

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: XX/XX/2010

Region: Mooresville Regional Office
County: Cleveland
NC Facility ID: 2300153
Inspector's Name: Joseph Foutz
Date of Last Inspection: 05/28/2009
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): PPG Industries Fiber Glass Products Inc</p> <p>Facility Address: PPG Industries Fiber Glass Products Inc 940 Washburn Switch Road Shelby, NC 28150</p> <p>SIC: 3229 / Pressed And Blown Glass, Nec NAICS: 327212 / Other Pressed and Blown Glass and Glassware Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: N/A NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: 15A NCAC 2D .1109 <i>[112(j) – Part 2 MACT Hammer for Boilers & Process Heaters]</i></p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 2300153.09B Date Received: 09/17/2009 Application Type: 112(j) Part II Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 01958/T49 Existing Permit Issue Date: 12/17/2008 Existing Permit Expiration Date: 10/31/2009</p>
Richard Young Senior Environmental Engineer Associate (704) 434-2261 940 Washburn Switch Rd Shelby, NC 28150	Timothy Mathis Manufacturing Manager (704) 434-2261 940 Washburn Switch Road Shelby, NC 28150	Richard Young Senior Environmental Engineer Associate (704) 434-2261 940 Washburn Switch Rd Shelby, NC 28150	
<p>Review Engineer: Jeff Twisdale</p> <p>Review Engineer's Signature: _____ Date: _____</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 01958/T50 Permit Issue Date: XX/XX/2010 Permit Expiration Date: 09/30/2014</p>	

I. Purpose of Application

PPG Industries Fiber Glass Products Inc (PPG) is fiberglass manufacturer that is located in Shelby, Cleveland County, North Carolina. Application No. 2300153.09B, received September 17, 2009, is a Part 2 MACT "Hammer" application for two natural gas/No. 2 fuel oil-fired boilers (25.1 million Btu per hour (MMBtu/hr), nominal heat input rate each) and for twenty-six natural gas-fired process heaters rated at various heat inputs ranging from 0.87 to 2.35 MMBtu/hr.

II. Permit Modifications/Changes

The following table lists the changes associated with this permit action:

Old Page No. [Air Permit No. 01958T49]	New Page No. [Air Permit No. 01958T50]	Condition No.	Changes
NA	NA	Cover letter	Changed dates, permit and app number, etc. Inserted note indicating this is a significant modification of the Title V permit; Added copy for G. Worley, EPA
NA	NA	Table of Changes	updated the Table of Changes
NA	NA	Permit Cover	Changed dates, permit and app number, etc.
Pages 7-8	Page 8	SECTION 1 Source Table	Added 112(j) identifier to the affected boilers and process heaters
Page 51	Page 50	Section 2.1 N.	Revised Table for 112(j) for the affected boilers by adding 2D .1109
Page 53	Page 52	Section 2.1 O.	Revised Table for 112(j) for the affected process heaters by adding 2D .1109
Page 55	Page 54	Section 2.1 P.	Revised Table for 112(j) for the affected process heater by adding 2D .1109
Page NA	Page 68	Section 2.2 D.	Added new condition for 2D .1109 requiring best combustion practices for 112(j) for the boilers and process heaters
Pages 69-77	Page 69-77	Section 3 General Conditions	Inserted New General Conditions (v 3.1)

III. Regulatory Review

A. Two natural gas/No. 2 fuel oil-fired boilers (ID Nos. ESB83 and ESB84) and twenty-six natural gas-fired process heaters (ID Nos. ES-1 through ES-12, and ES-16 through ES-22, and ES-14a, ES-14b, ES-14c, ES-15a, ES-15b, ES-15c, and ESPB72A)

1. **15A NCAC 2D .1109 – CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters** – On July 30, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General’s office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a valid standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT “hammer” provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On September 17, 2009, the NC DAQ received a Part 2 MACT “Hammer” application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ’s recommendations.

No control technologies for the control of CO, metals, Hg, or HCl were identified for the natural gas-fired/No. 2 fuel oil-fired boilers and the natural gas-fired process heaters in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA’s AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas (and No. 2 fuel oil for the boilers) combustion sources of this size (e.g., 25.1 MMBtu/hr for boilers and 1.12 MMBtu/hr for the process heaters), consistent with the provisions in CAA § 112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boilers and the process heaters as follows:

To assure compliance, the Permittee shall perform an annual boiler or process heater inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:

- i. Inspect the burner, and clean or replace any components of the burner as necessary;*
- ii. Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,*
- iii. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.*

The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected boilers and process heaters are not inspected and maintained as required above.

In addition, the Permittee will be required to record the results of the annual inspection in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

IV. Draft Permit Review Summary

Ms. Denise Hayes and Mr. Joseph Foutz of the Mooresville Regional Office were provided a draft permit and draft permit review document on March 3, 2010. No comments were provided by Mr. Foutz on March 4, 2010.

Mr. Tim Mathis and Mr. Richard Young, both of PPG, were provided a draft permit for review on March 3, 2010.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on **<DATE>**.

V. Recommendations

This permit modification application for the PPG facility located in Shelby, Cleveland County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Recommend issuance of Permit No. 01958T50 after completion of the public notice and EPA review periods.