

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date:**

**Region:** Raleigh Regional Office  
**County:** Chatham  
**NC Facility ID:** 1900104  
**Inspector's Name:** Steven Carr  
**Date of Last Inspection:** 12/16/2015  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>	<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> 3M Pittsboro - Industrial Mineral Products</p> <p><b>Facility Address:</b>            3M Pittsboro - Industrial Mineral Products            4191 Highway 87 South            Moncure, NC 27559</p> <p><b>SIC:</b> 3295 / Minerals, Ground Or Treated  <b>NAICS:</b> 327992 / Ground or Treated Mineral and Earth Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p><b>SIP:</b> N/A  <b>NSPS:</b> N/A  <b>NESHAP:</b> N/A  <b>PSD:</b> N/A  <b>PSD Avoidance:</b> N/A  <b>NC Toxics:</b> N/A  <b>112(r):</b> N/A  <b>Other:</b> N/A</p>

<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 1900104.15A  <b>Date Received:</b> 01/30/2015  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal</p> <p style="text-align: center;"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 09006/T05  <b>Existing Permit Issue Date:</b> 07/16/2015  <b>Existing Permit Expiration Date:</b> 10/31/2015</p>
Blake Arnett Plant Manager (919) 642-4011 4191 Highway 87 South Moncure, NC 27559	Blake Arnett Plant Manager (919) 642-4011 4191 Highway 87 South Moncure, NC 27559	Jennifer Moore Senior Environmental Engineer (651) 737-3596 3M Company, 3M Center St. Paul, MN 55144	

**Total Actual emissions in TONS/YEAR:**

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	0.1200	19.07	8.52	15.90	57.96	4.62	3.79 [Methanol (methyl alcohol)]
2013	0.1100	19.81	8.85	16.59	48.65	4.79	3.91 [Methanol (methyl alcohol)]
2012	0.1100	18.77	11.02	15.76	62.30	6.54	5.65 [Methanol (methyl alcohol)]
2011	0.1100	18.45	10.46	15.50	61.48	4.26	3.74 [Methanol (methyl alcohol)]
2010	0.1000	15.68	8.83	13.17	51.45	3.33	3.04 [Methanol (methyl alcohol)]

<p><b>Review Engineer:</b> Richard Simpson</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> March XX, 2016</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue:</b> 09006/T06  <b>Permit Issue Date:</b> March XX, 2016  <b>Permit Expiration Date:</b> February XX, 2021</p>
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## **I. Purpose of Application**

3M Pittsboro – Industrial Mineral Products (3M) currently holds Title V Permit No. 09006T05 with an expiration date of October 31, 2015 for producing stone granules for the shingle industries located in Moncure, Chatham County, North Carolina. The primary purpose of this application is for permit renewal without a modification. The renewal application was received on January 30, 2015, which was at least nine months prior to the expiration date, as required by General Permit Condition 3.K. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

## **II. Facility Description**

3M Pittsboro - Industrial Mineral Products (3M) manufactures various types of stone granules to sell to the asphalt shingle industry. Luck Stone Corporation operates a stone crushing operation on the same property and supplies the 3M plant with 4-inch stone. 3M then crushes, dries, screens, colors and bakes the stone materials to produce the granules. The final product is shipped out in specially designed bulk trucks. The 3M plant over the past years has had approximately 55 full-time employees. The Coloring Plant operates with two 8-hour shifts (11 pm-7 am, 7am-3pm). The Crushing/Screening Plant operates on a 24-hour basis. Both plants typically run Monday through Friday only.

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

**December 11, 2013** – Permit application **1900104.13A** was received for a Title V minor modification.

**January 30, 2015** – Permit application **1900104.15A** was received for a Title V renewal of the Title V Air Permit.

**July 16, 2015** – Title V Air Permit No. **09006T06** was submitted as a Title V minor modification.

**March 4, 2014** – Received comments for the Title V renewal from Charles Mceachern of the Raleigh Regional Office.

**November 10-December 16, 2015** – Emails were sent to and from facility representative James Zieglmeier and Raleigh Regional Office representative Charles Mceachern for clarification of questions regarding the Title V permit renewal application.

**December 29, 2015-January XX, 2016** – The facility, Asheville Regional Office, and Stationary Compliance Section were requested by the Permits Section to comment on the updated renewal. Comments were received and included in the permit.

**February XX, 2016** – DRAFT permit sent to public notice and EPA for review prior to issuance. The 30-day public comment period ended **February XX, 2016** with the receipt of no comments. The 45-day EPA review period ended **March XX, 2016** with the receipt of no comments.

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

The following table lists all modifications associated with this permit action:

Page(s)	Section	Description of Change(s)
Cover and throughout	Throughout	Updated all tables, dates, and permit revision numbers.
Attachment	Insignificant Activities List	Moved IS-ESCPBHCW Dust Conveyor from Crushing and Screening to the “Sources at Coloring Plant”.
Attachment	Insignificant Activities List	Updated description for IS-F123 to Plant Feed Conveyor No. 1.
Attachment	Insignificant Activities List	Updated description for IS-F56B to Grade Silo Outlet.
Attachment	Insignificant Activities List	Updated description for IS-F56B to Grade Silo Outlet.
Attachment	Insignificant Activities List	Updated description for IS-A8 to Mix tank No. 1 (325 gallon capacity)
Attachment	Insignificant Activities List	Inserted IS-A9 with emission source description of “Hold tank No. 1 (500 gallon capacity)”.
Attachment	Insignificant Activities List	Deleted redundant IS-A10 with emission source description of “Mix tank (325 gallon capacity)”.
Attachment	Insignificant Activities List	Updated description for IS-A12 to Mix tank No. 2 (325 gallon capacity).
Attachment	Insignificant Activities List	Updated description for IS-A13 to Hold tank No. 2 (500 gallon capacity).
Attachment	Insignificant Activities List	Deleted IS-A14 with emission source description of “Prinlin tank (550 gallon capacity)”.
Attachment	Insignificant Activities List	Updated description for IS-ES CPA1 from conveyor No. 6 to conveyor No. 4.
Attachment	Insignificant Activities List	For Emission Sources ID Nos. IS-ES (CPA1, CPA2, CPA3, CP15A, CP15B, CPVF16A, and CPVF16B) inserted Control Device ID No. as “CDB8” and control device description as “Finished granule baghouse (5,750 square feet of filter area)”.
Attachment	Insignificant Activities List	For Emission Sources ID Nos. IS-ES (CP1, CP2, CP3, CP4, CPC-8, CPL1-8, and CPL2-8) inserted Control Device ID No. as “CDB15” and control device description as “Finished granule baghouse (6,111 square feet of filter area)”.
Attachment	Insignificant Activities List	Inserted IS-ESCP44 with emission source description of “Transload conveyor”.
Attachment	Insignificant Activities List	Included IS-ESCPBHCW where it was moved from Crushing and Screening section.
Attachment	Insignificant Activities List	Inserted IS-A10 with emission source description of “Recycle water tank (10,000 gallon capacity)”.
Attachment	Insignificant Activities List	Updated IS-A11 with emission source description of “Chatham County Water Tower”.
Attachment	Insignificant Activities List	Deleted IS-FCP (45, 46, and 47) source description “Enclosed rail car unloading Nos.1, 2 and 3 since facility does not have rail car unloading capabilities.
Attachment	Insignificant Activities List	Added source header “Building 30 Laboratory”.
Attachment	Insignificant Activities List	Added emission source description IS-30 with description of “Laboratory Fume Hood”.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities List	Added emission source description IS-31 with description of "Laboratory Dispatch Machine".
3 - 9	Section 1	Inserted Page No. column with page numbers.
3, 10	Section 1 and Section 2.1.A.	Moved ES16-A and ES32.1 from control device ID No. CDB1 to CDB2.
3, 4, 10, and 11	Section 1 and Section 2.1.A.	Moved ESC3 from control device ID No. CDB2 to CDB1.
3, 10	Section 1 and Section 2.1.A.	Updated ES23A.1 with emission source description of "Conveyor No. 23A baghouse hopper screw conveyor to dust conveyor No. 23C".
3, 10	Section 1 and Section 2.1.A.	Updated ES23A.2 with emission source description of "Conveyor No. 22 baghouse hopper screw conveyor to dust conveyor No. 23A".
4, 11	Section 1 and Section 2.1.A.	Updated ES3537D with emission source description of "L crusher feed bin conveyor No. 14, three pickups (M screens to L crusher bins)".
4, 11	Section 1 and Section 2.1.A.	Updated ES23A.2 with emission source description of "Conveyor No. 22 (baghouse hopper screw conveyor to dust conveyor No. 23C)".
5, 6, and 11	Section 1 and Section 2.1.A.	Moved ES2327B from control device ID No. CDB5 to CDB4.
6, 12	Section 1 and Section 2.1.A.	Updated ES2729.1 with emission source description of "G crusher feed conveyor No. 8B (G crusher bin to G crusher)".
6, 12	Section 1 and Section 2.1.A.	Updated ES49B with emission source description of "Grade bucket elevator No. 1, two pickups (grade collecting conveyor No. 19 to grade transfer conveyor No. 20)".
7, 12	Section 1 and Section 2.1.A.	Moved ES23C from control device ID No. CDB6 to CDB7.
7, 12	Section 1 and Section 2.1.A.	Updated ES63B with emission source description of "Dust elevator No. 3, two pickups".
7, 12	Section 1 and Section 2.1.A.	Updated ES68B with emission source description of "Waste elevator No. 2, two pickups".
7, 13	Section 1 and Section 2.1.A.	Updated F61 with emission source description of "Enclosed dust conveyor No. 23C (dust conveyor No. 23A to transfer conveyor No. 23C)".
13	Section 2.1.A.	Updated language in summary table to "Visible emissions from the vents of the crushing and screening buildings, any other affected facility, stacks associated with conveyors, screening operations, screen feeders, storage bins, and elevators".
13	Section 2.1.A.	Updated language in summary table to "Visible emissions due to fugitive emissions from each grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, storage bin, enclosed truck loading operation, or from any other affected facility (i.e. pugmill, waste pile, etc.)". Updated Limits for opacity to 10% per 40 CFR Part 60 Subpart OOO since equipment installation was before 2008.
14	Section 2.1.A.2.a.i.	Updated emission limitation language to "Visible fugitive emissions greater than 10% opacity shall not be discharged into the atmosphere from any building enclosing any transfer point on a conveyor belt or any other affected facility (grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, storage bin, enclosed truck loading operation, or from any other affected facility ...".
14	Section 2.1.A.2.a.iii.	Updated emission standard from §60.672 to §60.670(d)(1).

Page(s)	Section	Description of Change(s)
14	Section 2.1.A.2.a.ii.	Updated emission limitation language to "...shall not be more than 0.05 grams per dry standard cubic meter (0.022 grains per dry standard cubic foot);".
14, 15	Section 2.1.A.2.a.iv. and 2.1.A.2.b.i.	Included emission sources ESC23A and ESC22 in permit regulatory language.
14	Section 2.1.A.2.a.v.	Updated emission limitation language to include "stack".
15	Section 2.1.A.2.c.i.(A).	Updated monitoring language to "...for any visible emissions. Should visible emissions and/or fugitive emissions be observed above the limits, each affected facility...".
15, 26	Section 2.1.A.2.c.i.(B). and 2.1.E.3.c.ii.	Corrected the regulatory reference from 02D .2601 to .2610.
16	Section 2.1.A.2.f.	Updated reporting language to " <u>Like-kind Replacement</u> - As provided in 40 CFR 60.670(d), when an existing facility (ID No. ESC23A, ESC22, and ESC23C is replaced by a piece..."
16, 21	Section 2.1.A.3.c.ii. and 2.1.C.3.c.ii	Updated 15A NCAC 02D .0540 language from 90 days to 60 days.
23	Section 2.1.D.2.d.ii.	Deleted redundant language to "The sampling time <del>shall be</del> and volume for each test run shall be at least ..."
36	Section 2.2.B.1.a. and b.	Deleted CAM language "and 15A NCAC 02D .0521" and "and visible emissions" since not applicable.
36	Section 2.2.B.1.c.i.	Updated CAM monitoring language for continuous pressure drop, daily recordings, pressure drop ranges with new filters and pressure drop ranges with filters after 120 operational hours.
36	Section 2.2.B.1.c.ii.	Updated CAM monitoring language to "If a source or bagfilter listed in Section 2.2 B.1.a, above, operates with more than ten excursions in a semiannual reporting period, then the Permittee shall develop a Quality Improvement Plan (QIP)".
37	Section 2.1.B.d.	Inserted updated CAM reporting language with the current requirements with monitoring and reporting.
38	General Conditions	Updated to latest version of DAQ shell version 4.0, 12/17/15.

There were changes made to the Title V Equipment Editor (TVEE) under this permit renewal.

## V. Regulatory Review/Equipment Changes

The facility is currently subject to the following regulations:

- a. 15A NCAC 02D .0510, "Particulates from Sand, Gravel, or Crushed Stone Operations"
- b. 15A NCAC 02D .0516, "Sulfur Dioxide Emissions from Combustion Sources"
- c. 15A NCAC 02D .0521, "Control of Visible Emissions"
- d. 15A NCAC 02D .0524, "New Source Performance Standards (40 CFR 60, Subpart OOO)"
- e. 15A NCAC 02D .0524, "New Source Performance Standards (40 CFR 60, Subpart UUU)"
- f. 15A NCAC 02D .0540, "Particulates from Fugitive Dust Emission Sources"
- g. 15A NCAC 02D .0614, "Compliance Assurance Monitoring"
- h. 15A NCAC 02D .0958, "Work Practices for Sources of Volatile Organic Compounds"

- i. 15A NCAC 02D .1806, “Control and Prohibition of Odorous Emissions”
- j. 15A NCAC 02D .1111, “Maximum Achievable Control Technology (MACT - Avoidance)”
- k. 15A NCAC 02Q .0317, “Avoidance Conditions (for 15A NCAC 02D .1111, MACT Avoidance)”
- l. 15A NCAC 02Q .0711, “Emission Rates Requiring a Permit”

An extensive review for each applicable regulation is not included in this document, as the facility’s status with respect to these regulations has not changed. For a discussion of MACT, CAM, and PSD requirements, see Section 6. The permit will be updated to reflect the most current stipulations for all applicable regulations.

The facility has the following equipment changes where a regulatory review was required. The changes will not increase or exceed the emissions allowed under the current Title V permit.

Permit Applicability Determination Application No. 2736 response was submitted November 24, 2015 for replacing two slip stick conveyors with two belt conveyors (ESC23.A.1. and ESC23A.2.) in a November 17, 2015 request from the facility. In summary, the DAQ’s analysis of the proposal concludes that the new conveyors will perform the same functions as the existing conveyors and is exempt from NSPS Subpart OOO provisions 40 CFR 60.672, 60.674, and 60.675. Since there is no increase of emissions for the proposal, the new belt conveyor replacements do not meet the NCAC 02Q modification definition.

The facility had an existing transload conveyor that will be added to the Title V permit renewal. The transload conveyor is a portable conveyor that is powered by a small diesel engine. The transload conveyor is utilized approximately less than 30 hours per year and is limited to a bottleneck in the truck loading capacity with two other conveyors. The transload conveyor is used if the final product does not meet specifications and is brought back to the plant by truck. The maximum potential fugitive emissions from the transload conveyor are much less than five tons per year. The engine is subject to the non road definition and not subject to permitting as a stationary source. The transload conveyor (IS-ESCP44) is insignificant because the emissions of criteria pollutants meets the definition in 2Q .0503(8).

## **VI. NSPS, NESHAP/MACT, PSD, Attainment Status, 112(r), CAM, and RACT:**

### **New Source Performance Standards (NSPS)**

Current Permit No. 09006T03 lists many of the crushing and screening operations at this facility as subject to 40 CFR Part 60, Subpart OOO [i.e. the new source performance standard (NSPS) for nonmetallic mineral processing plants] and the four dryers at this facility (ID Nos. ES1415, ESCPPH1, ESCPPH2, and ESCPPH3) as subject to 40 CFR Part 60, Subpart UUU (i.e. the NSPS for calciners and dryers in mineral industries). There are no additional New Source Performance Standards (NSPS) that apply to this renewal.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP)/Maximum Achievable Control Technology (MACT)**

Current Permit No. 09006T05 does not list any sources at this facility as subject to 40 CFR Part 63 [i.e. national emission standards for hazardous air pollutants (NESHAP)]. The facility has been and currently is a minor facility for HAPs Section 112. The facility is currently required to comply with the Stationary Reciprocating Internal Combustion MACT (40 CFR Part 63 Subpart ZZZZ).

#### *40 CFR Part 63 Subpart ZZZZ*

The diesel-fired emergency fire water pump (ID No. IS-FP) is considered a source under MACT Subpart ZZZZ. As specified in 40 CFR 63.6590(c), the facility must meet the

requirements of MACT Subpart ZZZZ by meeting the requirements of NSPS Subpart IIII for these engines. No further requirements under MACT Subpart ZZZZ apply. The diesel-fired emergency fire water pump (ID No. IS-FP) has the potential to emit less than five tons per year (tpy) of criteria pollutants. The pump is exempt from permitting per 02Q .0503(8), and it is currently in the insignificant activities list. The facility must meet the requirements of the Area Source MACT Subpart ZZZZ for these generators.

### **Prevention of Significant Deterioration (PSD)/National Ambient Air Quality Standards (NAAQS)**

The facility is currently classified as a **Minor** stationary source for the purpose of the Prevention of Significant Deterioration (PSD) permitting program (see 15A NCAC 02D .0530).

Chatham County is currently in attainment with all NAAQS. This facility does not fall into one of the categories listed at 40 CFR §51.166(b)(1)(i)(a) with a 100 tons per year threshold and does not qualify as a major stationary source for PSD purposes under 40 CFR §51.166(b)(1)(i)(b) since it does not have the potential to emit any regulated pollutant at rates in excess of 250 tons per consecutive 12-month period.

Chatham County triggered the minor source baseline for PM<sub>10</sub> and SO<sub>2</sub> on May 30, 1984; and for NO<sub>x</sub> on October 20<sup>th</sup>, 1994; however, increment tracking is not triggered for this renewal since emissions of PM<sub>10</sub>, SO<sub>2</sub>, and NO<sub>x</sub> are not affected.

### **Attainment Status**

Chatham County is currently classified as “Unclassifiable or Attainment” or “Can Not Be Classified or Better than National Standards” for Particulate and Ozone based on DAQ’s Planning website and for all Criteria Pollutants (TSP, SO<sub>2</sub>, Carbon Monoxide, Ozone (1-Hour Standard), NO<sub>2</sub>, Ozone (8-Hour Standard), PM<sub>2.5</sub> (Annual NAAQS), PM<sub>2.5</sub> [24-hour NAAQS]) based on the Electronic Code of Federal Regulations (e-CFR) data:

Title 40: Protection of Environment - CHAPTER I: ENVIRONMENTAL PROTECTION AGENCY  
SUBCHAPTER C: AIR PROGRAMS  
PART 81: DESIGNATION OF AREAS FOR AIR QUALITY PLANNING PURPOSES  
Subpart C: Section 107 Attainment Status Designations - 81.334 - North Carolina.

This renewal does not affect NAAQS or PM attainment status; thus, no permit change is necessary as part of this modification.

**CAM** – A continuous compliance assurance monitoring (CAM) (40 CFR Part 64) determination is required for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. This State-Only renewal does not trigger a CAM analysis because: (1) although this facility is a Title V facility with potential emissions that exceed major source levels without considering controls; (2) there are no sources subject to an emission limitation or standard that use a control device to meet an applicable standard that are being modified; thus, CAM is not triggered.

The facility currently has three kilns (ID Nos. ESCPK1, ESCPK2, and ESCPK3) and three roofing granule mixing units (ID Nos. ESCPM1, ESCPM2, and ESCPM3) that are subject to CAM requirements (for PM<sub>10</sub>). The specific CAM plans can be found in the permit in Sections 2.2.B.1. In general, 3M must perform daily monitoring for visible emissions from the subject control device and also perform the maintenance and monitoring.

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

**RACT** – This facility is not located in one of the areas listed in 02D .0902(e) or 02D .1402(d) and is therefore not subject to the existing source Reasonably Available Control Technology (RACT) requirements, other than 02D .0958.

## **VII. Facility Wide Air Toxics (State Enforceable Only)**

3M's Current Permit No. 09006T04 includes permit conditions under 02D .1100 and 02Q .0711 based on previous application submittals. The permit includes a list of those TAPs that are emitted from the facility at rates below their associated toxic air pollutant permitting emissions rates (TPERs) and requiring the Permittee to either (1) maintain records sufficient to demonstrate that facility-wide emissions of those TAPs are below the associated TPER, or (2) obtain a permit to emit a TAP before exceeding the TPER associated with that TAP as well as 02D .1100 modeled emission rates. Please refer to 3M's Air Dispersion Modeling Review performed by Mr. Charles Buckler, Meteorologist II, Air Quality Analysis Branch (AQAB) dated October 1, 2012. The analysis shows compliance on a facility wide basis for all the pollutants Acceptable Ambient Levels (AALs).

The toxics evaluation submitted with the application indicates that the facility-wide potential emissions will remain below the associated TPER, with the exception of Arsenic and Cadmium as previously modeled; however, there is NO increase in emissions requested as part of this renewal.

## **VIII. Facility Emissions Review**

The actual emissions of the last five years are listed in the first page of this review. Based on the emissions inventory, the actual emissions of all HAPs are below the Title V applicability thresholds.

## **IX. Compliance Status**

The facility was issued an NOV on March 10, 2010 for failing to notify the Regional Office about permit deviations related to missing visible emissions observations. Corrective actions were initiated by 3M in a timely manner. During the most recent inspection, conducted on December 16, 2015 by Steven Carr of the RRO, the facility appeared to be in compliance the applicable requirements.

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

A concurrent public notice period of 30 days and an EPA review period of 45 days are required for the issuance of this significant modification of the title V permit. A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to the EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.



EPA's 45 Day Review period

Ms. Heather Ceron (U.S. EPA, Region IV) was provided a PROPOSED permit for review on February XX, 2016. EPA 45 day review period ended on March XX, 2016. No comments were offered or received.

Public Notice

The 30-day public notice of the proposed permit was posted on the NCDAQ website on January XX, 2016. No comments were offered or received.

**XI. Other Regulatory Considerations**

- A P.E. seal is NOT required for this application.
- A zoning consistency determination is NOT required for this renewal.
- Since this application was a renewal with no modification, no emission increases were noted for the PSD increment tracking purposes.

**XII. Recommendations**

The permit renewal application for 3M Pittsboro – Industrial Mineral Products in Moncure, Chatham County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 09006T06.