08/2010 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05521/T08 Existing Permit Issue Date: 11/18/2005 Existing Permit Expiration Date: 10/31/2010
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Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2010		Comments / Recommendations: Issue 05521/T09 Permit Issue Date: date, 2010 Permit Expiration Date: date, 2015	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**05521T08**) was issued on **November 18, 2005**, and is currently scheduled to expire on **October 31, 2010**. The renewal application was received on **January 8, 2010**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility manufactures beverage delivery trucks. Normal hours of operation are 10 hours per day, 4 days per week, and 50 weeks per year.

III. History/Background/Application Chronology

November 18, 2005 – Permit **05521T08** was issued as a Title V renewal.

January 8, 2010 – Permit application **4100804.10A** received for permit renewal and deemed complete for processing.

January 26, 2010 – Received calculations verifying insignificant activity status for parts washer and solvent recovery machine from Permittee.

January 27, 2010 – Received WSRO Comments and Recommendations on Air Permit Application.

February 8, 2010 – DRAFT permit sent to regional office and Permittee for comment prior to public notice and EPA review.

date, 2010 – DRAFT permit sent to public notice and EPA review prior to issuance.

IV. Permit Modifications/Changes and ESM Discussion

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

Pages	Section	Description of Changes
Attachment	Insignificant activities	-amended permit revision number -moved ES2 and ES3 to permitted equipment list as MACT applicable sources -added IES5 and IES6 per WSRO inspection report
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed all references to Part II of the permit
All	Header	-amended permit revision number
3	Equipment table	-removed MACT designations to equipment identified as being not applicable -amended description of ES006 per WSRO inspection report (removed reference to process heater) -amended description of ES011 to accurately reflect purpose and operation of equipment -added former IES2 and IES3 to list as MACT applicable equipment
4	2.1 A	-clarified equipment descriptions and added new sources to reflect modifications in main equipment table
4-5	2.1 A (table)	-added/corrected equipment ID numbers for applicable emission limits
5	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c	-added ID numbers -corrected testing rule cross reference -added ID numbers -added ID numbers -corrected testing rule cross reference -added ID numbers
6	2.1 A.3.a 2.1 A.3.b 2.1 A.3.c	-added ID numbers -corrected testing rule cross reference -added ID numbers and updated shell language

Pages	Section	Description of Changes
8	2.1 A.6	-corrected rule citation
9-21	2.1 A.8	-replaced MACT placeholder language with detailed permit language
22	2.1 A.9	-replaced Last MACT/NC Air Toxics placeholder language with detailed permit language
23-33	General Conditions	-updated shell conditions (v3.1)
Attachment	List of Acronyms	-added acronyms for CAIR, NAA, and RACT per current shell

The following table indicates all changes to ESM as a result of this permit renewal:

Current Description	Description following modification
NA	<i>One parts washer (ID No. IES5)</i>
NA	<i>One solvent recovery machine (ID No. IES6)</i>
Cleaning solvents (ID No. IES2)	Cleaning solvents (ID No. ES2)
Undercoating application (ID No. IES3)	Undercoating application (ID No. ES3)

V. Regulatory Review

The facility is currently subject to the following regulations:

- 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 .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants
- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart Mmmm)
- 15A NCAC 2Q .0705, Existing Sources and SIC Calls
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

A regulatory review for these existing requirements will not be included in this document.

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

NSPS – The facility is not currently subject to any new source performance standards. This permit renewal does not affect this status.

NESHAPS/MACT – As part of the permit renewal (**05521T08 – November 18, 2005**), a MACT placeholder was added to the permit for 40 CFR 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The Permittee is subject (per 63.3881(b)) because he owns or operates a new, reconstructed, or existing affected source that uses at least 946 liters (250 gallons) per year or more of coatings that contain HAPs in the surface coating of miscellaneous metal parts and products. Existing sources were required to be in compliance with this MACT by **January 2, 2007**. The placeholder language was incorporated because the compliance date had not yet passed. Now that the compliance date has passed and because the Permittee did not take a restriction to avoid the applicability of the MACT, the following language has replaced the placeholder language previously in the permit:

8. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. *The Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart M, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products", by January 2, 2007 for the existing sources (ID Nos. ES001 through ES004, ES008, ES009, ES012, CAULK, ES2, and ES3).*

Emission Limits [40 CFR 63.3890]

- b. *For the sources (ID Nos. ES001 through ES004, ES008, ES009, ES012, CAULK, ES2, and ES3), the Permittee shall limit organic HAP emissions to the atmosphere as follows:*
- i. *For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period;*
 - ii. *For each existing high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period;*
 - iii. *For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 0.12 kg (1.0 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period;*
 - iv. *For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 4.5 kg (37.7 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period; and*
 - v. *For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 1.5 kg (12.4 lbs) organic HAP per liter (gal) coating solids used during each 12-month compliance period.*
- c. *If the sources (ID Nos. ES001 through ES004, ES008, ES009, ES012, CAULK, ES2, and ES3) meet the applicability criteria of more than one of the subcategory emission limits specified in Section 2.1 A.8.b.i through v above, the Permittee may comply separately with each subcategory emission limit or comply using one of the following alternatives.*
- i. *If the general use or magnet wire surface coating operations subject to only one of the emission limits specified in Section 2.1 A.8.b.i or iii above account for 90 percent or more of the surface coating activity at the facility (i.e., it is the predominant activity at the facility), then compliance with that one emission limitation for all surface coating operations constitutes compliance with the other applicable emission limits. The Permittee shall use liters (gal) of solids used as a measure of relative surface coating activity over a representative period of operation. The Permittee may estimate the relative volume of coating solids used from parameters other than coating consumption and volume solids content (e.g., design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The Permittee may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by DAQ. The Permittee shall determine the predominant activity at the facility annually and submit the results of that determination in the next semi-annual compliance report required by Section 2.1 A.8.i below; or*
 - ii. *The Permittee may calculate and comply with a facility-specific emission limit as described below. In calculating a facility-specific emission limit, the Permittee shall include coating activities that meet the applicability criteria of the other subcategories and constitute more than 1 percent of total coating activities.*

- A. The Permittee is required to calculate the facility-specific emission limit for the facility when submitting the notification of compliance status required in Section 2.1 A.8.g below, and on a monthly basis afterward using the coating data for the relevant 12-month compliance period.
- B. The Permittee shall use the following equation to calculate the facility-specific emission limit for the surface coating operations for each 12-month compliance period.

$$\text{Facility - Specific Emission Limit} = \frac{\sum_{i=1}^n (\text{Limit}_i)(\text{Solids}_i)}{\sum_{i=1}^n (\text{Solids}_i)} \quad (\text{Eq. 1})$$

Where: Facility-specific emission limit = Facility-specific emission limit for each 12-month compliance period, kg (lb) organic HAP per kg (lb) coating solids used.
 Limit_i = The new source or existing source emission limit applicable to coating operation, i, included in the facility-specific emission limit, converted to kg (lb) organic HAP per kg (lb) coating solids used, if the emission limit is not already in those units. All emission limits included in the facility-specific emission limit must be in the same units.

Solids_i = The liters (gal) of solids used in coating operation, i, in the 12-month compliance period that is subject to emission limit, i. The Permittee may estimate the volume of coating solids used from parameters other than coating consumption and volume solids content (e.g., design specifications for the parts or products coated and the number of items produced). The use of parameters other than coating consumption and volume solids content must be approved by the Administrator.

n = The number of different coating operations included in the facility-specific emission limit.

- d. The Permittee shall include all coatings, thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Section 2.1 A.8.b.i through v above. To make this determination, the Permittee shall use at least one of the following two compliance options. 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. If the Permittee switches between compliance options for any coating operation or group of coating operations, the facility shall document this switch as required by Section 2.1 A.8.h.iii below, and shall report it in the next semiannual compliance report required in Section 2.1 A.8.i below.
- i. Compliant material option. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Section 2.1 A.8.b.i through v above, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The Permittee shall meet all of the following requirements to demonstrate compliance with the applicable emission limit using this option:

- A. *The Permittee shall complete the initial compliance demonstration for the initial compliance period ending **January 31, 2008**, according to the requirements in Section 2.1 A.8.d.i.B below. The demonstration shall include the calculations and supporting documentation showing that during the initial compliance period, the Permittee used no coating with an organic HAP content that exceeded the applicable emission limit in Section 2.1 A.8.b.i through v above, and that the facility used no thinners and/or other additives, or cleaning materials that contained organic HAP.*
- B. *The Permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The Permittee shall use the emission rate without add-on controls option for any coating operation in the affected source for which the facility does not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in Section 2.1 A.8.b.i through v above and must use no thinner and/or other additive, or cleaning material that contains organic HAP. The Permittee shall conduct a separate initial compliance demonstration for each general use, high performance, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless the facility is demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Section 2.1 A.8.c.i above. If the facility is demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Section 2.1 A.8.c.ii above, the Permittee shall demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. The Permittee does not need to re-determine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if the facility has documentation showing that they received back the exact same materials that were sent off-site) and reused in the coating operation for which the facility uses the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.*
1. *Determine the mass fraction of organic HAP for each material used.* *The Permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in 40 CFR 63.3941(a)(1) through (5) or using one of the following options:*
- (a) Method 311 as provided in 40 CFR 63.3941(a)(1).*
 - (b) Method 24 as provided in 40 CFR 63.3941(a)(2).*
 - (c) Alternative test method as provided in 40 CFR 63.3941(a)(3).*
 - (d) Information from the supplier or manufacturer of the material as provided in 40 CFR 63.3941(a)(4).*
 - (e) Solvent blends as provided in 40 CFR 63.3941(a)(5).*

2. Determine the volume fraction of coating solids for each coating. The Permittee shall determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in Section 2.1 A.8.d.i.B.2.(a) through (d) below. If test results obtained according to Section 2.1 A.8.d.i.B.2.(a) below do not agree with the information obtained under Section 2.1 A.8.d.i.B.2.(c) or (d) below, the test results will take precedence unless, after consultation, the Permittee demonstrates to the satisfaction of DAQ that the formulation data are correct.
 - (a) ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003) as provided in 63.3941(b)(1).
 - (b) Alternative method as provided in 40 CFR 63.3941(b)(2).
 - (c) Information from the supplier or manufacturer of the material as provided in 63.3941(b)(3).
 - (d) Calculation of volume fraction of coating solids as provided in 63.3941(b)(4).
3. Determine the density of each coating. Determine the density of each coating used during the compliance period from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see 63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475-98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the Permittee demonstrates to the satisfaction of DAQ that the formulation data are correct.
4. Determine the organic HAP content of each coating. Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using the following equation:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

Where: H_c = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c = Density of coating, kg coating per liter (gal) coating, determined according to Section 2.1 A.8.d.i.B.3 above.

W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to Section 2.1 A.8.d.i.B.1 above.

V_s = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to Section 2.1 A.8.d.i.B.2 above.

5. Compliance demonstration. The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in Section 2.1 A.8.b.i through v above; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to Section 2.1 A.8.d.i.B.1 above. The Permittee shall keep all records required by Section 2.1 A.8.h below. As part of the notification of compliance status required in Section 2.1 A.8.g below, the Permittee shall identify the coating operation(s) for which the facility used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the facility used no coatings for which the organic HAP content exceeded the applicable emission limit in Section 2.1 A.8.b.i through v above, and the facility used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in Section 2.1 A.8.d.i.B.1 above.
- C.
1. For each compliance period to demonstrate continuous compliance, the Permittee shall use no coating for which the organic HAP content (determined using Equation 2 of Section 2.1 A.8.d.i.B.4 above) exceeds the applicable emission limit in Section 2.1 A.8.b.i through v above, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to Section 2.1 A.8.d.i.B.1 above. A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in Section 2.1 A.8.d.i.A above, is the end of a compliance period consisting of that month and the preceding 11 months. If the facility is complying with a facility-specific emission limit under Section 2.1 A.8.c.ii above, the Permittee shall also perform the calculation using Equation 1 in Section 2.1 A.8.c.ii.B above on a monthly basis using the data from the previous 12 months of operation.
 2. If the Permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in Section 2.1 A.8.d.i.C.1 above is a deviation from the emission limitations that must be reported as specified in Section 2.1 A.8.g.vi and Section 2.1 A.8.i.ix below.
 3. As part of each semiannual compliance report required by Section 2.1 A.8.i below, the Permittee shall identify the coating operation(s) for which the facility used the compliant material option. If there were no deviations from the applicable emission limit in Section 2.1 A.8.b.i through v above, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the facility used no coatings for which the organic HAP content exceeded the applicable emission limit in Section 2.1 A.8.b.i through v above, and the facility used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to Section 2.1 A.8.d.i.B.1 above.
 4. The Permittee shall maintain records as specified in Section 2.1 A.8.h below.
- ii. Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in Section 2.1 A.8.b.i through v above, calculated as a rolling 12-month emission rate and determined on a monthly basis. The Permittee shall meet all of the following requirements to demonstrate compliance with the emission limit using this option.

- A. *The Permittee shall complete the initial compliance demonstration for the initial compliance period ending on **January 31, 2008**, according to the requirements of Section 2.1 A.8.d.ii.B below. The Permittee shall determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The demonstration shall include the calculations according to Section 2.1 A.8.d.ii.B below and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in Section 2.1 A.8.b.i through v above.*
- B. *The Permittee may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. The Permittee shall use the compliant material option for any coating operation in the affected source for which the facility does not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in Section 2.1 A.8.b.i through v above. The Permittee shall conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless the facility is demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Section 2.1 A.8.c.i above. If the facility is demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Section 2.1 A.8.c.ii above, the Permittee shall demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which the Permittee uses the compliant material option. The Permittee does not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the facility has documentation showing that the facility received back the exact same materials that were sent off-site) and reused in the coating operation for which the facility uses the emission rate without add-on controls option. If the Permittee uses coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.*
1. *Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in Section 2.1 A.8.d.i.B.1 above.*
 2. *Determine the volume fraction of coating solids. Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in Section 2.1 A.8.d.i.B.2 above.*

3. Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see 63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If the Permittee is including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965-02, "Standard Test Methods for Specific Gravity of Coating Powders" (incorporated by reference, see 63.14), or information from the supplier. If there is disagreement between ASTM Method D1475-98 or ASTM Method D5965-02 test results and other such information sources, the test results will take precedence unless, after consultation the Permittee demonstrates to the satisfaction of DAQ that the formulation data are correct. If the facility purchases materials or monitors consumption by weight instead of volume, the Permittee does not need to determine material density. Instead, the Permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 below.
4. Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the facility purchases materials or monitors consumption by weight instead of volume, the Permittee does not need to determine the volume of each material used. Instead, the Permittee may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C below.
5. Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where: H_e = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to Section 2.1 A.8.d.ii.B.5.(d) below. (The Permittee may assign a value of zero to R_w if the facility does not wish to use this allowance.)

- (a) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^m (\text{Vol}_{c,i})(D_{c,i})(W_{c,i}) \quad (\text{Eq. 1A})$$

Where: A = Total mass of organic HAP in the coatings used during the month, kg.

$Vol_{c,i}$ = Total volume of coating, i , used during the month, liters.

$D_{c,i}$ = Density of coating, i , kg coating per liter coating.

$W_{c,i}$ = Mass fraction of organic HAP in coating, i , kg organic HAP per kg coating. For reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of this Part.

m = Number of different coatings used during the month.

- (b) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (\text{Eq. 1B})$$

Where: B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$Vol_{t,j}$ = Total volume of thinner and/or other additive, j , used during the month, liters.

$D_{t,j}$ = Density of thinner and/or other additive, j , kg per liter.

$W_{t,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j , kg organic HAP per kg thinner and/or other additive. For reactive adhesives, use the mass fraction of organic HAP that is emitted as determined using the method in Appendix A to Subpart PPPP of this Part.

n = Number of different thinners and/or other additives used during the month.

- (c) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad (\text{Eq. 1C})$$

Where: C = Total mass of organic HAP in the cleaning materials used during the month, kg.

$Vol_{s,k}$ = Total volume of cleaning material, k , used during the month, liters.

$D_{s,k}$ = Density of cleaning material, k , kg per liter.

$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k , kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

- (d) If the facility chooses to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then the Permittee shall determine the mass according to the procedures in 40 CFR 63.3951(e)(4).

6. Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad (\text{Eq. 2})$$

Where: V_{st} = Total volume of coating solids used during the month, liters.
 $Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.
 $V_{s,i}$ = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to Section 2.1 A.8.d.i.B.2 above.
 m = Number of coatings used during the month.

7. Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad (\text{Eq. 3})$$

Where: H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.
 H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of Section 2.1 A.8.d.ii.B.5 above.
 V_{st} = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of Section 2.1 A.8.d.ii.B.6 above.
 y = Identifier for months.
 n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

8. Compliance demonstration. The organic HAP emission rate for the initial compliance period calculated using Equation 3 above must be less than or equal to the applicable emission limit for each subcategory in Section 2.1 A.8.b.i through v above or the predominant activity or facility-specific emission limit allowed in Section 2.1 A.8.c.ii above. The Permittee shall keep all records as required by Section 2.1 A.8.h below. As part of the notification of compliance status required by Section 2.1 A.8.g below, the Permittee shall identify the coating operation(s) for which the facility used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in Section 2.1 A.8.b.i through v above, determined according to the procedures in this section.

- C 1. To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to Section 2.1 A.8.d.ii.B.1 through 7 above, must be less than or equal to the applicable emission limit in Section 2.1 A.8.b.i through v above. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in Section 2.1 A.8.d.ii.A above is the end of a compliance period consisting of that month and the preceding 11 months. The Permittee shall perform the calculations in Section 2.1 A.8.d.ii.B.1 through 7 above on a monthly basis using data from the previous 12 months of operation. If the facility is complying with a facility-specific emission limit under Section 2.1 A.8.c.ii above, the Permittee shall also perform the calculation using Equation 1 in Section 2.1 A.8.c.ii.B above on a monthly basis using the data from the previous 12 months of operation.
2. If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Section 2.1 A.8.b.i through v above, this is a deviation from the emission limitation for that compliance period and must be reported as specified in Sections 2.1 A.8.g.vi and 2.1 A.8.i.x above.
3. As part of each semiannual compliance report required by Section 2.1 A.8.i above, the Permittee shall identify the coating operation(s) for which the facility used the emission rate without add-on controls option. If there were no deviations from the emission limitations, the Permittee shall submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Section 2.1 A.8.b.i through v above, determined according to Section 2.1 A.8.d.ii.B.1 through 7 above.
4. The Permittee shall maintain records as specified in Section 2.1 A.8.h below. The Permittee shall be in compliance with the emission limitations in Section 2.1 A.8.b.i through v above, at all times and shall be deemed in noncompliance with 15A NCAC 2D .1111 if he does not demonstrate compliance with the emission limitations as described above.

Operating Limits/Work Practice Standards [40 CFR 63.3892 and 63.3893]

- e. For these sources (ID Nos. ES001 through ES004, ES008, ES009, ES012, CAULK, ES2, and ES3) on which the Permittee uses the compliant material option in Section 2.1 A.8.d.i above or the emission rate without add-on controls option in Section 2.1 A.8.d.ii above, the Permittee is not required to meet any operating limits or work practice standards.

Notifications [40 CFR 63.3910]

- f. The Permittee shall submit the notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the facility by the dates specified in those sections, except as provided in Section 2.1 A.8.g below.
- g. The Permittee shall submit the notification of compliance status required by 63.9(h) by **March 1, 2008**. The notification of compliance status must contain the following information and the information in 63.9(h).
- i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;
 - iii. Date of the report and beginning and ending dates of the reporting period;
 - iv. Identification of the compliance option or options specified in Section 2.1 A.8.d above that the facility used on each coating operation during the initial compliance period;
 - v. Statement of whether or not the affected source achieved the emission limitations for the initial compliance period;
 - vi. If the Permittee had a deviation, include the following information:
 - A. A description and statement of the cause of the deviation; and

- B. *If the Permittee failed to meet the applicable emission limit in Section 2.1 A.8.b.i through v above, include all the calculations used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. The Permittee does not need to submit information provided by the materials' suppliers or manufacturers, or test reports;*
- vii. *For each of the following data items that is required by the compliance option(s) the Permittee used to demonstrate compliance with the emission limit, an example of how the Permittee determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to Sections 2.1 A.8.d.i.B.1, 2, or 3 above. The Permittee does not need to submit copies of any test reports.*
 - A. *Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material;*
 - B. *Volume fraction of coating solids for one coating;*
 - C. *Density for one coating, one thinner and/or other additive, and one leaning material, except that if the Permittee uses the compliant material option, only the example coating density is required; and*
 - D. *The amount of waste materials and the mass of organic HAP contained in the waste materials for which the Permittee is claiming an allowance in Equation 1 of Section 2.1 A.8.d.ii.B.5 above;*
- viii. *The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) the Permittee used, as specified below:*
 - A. *For the compliant material option, an example calculation of the organic HAP content for one coating, using Equation 2 of Section 2.1 A.8.d.i.B.4 above; and*
 - B. *For the emission rate without add-on controls option, the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of Sections 2.1 A.8.d.ii.B.5 through 7 above;*
- ix. *If the Permittee is complying with a single emission limit representing the predominant activity under Section 2.1 A.8.c.i above, include the calculations and supporting information used to demonstrate that this emission limit represents the predominant activity as specified in Section 2.1 A.8.c.i above; and*
- x. *If the Permittee is complying with a facility-specific emission limit under Section 2.1 A.8.c.ii above, include the calculation of the facility-specific emission limit and any supporting information as specified in Section 2.1 A.8.c.ii above.*

Recordkeeping [40 CFR 63.3930]

- h. *The Permittee shall collect and keep records of the data and information specified below. Failure to collect and keep these records is a deviation from the applicable standard.*
 - i. *A copy of each notification and report submitted to comply with this Subpart, and the documentation supporting each notification and report. If the facility is using the predominant activity alternative under Section 2.1 A.8.c.i above, the Permittee shall keep records of the data and calculations used to determine the predominant activity. If the facility is using the facility-specific emission limit alternative under Section 2.1 A.8.c.ii above, the Permittee shall keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. The Permittee shall also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports;*

- ii. *A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the facility conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the Permittee shall keep a copy of the complete test report. If the facility uses information provided by the manufacturer or supplier of the material that was based on testing, the Permittee shall keep the summary sheet of results provided by the manufacturer or supplier. The Permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier;*
 - iii. *For each compliance period, the records specified below:*
 - A. *A record of the coating operations on which the Permittee used each compliance option and the time periods (beginning and ending dates and times) for each option;*
 - B. *For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of Section 2.1 A.8.d.i.B.4 above; and*
 - C. *For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of Sections 2.1 A.8.d.ii.B.5 through 7 above; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Section 2.1 A.8.d.ii.B.5.(d) above; the calculation of the total volume of coating solids used each month using Equation 2 of Section 2.1 A.8.d.ii.B.6 above; and the calculation of each 12-month organic HAP emission rate using Equation 3 of Section 2.1 A.8.d.ii.B.7 above.*
 - iv. *A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the facility is using the compliant material option for all coatings at the source, the Permittee may maintain purchase records for each material used rather than a record of the volume used;*
 - v. *A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight;*
 - vi. *A record of the volume fraction of coating solids for each coating used during each compliance period;*
 - vii. *If the facility uses the emission rate without add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period;*
 - viii. *If the facility uses an allowance in Equation 1 of Section 2.1 A.8.d.ii.B.5 above for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to Section 2.1 A.8.d.ii.B.5.(d) above, the Permittee shall keep records of the information listed in 40 CFR 63.3930(h); and*
 - ix. *The Permittee shall keep records of the date, time, and duration of each deviation.*
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 of the above records are not maintained.*

Reporting [40 CFR 63.3920]

- i. *The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. The report shall 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 truth, accuracy, and completeness of the content of the report;*

- iii. *Date of report and beginning and ending dates of the reporting period;*
- iv. *Identification of the compliance option or options specified in Section 2.1 A.8.d above that the facility used on each coating operation during the reporting period. If the facility switched between compliance options during the reporting period, the Permittee shall report the beginning and ending dates for each option used;*
- v. *If the Permittee used the emission rate without add-on controls compliance option (Section 2.1 A.8.d.ii above), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period;*
- vi. *If the Permittee used the predominant activity alternative (Section 2.1 A.8.c.i above), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;*
- vii. *If the Permittee used the facility-specific emission limit alternative (Section 2.1 A.8.c.ii above), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period;*
- viii. *If there were no deviations from the emission limitations in Section 2.1 A.8.b.i through v above that apply, a statement that there were no deviations from the emission limitations during the reporting period;*
- ix. *If the Permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in Section 2.1 A.8.b.i through v above, the following information:*
 - A. *Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used;*
 - B. *The calculation of the organic HAP content (using Equation 2 of Section 2.1 A.8.d.i.B.4 above) for each coating identified in Section 2.1 A.8.i.ix.A above. The Permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports);*
 - C. *The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in Section 2.1 A.8.i.ix.A above. The Permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports); and*
 - D. *A statement of the cause of each deviation;*
- x. *If the Permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in Section 2.1 A.8.b.i through v above, the following information:*
 - A. *The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in Section 2.1 A.8.b.i through v above;*
 - B. *The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The Permittee shall submit the calculations for Equations 1, 1A through 1C, 2, and 3 of Sections 2.1 A.8.d.ii.B.5 through 7 above; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to Section 2.1 A.8.d.ii.B.5.(d) above. The Permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports); and*
 - C. *A statement of the cause of each deviation.*

PSD – The facility is not currently subject to any PSD requirements and is classified as a PSD minor facility. 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 any 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 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 facility does not have control devices installed; therefore, CAM does not apply at this time. This permit renewal does not affect this status.

VII. Facility Wide Air Toxics

A. The facility currently operates under a toxics demonstration in which it was determined that the TPERs for the following toxics were not being exceeded on a facility-wide level.

Pollutant (CAS Number)	TPERs Limitations			
	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Hydrogen fluoride (7664-39-3)		0.63		0.064
Methyl ethyl ketone (78-93-3)		78		22.4
Methyl isobutyl ketone (108-10-1)		52		7.6
Sulfuric acid (7664-93-9)		0.25	0.025	
Toluene (108-88-3)		98		14.4

The Permittee is required to install and maintain dry filters on the spray booths and record all inspection results in order to ensure compliance with these TPERs. This permit renewal does not affect this status.

B. The facility currently operates under emission limits established in a modeling demonstration for Xylene for the following emission sources.

Emission Source	Xylene (lb/day)	Xylene (lbs/hour)
EP01	115.2	4.80
EP02	115.2	4.80
EP03	115.2	4.80
EP04	115.2	4.80
EP08	170.6	7.11
EP12	73.4	3.06
EP13	73.4	3.06
EP14	73.4	3.06
EP15	73.4	3.06
CAULK	32.8	1.37

The Permittee is required to keep a daily painting materials/solvents/thinners log to ensure compliance. This permit renewal does not affect this status.

C. 15A NCAC 2Q .0705. As part of the permit renewal (**05521T08 – November 18, 2005**), a Last MACT/NC Air Toxics placeholder condition was placed in the permit. That condition required that a permit application be required demonstrating compliance with 15A NCAC 2D .1100 by the same deadline that the facility is required to comply with the last MACT. The permit application shall include an evaluation for all toxic air pollutants covered under rule 15A NCAC 2D .1104 for all sources at the facility, excluding those sources exempt from evaluation under 15A NCAC 2Q .0702. According to the WSRO inspection report, “the facility never submitted an application to demonstrate compliance with the toxics rule by that date (**January 2, 2007** MACT compliance date). For not submitting an application demonstrating compliance with the toxics rule, in violation of this condition, the facility received a NOV on **September 28, 2007**. On **October 12, 2007**, the facility submitted calculations demonstrating compliance with the toxic rule for HCl. Because this requirement has been satisfied, the placeholder language has been replaced with a record of compliance as follows:

State-enforceable only

9. 15A NCAC 2D .0705: EXISTING FACILITIES AND SIC CALLS

- a. *As of the **October 12, 2007** submittal, emissions of toxic air pollutants have been demonstrated on a facility-wide bases (excluding those sources exempt under 15A NCAC 2Q .0702 “Exemptions”), that each of the toxic air pollutants (TAPs) emitted from all sources at the facility are either below its respective toxic permit emission rates (TPERs) listed in 15A NCAC 2Q .0711 “Emission Rates Requiring a Permit”, or the TAPs are in compliance with 15A NCAC 2D .1100 “Control of Toxic Air Pollutants” as described in Section 2.1 A.7 above.*
- b. *The facility shall be operated and maintained in such a manner that any new, existing, or increased actual emissions of any TAP listed in 15A NCAC 2Q .0711 or in this permit from all sources at the facility (excluding those sources exempt under 15A NCAC 2Q .0702 “Exemptions”), including fugitive emissions and emission sources not otherwise required to have a permit, will not exceed its respective TPER listed in 15A NCAC 2Q .0711 without first obtaining an air permit to construct or operate.*
- c. *Prior to exceeding any of the TPERs listed in 15A NCAC 2Q .0711, the Permittee shall be responsible for obtaining an air permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D .1100 “Control of Toxic Air Pollutants”.*
- d. *The Permittee shall maintain at the facility records of operational information sufficient for demonstrating to the Division of Air Quality staff that actual TAPs are less than the rate listed in 15A NCAC 2Q .0711.*

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

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

Pollutant(s)	2007 Actual Emissions (tpy)	2008 Actual Emissions (tpy)
CO	4.81	7.31
NO _x	5.70	8.57
PM ₁₀	4.76	3.19
SO ₂	0.03	0.05
VOC	32.40	18.39
Total HAP	11.31	

IX. Stipulation Review

WSRO had the following comments based on their latest **August 26, 2009** inspection of the facility:

1. The permit lists dry filter-type wash/etch booth ES006 as being associated with a process heater. The process heater is associated with drying booth ES007. Need to correct this when the permit is reopened. *Agree; description has been amended accordingly.*
2. Looking in the permit, some of the emission sources, which are listed as being subject to 40 CFR Part 63, Subpart M, are not. The emission sources that are not are as follows:
 - two drying booths (ES007 and ES010), the two spray booths are only used for drying, no coating is applied;
 - a dry filter-type wash/etch booth (ES006), the wash/etch booth is not used for etching, but is for cleaning the smut off of the welds and washing the dirt off of the truck bodies; and
 - an aerosol can spray operation (ES011), the aerosol can spray operation is not a coating operation. Here paint cans are filled up for touch up kits.*Agree; the description of these sources has been modified to remove the MACT designation.*
3. Two insignificant sources are subject to the MACT. These two sources are as follows:
 - cleaning solvents (IES2), as per the MACT, surface coating includes associated activities such as cleaning; and
 - undercoating application (IES3), the undercoating operation is a surface coating operation.*Agree; sources have been added to the list of permitted equipment subject to MACT requirements.*
4. Looking at the diesel and gasoline tanks (IES4) during the inspection, they do not each have a capacity of 1,000 gallons as listed in the permit. Looking at an old inspection report and talking to Mr. Young, the diesel tank is 500 gallons and the gasoline tank is 250 gallons. These are insignificant sources, but the capacities should be corrected to reflect the actual size of the tanks. *Agree; descriptions have been modified.*
5. The facility has a parts washer and solvent recovery machine which are not listed in the permit. Need to evaluate these sources and see if they need to be added to the permit when it is reopened. *Agree; Permittee provided calculations verifying insignificant activity status of equipment. These have been added to the current list of insignificant activities.*

Based on review of records and visual observation, the facility "appears to be operating in compliance with Air Quality standards and regulations at the time of this inspection."

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The State of Virginia and the Forsyth 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.

WSRO recommends issuance of the permit and was sent a DRAFT permit prior to notice and issuance.

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