

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Wake
NC Facility ID: 9200782
Inspector's Name: Stanley Williams
Date of Last Inspection: 02/12/2015
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Column & Post Inc.</p> <p>Facility Address: Column & Post Inc. 8013 Purfoy Road Fuquay-Varina, NC 27526</p> <p>SIC: 3089 / Plastics Products, Nec NAICS: 326199 / All Other Plastics Product Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
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Contact Data	Application Data						
<table border="1" style="width: 100%;"> <tr> <td style="width: 33%; text-align: center;">Facility Contact</td> <td style="width: 33%; text-align: center;">Authorized Contact</td> <td style="width: 33%; text-align: center;">Technical Contact</td> </tr> <tr> <td>David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526</td> <td>David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526</td> <td>David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526</td> </tr> </table>	Facility Contact	Authorized Contact	Technical Contact	David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526	David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526	David Szilezy President (919) 255-1533 8013 Purfoy Road Fuquay-Varina, NC 27526	<p>Application Number: 9200782.15A Date Received: 05/21/2015 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 09594/T02 Existing Permit Issue Date: 05/23/2011 Existing Permit Expiration Date: 04/30/2016</p>
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Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	---	---	5.56	---	---	6.06	5.45 [Styrene]
2013	---	---	5.19	---	---	5.70	5.13 [Styrene]
2012	---	---	10.68	---	---	11.76	10.59 [Styrene]
2011	---	---	10.84	---	---	11.95	10.79 [Styrene]
2010	---	---	12.68	---	---	13.99	12.61 [Styrene]

<p>Review Engineer: David Hughes</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 09594/T03 Permit Issue Date: Permit Expiration Date:</p>
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1. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**09594T02**) was issued on **May 23, 2011**, with an expiration date of **April 30, 2016**. The renewal application was received on **May 21, 2015**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

There have been no modifications to the facility since the permit was last reviewed.

2. Facility Description

The facility is a manufacturer of fiberglass columns and posts for houses and buildings. Products are made by filling forms with a polyester resin, a catalyst, and reinforcement such as fiberglass.

3. History/Background/Application Chronology

- May 23, 2011** Permit **09594T02** issued as a Renewal Title V permit.
- May 21, 2015** Permit application **9200782.15A** received as a Title V permit renewal application. The application was deemed complete for processing.
- September 29, 2015** David Hughes sent an e-mail to David Szilezy of Column & Post, Inc. informing him that they were eligible to remove 15A NCAC 02D .1100 *Control of Toxic Air Pollutants* (Styrene) from their permit for all emission sources. Mr. Szilezy responded via e-mail stating that he was in agreement to remove the Toxic Air Pollutant limits.
- December 09, 2015** Annual compliance inspection completed by Stanley Williams of the RRO.
- December 18, 2015** DRAFT permit sent to Permittee and RRO for comment prior to public notice and EPA review.
- XXXX XX, 2015** DRAFT permit sent to 30-day public notice and 45-day EPA review. The 30-day public comment period ended **XXXX XX, 201X** with the receipt of no comments. The 45-day EPA review period ended **XXXX XX, 201X** with the receipt of no comments.

4. Permit Modifications/Changes and ESM Discussion

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

Pages	Section	Description of Changes
Cover	-	-amended all dates and permit revision numbers
4	2.1 A (table)	-removed references to permit conditions for Toxic air pollutants 15A NCAC 02D .1100 and 15A NCAC 02Q .0705
4	2.1 A.1.d	-added iv. – any variance from manufacturer’s recommendations if any, and corrections made.
6	2.1 B (table)	-removed references to permit conditions for Toxic air pollutants 15A NCAC 02D .1100 and 15A NCAC 02Q .0705
10	2.2 A (table)	-removed references to permit conditions for Toxic air pollutants 15A NCAC 02D .1100 and 15A NCAC 02Q .0705
10	2.2 A.1.a	-updated permit condition with current shell language
13	2.2 A.4	-removed references to permit conditions for Toxic air pollutants 15A NCAC 02D .1100
14	2.2 A.5	-removed references to permit conditions for Toxic air pollutants 15A NCAC 02Q .0705
13-25	General Conditions	-updated shell conditions (v3.7)
26	List of Acronyms	-updated to current list of acronyms

There were only minor, non-significant modifications to the equipment descriptions needed in ESM.

5. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 02D .0521, Control of Visible Emissions
15A NCAC 02D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 02D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart WWWW)
15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 02Q .0317, Avoidance Conditions (for 15A NCAC 2D .0531, Sources in Nonattainment Areas, and 15A NCAC 02D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart PPPP))

A regulatory review for these current permit conditions will not be included in this document. 15A NCAC 02D .1100, Control of Toxic Air Pollutants and 15A NCAC 02Q .0705, Existing Facilities and SIC Calls are being removed from the permit. An explanation for the removal can be found in Section 7. of this Air Permit Review.

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

NSPS – The Permittee is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is subject to the NESHAP for Reinforced Plastic Composites Production (40 CFR 63, Subpart WWWW). The requirements of the Subpart are applicable to the facility’s seven mixing tanks, molding area, material storage, and cleaning operations. Specific emission limits include a requirement to emit less than 87 pounds organic HAP per ton of resin used on a 12-month rolling average and less than 100 tons organic HAP per calendar year. The permit condition allows the Permittee to choose between two compliance options. Additional work practice standards, monitoring, recordkeeping, and reporting requirements are detailed in the permit condition. This permit renewal does not affect this status.

The Permittee also operates under a MACT avoidance condition for 40 CFR 63, Subpart PPPP (Surface Coating of Plastic Parts and Products). The Permittee does paint plastic parts, however, they are allowed an exemption to the applicability of this Subpart by limiting all HAP coatings to less than 100 gallons per year from its spraying operations (**ID Nos. P1 and P2**) [40 CFR 63.4481(b)]. The permit requires that the Permittee track HAP containing coatings on a monthly basis and submit summary reports of usage. This permit renewal does not affect this status.

PSD – The Permittee operates under a PSD/NSR avoidance condition limiting facility-wide volatile organic compound emissions to less than 100 tons per year. This permit condition was placed into the permit (09594R00) because the facility is located in Wake County (former ozone nonattainment area) and carried over into the first-time Title V permit. Wake County has since attained the ozone standard, however, this permit requirement must be retained as part of the requirements for maintenance areas under PSD regulations. The permit condition includes monthly calculation and recordkeeping of VOC emissions and semiannual reporting requirements. This permit renewal does not affect this status.

The PSD minor baseline date for Wake County has been triggered for SO₂ as of December 08, 1982. This renewal/modification does not trigger PSD increment tracking because there is no increase or decrease in SO₂. Wake County is designated as “Unclassified/Attainment” for both North Carolina — Ozone Standards. In addition, as previously stated this renewal/modification does not affect NAAQS (National Ambient Air Quality Standards) or Ozone Attainment Status; thus, this permit renewal does not affect this status.

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

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. There are no permitted control devices operating (other than dry filters on spray booths); therefore, CAM is not applicable to this facility. This permit renewal does not affect this status.

7. Facility Wide Air Toxics

Removal of toxic permit limits.

The Division of Air Quality (DAQ) informed Column & Post, Inc. that the toxic permit limits for affected sources subject to 40 CFR Part 63 WWWW are potentially eligible for removal from the permit in accordance with the following General Statute recently modified by HB952 (June 28, 2012). The applicant requested that DAQ review those exempt sources for their risk potential and if eligible, remove the toxic requirements as a result.

G.S. 143-215.107(a)(5) ...The Department shall implement rules adopted pursuant to this subsection as follows:

- a. Except as provided in sub-subdivision b. of this subdivision, rules adopted pursuant to this subdivision that control emissions of toxic air pollutants shall not apply to an air emission source that is any of the following:
 - 1. Subject to an applicable requirement under 40 C.F.R. Part 61, as amended.*
 - 2. An affected source under 40 C.F.R. Part 63, as amended.*
 - 3. Subject to a case-by-case maximum achievable control technology (MACT) permit requirement issued by the Department pursuant to 42 U.S.C. § 7412(j), as amended.**
- b. Upon receipt of a permit application for a new source or facility, or for the modification of an existing source or facility, that would result in an increase in the emission of toxic air pollutants, the Department shall review the application to determine if the emission of toxic air pollutants from the source or facility would present an unacceptable risk to human health. Upon making a written finding that a source or facility presents or would present an unacceptable risk to human health, the Department shall require the owner or operator of the source or facility to submit a permit application for any or all emissions of toxic air pollutants from the facility that eliminates the unacceptable risk to human health. The written finding may be based on modeling, epidemiological studies, actual monitoring data, or other information that indicates an unacceptable health risk. When the Department requires the owner or operator of a source or facility to submit a permit application pursuant to this sub-subdivision, the Department shall report to the Chairs of the Environmental Review Commission on the circumstances surrounding the permit requirement, including a copy of the written finding.*

The removal of the current toxic emission limits requires that an analysis be performed under 143-215.107 (a)(5)(b). DAQ has evaluated toxic emissions from this facility to determine if the removal of the limitations under 15A NCAC 02D .1100 restricting the facility-wide emissions of toxic air pollutants (TAPs) presents an unacceptable risk to human health.

The facility is currently subject to a facility wide modeled emission rate for styrene of less than 102 pounds per hour (lb/hr) (based upon a October 13, 2006 demonstration). This equates to 97% of the Acceptable Ambient Levels (AAL) at an optimized emission rate. The optimized limit ensure the AAL levels are not exceeded. The highest actual emissions of Styrene over the last 5 years is 12.61 tons per year (tons/year) which is well below the modeled optimized emission rate of 102 lb/hr. Therefore, the removal of the facility-wide emission limit for styrene poses no unacceptable risk to human health.

In addition to the removal of the facility-wide toxics conditions for styrene discussed above, the current permit condition for compliance with 15A NCAC 02Q .0705 is being removed because the rule was repealed effective May 1, 2014.

8. Facility Emissions Review

See Table above for a summary of the latest years actual emissions as reported to DAQ.

9. Stipulation Review

The facility was last inspected by Stanley Williams on **December 09, 2015**. Based on his observations the facility appeared to be in compliance with their Title V permit requirements. Charles M. McEachern, III, P.E. of the RRO reviewed the file for this facility and found no additional comments related to this permit.

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

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 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 provided to the public under 02Q .0521 above. There are no affected States/areas within 50 miles of this facility.

11. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

RRO recommends issuance of the permit and was sent a DRAFT permit prior to issuance (See Section III of this document for a discussion).

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