



PAT MCCRORY  
*Governor*

DONALD R. VAN DER VAART  
*Secretary*

SHEILA C. HOLMAN  
*Director*

MM DD, YYYY

Mr. Kevin Smith  
Senior Vice President  
Marsh Furniture Company  
P. O. Box 870  
High Point, North Carolina 27261

**SUBJECT: Air Quality Permit No. 03238T23**  
**Facility ID: 4100854**  
**Marsh Furniture Company**  
**High Point, North Carolina**  
**Guilford County**  
**Fee Class: Title V**

Dear Mr. Smith:

In accordance with your completed Air Quality Permit Application for **the significant** modification of your Title V permit received **November 13, 2015**, we are forwarding herewith Air Quality Permit No. 03238T23 to Marsh Furniture Company, 1001 South Centennial Street, High Point, North Carolina authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the conditions of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Guilford County has been triggered for PM<sub>10</sub> and SO<sub>2</sub> with respect to minor source baseline dates. However, this permit modification does not consume or expand increments for any pollutants.

This Air Quality Permit shall be effective from MM DD, YYYY until March 31, 2020, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact Joseph M. Voelker, P.E., at (919) 707-8730.

Sincerely yours,

William D. Willets, P. E., Chief, Permitting Section  
Division of Air Quality, NCDEQ

Enclosure

cc: Heather Ceron, EPA Region 4  
Connie Horne (cover letter only)  
Winston-Salem Regional Office  
Central Files

ATTACHMENT to Air Quality Permit Number 03238T23  
 Insignificant Activities List

Insignificant Activities Pursuant to 15A NCAC 02Q .0503(8):

<b>Emission Source ID</b>	<b>Emission Source Description</b>
<b>I-Distillation</b>	Distillation system for recovery and reuse of non-HAPs thinners in finishing room
<b>I-NVLO</b>	One temporary veneer laminating operation utilizing hand held applicator and pinch roller
<b>I-C-1</b>	Cleanup operations (located at all assembly locations; wipe rags and naphtha)
<b>I-MO</b>	Maintenance operations (welding, fabricating and maintenance activities)
<b>I-TUO</b>	Touchup and repair operations (located at all assembly locations)
<b>I-MUA-1 and I-MUA-2</b>	Two (2) natural gas-fired (4.12 million Btu per hour maximum heat input capacity) make-up air units manufactured by Rupp Air Management Systems. These units are intended to provide comfort heat to the space in winter/cold weather; thus, insignificant per 15A NCAC 02Q .0503(7)(d)

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."
3. For additional information regarding the applicability of GACT see the DAQ page titled "The Regulatory Guide for Insignificant Activities/Permits Exempt Activities". The link to this site is as follows: <http://daq.state.nc.us/permits/insig/>

**ATTACHMENT to cover letter to Air Quality Permit Number 03238T23**

Existing Condition No.	New Condition No.	Changes
Cover Letter	Same	<ul style="list-style-type: none"> <li>• Used current shell language, updated permit numbers, dates, etc.</li> <li>• Removed “minor modification” paragraph associated with previous permit modification</li> </ul>
Permit, page 1	Same	<ul style="list-style-type: none"> <li>• Revised dates, permit numbers, etc using current shell standards</li> </ul>
Global	Same	<ul style="list-style-type: none"> <li>• Updated regulation references from “2D” and “2Q” to “02D” and “02Q” to be consistent with regulation nomenclature.</li> </ul>
2.1.A.4.a	Same	<ul style="list-style-type: none"> <li>• The emission limits for TSM and CO were revised to the 112(d) emission limits</li> </ul>
Section 3 General Conditions	Same	<ul style="list-style-type: none"> <li>• Section was revised form v.3.6 to current shell version 4.0 (12/17/2015). Only minor changes were made. Changes include:               <ul style="list-style-type: none"> <li>▪ Updating regulation references from “2D” and “2Q” to “02D” and “02Q” to be consistent with regulation nomenclature.</li> <li>▪ References to DENR were revised to DEQ</li> </ul> </li> </ul>



## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
03238T23	03238T22	MM DD, YYYY	March 31, 2020

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

**Permittee:** **Marsh Furniture Company**

**Facility ID:** **4100854**

**Facility Site Location:** **1001 South Centennial Street**  
**City, County, State, Zip:** **High Point, Guilford County, North Carolina 27260**  
**Mailing Address:** **P.O. Box 870**  
**City, State, Zip:** **High Point, North Carolina 27260**

**Application Number:** **4100854.15C**  
**Complete Application Date:** **November 13, 2015**

**Primary SIC Codes:** **2434**

**Division of Air Quality,**  
**Regional Office Address:** **Winston-Salem Regional Office**  
**450 West Hanes Mill Road, Suite 300**  
**Winston-Salem, North Carolina 27105**

Permit issued this the MM DD, YYYY.

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William D. Willets, P. E., Chief, Permitting Section  
By Authority of the Environmental Management Commission

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ATTACHMENT

List of Acronyms

## SECTION 1 – PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>New Hanging Line No. 1 including: (Building Three, Former Whitewood Warehouse)</b>				
8 14 15 16 26 28	<b>NHL1S (PSD, MACT Subpart JJ)</b>	Stage 1 – Two stain booths (Nos. Stage1.1 and Stage1.2)	NA	NA
		Stage 2 – Two stain booths (Nos. Stage2.1 and Stage2.2)	NA	NA
		Stage 3 – Two stain booths (Nos. Stage3.1 and Stage3.2)	NA	NA
		Stage 4 – Two sealer booths (Nos. Stage4.1 and Stage4.2)	NA	NA
		Stage 5 – Two topcoat booths (Nos. Stage5.1 and Stage5.2)	NA	NA
		Stage 6 – Two stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)	NA	NA
		One paint spray booth fitted with high volume low pressure (HVLP) guns (No. NHL-4A)	NA	NA
		One paint spray booth fitted with high volume low pressure (HVLP) guns (No. SB-R1)	NA	NA
		Five natural gas-fired ovens (four at 0.5 and one at 0.8 million Btu per hour maximum heat input capacity, respectively; Nos. Oven.1 through Oven.5)	NA	NA
		Three natural gas-fired process air makeup units (3.4 million Btu per hour maximum heat input capacity each; Nos. Makeup-1, Makeup-2, and Makeup-3)	NA	NA
		One washoff tank (No. ESWO1)	NA	NA
<b>New Hanging Line No. 2 including: (Building Five, Third Floor, Existing Finishing Room)</b>				
8 14 15 16 26 28	<b>NHL2S (PSD, MACT Subpart JJ)</b>	Stage 2 – Two stain booths (Nos. Stage2.1 and Stage2.2)	NA	NA
		Stage 3 – Two stain booths (Nos. Stage3.1 and Stage3.2)	NA	NA
		Stage 4 – Two sealer booths (Nos. Stage4.1 and Stage4.2)	NA	NA
		Stage 5 – Two topcoat booths (Nos. Stage5.1 and Stage5.2)	NA	NA
		Stage 6 – Two stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)	NA	NA
		Three natural gas-fired process air makeup units (3.4 million Btu per hour maximum heat input capacity, each; Nos. Makeup-1, Makeup-2, and Makeup-3)	NA	NA

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>Glaze Line No. 2 (Building Five, Third Floor, Existing Finishing Room)</b>				
8 26 28	GL-NHL2S-1	One baffle type paint spray hanging line fitted with a reciprocator and high volume low pressure (HVLP) guns	NA	NA
<b>New Flat Line No. 1 (Building Two, Third Floor, Former Roller Room)</b>				
8 14 15 16 26 28	NFLS1 (PSD, MACT Subpart JJ)	Stage 1 – Five roll coaters (Nos. Stage1.1 through Stage1.5)	NA	NA
		Stage 6 – Two back to back topcoat spray booths (Nos. Stage6.1 and Stage6.2)	NA	NA
		Stage 7 – Six UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)	NA	NA
		Five steam-heated drying ovens (Nos. Oven.1 through Oven.5)	NA	NA
		Three natural gas-fired process air makeup units (3.4 million Btu per hour maximum heat input capacity each; Nos. Makeup-1, Makeup-2, and Makeup-3)	NA	NA
<b>New Flat Line No. 4 (Building Five, Third Floor, Existing Finishing Room)</b>				
15 16	NFLS4 (PSD, MACT Subpart JJ)	Four roll coaters utilizing products that do not contain volatile organic compounds (Nos. UVRC1 through UVRC4)	NA	NA
		Four ultraviolet light drying ovens (Nos. UVDO1 through UVDO4)	NA	NA
		One natural gas-fired three zone drying oven (0.5, 0.5 and 0.8 million Btu per hour maximum heat input capacities; No. Oven.6)	NA	NA
<b>Old Shipping Warehouse</b>				
<b>Stain-Paint Line</b>				
8 15 26 28	NFLS-4 (PSD, MACT Subpart JJ)	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A
8 15 26 28	NFLS-2 (PSD, MACT Subpart JJ)	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A
8 26 29	SWM-1 & SWM-2 (MACT Subpart JJ)	Two stain wiping machines	N/A	N/A
<b>Sealer Line</b>				
8 15 26 29	NFLS-5 (PSD, MACT Subpart JJ)	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A

**Topcoat Line**



Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
8 15 26 29	NFLS-3 <b>(PSD, MACT Subpart JJ)</b>	Flat line dry filter type spray booth and one steam-heated drying oven	N/A	N/A
<b>Washoff Tanks</b>				
9 29	ESW02* through ESW05* <b>(MACT Subpart JJ)</b>	Four washoff tanks (each 107 gallon capacity)	NA	NA
<b>Existing (Old) Flat Line No. 1 (Building Five, Third Floor)</b>				
8 15 26 29 34	EFL1 <b>(PSD, MACT Subpart JJ)</b>	Two baffle type stain spray booths (Nos. SB1 and SB2)	NA	NA
		One baffle type sealer spray booth (No. SB3)	NA	NA
		One baffle type varnish spray booth (No. SB4)	NA	NA
		Four steam-heated drying ovens (Nos. DO1 through DO4)	NA	NA
<b>Existing (Old) Flat Line No. 3 (Building Five, Third Floor)</b>				
9 15 27 29 34	EFL3 <b>(PSD, MACT Subpart JJ)</b>	One baffle type stain spray booth (No. SB8)	NA	NA
		One baffle type sealer spray booth (No. SB9)	NA	NA
		One baffle type varnish spray booth (No. SB10)	NA	NA
		One steam-heated stain drying oven (No. DO8)	NA	NA
		One steam-heated sealer drying oven (No. DO9)	NA	NA
		One steam-heated varnish drying oven (No. DO10)	NA	NA

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>Off-Line Spray Booths and Roll Coaters</b>				
9 27 29 34	ECD-SB11a <b>(PSD, MACT Subpart JJ)</b>	One off-line paint spray booth (Clamp Department 121)	NA	NA
9 27 29 34	GL-SB11b	One hand spray booth fitted high volume low pressure (HVLV) guns (Flat Line Finishing Area – Building Five, Third Floor)	NA	NA
9 27 29 34	SB12 <b>(PSD, MACT Subpart JJ)</b>	One off-line paint spray booth (Machine Room – Department 116)	NA	NA
9 27 29 34	ECD-SB13 <b>(PSD, MACT Subpart JJ)</b>	One off-line paint spray booth (Clamp Department 121)	NA	NA
9 27 29 34	ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19 <b>(PSD, MACT Subpart JJ)</b>	Five roll coaters (Clamp Department 121)	NA	NA
<b>Existing Main UV Line (Building Two, Third Floor, Roller Room)</b>				
9 15 27 29 34	EMUV <b>(PSD, MACT Subpart JJ)</b>	Seven roll coaters (Nos. RC7 through RC11, RC13, and RC14)	NA	NA
		Three steam-heated drying ovens (Nos. DO12 through DO14)	NA	NA
<b>Existing Short Line (Building Two, Third Floor, Roller Room)</b>				
9 15 27 29	ESL <b>(PSD, MACT Subpart JJ)</b>	Four roll coaters (Nos. RC4, RC5A, RC5B, and RC6)	NA	NA
		Two steam-heated drying ovens (Nos. DO11 and DO17)	NA	NA

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>Existing Facility Support Equipment</b>				
9 27 29	ES-Gluing-1	One gluing operation	NA	NA
17 18 19 20	B1 (.1109 Case-by-Case MACT, MACT DDDDD)	One firetube-design adulterated/unadulterated wood waste-fired boiler (Dutch oven/pile burner designed to burn biomass/bio-based solid; 19.2 million Btu per hour maximum heat input capacity)	FA1	One multicyclone (20 nine inch diameter tubes)
11 12 13 14	WWCS1	One wood waste/wood dust collection and storage system	CD1, CD2, CD4, and CD5  BF1 through BF5  CD3 and CD6	Four cyclones (80, 144, 120, and 48 inches in diameter, respectively)  Five bagfilters (1936, 3873, 5765, 6924, and 7045 square feet of filter area, respectively)  Two simple closed loop cyclones (60 and 84 inches in diameter, respectively)
11 12	TL1	One enclosed auger type wood chip truck load-out operation	NA	NA
11 12	ESWH1	One wood hog with pneumatic transport and wood collection	CD7  BF6	One simple cyclone (106 inches in diameter)  One bagfilter (948 square feet of filter area)
11 12	WW-8, WW-9, and WW-10	Miscellaneous woodworking operations	BF8, BF9, and BF10	Three bagfilters (5,750 square feet of filter area, one each)

\* The emission sources (ID Nos. ESWO2 through ESWO5) are listed as a minor modification per 15A NCAC 02Q .0515. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected terms of this permit (excluding the permit shield as described General Condition R) for these sources shall become final on September 11, 2015. Until this date, the affected permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 02Q .0515(f). [Application No. 4100854.15A]

## **SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS**

### **2.1 - Emission Source(s) and Control Devices(s) Specific Limitations and Conditions**

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, record keeping, and reporting requirements as specified herein:

**A. New hanging line No. 1 (NHL1S) consisting of:**

- Stage 1 stain booths (Nos. Stage1.1 and Stage1.2)**
- Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)**
- Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)**
- Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)**
- Stage 5 topcoat booths (Nos. Stage5.1 and Stage 5.2)**
- Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage 6.1 and Stage 6.2)**
- Paint spray booth (No. NHL-4A)**
- Paint spray booth (No. SB-R1)**
- Washoff tank (No. ESWO1)**

**New hanging line No. 2 (NHL2S) consisting of:**

- Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)**
- Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)**
- Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)**
- Stage 5 topcoat booths (Nos. Stage5.1 and Stage5.2)**
- Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)**

**Glaze Line No. 2 (GL) consisting of:**

- Paint spray hanging line (No. GL-NHL2S-1)**

**New flat line (NFLS1) consisting of:**

- Stage 1 roll coaters (Nos. Stage1.1 through Stage1.5)**
- Stage 6 topcoat booths (Nos. Stage6.1 and Stage6.2)**
- Stage 7 UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)**

**New flat line consisting of:**

- Roll coaters (Nos. UVRC1 through UVRC4)**

**Old Shipping Warehouse consisting of:**

- Flat line dry filter type spray booth (ID No. NFLS-4) and one steam-heated drying oven**
- Flat line dry filter type spray booth (ID No. NFLS-2) and one steam-heated drying oven**
- Flat line dry filter type spray booth (ID No. NFLS-5) and one steam-heated drying oven**
- Flat line dry filter type spray booth (ID No. NFLS-3) and one steam-heated drying oven**
- Two stain wiping machines (ID Nos. SWM-1 & SWM-2)**

**Existing (Old) flat line No. 1 (EFL1) consisting of:**

- Baffle type stain booths (Nos. SB1 and SB2)**
- Baffle type sealer booth (No. SB3)**
- Baffle type varnish booth (No. SB4)**

**Existing (Old) flat line No. 3 (EFL3) consisting of:**

- Baffle type stain booth (No. SB8)**
- Baffle type sealer booth (No. SB9)**
- Baffle type varnish booth (No. SB10)**

**Off-Line Spray Booths and Roll Coaters consisting of:**

- Paint spray booths (ID Nos. ECD-SB11a, GL-SB11b, SB12, and ECD-SB13)**
- Roll coaters (ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19)**

**Existing main UV line (EMUV) consisting of:**

- Roll coaters (Nos. RC7 through RC11, RC13, and RC14)**

**Existing short line (ESL) consisting of:**

- Roll coaters (Nos. RC4, RC5A, RC5B, and RC6)**

**Gluing operation (ID No. ES-Gluing-1)**

**Four washoff tanks (ID Nos. ESWO2 through ESWO5)**

The following table provides a summary of limits and/or standards for the emission source(s) described above.

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
Particulate matter	Adequate ductwork and properly designed collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Volatile organic compounds	BACT Limits <b>See Section 2.2 A</b>	15A NCAC 02D .0530 (PSD)
Odororous emissions	<b>State-enforceable only</b> <b>See Section 2.2 B</b>	15A NCAC 02D .1806
Hazardous air pollutants	MACT Standards <b>See Section 2.2 D</b>	15A NCAC 02D .1111 (40 CFR 63, Subpart JJ)

**1. 15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS**

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate ductwork and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

**Monitoring** [15A NCAC 02Q .0508(f)]

- b. Particulate matter emissions from the spray booths in finishing lines shall be controlled by adequate ductwork and properly designed collectors. To assure compliance, the Permittee shall perform inspections and maintenance. As a minimum, the inspection and maintenance program shall include:
  - i. weekly inspection of the spray booths' filters noting the condition; and
  - ii. annual (for each 12 month period following the initial inspection) inspection of the associated ductwork noting structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if the filters are not inspected and maintained.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

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

logbook shall record the following:

- i. the date and time of each recorded action;
- ii. the results of each inspection; and
- iii. the results of maintenance performed on any filters.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit the results of any maintenance performed on the filters or ductwork within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISIONS**

- a. Visible emissions from the spray booths in finishing lines shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of the spray booths in finishing lines for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of these emission sources in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.2.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations 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.

**B. Three miscellaneous woodworking operations (ID Nos. WW-8, WW-9, WW-10) with associated bagfilters (ID Nos. BF8, BF9, and BF10, respectively)**

**One wood waste/wood dust collection and storage system (ID No. WWCS1) consisting of group processes controlled with four associated cyclones (ID Nos. CD1, CD2, CD4, and CD5 respectively) installed in series with one bagfilter (ID No. BF1), with four associated bagfilters (ID Nos. BF2, BF3, BF4, BF5, respectively), and two cyclones (ID Nos. CD3 and CD6, respectively) which normally operate closed loop, with ambient vents on each cyclone that could vent to ambient air in an emergency**

**One enclosed auger type wood chip truck load-out operation (ID No. TL1)**

**One wood hog (ID No. ESWH1) with associated collection cyclone (ID No. CD7) in series with one bagfilter (ID No. BF6)**

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate emissions	Adequate ductwork and properly designed collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Particulate matter	<b>(ID Nos. BF2 and BF3 only)</b> Compliance Assurance Monitoring	15A NCAC 02D .0614

**1. 15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS**

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate ductwork and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

**Monitoring** [15A NCAC 02Q .0508(f)]

- b. Particulate matter emissions from these sources (ID Nos. WW-8, WW-9, WW-10, WWCS1, TL1, and ESWH1) shall be controlled by cyclones (ID Nos. CD1 through CD7) and bagfilters (ID Nos. BF1 through BF6 and BF8 through BF10) as described above. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
  - i. monthly external inspection of the ductwork, cyclones, and/or bagfilters noting the structural integrity; and
  - ii. annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters noting the structural integrity and the condition of the filters.
 The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if the ductwork, cyclones, and/or bagfilters are not inspected and maintained.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The results of inspection and maintenance for the cyclones and bagfilters shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection; and
  - iii. the results of maintenance performed on any control device.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit the results of any maintenance performed on the control devices within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources (**ID Nos. WW-8, WW-9, WW-10, WWCS1, TL1, and ESWH1**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in a 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To assure compliance, once a week the Permittee shall observe the emission points of these sources (**ID Nos. WW-8, WW-9, WW-10, WWCS1, TL1, and ESWH1**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 B.2.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.



The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations 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.

**3. 15A NCAC 02D .0614: COMPLIANCE ASSURANCE MONITORING**

- a. Per 40 CFR 64 and 15A NCAC 02D .0614, the Permittee shall comply with the following.
- b. **Background.**
  - i. Emission Unit(s).
    - A. Description. One wood waste/wood dust collection and storage system
    - B. Identification. **ID No. WWCS1**
  - ii. Applicable Regulations, Emission Limits, and Monitoring Requirements.
    - A. Regulations. 15A NCAC 02D .0512 and .0521
    - B. Emission Limits.
      - 1. Adequate ductwork and properly designed collectors
      - 2. 20 percent opacity
    - C. Control Technology. Two fabric filters (**ID Nos. BF2 and BF3**)
- c. **Monitoring Approach.** The key elements of the monitoring approach for particulate matter, including parameters to be monitored, parameter ranges and performance criteria are presented in the following table:

Performance Indicators	Parameter
I. Indicator	Visible emissions
Measurement Approach	Visible emissions from the fabric filters will be monitored daily using EPA Reference Method 22-like procedures
II. Indicator Range	An excursion is defined as the presence of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement.
QIP Threshold (Quality Improvement Plan)	The QIP threshold is five excursions in a 6-month period.
III. Performance Criteria	
A. Data Representativeness	Measurements are being made at the emission point (fabric filter outlet).
B. Verification of Operational Status	NA
C. QA/QC Practices	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.
D. Monitoring Frequency	Observations are done daily.
Data Collection Procedures	VE observations are documented by the observer.
Averaging Periods	NA

- d. **Justification.**
  - i. Background. The pollutant-specific emission unit is the wood dust system (**ID No. WWCS1**),

which is used to collect and transfer the wood dust from the equipment in the plant to the dust silo. The equipment consists of saws, planers, sanders, etc. in the typical furniture manufacturing operation. The particular control devices subject to this condition are two fabric filters (**ID Nos. BF2 and BF3**).

- ii. Rationale for Selection of Performance Indicators. Visible emissions was selected as the performance indicator because it is a good indicator of the proper operation and maintenance of the filter units. When the filter units are operating properly, there will not be any visible emissions in the exhaust outlet. Any increase in visible emissions indicates reduced performance of the filter units, therefore, the presence of visible emissions is used as a performance indicator.
- iii. Rationale for Selection of Indicator Ranges. The selected indicator range is no visible emissions. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. Although Reference Method 22 applies to fugitive sources, the visible/no visible emissions observation technique of RM-22 can be applied to ducted emissions; i.e., Method 22-like observations.

The selected QIP threshold for fabric filter visible emissions is five excursions in a 6-month reporting period. This level is 3 percent of the total visible emissions observations. If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. Per 64.6(e), the Permittee shall submit compliance assurance monitoring in the form of an administrative amendment that satisfies Parts 64.3 and 64.4, including the establishment of normal operating ranges of the control devices within 180 days of startup of each or all control device (**ID Nos. BF8, BF9, and BF10**). If the Permittee does not submit the monitoring or if DAQ disapproves the submittal, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0614.
- f. The Permittee shall submit a summary report of all monitoring 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 period for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**C. New hanging line No. 1 (NHL1S) consisting of:**

**Natural gas-fired ovens (Nos. Oven.1 through Oven.5)**

**Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)**

**New hanging line No. 2 (NHL2S) consisting of:**

**Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)**

**New flat line (NFLS1) consisting of:**

**Steam heated drying ovens (Nos. Oven.1 through Oven.5)**

**Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)**

**New flat line consisting of:**

**Natural gas-fired oven (No. Oven.6)**

**Ultraviolet light drying ovens (Nos. UVDO1 through UVDO4)**

**Old Shipping Warehouse consisting of:**

**Four steam-heated drying ovens associated with Flat line dry filter type spray booths (ID Nos.**

**NFLS-4, NFLS-2, NFLS-5 and NFLS-3)**

**Existing (Old) flat line No. 1 (EFL1) consisting of:  
 Steam heated drying ovens (Nos. DO1 through DO4)**

**Existing (Old) flat line No. 3 (EFL3) consisting of:  
 Steam heated drying ovens (Nos. DO8 through DO10)**

**Existing main UV line (EMUV) consisting of:  
 Steam heated drying ovens (Nos. DO12 and DO14)**

**Existing short line (ESL) consisting of:  
 Steam heated drying ovens (Nos. DO11 and DO17)**

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521

**1. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

a. Emissions of sulfur dioxide from these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFLS.Oven.6, Four Ovens (associated with ID Nos. NFLS-4, NFLS-2, NFLS-5 and NFLS-3), NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

**Testing** [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFLS4.Oven.6, NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**).

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

a. Visible emissions from these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFLS4.Oven.6, NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.2.a above, the Permittee shall be

deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of these sources (**ID Nos. NHL1S.Oven.1 through NHL1S.Oven.5, NFLS4.Oven.6, NHL1S.Makeup-1 through NHL1S.Makeup-3, NHL2S.Makeup-1 through NHL2S.Makeup-3, and NFLS1.Makeup-1 through NFLS1.Makeup-3**) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 C.2.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations 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.

**D. One firetube-design adulterated/unadulterated wood-fired boiler (ID No. B1)**

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.61 pounds per million Btu heat input	15A NCAC 02D .0504
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	40 percent opacity	15A NCAC 02D .0521
<b>Total Selected Metals</b>	<b>0.002 lbs/MMBtu</b>	15A NCAC 02D .1109
Mercury	5.0e-06 lbs/MMBtu	
HCl - Equivalent	188.5 pounds/hour	
<b>Carbon Monoxide</b>	<b>770 ppmvd, corrected to 3% O<sub>2</sub></b>	
Hazardous Air Pollutants	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	15A NCAC 02D .1111

**1. 15A NCAC 02D .0504: PARTICULATES FROM WOODBURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from the combustion of adulterated/unadulterated wood that are discharged from this source (**ID No. B1**) into the atmosphere shall not exceed 0.61 pounds per million Btu heat input.
- b. In no case shall this source (**ID No. B1**) burn any chlorinated or non-chlorinated plastics and/or resins, or any wood waste which has been adulterated by finishes and/or coatings whose solid content contains compounds containing chlorine.

**Testing** [15A NCAC 02Q .0508(f)]

- c. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.
- d. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit above by testing this source (**ID No. B1**) for particulate matter with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in Section 3 – General Condition JJ. Testing shall be completed and the results submitted within one year of issuance of permit by April 7, 2016 unless an alternate date is approved by the DAQ. Previous testing was completed on February 10, 2009; however, the boiler was only tested for filterable PM emissions. Per Stationary Source Compliance Branch Memorandum dated April 22, 2009, the filterable PM emissions test results were acceptable and indicated compliance with the PM emission standard.<sup>1</sup> Emissions testing for both filterable and condensable PM is required to demonstrate compliance with the applicable standard. The last acceptable test that demonstrated compliance with the particulate standard was approved on January 15, 2003.<sup>2</sup> If the results of this test are above the limit given in Section 2.1 D.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.

**Monitoring** [15A NCAC 02Q .0508(f)]

- e. Particulate matter emissions from this source (**ID No. B1**) shall be controlled by one multicyclone (**ID No. FA1**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement must include the following:
  - i. a monthly external visual inspection of the system ductwork and material collection unit for leaks; and
  - ii. an annual (for each 12 month period from initial inspection) internal inspection of the multicyclone's structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504 if the multicyclone and ductwork are not inspected and maintained.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- f. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. a report of any maintenance performed on the multicyclone (**ID No. FA1**); and

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<sup>1</sup> DAQ Memorandum from Paula Hemmer, Stationary Source Compliance Branch (SSCB) to Margaret Love, Winston-Salem Regional Office (WSRO) dated April 22, 2009 regarding Particulate Emissions Test on Boiler ES-B1. Memo stated that "Future testing should be conducted for both filterable and condensable PM."

<sup>2</sup> DAQ Memorandum from Stacey Vick, SSCB to Myron Whitley, WSRO dated January 15, 2003 regarding Particulate Emissions Test on Boiler ES-B1. Memo approval based on Total PM (filterable PM and condensable PM) of 0.396 pounds per million Btu (lb/MMBtu) less than permitted limit of 0.61 lb/MMBtu.

iv. any variance from manufacturer's recommendations, if any, and corrections made.  
The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- g. Within 30 days of a written request from the DAQ, the Permittee shall submit a report of any maintenance performed on the multicyclone (**ID No. FA1**).
- h. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from this source (**ID No. B1**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with the standard.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of wood in this source (**ID No. B1**).

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from this source (**ID No. B1**) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity. [15A NCAC 02D .0521 (c)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To assure compliance, once a day the Permittee shall observe the emission points of this source (**ID No. B1**) for any visible emissions above normal. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If visible emissions from this source are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 D.3.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the observations 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.

**4. 15A NCAC 02D .1109: CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters**

The Permittee shall comply with this CAA §112(j) standard until May 19, 2019. The initial compliance date for the applicable CAA §112(d) standard for “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters” is May 20, 2019.

- a. Emissions of the following regulated pollutants shall not exceed the emissions limits listed below for the affected boiler (**ID No. B1**):

- i. Total Selected Metals (TSM): 0.002 lbs/mmBtu. TSM is defined as the sum of the following metallic hazardous air pollutants: arsenic, beryllium, cadmium, chromium, lead, manganese, nickel and selenium.
- ii. Mercury (Hg): 5.0e-06 lbs/mmBtu
- iii. Hydrogen Chloride-equivalent (HCl): 188.5 pounds per hour. HCl-equivalent is defined by the following equation:

$$E = E_{HCl} + E_{Cl_2} * (Rf_{C_{HCl}} / Rf_{C_{Cl_2}})$$

Where:

E	=	HCl-equivalent
$E_{HCl}$	=	HCl emission rate
$E_{Cl_2}$	=	Cl <sub>2</sub> emission rate
$Rf_{C_{HCl}}$	=	Reference concentration for HCl (20 micrograms/m <sup>3</sup> )
$Rf_{C_{Cl_2}}$	=	Reference concentration for Cl <sub>2</sub> (0.20 micrograms/m <sup>3</sup> )

- iv. Carbon Monoxide (CO): 770 ppm by volume on a dry basis corrected to 3 percent oxygen, 3-run average

**Initial Testing Requirement** [15A NCAC 02Q .0508(f)]

- b. The Permittee was required to conduct an initial compliance test for all pollutants listed in Section 2.1.D.4.a above while firing wood within 180 days of the initial compliance date<sup>3</sup> of June 14, 2013, unless the NC DAQ –SSCB approved a previously conducted performance test as an equivalent

<sup>3</sup> Initial compliance testing was performed on May 23, 2013 by Integrity Air Monitoring, Inc., of Huntersville, NC. DAQ Memorandum from Shannon Vogel, SSCB to Margaret Love, WSRO dated October 10, 2013 states “results are acceptable and demonstrate compliance with the applicable emissions standards.”

compliance demonstration. Testing was performed in accordance with 15A NCAC 02D .2601 and General Condition JJ found in Section 3 on May 23, 2013.

The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1109 if the required tests are not conducted, or if the results of the emissions tests exceed the limits in Section 2.1.D.4.a above.

**Periodic Testing** [15A NCAC 02Q .0508 (f)]

- c. The Permittee must conduct all applicable performance tests on an annual basis, unless the Permittee meets the requirements listed in i. through iii. below. Annual performance tests, if required, must be completed between 10 and 12 months<sup>4</sup> after the previous performance test.
  - i. The Permittee may conduct performance tests less often for a given pollutant if the performance tests for at least 3 consecutive years show compliance with the emission limit. In this case, the Permittee need not conduct a performance test for that pollutant for the next 2 years, but must conduct a performance test during the third year and no more than 36 months from the previous performance test.
  - ii. If the affected boiler continues to meet the emission limit, the Permittee may conduct performance tests every third year, but each such performance test must be conducted no more than 36 months after the previous performance test.
  - iii. If a performance test shows noncompliance with an emission limit, the Permittee must conduct annual performance tests for that pollutant until all performance tests over consecutive 3-year period show compliance.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall maintain opacity of exhaust from the multicyclone (**ID No. FA1**) at less than or equal to 20 percent (6-minute average) except for one 6-minute period per hour of not more than 27 percent. The monitoring and recordkeeping in Section 2.1.D.3.c and d are sufficient to demonstrate compliance with this opacity requirement. The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1109 if it fails to meet these monitoring and recordkeeping requirements or if the monitoring shows opacity from the control device does not meet the opacity requirement.
- e. The monitoring and recordkeeping in Section 2.1.D.1.e and f are sufficient to demonstrate compliance with the TSM limitation provided in Section 2.1.D.4.a above. The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1109 if it fails to meet these monitoring and recordkeeping requirements.

**Reporting** [15A NCAC 02Q .0508(f)]

- f. Notification of Compliance Status. The Permittee must submit a Notification of Compliance Status that meets the requirements of 40 CFR 63.9(h)(2)(ii) before the close of business on the 60th day following the completion of the final required performance test and/or other initial compliance demonstration. The Notification of Compliance Status report must contain the following information, as applicable:
  - i. A description of the boiler including identification of which subcategory the boiler is in, the capacity of the boiler, a description of the add-on controls used on the boiler, a description of the fuel(s) burned, and justification for the fuel(s) burned during the performance test.
  - ii. Summary of the results of all performance tests and calculations conducted to demonstrate initial compliance.
  - iii. A certification signed by the Responsible Official that the facility has met all applicable emission limits and work practice standards.

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<sup>4</sup> Annual performance testing was required between March 23, 2014 and May 23, 2014. Based on the most recent inspection report dated September 12, 2014 prepared by Christopher W. Lewter, P. E., WSRO the facility conducted stack testing on June 5, 2014 to show compliance with 112(j). The test results were received by DAQ on July 8, 2014 and are currently being reviewed by SSCB.



- g. Semiannual Summary Report<sup>5</sup>. The Permittee shall submit a summary report by 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 include the following:
- 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. A summary of the results of the annual performance tests; and
  - v. Signed statement indicating that no new types of fuel were fired in the boiler.

## 5. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

### Applicability [40 CFR 63.7485, §63.7490(d), §§63.7499(j),p)]

- a. For the existing source (dutch oven designed to burn biomass), the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart DDDDD . "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" and Subpart A "General Provisions."

### Definitions and Nomenclature [§63.7575]

- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.7575 shall apply.

### 40 CFR Part 63 Subpart A General Provisions [§63.7565]

- c. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A General Provisions according to the applicability of Subpart A to such sources as identified in Table 10 to 40 CFR Part 63, Subpart DDDDD.

### Compliance Date [§63.7510(e), §63.56(b)]

- d. The Permittee shall:
- i. Complete the initial tune up (condition x.) and the one-time energy assessment (condition aa.) no later than May 20, 2019.
  - ii. Complete the initial compliance requirements in conditions k., l., m., p. q. r. and s. no later than 180 days after May 20, 2019 and according to the applicable provisions in . §63.7(a)(2).

### Notifications [§63.7545]

- e. The Permittee shall submit the following notifications:
- i. Notification of intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.
  - ii. Notification of intent to conduct a performance evaluation of the CMS(s) simultaneously with the notification of the performance test date required, or at least 60 days prior to the date the performance evaluation is scheduled to begin if no performance test is required. [§63.8(e)]
- f. The Permittee shall submit, for the initial compliance demonstration for each affected unit, a Notification of Compliance Status report, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for all boiler or process heaters at the facility according to §63.10(d)(2). The Notification of Compliance Status report must contain all the information specified in §§63.7545 (e)(1) through (8), as applicable.

### General Compliance Requirements [§63.7505(a), §63.7500]

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<sup>5</sup> The first summary report was required on **July 30, 2013** and received by WSRO on July 19, 2013.

- g. At all times the affected unit(s) is operating, the Permittee shall be in compliance with the emission standards in condition i, except during periods of startup and shutdown.
- h. At all times, you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Emission Limits** [15A NCAC 02Q .0508(f), §63.7500(a)(1), Table 2]

- i. The affected units shall meet the following emission limits:

Pollutant	Emission Limit
Hydrochloric Acid(HCl)	2.2E-02 lb per MMBtu of heat input
Mercury (Hg)	5.7E-06 lb per MMBtu of heat input
Carbon monoxide (CO)	770 ppm by volume on a dry basis corrected to 3 percent oxygen
Filterable Particulate Matter(PM) or Total Suspended Metals (TSM)	0.28 lb per MMBtu of heat input or 2.0E-03 lb per MMBtu of heat input

**Testing** [15A NCAC 02Q .0508(f)]

- j. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test(s) are above the limit given in condition i. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Initial compliance requirements** [§63.7510]

- k. For filterable PM (if chosen rather than TSM) and CO, the Permittee shall demonstrate compliance with the limits in condition i. by developing a site-specific stack test plan and conducting an initial stack test(s) according to §63.7520.
- l. For HCL, Hg and/or TSM (if chosen rather than filterable PM), the Permittee shall demonstrate compliance with the emission limits in condition i. by :
  - i. Developing a site-specific stack test plan and conducting an initial stack test(s) according to §63.7520; or
  - ii. Developing a site-specific fuel monitoring plan and conducting fuel analyses according to §63.7521.
- m. The Permittee shall establish operating limits for boiler operating load, minimum oxygen level, maximum pollutant emission rates (if necessary) according to §63.7530. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in k. through m. are not met.

**Subsequent compliance test and fuel analysis requirements** [§63.7515]

- n. For each pollutant for which initial compliance was demonstrated with a source test, the Permittee shall conduct all subsequent stack tests on an annual basis, except as specified in §63.7515.
- o. For each pollutant for which initial compliance was demonstrated with a fuel analysis, the Permittee shall conduct all subsequent fuel analyses and determine the applicable pollutant emission rates on a monthly basis, except as specified in §63.7515.

**Monitoring Requirements** [15A NCAC 02Q .0508(f)]

- p. The Permittee shall install, operate, and maintain an oxygen analyzer system(s) according to §63.7525(a).
- q. The Permittee shall record operating load data every 15 minutes according to §63.7540.
- r. The Permittee shall install, operate, and maintain a continuous opacity monitoring system according to §63.7525(c).
- s. The Permittee shall develop site-specific monitoring plan(s) according to the requirements in

§§63.7505(d)(1) through (4).

- t. The Permittee shall maintain the 30-day rolling average oxygen content for each unit at or above the lowest hourly average oxygen concentration measured during the most recent CO performance test.  
[§63.7500(a)(2)]
- u. The Permittee shall maintain the operating load of each unit such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance test. [§63.7500(a)(2)]
- v. If the Permittee demonstrates compliance with emission limits using fuel analysis, the Permittee shall maintain the 12-month rolling average emission rate for HCl, Hg, and/or TSM at or below the applicable emission limit.
- w. The Permittee shall maintain opacity to less than or equal to 10 percent opacity (daily block average).  
[§63.7500(a)(2)]

**Work Practice Standards** [15A NCAC 02Q .0508(f)]

- x. The Permittee shall conduct a tune-up of the boiler annually as specified below.
  - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may delay the burner inspection until the next scheduled or unscheduled unit shutdown);
  - ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
  - iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
  - iv. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject; and
  - v. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).  
Measurements may be taken using a portable CO analyzer.  
[§63.7500(a)(1), §63.7540(a)(10)]
- y. Each annual tune-up shall be conducted no more than 13 months after the previous tune-up. [40CFR 63.7515(d)]
- z. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of restart.  
[§63.7540(a)(13), §63.7515(g)]  
The Permittee shall be deemed in noncompliance with 15A NCAC 002D .1111 if the requirements in n. through z. are not met.

**Energy Assessment Requirements** [15A NCAC 02Q .0508(f)]

- aa. The Permittee shall have a one-time energy assessment performed by a qualified energy assessor. The energy assessment must address the requirements in 40 CFR 63 Subpart DDDDD, Table 3, with the extent of the evaluation for items (a) to (e) appropriate for the on-site technical hours listed in §63.7575:  
[§63.7500(a)(1), Table 3]  
The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in condition aa. are not met.

**Recordkeeping Requirements** [15A NCAC 02Q .0508(f), 40 CFR 63.7555]

- bb. The Permittee shall keep the following:
  - i. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status, or semiannual compliance report that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
  - ii. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii).
- cc. For each continuous monitoring system the Permittee shall keep the following records:
  - (1) Records described in § 63.10(b)(2)(vii) through (xi).

- (2) Monitoring data for continuous opacity monitoring system during a performance evaluation as required in § 63.6(h)(7)(i) and (ii).
  - (3) Previous (i.e., superseded) versions of the performance evaluation plan as required in § 63.8(d)(3).
  - (4) Request for alternatives to relative accuracy test for CEMS as required in § 63.8(f)(6)(i).
  - (5) Records of the date and time that each deviation started and stopped.
- dd. The Permittee shall keep records of all monitoring data and calculated averages for applicable operating limits to show continuous compliance with each emission limit and operating limit that applies.
- ee. For each boiler or process heater the Permittee shall keep the following:
- i. records of monthly fuel use by each boiler or process heater, including the type(s) of fuel and amount(s) used.
  - ii. for Hg, HCl and TSM, copies of all calculations and supporting documentation of maximum pollutant fuel input or pollutant emission rates as described in §63.7555.
  - iii. records to support stack testing less frequently than annually (if applicable) as described in §63.7555(6).
  - iv. records of the occurrence and duration of each malfunction of the boiler or process heater, or of the associated air pollution control and monitoring equipment.
  - v. records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.7500(a)(3), including corrective actions to restore the malfunctioning boiler or monitoring equipment to its normal or usual manner of operation.
  - vi. records of the calendar date, time, occurrence and duration of each startup and shutdown.
  - vii. records of the type(s) and amount(s) of fuels used during each startup and shutdown.
  - viii. records associated with emissions averaging as described in §63.7555(e).
- ff. Maintain on-site and submit, if requested by the Administrator, an annual report associated with each boiler tune up, containing the following information:
- i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the source;
  - ii. A description of any corrective actions taken as a part of the combustion adjustment; and
  - iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.  
[40 CFR 63.7540(a)(10)(vi)]
- gg. The Permittee shall:
- i. maintain records in a form suitable and readily available for expeditious review;
  - ii. keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record; and
  - iii. keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee can keep the records offsite for the remaining 3 years.  
[40 CFR 63.7560, 63.10(b)(1)]
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if records are not maintained as described in conditions bb. through gg.

**Reporting Requirements** [15A NCAC 02Q .0508(f), §63.7550]

- hh. The Permittee shall submit a compliance report semiannually 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.
- i. The first compliance report shall be postmarked on or before July 30 and cover the period from May 20, 2019 through June 30, 2019.
  - ii. The compliance report shall contain the information in §63.7550(c) depending on how the facility chooses to comply with the limits.
  - jj. For each deviation from an emission limit or operating limit, the report shall contain the information in §§63.7550(d) and (e).
  - kk. Within 60 days after the date of completing each performance test (defined in §63.2) as required by this

subpart the Permittee shall submit the results of the performance tests, including any associated fuel analyses, to the DAQ pursuant to 63.10(d)(2) and to the EPA via the procedures in §63.7550(f). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the reporting requirements in hh. through kk. are not met.

## **2.2 - Multiple Emission Source(s) Specific Limitations and Conditions**

### **A. New hanging line No. 1 (NHL1S) consisting of:**

- Stage 1 stain booths (Nos. Stage1.1 and Stage1.2)**
- Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)**
- Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)**
- Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)**
- Stage 5 topcoat booths (Nos. Stage5.1 and Stage 5.2)**
- Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage 6.1 and Stage 6.2)**
- Paint spray booth (No. NHL-4A)**
- Paint spray booth (No. SB-R1)**
- Washoff tank (No. ESWO1)**
- Natural gas-fired ovens (Nos. Oven.1 through Oven.5)**
- Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)**

### **New hanging line No. 2 (NHL2S) consisting of:**

- Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)**
- Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)**
- Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)**
- Stage 5 topcoat booths (Nos. Stage5.1 and Stage5.2)**
- Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)**
- Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)**

### **Glaze Line No. 2 (GL) consisting of:**

- Paint spray hanging line (No. GL-NHL2S-1)**

### **New flat line (NFLS1) consisting of:**

- Stage 1 roll coaters (Nos. Stage1.1 through Stage1.5)**
- Stage 6 topcoat booths (Nos. Stage6.1 and Stage6.2)**
- Stage 7 UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)**
- Steam heated drying ovens (Nos. Oven.1 through Oven.5)**
- Natural gas-fired process air makeup units (Nos. Makeup-1 through Makeup-3)**

### **New flat line consisting of:**

- Roll coaters (Nos. UVRC1 through UVRC4)**
- Natural gas-fired oven (No. Oven.6)**
- Ultraviolet light drying ovens (Nos. UVDO1 through UVDO4)**

### **Old Shipping Warehouse consisting of:**

- Flat line dry filter type spray booth (ID No. NFLS-4) and one steam-heated drying oven**
- Flat line dry filter type spray booth (ID No. NFLS-2) and one steam-heated drying oven**
- Flat line dry filter type spray booth (ID No. NFLS-5) and one steam-heated drying oven**
- Flat line dry filter type spray booth (ID No. NFLS-3) and one steam-heated drying oven**
- Two stain wiping machines (ID Nos. SWM-1 & SWM-2)**

### **Existing (Old) flat line No. 1 (EFL1) consisting of:**

- Baffle type stain booths (Nos. SB1 and SB2)**
- Baffle type sealer booth (No. SB3)**
- Baffle type varnish booth (No. SB4)**
- Steam heated drying ovens (Nos. DO1 through DO4)**

**Existing (Old) flat line No. 3 (EFL3) consisting of:**  
 Baffle type stain booth (No. SB8)  
 Baffle type sealer booth (No. SB9)  
 Baffle type varnish booth (No. SB10)  
 Steam heated drying ovens (Nos. DO8 through DO10)

**Off-Line Spray Booths and Roll Coaters consisting of:**  
 Paint spray booths (ID Nos. ECD-SB11a, GL-SB11b, SB12, and ECD-SB13)  
 Roll coaters (ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19)

**Existing main UV line (EMUV) consisting of:**  
 Roll coaters (Nos. RC7 through RC11, RC13, and RC14)  
 Steam heated drying ovens (Nos. DO12 and DO14)

**Existing short line (ESL) consisting of:**  
 Roll coaters (Nos. RC4, RC5A, RC5B, and RC6)  
 Steam heated drying ovens (Nos. DO11 and DO17)

**Gluing operation (ID No. ES-Gluing-1)**

**1. 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

Pursuant to 15A NCAC 02D .0530 “Prevention of Significant Deterioration”, the Permittee shall limit annual volatile organic compound emissions to less than 800 tons per consecutive twelve month period from all VOC emitting sources subject to PSD located at the facility.

<b>Product</b>	<b>BACT Limit (minus H<sub>2</sub>O and exempt solvents)</b>
Transparent stains	7.2 lbs VOC/gallon
Sealers	6.2 lbs VOC/gallon
Topcoats	5.5 lbs VOC/gallon
Basecoats/Primers	6.4 lbs VOC/gallon
Enamels	5.6 lbs VOC/gallon
Edge coats	5.0 lbs VOC/gallon
Fillers	5.0 lbs VOC/gallon
Booth coater	4.0 lbs VOC/gallon
Booth prep, stripper	6.8 lbs VOC/gallon

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- a. Calculations of VOC emissions per month shall be made at the end of each month. VOC emissions shall be determined by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the amounts of VOC containing materials or the VOC emissions are not maintained and recorded.
- b. The highest VOC content of coatings per gallon applied over the calendar year quarter for each stain booth, toner booth, sealer booth, or topcoat booth, the calculations and the total amount of VOC emissions shall be recorded monthly in a logbook (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the VOC emissions exceed the PSD limit.

**Reporting** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall submit a summary report 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 monthly VOC emissions for the previous 17 months. The emissions shall be calculated for each of the 12-month periods over the previous 17 months.

**B. Facility-wide affected sources**

**State-enforceable only**

**1. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

**C. Affected Source - All facilities subject to 40 CFR Part 63 Subpart JJ: NATIONAL EMISSIONS STANDARD FOR WOOD FURNITURE MANUFACTURING OPERATIONS**

**New hanging line No. 1 (NHL1S) consisting of:**

- Stage 1 stain booths (Nos. Stage1.1 and Stage1.2)
- Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
- Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
- Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
- Stage 5 topcoat booths (Nos. Stage5.1 and Stage 5.2)
- Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage 6.1 and Stage 6.2)
- Paint spray booth (No. NHL-4A)
- Paint spray booth (No. SB-R1)
- Washoff tank (No. ESWO1)

**New hanging line No. 2 (NHL2S) consisting of:**

- Stage 2 stain booths (Nos. Stage2.1 and Stage2.2)
- Stage 3 stain booths (Nos. Stage3.1 and Stage3.2)
- Stage 4 sealer booths (Nos. Stage4.1 and Stage4.2)
- Stage 5 topcoat booths (Nos. Stage5.1 and Stage5.2)
- Stage 6 stain/sealer/glaze/topcoat booths (Nos. Stage6.1 and Stage6.2)

**Glaze Line No. 2 (GL) consisting of:**

- Paint spray hanging line (No. GL-NHL2S-1)

**New flat line (NFLS1) consisting of:**

- Stage 1 roll coaters (Nos. Stage1.1 through Stage1.5)
- Stage 6 topcoat booths (Nos. Stage6.1 and Stage6.2)
- Stage 7 UV sealer/topcoat roll coaters (Nos. Stage7.1 through Stage7.6)

**New flat line consisting of:**

- Roll coaters (Nos. UVRC1 through UVRC4)

**Old Shipping Warehouse consisting of:**

- Flat line dry filter type spray booth (ID No. NFLS-4) and one steam-heated drying oven
- Flat line dry filter type spray booth (ID No. NFLS-2) and one steam-heated drying oven
- Flat line dry filter type spray booth (ID No. NFLS-5) and one steam-heated drying oven
- Flat line dry filter type spray booth (ID No. NFLS-3) and one steam-heated drying oven



**Two stain wiping machines (ID Nos. SWM-1 & SWM-2)**

**Existing (Old) flat line No. 1 (EFL1) consisting of:**

- Baffle type stain booths (Nos. SB1 and SB2)**
- Baffle type sealer booth (No. SB3)**
- Baffle type varnish booth (No. SB4)**

**Existing (Old) flat line No. 3 (EFL3) consisting of:**

- Baffle type stain booth (No. SB8)**
- Baffle type sealer booth (No. SB9)**
- Baffle type varnish booth (No. SB10)**

**Off-Line Spray Booths and Roll Coaters consisting of:**

- Paint spray booths (ID Nos. ECD-SB11a, GL-SB11b, SB12, and ECD-SB13)**
- Roll coaters (ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19)**

**Existing main UV line (EMUV) consisting of:**

- Roll coaters (Nos. RC7 through RC11, RC13, and RC14)**

**Existing short line (ESL) consisting of:**

- Roll coaters (Nos. RC4, RC5A, RC5B, and RC6)**

**Gluing operation (ID No. ES-Gluing-1)**

**Four washoff tanks (ID Nos. ESWO2 through ESWO5)**

**APPLICABILITY**

1. The wood furniture manufacturing operations listed above shall comply with all requirements of 15A NCAC 02D .1111 “Maximum Achievable Control Technology” and 40 CFR Part 63 Subpart JJ “National Emission Standards for Wood Furniture Manufacturing Operations.” [40 CFR 63.800]

**DEFINITIONS AND NOMENCLATURE**

2. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.801 shall apply.

**REGULATED POLLUTANTS**

3. Volatile Hazardous Air Pollutants (VHAPs), Volatile Organic Compounds (VOCs), and Organic HAP solvents as defined in 40 CFR 63.801.

**GENERAL PROVISIONS**

4. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A “General Provisions” according to the applicability of Subpart A to such sources, as identified in Table 1 of 40 CFR Part 63, Subpart JJ.

**WORK PRACTICE STANDARDS**

5. The Permittee shall adhere to the work practice standards as specified by 40 CFR 63.803.
  - a. **Recordkeeping Requirements** – The Permittee shall prepare, maintain, and follow a written work practice implementation plan in accordance with 40 CFR 63.806(e) that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards specified in items i. through xi. below:
    - i. **Operator training** – in accordance with 40 CFR 63.803(b),
    - ii. **Inspection and maintenance plan** – in accordance with 40 CFR 63.803(c),
    - iii. **Cleaning and wash-off solvent accounting system** – in accordance with 40 CFR 63.803(d),

- iv. **Chemical composition of cleaning and wash-off solvents** – in accordance with 40 CFR 63.803(e),
  - v. **Spray booth cleaning** – in accordance with 40 CFR 63.803(f),
  - vi. **Storage requirements** – in accordance with 40 CFR 63.803(g),
  - vii. **Application equipment requirements** – in accordance with 40 CFR 63.803(h). **Effective November 21, 2014 conventional air spray guns are allowed only when emissions are vented to a control device,**
  - viii. **Line cleaning** – in accordance with 40 CFR 63.803(i),
  - ix. **Gun cleaning** – in accordance with 40 CFR 63.803(j),
  - x. **Wash-off operations** – in accordance with 40 CFR 63.803(k), and
  - xi. **Formulation assessment plan** - in accordance with 40 CFR 63.803(l).
- b. **Reporting Requirements** – The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(8) and 63.807(b). The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(8) and 63.807(c). The Permittee shall follow the reporting requirements in 40 CFR 64.807(e) as required and 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

**FINISHING OPERATIONS**

6. Per 40 CFR 63.804(a)(4), the Permittee has chosen to use both the **compliant coatings** and the **facility averaging** compliance options for the finishing operations listed above.
- Recordkeeping Requirements** – Compliance with each of these options is considered a separate **ALTERNATIVE COMPLIANCE SCENARIO** and the Permittee, prior to using a known non-compliance coating, i.e., knowingly switching from the use of compliant coatings to facility averaging as a compliance scenario, shall record in a logbook (written or electronic format) the scenario under which it is operating.
- a. **Emission Limits** – The Permittee shall either:
- i. comply with all provisions of 40 CFR 63.802(a)(1) and 63.804(a)(2) as applicable to the finishing operations listed above. All thinners, stains, washcoats, sealers, topcoats, basecoats, and enamels used at the facility shall meet the emission limitations as detailed in the following table:

<b>Emission Source</b>	<b>Regulated Material</b>	<b>Emission Limitation</b>
<b>Finishing operations</b>	Thinners	10% by weight HAP
<b>Finishing operations</b>	Stains, washcoats, sealers, topcoats, basecoats, and enamels	1.0 lb VHAP/lb solids (or kg VHAP per kg solids), as applied
<b>Finishing operations</b>	Washcoat, basecoat, or enamel formulated on-site	Coatings – 1.0 lb VHAP/lb solids (or kg VHAP per kg solids) Thinners – 3.0% by weight VHAP

**OR**

- ii. comply with all provisions of 40 CFR 63.802(a)(1) and 63.804(a)(1) as applicable to the finishing operations listed above. The weighted average VHAP content across all coatings, as applied, shall not exceed 1.0 lb VHAP per lb solids (1.0 kg VHAP per kg solids).
- b. **Compliance Procedures and Monitoring Requirements** – The Permittee shall either:
- i. demonstrate that only compliant thinners are being used and that all stains, washcoats, sealers, topcoats, basecoats, and enamels are compliant, as applied, in accordance with 40 CFR 63.804(g)(2) for Noncontinuous coaters and 40 CFR 63.804(g)(3) for continuous coaters, if applicable.

**OR**

- ii. demonstrate that the monthly average VHAP content for all finishing materials used at the facility is no greater than 1.0 lb VHAP per lb solids (1.0 kg VHAP per kg solids), as applied, in accordance with 40 CFR 63.804(g)(1).
- c. **Performance Test Method** – EPA Method 311 [40 CFR 63, Appendix A] shall be used to determine the VHAP content of liquid coatings in accordance with 40 CFR 63.805(a).
- d. **Recordkeeping Requirements** – The Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(2), 63.806(h), 63.806(i), and 63.806(j) and either:
  - i. 63.804(g)(2-3) and 63.806(d) when complying with Section 2.2 D.6.a.i above,
  - OR**
  - ii. 63.804(g)(1) and 63.806(c) when complying with Section 2.2 D.6.a.ii above.
- e. **Reporting Requirements** – The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.807(b) and either: 40 CFR 63.804(f)(2), when complying with Section 2.2 D.6.a.i above, **OR** 40 CFR 63.804(f)(1), when complying with Section 2.2 D.6.a.ii above. The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.807(c) and either: 40 CFR 63.804(g)(2), when complying with Section 2.2 D.6.a.i above, **OR** 40 CFR 63.804(g)(1), when complying with Section 2.2 D.6.a.ii above. The Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

**CLEANING OPERATIONS**

- 7. a. **Emission Limits** - The Permittee shall comply with the limits of 40 CFR 63.802(a)(3) applicable to the strippable spray booth operations as detailed in the following table:

Emission Source	Regulated material	Emission Limitation
Finishing operations	strippable spray booth coatings	0.8 lb VOC per lb solids (or kg VOC/kg solids), as applied

- b. **Compliance Procedures and Monitoring Requirements** - The Permittee shall demonstrate that only compliant strippable spray booth coatings are used in accordance with 40 CFR 63.804(g)(7).
- c. **Performance Test Method** - EPA Method 311 [40 CFR Part 63 Appendix A] shall be used to determine the VHAP content of liquid coatings in accordance with 40 CFR 63.805(a).
- d. **Recordkeeping Requirements** - The Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(3), 63.806(h), 63.806(i), and 63.806(j).
- e. **Reporting Requirements** - The Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(7) and 63.807(b). The Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(7) and 63.807(c). The Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

**CONTACT ADHESIVE OPERATIONS**

8. a. **Emission Limits** - The Permittee shall comply with all provisions of 40 CFR 63.802(a)(2) and 63.804(b-c) as applicable to the contact adhesive operation as detailed in the following table:

<b>Emission Source</b>	<b>Regulated material</b>	<b>Emission Limitation</b>
<b>Gluing operations</b>	Foam contact adhesives used in products which meet flammability requirements per California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies	1.8 lb VHAP per lb solids (or kg VOC/kg solids), as applied
<b>Gluing operations</b>	All other contact adhesives	1.0 lb VHAP/lb solids (or kg VOC/kg solids), as applied

- b. **Compliance Procedures and Monitoring Requirements** - When emission source is using foam and other contact adhesives, the Permittee shall demonstrate that only compliant adhesives are used in accordance with 40 CFR 63.804(g)(5).
- c. **Performance Test Method** - EPA Method 311 [40 CFR Part 63 Appendix A] shall be used to determine the VHAP content of liquid coatings in foam and other contact adhesives in accordance with 40 CFR 63.805(a).
- d. **Recordkeeping Requirements** - When foam and other contact adhesives are used, the Permittee shall keep records in accordance with 40 CFR 63.806(a) following the applicability criteria in 40 CFR 63.800(d), 63.806(b)(1) and (b)(2), 63.806(h), 63.806(i), and 63.806(j).
- e. **Reporting Requirements** - When foam and other adhesives are used, the Permittee shall submit the compliance status report to the Regional Supervisor in accordance with 40 CFR 63.804(f)(5) and 63.807(b). When foam and other contact adhesives are used, the Permittee shall submit semiannual reports to the Regional Supervisor in accordance with 40 CFR 63.804(g)(5) and 63.807(c). When foam and other contact adhesives are used, the Permittee shall follow the reporting requirements in 40 CFR 63.807(a) following the applicability criteria in 40 CFR 63.800(d).

**FORMALDEHYDE REQUIREMENTS**

9. The permittee shall comply with one of the following two options by November 21, 2014 and thereafter.
- a. **Option #1 (400 lb formaldehyde limit per rolling 12 month period)** –
- i. **Emissions Limits** – In accordance with 40 CFR 63.802(a) and (b), limit total formaldehyde ( $F_{total}$ ) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.
  - ii. **Compliance Procedures and Monitoring Requirements** – In accordance with 40 CFR 63.804(h), calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 5 and maintain a value of  $F_{total}$  no more than 400 pounds per rolling 12 month period.
  - iii. **Recordkeeping Requirements** – In accordance with 40 CFR 63.806(b), the Permittee shall keep records of the formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits of 40 CFR 63.802(a) and (b).
  - iv. **Reporting Requirements** - The Permittee shall submit semi-annual reports to the Regional Supervisor in accordance with 40 CFR 63.807(c).

b. **Option#2 (CPDS  $\leq$  1.0% by weight formaldehyde) –**

- i. **Emissions Limits** – In accordance with 40 CFR 63.802(a) and (b), use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations. *Low-formaldehyde* means, in the context of a coating or contact adhesive, a product concentration of less than or equal to 1.0 percent formaldehyde by weight, as described in a certified product data sheet for the material.
- ii. **Compliance Procedures and Monitoring Requirements** – In accordance with 40 CFR 63.804(h), demonstrate compliance by use of coatings and contact adhesives only if they are *low-formaldehyde* coatings and contact adhesives maintaining a certified product data sheet for each coating and contact adhesive used and submitting a compliance certification with the semi-annual report.
- iii. **Recordkeeping Requirements** – In accordance with 40 CFR 63.806(b), the Permittee shall keep a certified product data sheet for each coating and contact adhesive used.
- iv. **Reporting Requirements** - The Permittee shall submit semi-annual reports to the Regional Supervisor in accordance with 40 CFR 40 CFR 63.807(c) and 40 CFR 63.804(h). The compliance certification shall state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact adhesive that is not low-formaldehyde, as demonstrated by records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

## 2.3 - Permit Shield for Nonapplicable Requirements

The Permittee is shielded from the following nonapplicable requirements [15A NCAC 02Q .0512(a)(1)(B)].

- A. NC Air Toxics Removal of toxic limitations per SESSION LAW 2012-91 – HOUSE BILL 952 – All reference to NC toxics will be removed from the facility's permit per NC Session Law 2012-91 as requested by the facility as a result of this modification (Application No. 4100854.14B); thus, removal of the 15A NCAC 02D .1100 emission limits for MEK, toluene, xylene, ethyl acetate, and MIBK for the following sources does not present any unacceptable health risk as discussed in detail in the review for issued Air Quality Title V Permit No. 03238T21:

Existing (Old) flat line No. 1 (**EFL1**) consisting of:  
Baffle type stain booths (**Nos. SB1 and SB2**)  
Baffle type sealer booth (**No. SB3**)  
Baffle type varnish booth (**No. SB4**)

Existing (Old) flat line No. 3 (**EFL3**) consisting of:  
Baffle type stain booth (**No. SB8**)  
Baffle type sealer booth (**No. SB9**)  
Baffle type varnish booth (**No. SB10**)

Off-Line Spray Booths and Roll Coaters consisting of:  
Paint spray booths (**ID Nos. ECD-SB11a, GL-SB11b, SB12, and ECD-SB13**)  
Roll coaters (**ID Nos. ECD-RC1 through ECD-RC3, ECD-RC12, and ECD-RC19**)

Existing main UV line (**EMUV**) consisting of:  
Roll coaters (**Nos. RC8 through RC11, RC13, and RC14**)

## SECTION 3 - GENERAL CONDITIONS (version 4.0 12/17/15)

This section describes terms and conditions applicable to this Title V facility.

A. **General Provisions** [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]

1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02Q.
2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.
3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of Department of Environmental Quality upon request.

C. **Severability Clause** [15A NCAC 02Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [15A NCAC 02Q .0507(e) and 02Q .0508(i)(16)]

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NO<sub>x</sub> budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance  
North Carolina Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. **Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 02Q .0514]  
The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02Q .0514.
2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505]  
The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q.0524 and 02Q .0505.
3. Minor Permit Modifications [15A NCAC 02Q .0515]  
The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.
4. Significant Permit Modifications [15A NCAC 02Q .0516]  
The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.
5. Reopening for Cause [15A NCAC 02Q .0517]  
The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Reporting Requirements  
Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application;
  - b. changes that modify equipment or processes; or
  - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]
  - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
  - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
    - i. the changes are not a modification under Title I of the Federal Clean Air Act;
    - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
    - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
    - iv. the Permittee shall attach the notice to the relevant permit.
  - c. The written notification shall include:
    - i. a description of the change;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.
  - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
3. Off Permit Changes [15A NCAC 02Q .0523(b)]  
The Permittee may make changes in the operation or emissions without revising the permit if:
  - a. the change affects only insignificant activities and the activities remain insignificant after the change; or
  - b. the change is not covered under any applicable requirement.
4. Emissions Trading [15A NCAC 02Q .0523(c)]  
To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).



I.A. **Reporting Requirements for Excess Emissions and Permit Deviations** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

“**Excess Emissions**” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. (*Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.*)

“**Deviations**” - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.

**Excess Emissions**

1. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
2. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
  - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
    - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
      - name and location of the facility;
      - nature and cause of the malfunction or breakdown;
      - time when the malfunction or breakdown is first observed;
      - expected duration; and
      - estimated rate of emissions;
    - ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
    - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

**Permit Deviations**

3. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
  - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535 quarterly. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

I.B. **Other Requirements under 15A NCAC 02D .0535**

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

J. **Emergency Provisions** [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

1. An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent

caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3. below are met.
3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
  - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. the permitted facility was at the time being properly operated;
  - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
  - d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

K. **Permit Renewal** [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least nine months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.

L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. **Duty to Provide Information (submittal of information)** [15A NCAC 02Q .0508(i)(9)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 02Q .0508(f) and 02Q .0508 (l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions

limitations, standards, or work practices. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. whether compliance was continuous or intermittent; and
4. the method(s) used for determining the compliance status of the source during the certification period.

**Q. Certification by Responsible Official** [15A NCAC 02Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**R. Permit Shield for Applicable Requirements** [15A NCAC 02Q .0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
  - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
  - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
  - c. the applicable requirements under Title IV; or
  - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

**S. Termination, Modification, and Revocation of the Permit** [15A NCAC 02Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

**T. Insignificant Activities** [15A NCAC 02Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

**U. Property Rights** [15A NCAC 02Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

**V. Inspection and Entry** [15A NCAC 02Q .0508(l) and NCGS 143-215.3(a)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
  - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. **Confidential Information** [15A NCAC 02Q .0107 and 02Q. 0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 02Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.

AA. **Standard Application Form and Required Information** [15A NCAC 02Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.

BB. **Financial Responsibility and Compliance History** [15A NCAC 02Q .0507(d)(4)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 02Q .0501(e)]

1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 02Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. **Prevention of Accidental Releases General Duty Clause - Section 112(r)(1) – FEDERALLY-ENFORCEABLE ONLY**

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

FF. **Title IV Allowances** [15A NCAC 02Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. **Air Pollution Emergency Episode** [15A NCAC 02D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.

HH. **Registration of Air Pollution Sources** [15A NCAC 02D .0202]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).

II. **Ambient Air Quality Standards** [15A NCAC 02D .0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. **General Emissions Testing and Reporting Requirements** [15A NCAC 02Q .0508(i)(16)]

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .0912, .1110, .1111, or .1415 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
  - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
    - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
    - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.

- iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in this Section if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
- b. The Director may authorize the Division of Air Quality to conduct independent tests of any source subject to a rule in this Subchapter to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the Division of Air Quality using the appropriate testing procedures described in Section 02D .2600 has precedence over all other tests.

**KK. Reopening for Cause** [15A NCAC 02Q .0517]

1. A permit shall be reopened and revised under the following circumstances:
  - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
  - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
  - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. the Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

**LL. Reporting Requirements for Non-Operating Equipment** [15A NCAC 02Q .0508(i)(16)]

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. During operation the monitoring recordkeeping and reporting requirements as prescribed by the permit shall be implemented within the monitoring period.

**MM. Fugitive Dust Control Requirement** [15A NCAC 02D .0540] - STATE ENFORCEABLE ONLY

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

**NN. Specific Permit Modifications** [15A NCAC 02Q.0501 and .0523]

1. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
2. For modifications made pursuant to 15A NCAC 02Q .0501(d)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA - Air Planning Branch, 61 Forsyth Street SW, Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:

- a. a description of the change at the facility;
- b. the date on which the change will occur;
- c. any change in emissions; and
- d. any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

OO. **Third Party Participation and EPA Review** [15A NCAC 02Q .0521, .0522 and .0525(7)]

For permits modifications subject to 45-day review by the federal Environmental Protection Agency (EPA), EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.

## ATTACHMENT

### List of Acronyms

<b>AOS</b>	Alternate Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>Btu</b>	British thermal unit
<b>CAA</b>	Clean Air Act
<b>CAIR</b>	Clean Air Interstate Rule
<b>CEM</b>	Continuous Emission Monitor
<b>CFR</b>	Code of Federal Regulations
<b>DAQ</b>	Division of Air Quality
<b>DEQ</b>	Department of Environmental Quality
<b>EMC</b>	Environmental Management Commission
<b>EPA</b>	Environmental Protection Agency
<b>FR</b>	Federal Register
<b>GACT</b>	Generally Available Control Technology
<b>HAP</b>	Hazardous Air Pollutant
<b>MACT</b>	Maximum Achievable Control Technology
<b>NAA</b>	Non-Attainment Area
<b>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAP</b>	National Emission Standards for Hazardous Air Pollutants
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NSPS</b>	New Source Performance Standard
<b>OAH</b>	Office of Administrative Hearings
<b>PM</b>	Particulate Matter
<b>PM<sub>10</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
<b>POS</b>	Primary Operating Scenario
<b>PSD</b>	Prevention of Significant Deterioration
<b>RACT</b>	Reasonably Available Control Technology
<b>SIC</b>	Standard Industrial Classification
<b>SIP</b>	State Implementation Plan
<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>tpy</b>	Tons Per Year
<b>VOC</b>	Volatile Organic Compound