

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

Permit Issue Date: **date, 2007**

**Region:** Asheville Regional Office  
**County:** Caldwell  
**NC Facility ID:** 1400139  
**Inspector's Name:** Brendan Davey  
**Date of Last Inspection:** 01/10/2006  
**Compliance Code:** 3/In Compliance - Inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<b>Applicant (Facility's Name):</b> Pregis Innovative Packaging, Inc.  <b>Facility Address:</b> Pactiv Corporation 3825 N. Main Street Granite Falls, NC 28630  <b>SIC:</b> 3086 / Plastics Foam Products <b>NAICS:</b> 326112 / Plastics Packaging Film and Sheet (including Laminated) Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> <b>NSPS:</b> <b>NESHAP:</b> <b>PSD:</b> <b>PSD Avoidance:</b> 15A NCAC 2Q .0317 <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b>		
<b>Contact Data</b>			<b>Application Data</b>		
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<b>Application Number:</b> 1400139.05A <b>Date Received:</b> 01/27/2005 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 06552/T06 <b>Existing Permit Issue Date:</b> 08/06/2004 <b>Existing Permit Expiration Date:</b> 10/31/2005		
Nicole McGee Technical Manager (828) 396-2373 3825 North Main Street Granite Falls NC, 28630	Darren Green Plant Manager (828) 396-2373 3825 North Main Street Granite Falls NC, 28630	Nicole McGee Technical Manager (828) 396-2373 3825 North Main Street Granite Falls NC, 28630			
<b>Review Engineer:</b> Mark Cuilla  <b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2007</b>			<b>Comments / Recommendations:</b> Issue 06552/T07 <b>Permit Issue Date:</b> <b>date, 2007</b> <b>Permit Expiration Date:</b> <b>date, 2012</b>		

**I. Purpose of Application**

This permitting action is for the following:

1. Renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit **(06552T06)** was issued on **August 6, 2004**, and is currently scheduled to expire on **October 31, 2005**. The renewal application was received on **January 27, 2005**, 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.
2. Change in facility name. The Permittee submitted a request for a name change on November 15, 2005. The Permittee requested that the current name Pactiv Protective Packaging, Inc. be changed to Pregis Innovative Packaging, Inc.

The permit renewal application as originally submitted also requested the following modifications to the current permitted equipment list:

1. The reclaim extruder, storage silos, converting equipment including bag making and seal bar, Beringer jet cleaners, auxiliary oven heater, roll printers, and finished goods warehouse have been added to form D4 as insignificant activities.

The permit renewal application as originally submitted also requested the following modifications to the current permit conditions:

1. For the thermal oxidizers (**ID Nos. CD-1 and CD-2**), add inspection and maintenance requirements, recordkeeping requirements, monitoring requirements, and reporting requirements, and
2. Correct the reference to the repealed odor rule 15A NCAC 2D .0522.

In an **October 11, 2005** submittal, the Permittee amended the renewal application to include additional insignificant activities calculations. In addition, the Permittee requested:

1. to include a small welding operation on the list of insignificant activities.

## **II. Facility Description**

The facility produces foam and film packaging products. It currently operates two polyethylene sheet foam extrusion lines. Polyethylene foam sheets are produced by feeding virgin and reclaim pellets, color pellets, nucleating agent pellets, and blowing agent to the extruders. Formed sheets are allowed to de-gas and then are wound on a roll. Extruder emissions are each routed to a separate thermal oxidizer for VOC destruction.

## **III. History/Background/Application Chronology**

**August 6, 2004** – Permit **06552T06** was issued as a minor modification for the modification of an existing polyethylene sheet foam extrusion line (**ID No. ES-2**).

**January 27, 2005** – Permit application **1400139.05A** was received as a permit renewal request. The application was deemed complete for processing and assigned to Ken Babb for processing.

**February 24, 2005** – Received recommendations and comments on permit renewal application from Brendan Davey of ARO. See Section IX of this Document for a discussion.

**May 28, 2005** – Permit application **1400139.05B** was received as a permit name change. The facility requested that its name be changed from Pactiv Corporation to Pactiv Protective Packaging, Inc. The application was deemed complete for processing and consolidated into the renewal application **1400139.05A**.

**October 11, 2005** – The Permittee submitted an amendment to the permit renewal application.

**November 15, 2005** – Permit application **1400139.05C** was received as a permit name change. The facility requested that its name be changed from Pactiv Protective Packaging, Inc. to Pregis Innovative Packaging, Inc. The application was deemed complete for processing and consolidated into the permit renewal application **1400139.05A**.

**February 16, 2007** – Renewal application **1400139.05A** was transferred to Mark Cuilla for processing from Ken Babb.

**February 28, 2007** – Per facility request, I sent an update email to the Permittee explaining DAQ's delays in issuing the renewed permit and stated that because the renewal application was submitted in a timely manner, that even though the original permit expiration has passed, the Permittee is not in a state of noncompliance as long as it continues to comply with the existing requirements.

**March 7, 2007** – DRAFT permit sent to Title V Coordinator and Regional Office for comment prior to the public notice and EPA review periods. Response was received from Brendan Davey on same day. See Section IX of this Document for a discussion.

**April 23, 2007** – DRAFT permit sent to Permittee for comment prior to the public notice and EPA review periods.

**May 15, 2007** – Received response for my request for comments on the DRAFT permit from the Permittee. In that letter, they state that “at this time they do not wish to add a PSD avoidance limit...further, they do not seek the flexibility to run the extruders without the use of the thermal oxidizers as a method of operation.” They requested that the PSD avoidance condition be removed from the DRAFT permit. It should be noted that in follow-up conversations with Dale Overcash (Permittee's consultant) I reminded him and the facility that they had requested that inspection and maintenance requirements for the thermal oxidizers be included in the renewed permit. The PSD avoidance condition was established to provide DAQ with the ability to add these requirements.

**May 24, 2007** – Received an amendment to the Title V renewal application requesting removal of the inspection and maintenance request for the thermal oxidizers that was part of the original Title V renewal application. This request would eliminate the need for the inclusion of a PSD avoidance condition in the DRAFT permit.

**June 28, 2007** – Mark Cuilla had a phone conversation with Dale Overcash (Permittee's consultant) concerning the PSD status of the facility. It was confirmed that the thermal oxidizers were put into service after the grandfathering date and therefore, the facility should have triggered a PSD review. As such, the Permittee has decided that it can live with a facility-wide VOC cap of 250 tons per year to avoid the applicability of PSD. With that CAP it could also live with temperature monitoring and inspection and maintenance requirements. It however would prefer not to have to retest for capture and destruction efficiency.

**July 5, 2007** – Mark Cuilla had a phone conversation with Brendan Davey concerning the Permittee's new request for a PSD avoidance condition and their opposition to new testing requirements.

**July 11, 2007** – Second DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review.

**Date, 2007** – 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(s)	Section	Description of Change(s)
Attachment	Insignificant activities	-amended permit revision number -corrected tabular format -added equipment per application
Cover	-	-changed facility name per application -amended all dates and permit revision numbers
All	Header	-amended permit revision numbers
3	Equipment table 2.1 A 2.1 A (table)	-modified equipment description -combined former 2.1 A and 2.1 B into one section -corrected rule citation (.0522 to .1806) -added PSD avoidance condition citation
4	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.1.d 2.1 A.2.a 2.1 A.2.c 2.1 A.3.a	-added ID Nos. -updated shell language -updated shell language -added "no reporting" statement -added ID Nos. -added ID Nos. -added ID Nos.
5	2.1 A.3.c 2.1 A.3.d 2.1 A.3.e 2.1 A.4	-updated shell language and added ID Nos. -updated shell language -updated shell language -renumbered section (formerly 2.2 A)
6	2.1 A.4.c-e 2.1 A.5	-added MRR requirements for 2D .0958 -renumbered section (formerly 2.2 B)
6-8	2.1 A.6	-added PSD avoidance language
-	2.2  2.3	-removed section by incorporating conditions into Section 2.1  -removed section as being completed
9-18	General Conditions	-updated shell conditions (version 2.20)

The following table indicates the modifications to ESM as a result of this permit renewal:

Current Description	Change resulting from permit renewal
NA	Storage silos ( <b>ID No. I-Storage</b> )
NA	One reclaim extruder ( <b>ID No. I-Reclaim</b> )
NA	Beringer jet cleaners ( <b>ID No. I-Jet</b> )
NA	Finished goods warehouse ( <b>ID No. I-FGW</b> )
NA	One auxiliary oven heater ( <b>ID No. I-AuxOH</b> )
NA	One small welding operation ( <b>ID No. I-Weld</b> )
Polyethylene sheet foam extrusion operation (6-inch; <b>ID No. ES-1</b> )	One 6-inch polyethylene sheet foam extrusion line ( <b>ID No. ES-1</b> )
Polyethylene sheet foam extrusion operation (6" line; <b>ID No. ES-2</b> )	One 6-inch polyethylene sheet foam extrusion line ( <b>ID No. ES-2</b> )

Current Description	Change resulting from permit renewal
Natural gas-fired direct flame thermal oxidizers (2.5 million Btu per hour heat input; ID Nos. CD-1 and CD-2)	Two natural gas-fired direct thermal oxidizers (2.5 million Btu per hour maximum heat input capacity, each; ID Nos. CD-1 and CD-2)

## 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 .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds

A regulatory review for these existing requirements will not be included in this document. As part of this permit renewal the following regulations have been added:

15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration).

As part of this permit renewal the following calculations were submitted in support of the addition of the insignificant activities:

Sources	Potential VOC (tons/yr)	Actual VOC (tons/yr)	Potential HAP (tons/yr)	Actual HAP (tons/yr)	Potential Particulate (tons/yr)	Actual Particulate (tons/yr)
Roll Printers	2.81	0.15	0.15	0.10	-	-
Blown film line	0.9310	0.5778	0.0643	0.0285	0.0175	0.0109
Jet Cleaner	0.01638	0.00103	0.00048	0.0003	0.00077	0.00005
Bagmaking	-	-	0.00378	0.00004	0.0295	0.000295
Resin Conveying	-	-	-	-	0.0065	0.0048
Reclaim	-	-	0.04976	0.013775	0.06082	0.01687

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

**NSPS** – The facility is not currently subject to a New Source Performance Standard. This permit renewal does not affect this status.

**NESHAPS/MACT** – The facility is not currently subject to a Maximum Achievable Control Technology Standard because they are classified as a Title III minor facility. This permit renewal does not affect this status.

**PSD** – The facility is not currently subject to a Prevention of Significant Deterioration (PSD) Standard. However, as part of this renewal application a PSD standard is being added to establish a 250-tons per year facility-wide emission limit. The renewal application indicates expected actual VOC emissions from the facility at 148.81 tons per year, potential uncontrolled VOC emissions from the facility at 870.30 tons per year, and potential controlled VOC emissions from the facility at 171.94 tons per year. The purpose of adding this requirement to an obvious PSD minor source is two-fold. First, the Permittee has requested that inspection and maintenance requirements for the oxidizers (**ID Nos. CD-1 and CD-2**) be included in the renewed permit. This is most easily done in the context of a PSD avoidance condition. Second, the Regional Office has requested as part of this renewal that the facility be required to perform testing for VOC destruction efficiency, capture and control efficiency, and to establish normal operating temperatures for the oxidizers (**ID Nos. CD-1 and CD-2**). This too, is most easily done as part of a PSD avoidance condition.

This proposed permit condition includes a requirement that the Permittee test both control devices (**ID Nos. CD-1 and CD-2**) for destruction efficiency (both capture and control) as well as establish a “normal” operating temperature. In addition, monitoring (in the form of inspection and maintenance), recordkeeping, and reporting have been included. The Permittee shall comply with the following language as Section 2.1 A.6:

**6. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS  
for 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. *In order to avoid applicability of 15A NCAC 2D .0530 as requested by the Permittee, the volatile organic compound (VOC) emissions from these sources (**ID Nos. ES-1 and ES-2**) shall be less than 250 tons per consecutive twelve month period combined.*

**Testing** [15A NCAC 2D .0501(c)(4)]

- b. *If emissions testing is required, the Permittee shall perform such testing in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.6.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.*
- c. *Under the provisions of NCGS 1430215.108, the Permittee shall demonstrate compliance with the emission limit above by testing each of the control devices (**ID Nos. CD-1 and CD-2**) for VOC destruction efficiency and capture efficiency in accordance with a testing protocol approved by DAQ. The Permittee may stagger testing so that one control device is tested in one calendar year and the second control device is tested the following year, provided both devices are tested by (**date, 2009**). The Permittee shall also determine the average operating temperatures of the control devices (**ID Nos. CD-1 and CD-2**) during this test. Details of the emissions testing and requirements can be found in General Condition JJ.*

**Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. *The Permittee shall monitor and record the 3-hour average combustion chamber temperature for each thermal oxidizer (**ID No. CD-1 and CD-2**) using continuous temperature reading and recording instruments. The operating temperature shall be measured at the same location used to establish the average operating temperatures during the oxidizer control device VOC destruction efficiency tests required in Section 2.1 A.6.c above. The charts from these instruments shall be kept on-site for a period of five years after the date on which the record was made. These records shall be made available to DAQ personnel upon request. The thermal oxidizers (**ID Nos. CD-1 and CD-2**) shall be maintained at an operating temperature no less than 50 degrees Fahrenheit below the average temperature recorded during the most recent test of the control device for VOC destruction efficiency. The*

Permittee shall assume no emissions control for any period during which the minimum combustion temperature is not met.

- e. The Permittee shall calculate the VOC emissions on a monthly basis to ensure compliance with Section 2.1 A.6.a above. VOC emissions shall be calculated by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material (i.e., VOC usage), and accounting for capture and control efficiency where applicable. VOC emissions from these sources (**ID Nos. ES-1 and ES-2**) may be either uncontrolled or controlled by the thermal oxidizers (**ID Nos. CD-1 and CD-2**) except where control is required by other specific conditions of this permit. VOC emissions emitted from the oxidizers (**ID Nos. CD-1 and CD-2**) shall be calculated as follows using the results of the most recent tests for the destruction of the oxidizers:

$$E_{\text{VOC}} = \sum_{i=1}^2 (\text{VOC Usage}) \times (1 - \text{capture efficiency}) + \sum_{i=1}^2 (\text{VOC Usage})(\text{capture efficiency})(1 - \text{control efficiency})$$

The Permittee shall assume that the **control efficiency is 0%** by weight for any period during which the control device is not operated, the combustion temperature is not monitored or recorded, or the monitored combustion temperature is less than the minimum requirement pursuant to Section 2.1 A.6.d above. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the amounts of VOC containing materials are not monitored and recorded or if emissions exceed the limit in Section 2.1 A.6.a above. In addition, the Permittee must make available to officials of the DAQ, upon request, copies of the monthly emissions log.

- f. To comply with the provisions of this permit and ensure that emissions do not exceed the regulatory limits, the Permittee shall perform periodic inspection and maintenance on the thermal oxidizers (**ID Nos. CD-1 and CD-2**) as recommended by the manufacturer. As a minimum, the inspection and maintenance requirement shall include the following:
- i. a monthly visual inspection of the system ductwork and capture system for leaks;
  - ii. a semi-annual inspection of the enclosures to ensure structural integrity and smoke tube verification of inward flow; and
  - iii. an annual (for each 12 month period following the initial inspection) internal inspection of each of the primary heat exchangers and associated inlet/outlet valves to ensure structural integrity of the systems.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the control systems are not inspected and maintained.

- g. The results of all inspections and any variance from manufacturer's recommendations or from those given in the permit (when applicable) shall be investigated with corrections made and dates of actions recorded in a logbook. Records of all maintenance and monitoring activities shall be recorded in the logbook. The logbook (in written or electronic format) shall be kept on-site and made available to DAQ personnel upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if these records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- h. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of 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. The report shall contain the following:

- i. *the monthly VOC emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months; and*
- ii. *a description of any deviations from the monitoring and recordkeeping requirements in condition 2.1 A.6.d through A.6.g above and any corrective actions taken as a result of the deviation.*

**112(r)** – The Permittee is subject to the 112(r) “Prevention of Accidental Releases” requirements because he does store chemicals in amounts greater than the applicability threshold for the two blowing agent storage tanks (**ID Nos. I-BA Tank 1 and I-BA Tank 2**). The Permittee has submitted a Risk Assessment Plan to EPA pursuant to 40 CFR 68.150 prior to the June 21, 1999 deadline.

**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. Only the two polyethylene sheet foam extrusion operations (**ID Nos. ES-1 and ES-2**) have emissions that are potentially subject to CAM due to the two natural gas-fired thermal oxidizers (**ID Nos. CD-1 and CD-2**) that are in place to ensure compliance with the 250 tons per year volatile organic compound emission limit. The PSD condition requires the Permittee to calculate VOC emissions, using a continuous compliance determination method. VOC emissions are calculated using a mass balance approach. Specifically, the Permittee monitors the mass of solvent that is recovered and the VOC content and amount of VOC containing material used to determine how much VOC was emitted. No control efficiency is assumed; the control efficiency is determined based on the mass balance calculation. There are no short-term emission limit or control efficiency requirements.

Part 64 defines continuous compliance determination method as “a method specified by the applicable standard or an applicable permit condition which is used to determine compliance with an emission limitation or standard on a continuous basis, consistent with the averaging period established for the emission limitation or standard and provides data either in units of the standard or correlated directly with the compliance limit.”

The PSD avoidance condition requires that the Permittee calculate VOC emissions by multiplying the total amount of VOC-containing material consumed by the VOC content of the material. This is completed by the referenced mass balance determination method described above. DAQ agrees that this method is consistent with the continuous compliance determination method described in Part 64; therefore, specific CAM requirements will not be included as part of this renewal.

## **VII. Facility Wide Air Toxics**

The facility is not currently subject to a facility wide toxics condition and has not triggered a toxics review. 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 inventory from the facility:

Pollutant(s)	2005 Actual Emissions (tpy)
CO	1.61
NO <sub>x</sub>	1.93
PM <sub>10</sub>	0.11
VOC	154.17
Total HAP/TAP	0.055

## IX. Stipulation Review

The ARO had the following comments on the renewal application (submitted February 24, 2005):

1. The facility should be reviewed for PSD applicability. A PSD avoidance condition may be necessary to ensure compliance. *Agree, this has been included.*
2. Thermal oxidizer and enclosure monitoring and maintenance requirements should be added to the air permit. I (Brendan Davey) recommend parametric monitoring for the two enclosures such as pressure drop and temperature for the oxidizers. *Agree, requirements for the oxidizers have been included. No assumed efficiency for the total enclosures has been added.*
3. Per past DAQ letters, the following sources should now be listed on the air permit as insignificant: converting operations and two roll printers. *Agree, sources have been added to permit and ESM.*
4. The insignificant activities addressed in the renewal application should be reviewed for inclusion in the air permit. *Agree, all proposed insignificant activities have been reviewed for applicability.*
5. Recommend thermal oxidizer efficiency testing for both oxidizers as part of the renewal (one tested within one year of issuance and one to be tested by the end of the permit cycle). *Agree, testing has been included as part of the new PSD avoidance condition.*

Note, the renewal application incorrectly refers to total enclosures, but the emissions calculations correctly refer to past capture efficiency testing of well less than 100% capture.

The ARO had the following comments in their most recent inspection report (1/10/2006):

1. When the permit is opened in the future, recommend oxidizer I&M requirements be included and enclosure requirements. *Agree, see above.*
2. The facility is subject to the requirements of the 112r program for storage of the blowing agent and did have an updated RMP on site. A letter from the EPA indicated the RMP was updated 8/26/2004. The last update on-site indicated it was updated 8/4/2005. *No change, the renewed permit has been modified to remove this requirement as being completed.*

A DRAFT permit was sent to the Permittee and Regional Office on March 7, 2007. The following comments were received from Brendan Davey on that DRAFT:

1. Darren Green is the new plant manager/authorized contact. *Agree; change has been made.*
2. Your equipment description for ES-2 resembles what was in place a few permits ago before they replaced the extruder. Do you want to keep the current permit descriptions? *Permit descriptions were verified with the Permittee on April 23, 2007. Those descriptions are indicated in the final DRAFT permit and ESM.*

3. Not really an issue for this facility, but I disagree the company should have one month to correct a VE problem. *Agree; shell language has been modified to include "as soon as practicable".*
4. Do we want capture efficiency tests at this time? We are feeling neutral about this. We do want control efficiency testing. *Testing has been included in the DRAFT renewed permit. See above comments.*
5. Do we want them to believe they can operate uncontrolled? I do not understand this sentence. *The PSD avoidance condition as written does allow for the operation of the permitted equipment with or without the control device operating. Capture and control efficiencies and "credit" are only given when the control device is in operation and operating correctly. At all other times, no emission reduction credit is assumed. The facility is required to stay below a permit limit of 250 tons VOC per year. How that limit is met is up to the Permittee.*
6. Are they OK with no averaging on temperature? "Recording" is spelled wrong. Do we want to clarify what continuous recording means – a reading every XX minutes? What about monitor downtime? Is the temperature high enough on start-up before the full process VOC stream contributes to the heat loading? Do they have continuous recorders or should we require once daily recording? *On April 23, 2007, it was verified that the Permittee does operate continuous temperature recording devices (strip charts). Therefore, continuous is set. The Permittee has stated that the thermal oxidizers need to reach a minimum temperature of 1325 degrees Fahrenheit prior to receiving the VOC air stream. The proposed testing will require that this average minimum operating temperature be defined.*
7. Can we require monthly or quarterly inspections of the enclosures to ensure structural integrity and smoke tube verification of inward airflow? Any canned language on this from other permits? *The renewed permit includes inspection and maintenance requirements. A part of those requirements is a semi-annual enclosure testing for negative pressure.*

## **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 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. Tennessee is an affected State and Forsyth County is an affected Local Program 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.

ARO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

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