

Air Permit Review

Permit Issue Date: **date, 2010**

Region: Winston-Salem Regional Office
County: Rockingham
NC Facility ID: 7900090
Inspector's Name: Ray Stewart
Date of Last Inspection: 04/21/2010
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): MillerCoors LLC</p> <p>Facility Address: MillerCoors LLC 863 East Meadow Road Eden, NC 27289</p> <p>SIC: 2082 / Malt Beverages NAICS: 31212 / Breweries</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 7900090.10A Date Received: 03/31/2010 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 03116/T18 Existing Permit Issue Date: 09/02/2008 Existing Permit Expiration Date: 12/31/2010</p>
<p>Andrew Lucas EH&S Representative (336) 627-2592 863 East Meadow Road Eden, NC 27288</p>	<p>James A. Smith Vice President and Plant Manager (336) 627-2592 863 East Meadow Road Eden, NC 27288</p>	<p>Andrew Lucas EH&S Representative (336) 627-2592 863 East Meadow Road Eden, NC 27288</p>	
<p>Review Engineer: Mark Cuilla</p> <p>Review Engineer's Signature: Date: date, 2010</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 03116/T19 Permit Issue Date: date, 2010 Permit Expiration Date: date, 2015</p>	

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**03116T18**) was issued on **September 2, 2008**, and is currently scheduled to expire on **December 31, 2010**. The renewal application was received on **March 31, 2010**, 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.

As part of this permit renewal, the Permittee has requested the following administrative changes to the permit:

1. the two grain dryers (**ID No. ES13**) have been removed from service and can be removed from the Title V permit. *Agree. Permit has been modified to remove references to sources as requested.*
2. the Permittee received authorization to install a new packaging line per an approved applicability determination. *Agree. Charlie Yirka of RCO responded to Miller-Coors on **September 30, 2009** approving the installation of a new packaging line (B12) without the need for permit modification.*

3. that the following operations be added to the list of insignificant activities:

- two diesel-fired fire pumps,
- one diesel-fired emergency generator,
- ammonia refrigeration system,
- CO₂ recovery and scrubber system,
- specialty malt handling/receiving,
- two hot wort tanks,
- spice addition system to Brewhouse,
- QC testing lab/fume hoods,
- hot melt adhesives application at labelers,
- one 1,000,000 gallon No. 6 fuel oil storage tank,
- one 30,000 gallon No. 2 fuel oil storage tank,
- two 2,500 gallon diesel fuel storage tanks,
- one 2,500 gallon gasoline storage tank,
- cooling towers,
- utilities carbon refrigeration system,
- one 1,000 gallon used oil storage tank,
- warehousing operations,
- vehicular traffic, and
- yeast propagation room.

*Agree. Permit application (and supporting additional information request dated **September 7, 2010**) provided potential emission calculations for the above listed sources indicating insignificant status. Note that only the 15A NCAC 2Q .0503(8) activities have been listed on the renewed permit. Those meeting insignificant status per 15A NCAC 2Q .0503(7) have not been listed.*

4. that the following revisions to several conditions be made:

- remove source (**ID No. ES21**) from Section 1 of significant emission units. This source is an insignificant activity. *Agree. References to ES21 have been removed as requested.*
- include ASTM method 5865 as another test method for gross calorific value of the coal in Section 2.1 A.2.d. *Agree. Shell language listing test methods already lists method 5865. The renewed permit has been modified to add test as requested.*
- remove emission units (**ID Nos. ES11, ES12, ES14, and ES21**) from condition 2.1 C. These units are insignificant activities and should not be included in this permit condition. *Agree. Sources should have been removed during the permit modification classifying these sources as insignificant. This oversight has been corrected as part of this permit renewal.*
- clarify the compliance assurance monitoring (CAM) conditions as follows:
 - 2.1 A.4.b add “The minimum calculated total ESP power shall be 7.0 kVA averaged over three hours. Three-hour averages below 7.0 kVA are considered excursions, which are reported semiannually. Excursions only trigger corrective action and do not constitute excess emissions or Title V deviations.”
 - 2.1 A.4.k add “if the calculated total ESP power falls below 5.0 kVA, averaged over three hours, or less than two ESP fields are in service at any one time it is an exceedance. For the purpose of determining the number of exceedances, no more than one exceedance shall be attributed in any given 24-hour period.”
 - 2.1 A.4.r.iv add “a statement that there were no excursions outside of the allowable operating parameter limits during the reporting period (as applicable), and that no continuous parametric monitoring system (CPMS) was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted. For each exceedance of an allowable operating parameter that occurs, the compliance report must contain:
(A) the total operating time of the source during the reporting period,

- (B) information on the number, duration, and cause of exceedances (including unknown cause), if applicable, and the corrective action taken,
- (C) information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other daily calibration checks.”
- 2.1 A.4.v add “for each excursion of an allowable operating parameter that occurs, the compliance report must contain:
 - (A) information on the number, duration, and cause of excursions (including unknown cause), if applicable, and the corrective action taken.”

Agree. The modifications/clarifications have been made to the current CAM language as suggested.

II. Facility Description

The facility is a beer brewing and packaging facility.

III. History/Background/Application Chronology

January 17, 2006 – Permit **03116T17** issued as a TV renewal.

September 2, 2008 – Permit **03116T18** issued as an ownership change.

September 14, 2009 – Permit application **7900090.09A** was received for 112j MACT Hammer submittal.

March 31, 2010 – Permit application **7900090.10A** received and deemed complete for processing.

April 21, 2010 – WSRO completed annual inspection of the facility.

July 15 and 16, 2010 – Mark Cuilla sent the Permittee request for additional information on CAM indicators for ESPs, on the home draft 502(b)(10) applicability determination, and on a complete list of insignificant activities via email. A follow-up conference call with Miller Coors, RCO, and WSRO on these issues took place on **August 2, 2010**.

September 9, 2010 – Received response for additional information via mail from Permittee.

September 24, 2010 – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review. Permittee provided the following comments on draft permit and review on October 29, 2010 (*DAQ's response in italics*):

1. Responsible official should be James A. Smith – Vice President and Plant Manager. *Agree, permit has been modified accordingly (note that IBEAM is currently correct);*
2. Rename ES-31 as “product packaging”. *Agree, change has been made in permit and in ESM;*
3. Condition 2.1 A.1.e.iii should read “calculated total ESP power (kVA)”. *Agree, correction has been made;*
4. Condition 2.1 A.4.a.iv should be removed. CAM parameter is limited to ESP total power. *Disagree; while the CAM excursion level has been defined as total ESP power level of 7.0 kVA, the requirement to monitor secondary voltage, secondary current, calculated total ESP power, and number of ESP fields in service remains. These were included as part of an agreement to use parametric monitoring rather than opacity monitoring as CAM during the last renewal cycle.*

5. Condition 2.1 A.4.d should be removed. CAM parameter is limited to ESP total power. *Agree; this language defined a total ESP power level corresponding to an exceedance of the particulate matter emission limit. CAM is designed to define excursion levels. An excursion level is established to allow the Permittee to make operational changes to a process or fixes to equipment prior to an emission limit being exceeded. The language requiring that the Permittee operate these sources above 5.0 kVA has been moved to the 15A NCAC 2D .0503 permit condition in Section 2.1 A.1.*
6. Condition 2.1 C.1.c should be modified to more accurately identify the cyclone/baghouse combination as a single unit without separate inspection requirements. These units operate as a single particulate control scheme rather than two individual units. *Disagree; the control devices are separate units acting in series. As such, each has independent I&M requirements. The renewed permit no reflects those requirements;*
7. Condition 2.1 C.2.c should be modified to limit monitoring to when sources are in operation. *Agree, the monitoring language for visible emissions has been modified as requested;*
8. Condition 2.1 E.a should confirm that units ES-24, ES-32, and ES-36 are subject to the requirements of 15A NCAC 2D .0958 as listed. *The WSRO inspection report indicates the following:*
 - The cold services area (ID No. ES-24) is responsible for VOC emissions from the fermentation operation, spent yeast storage, and general ventilation.*
 - The packaging (ID No. ES-31) and coding ink application (ID No. ES-32) are sources of volatile organic compound emissions.**The inspection report is silent on the wastewater treatment plant (ID No. ES-36) except for a discussion on the removal of a lime silo and associated bagfilter. The permit identifies ES-36 as being subject to 2D .0515 and 2D .0521. However, this engineer assumes that this would have been the case when the lime silo was operating. With its removal, ES-36 no longer has any applicable requirements listed in the permit. To correctly modify the permit as part of this permit renewal, the specific reference to 15A NCAC 2D .0958 in Section 2.1 E for sources ES-24, ES-32, and ES-36 has been removed and replaced with a facility-wide applicable requirement in Section 2.2. This work practice standard is now applicable to all sources of VOCs and requires the Permittee to perform specific work practice standards as well as monitoring, recordkeeping, and reporting.*
9. Add GHG reporting rule as a Federal only enforceable General Condition. *No, GHG is not an applicable requirement according to EPA.*

date, 2010 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

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

Page(s)	Section(s)	Description of Change(s)
Attachment	Insignificant activities	-amended permit revision number -added equipment per permit application (note only 2Q .0503(8) sources have been listed) -added ID numbers where necessary -added asterisk language per current shell (v3.2.2)
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3	Equipment table	-removed references to MACT Subpart DDDDD -removed references to ES13 and ES21 per Permittee request

Page(s)	Section(s)	Description of Change(s)
4	2.1 A (table) 2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.1.d	-added rule title where needed -removed reference to 2D .1111 (40 CFR 63, Subpart DDDDD) -added ID numbers -corrected particulate standard from 0.208 to 0.21 -corrected testing rule cross reference -added “no monitoring/recordkeeping” language for No. 2/No. 6 fuel oil firing -added ID numbers and updated shell language
4-5	2.1 A.1.e	-updated shell language
5	2.1 A.1.f 2.1 A.1.h 2.1 A.1.j 2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.2.d	-updated shell language -added “no reporting” language for No. 2/No. 6 fuel oil firing -updated shell language -added ID numbers -added shell testing language -removed annual coal analysis testing requirement -added “no monitoring/recordkeeping” language for No. 2 fuel oil firing -added ID numbers
6	2.1 A.2.e 2.1 A.2.f 2.1 A.2.g 2.1 A.2.h 2.1 A.2.i 2.1 A.3.a	-added gross calorific test method ASTM D-5865 per current shell and Permittee request -added ID numbers -updated shell language -added “no reporting” language for No. 2 fuel oil firing -removed annual coal test reporting language -updated shell language -added ID numbers
7	2.1 A.3.b 2.1 A.3.c 2.1 A.3.d 2.1 A.3.f 2.1 A.3.g	-corrected testing rule cross reference -added “no monitoring/recordkeeping” language for No. 2 fuel oil firing -added ID numbers and updated shell language -added “no reporting” language for No. 2 fuel oil firing -updated shell language
7-10	2.1 A.4	-updated shell language and corrected paragraph numbering -amended CAM language per permit application
10	2.1 B (table) 2.1 B.1.a 2.1 B.1.b 2.1 B.1.c	-corrected particulate emission limit from 0.208 to 0.21 -removed reference to 40 CFR 63, Subpart DDDDD -added ID numbers -corrected testing rule cross reference -added ID numbers
11	2.1 B.2.a 2.1 B.2.b 2.1 B.2.c 2.1 B.2.d 2.1 B.2.e 2.1 B.2.f 2.1 B.2.g 2.1 B.3.a	-added ID numbers -corrected testing rule cross reference -added ID numbers -added ID numbers -updated shell language -added “no reporting” language for No. 2 fuel oil firing -updated shell language -added ID numbers

Page(s)	Section(s)	Description of Change(s)
12	2.1 B.3.b 2.1 B.3.c 2.1 B.3.d 2.1 B.3.f 2.1 B.3.g	-corrected testing rule cross reference -added ID numbers -added ID numbers and updated shell language -added “no reporting” language for No. 2 fuel oil firing -updated shell language
13	2.1 C 2.1 C.1.a 2.1 C.1.b	-removed references to ES11, ES12, ES13, ES14, and ES21 and corresponding control devices per Permittee request -added ID numbers -corrected testing rule cross reference
13-14	2.1 C.1.c	-added ID numbers and updated shell language
14	2.2 C.1.f 2.1 C.2.a 2.1 C.2.c	-updated shell language -added ID numbers -added ID numbers and updated shell language
15	2.1 C.2.e 2.2 A.1.b-c 2.2 A.2	-updated shell language -modified equipment description as necessary -modified equipment description as necessary -modified 112(r) language to require renewal of RMP plan once per every 5 years -added odor rule permit language
15-16	2.2 A.3	-placed facility-wide 2D .0958 condition here rather than in Section 2.1 of the permit
16-26	General Conditions	-updated general conditions with most recent shell (v3.2.2)
27	List of Acronyms	-added acronyms for CAIR, NAA, and RACT per current shell

The following table indicates the necessary modifications to ESM as part of the renewal process.

Current Description	Modified Description
Brewers grain transfer and loadout with CD14a and CD14b	<i>End-dated per Permittee</i>
Bottle warehousing	<i>End-dated per Permittee</i>
NA	<i>Warehousing operations (including bottle warehousing) (IES1)</i>
NA	<i>Spent grain silo (IES2)</i>
NA	<i>Two diesel-fired fire pumps (170 Hp, each) (IES3.1 and IES3.2)</i>
NA	<i>One diesel-fired emergency generator (16 Hp) (IES4)</i>
NA	<i>Ammonia refrigerator system (IES5)</i>
NA	<i>CO₂ recovery system (IES6)</i>
NA	<i>Specialty malt handling/receiving (IES7)</i>
NA	<i>Spice addition system to brewhouse (IES8)</i>
NA	<i>Hot melt adhesives application (IES9)</i>
NA	<i>One No. 6 fuel oil storage tank (1,000,000 gallon capacity) (IES10)</i>
NA	<i>One No. 2 fuel oil storage tank (30,000 gallon capacity) (IES11)</i>
NA	<i>Two diesel fuel storage tanks (2,500 gallon capacity each) (IES12.1 and IES12.2)</i>

Current Description	Modified Description
NA	<i>One gasoline storage tank (2,500 gallon capacity) (IES13)</i>
NA	<i>Cooling towers (IES14)</i>
NA	<i>Utilities carbon regeneration system (IES15)</i>
NA	<i>One used oil tank (1,000 gallon capacity) (IES16)</i>
NA	<i>Raw materials unloading and transfer with CD11a, CD11b, and CD11c (formerly ES11) (IES17)</i>
NA	<i>Grain transfer system with CD12a, CD12b, CD12c, and CD12d (formerly ES12) (IES18)</i>
NA	<i>WWTP lime silo (formerly ES21) (IES19)</i>
NA	<i>Brewhouse (including wort tanks) (IES23)</i>

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0614, Compliance Assurance Monitoring
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds

A regulatory review for these current permit conditions will not be included in this document. However as part of this permit renewal the following regulations have been added to the permit:

- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart ZZZZ)
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions

VI. 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 current TV permit includes a reference to the applicability of 40 CFR 63, Subpart DDDDD to the facility’s four boilers (**ID Nos. ES1, ES2, ES3, and ES6**). However, on **July 20, 2007**, the D.C. Circuit Court vacated the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. Therefore, the reference to this Subpart has been removed as part of this permit renewal. It should be noted that the NC Attorney General’s Office has determined that the NESHAP vacatur equates to a failure of the US EPA to promulgate a valid standard as required under Section 112(d) of the Clean Air Act. As a result, a site-specific MACT standards under Section 112j have been triggered. On **September 14, 2009**, the NC DAQ received a Part 2 MACT Hammer application from this facility asking that the NC DAQ establish 112j emission limitations in accordance with NC DAQ’s recommendations. These requirements are being processed outside of this permit renewal.

As part of this permit renewal, the list of insignificant activities has been updated to include three combustion sources (**ID Nos. IES3.1, IES3.2 and IES4**). They are classified as existing, emergency, compression ignition generators/firepumps located at a major source of hazardous air pollutants. 40 CFR 63, Subpart ZZZZ was modified as recently as **August 20, 2010** (75 FR 51570-51680) to address existing sources. Per the summary table provided on the EPA Website (**October 2010**), the following requirements are applicable for an existing unit less than 500 Hp located at a major source of HAP:

Emission limits – 63.6602 (What emission limitations must I meet if I own or operate an existing stationary CI RICE with a site rating of equal to or less than 500 brake Hp located at a major source of HAP emissions?) Table 2c

- change oil and filter every 500 hours of operation or annually, whichever comes first.
- inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
- inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- minimize the engine's time spent at idle and minimize the engine's startup time at start-up to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

Operating limits – NA

Fuel requirements – NA

Performance tests – NA

Monitoring, Installation, Collection, Operation and Maintenance requirements – 63.6625(e), (f), (h), and (i) (What are my monitoring, installation, collection, operation, and maintenance requirements?)

- (e) operate and maintain the stationary RICE and after-treatment control device (if any) according to manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- (f) you must install a non-resettable hour meter if one is not already installed.
- (h) you must minimize the engine's time spent at idle during startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2c to this subpart apply.
- (i) you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2c. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c. The analysis program must at a minimum analyze the following three parameters: total base number, viscosity, and percent water content. The condemning limits for these parameters are as follows: total base number is less than 30 percent of the total base number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

Initial compliance – NA

Continuous compliance – 63.6605 (What are my general requirements for complying with this Subpart?) and 63.6640 (How do I demonstrate continuous compliance with the emission limitations and operating hours?)

-63.6605(a) you must be in compliance with the emission limitations and operating limitations in this Subpart that apply to you at all times.

-63.6605(b) 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. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which 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.

-63.6640(a) you must demonstrate continuous compliance with each emission limitation and operating limitation in Table 2c according to methods specified in Table 6 of this subpart.

-63.6640(b) you must report each instance in which you did not meet each emission limitation or operating limitation in Table 2c that apply to you. These instances are deviations from the emission and operating limitations in this Subpart. These deviations must be reported according to the requirements in 63.6650.

-63.6640(e) you must also report each instance in which you did not meet the requirements in Table 8 (Applicability of General Provisions to Subpart ZZZZ) to this subpart that apply to you.

-63.6640(f) you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

- (i) there is no time limit on the use of emergency stationary RICE in emergency situations.

- (ii) you may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year...

- (iii) you may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity...

Notification requirements – NA

Recordkeeping requirements – 63.6655 [except 63.6655(c)] (What records must I keep?)

-63.6655(a) if you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) [as applicable].

- (a)(1) a copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any initial notification or notification of compliance status that you submitted, according to the requirements in 63.10(b)(2)(xiv)

- (a)(2) records of the occurrence and duration of each malfunction of operation or the air pollution control and monitoring equipment.

- (a)(3) records of performance tests and performance evaluations as required by 63.10(b)(2)(viii).

- (a)(4) records of all required maintenance performed on the air pollution control and monitoring equipment.
- (a)(5) records of actions taken during periods of malfunction to minimize emissions in accordance with 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- 63.6655(b)(1) through (b)(3) *this section applies to CEMS or CPMS. The Permittee does not operate this type of equipment.*
- 63.6655(d) you must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.
- 63.6655(e) you must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE:
 - (e)(1) an existing stationary RICE with a site rating of less than 100 brake Hp located at a major source of HAP emissions
 - (e)(2) an existing stationary emergency RICE
 - (e)(3) an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.
- 63.6655(f) if you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response:
 - (f)(1) an existing emergency stationary RICE with a site rating of less than or equal to 500 brake Hp located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.
 - (f)(2) an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Reporting requirements – 63.6650 (except 63.6650(g)) (What reports must I submit and when?)

- 63.6650(a) you must submit each report in Table 7 of this subpart that applies to you
- 63.6650(b) you must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of this section.
 - (b)(1) for semiannual compliance reports, the first compliance report must cover the period beginning on the compliance date that is specified for your affected source in 63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in 63.6595.
 - (b)(2) for semiannual compliance reports, the first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in 63.6595
 - (b)(3) for semiannual compliance reports, each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31
 - (b)(4) for semiannual compliance reports, each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period
 - (b)(5) you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section for those units permitted pursuant to Part 70 or 71

- (b)(6) for annual compliance reports, the first compliance report must cover the period beginning on the compliance date that is specified for your affected source in 63.6595 and ending on December 31
- (b)(7) for annual compliance reports, the first compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for your affected source in 63.6595
- (b)(8) for annual compliance reports, each subsequent compliance report must cover the annual reporting period from January 1 through December 31
- (b)(9) for annual compliance reports, each subsequent compliance report must be postmarked or delivered no later than January 31
- 63.6650(c) the compliance report must contain the information in paragraphs (c)(1) through (c)(6) of this section
 - (c)(1) company name and address
 - (c)(2) statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report
 - (c)(3) date of report and beginning and ending dates of the reporting period
 - (c)(4) if you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 63.6605(b), including actions taken to correct a malfunction
 - (c)(5) if there were no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period
 - (c)(6) if there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period
- 63.6650(d) for each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the compliance report must contain the information in paragraphs (c)(1) through (c)(4) of this section and the information in paragraphs (d)(1) and (d)(2) of this section
 - (d)(1) the total operating time of the stationary RICE at which the deviation occurred during the reporting period
 - (d)(2) information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken
- 63.6650(e) for each deviation from an emission or operating limitation occurring for a stationary RICE where you are using a CMS to comply with the emission and operating limitations in this subpart, you must include information in paragraphs (c)(1) through (c)(4) and (e)(1) through (e)(12) of this section
 - (e)(1) the date and time that each malfunction started and stopped
 - (e)(2) the date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks
 - (e)(3) the date, time, and duration that each CMS was out-of-control, including the information in 63.8(c)(8)
 - (e)(4) the date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period
 - (e)(5) a summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period

- (e)(6) a breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes
 - (e)(7) a summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period
 - (e)(8) an identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE
 - (e)(9) a brief description of the stationary RICE
 - (e)(10) a brief description of the CMS
 - (e)(11) the date of the latest CMS certification or audit
 - (e)(12) a description of any changes in CMS, processes, or controls since the last reporting period
- 63.6650(f) each affected source that has obtained a title V operating permit pursuant to Part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority

General Provisions – Yes

To address the cases where current insignificant activities subject to a MACT or GACT now have to be acknowledged in the permit as being applicable to the respective subpart, DAQ has created a new web page titled “Regulatory Guide for Insignificant / Permit Exempt Activities.” The link to this site is as follows:

<http://daq.state.nc.us/permits/insig/>

Asterisked language, including this link, has been added to the insignificant activities table of the renewed permit. Once the Permittee accesses this link he will be able to get the regulatory guide for the subject MACT/GACT, NSPS, and/or NCAC affected sources (in this case, the emergency generators **ID Nos. IES3.1, IES3.2 and IES4**).

PSD – The facility operates fossil fuel fired boilers totaling more than 250 million Btu per hour heat input. Therefore, as a source included in the “list of 28” named source categories, the PSD major source threshold is 100 tons per year. Potential criteria pollutants from the facility exceed 100 tons per year; therefore, the facility is classified as a PSD major source. This permit renewal does not affect this status.

112(r) – The facility is subject to Section 112(r) of the Clean Air Act requirements because it stores one or more of the regulated substances in quantities above the thresholds in the Rule. This requirement was modified as part of this permit renewal to require the submittal of revised risk management plan as follows:

1. 15A NCAC 2Q .0508(g): PREVENTION OF ACCIDENTAL RELEASES – SECTION 112(r) OF THE CLEAN AIR ACT

a. *The Permittee is subject to Section 112(r) of the Clean Air Act and shall comply with all applicable requirements in accordance with 40 CFR Part 68.*

Recordkeeping/Reporting [15A NCAC 2Q .0508(g)]

b. *The Permittee has submitted a Risk Management Plan (RMP) to EPA pursuant to 40 CFR Part 68.150 on **July 14, 2008**.*

c. *The Permittee shall revise and update the RMP submitted under 40 CFR 68.150 by **July 14, 2013** and at least once every five years after that date or most recent update required by 40 CFR 68.190(b)(2) through (b)(7), whichever is later.*

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. CAM applicability for the facility’s control devices was established during the most recent permit renewal process (See William Willet’s **January 17, 2006** permit review for permit **03116T17**). There have been no permit modifications which would have added/removed any new CAM requirements as part of this permit renewal. However, the current CAM language has been modified as part of this renewal to update the requirements and format the condition per the Permittee’s request (see Section I of this Document for a discussion of each request).

VII. Facility Wide Air Toxics

The facility is not currently subject to any NC Air Toxics requirements. This permit renewal does not affect this status.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years’ emission inventories from the facility:

Pollutant(s)	2008 Actual Emissions (tpy)	2009 Actual Emissions (tpy)
CO	12.5	12.41
NO _x	540.54	532.67
PM ₁₀	25.81	18.65
SO ₂	1043.69	1046.18
VOC	114.34	104.84
Total HAPs/TAPs	39.85	32.54

IX. Stipulation Review

The facility was last inspected by Ray Stewart of the WSRO on **April 21, 2010**. Based on his observations and inspection of the facility's records, the facility appeared to be in compliance.

He noted the following in his description of the two coal-fired boilers:

“When observed from the naked eye, visible emissions were in the 0-5% opacity range, and thus compliance with 2D .0521 was indicated (20% source). The facility has installed a continuous opacity monitor on the stack of the boilers and it was reading 10% opacity. As the continuous opacity monitor has not yet been QA/QC'ed, the manual observations of visible emissions will be used for compliance purposes.”

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. The State of Virginia and the Forsyth County Local Program are affected States/areas within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

WSRO 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 WSRO's recommendation to issue the renewed air permit.