

## Air Permit Review

Permit Issue Date: **date, 2011**

**Region:** Mooresville Regional Office  
**County:** Iredell  
**NC Facility ID:** 4900203  
**Inspector's Name:** Jim Hafner  
**Date of Last Inspection:** 04/12/2011  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<p><b>Applicant (Facility's Name):</b> Armstrong Hardwood Flooring Company - Statesville Plant</p> <p><b>Facility Address:</b> Armstrong Hardwood Flooring Company - Statesville Plant 755 Washington Avenue Statesville, NC 28677</p> <p><b>SIC:</b> 2426 / Hardwood Dimension &amp; Flooring <b>NAICS:</b> 321918 / Other Millwork (including Flooring)</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> <b>NSPS:</b> <b>NESHAP:</b> 15A NCAC 2D .1111 (40 CFR 63, Subpart JJJJJJ) <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> <b>112(r):</b> <b>Other:</b></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> 4900203.11A <b>Date Received:</b> 07/11/2011 <b>Application Type:</b> Renewal <b>Application Schedule:</b> TV-Renewal <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 07085/T12 <b>Existing Permit Issue Date:</b> 05/14/2008 <b>Existing Permit Expiration Date:</b> 04/30/2012</p>		
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<p><b>Review Engineer:</b> Mark Cuilla</p> <p><b>Review Engineer's Signature:</b> <b>Date:</b> <b>date, 2011</b></p>			<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p>Issue 07085/T13 <b>Permit Issue Date:</b> <b>date, 2011</b> <b>Permit Expiration Date:</b> <b>date, 2016</b></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 (**07085T12**) was issued on **May 14, 2008**, with an expiration date of **April 30, 2012**. The renewal application was received on **July 11, 2011**, 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.

It should be noted that the facility recent shut-down its operations effective May 2011. The Permittee wishes to keep the permit up-to-date in the event of a re-start.

### II. Facility Description

The facility is a manufacturer of hardwood flooring.

### III. History/Background/Application Chronology

**May 10, 2007** – Permit **07085T11** issued as a Title V renewal.

**February 8, 2008** – Applicability Determination No. 1178 was processed by Charlie Yirka of the RCO allowing the Permittee to use alternative raw materials in the flooring process reducing emissions of state air toxics without a permit.

**May 14, 2008** – Permit **07085T12** issued as an administrative amendment to correct monitoring/recordkeeping/reporting requirements.

**August 8, 2008** – Applicability Determination No. 1296 was processed by David Putney of the RCO allowing for the Permittee to substitute softwood for hardwood in the flooring process either having no change or a decrease in emissions of state air toxics without a permit.

**March 9, 2010** – Applicability Determination No. 1559 was processed by David Putney of the RCO allowing the Permittee to add a “lock-n-fold” router to the list of current woodworking operations (**ID No. ES-1**) without a permit.

**April 12, 2011** – Jim Hafner of the MRO completed annual facility inspection.

**July 11, 2011** – Permit application **4900203.11A** was received as TV renewal application. Application was deemed complete for processing once third copy of application was received.

**July 25, 2011** – Received MRO comments on the TV renewal application via email.

**July 29, 2011** – Draft permit sent to regional office and Permittee for review prior to public notice and EPA review. Jim Hafner of the MRO commented via email on **August 3, 2011** that the renewed permit should include a particulate testing requirement for the wood-fired boiler (**ID No. ES-B-2**). This testing should be required within 180 days of restart of this source. In addition to this new testing requirement, the permit should also include the lock-n-fold router. Note that the MRO had erroneously commented “this source should not be included as it was installed at a different facility” in its latest facility inspection report. The source will not specifically be listed on the permit because it was determined to be part of the existing woodworking operations (**ID No. ES-1**). The specific router is allowed to be installed and operated under the current requirements of this source. No permit modification is necessary.

**date, 2011** – 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	Section	Description of Change
Attachment	Insignificant activities	-amended permit revision numbers and updated shell asterisk language
Cover	-	-amended dates and permit revision numbers
TOC	-	-removed reference to Section 2.3 (Permit Shield for Non-applicable Requirements)
3	Equipment table	-added area source GACT designation
4	2.1 A.1.a 2.1 A.1.b 2.1 A.2.b 2.1 A.3.b	-added ID numbers -corrected testing rule cross reference -corrected testing rule cross reference -corrected testing rule cross reference
5	2.1 B (table) 2.1 B.1.b 2.1 B.1.c	-added area source GACT requirement -corrected testing rule cross reference -added new particulate testing requirement per MRO request (renumbered subsequent sections)
6	2.1 B.2.b 2.1 B.3.b	-corrected testing rule cross reference -corrected testing rule cross reference
6-7	2.1 B.3.c	-updated shell VE monitoring language
7	2.1 B.4	-added area source GACT placeholder language
8	2.1 C.2.b	-corrected testing rule cross reference
8-9	2.1 C.2.c	-updated shell VE monitoring language
9	2.1 D 2.1 D.1.b	-updated control device linkage description -updated shell particulate standard monitoring language
10	2.1 D.2.b 2.1 D.2.c	-corrected testing rule cross reference -updated shell VE monitoring language
11	2.1 E (table)	-added "state-enforceable only" designation
12	2.1 E.1.c	-modified NC toxics reporting language from semi-annual to quarterly per General Statute Requirements
13	2.2 A.1.c 2.2 A.1.e  2.2 A.2.b-d	-added regulatory citation -added regulatory citation and updated shell reporting language -renumbered paragraphs
-	2.3	-removed permit shield for non-applicable requirements
14-24	General Condition	-updated shell conditions (v3.4)
25	List of Acronyms	-added acronyms for CAIR, NAA, and RACT per current shell

## 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 .0504, Particulates from Wood Burning Indirect Heat Exchangers
- 15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing Plants
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

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

- 15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart JJJJJ)

## 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/112i** – The current permit includes a permit shield for non-applicable requirements. It notes that “15A NCAC 2D .1111 does not apply because facility-wide potential emissions are below the major source thresholds of 10 tons per year for any single HAP or 25 tons per year for all HAPs combined.” This statement is true for the major source MACT standards. However, EPA has promulgated area source GACTs. These regulations apply to Title III minor facilities. As part of the permit renewal, it was determined that the area source GACT for Industrial, Commercial, and Institutional Boilers (40 CFR 63, Subpart JJJJJ) is applicable to the wood-fired boiler (**ID No. ES-B-2**). This GACT was promulgated on **March 21, 2011** with an effective date of **May 21, 2011**. As part of this permit renewal, the permit shield in Section 2.3 has been removed and a reference to the area source GACT has been added. The following GACT details are applicable to the permitted boiler:

The Permittee also operates one natural gas-fired boiler (**ID No. ES-B-1**). This source is categorized as an existing gas-fired boiler. Per 63.11195(e) gas-fired boilers “are not subject to this Subpart and to any requirements in this Subpart.” 63.11237 defines gas-fired boiler as “any boiler that burns gaseous fuels not combined with any solid fuels.” Gaseous fuels include, but are not limited to natural gas. Therefore, this Subpart is not applicable to this facility. This permit renewal does not affect this status.

### **Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

*Note..This permit condition is being written for Armstrong Hardwood Flooring. Permitted equipment includes one wood-fired boilers (14.0 million Btu per hour heat input; ID No. ES-B-2) with associated multiclone (ID No. CD-1). 40 CFR 63.11237 defines “biomass” as any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (e.g., trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings). The equipment description identifies the wood burned at this facility as a product of the onsite engineered flooring operations.*

**63.11196 - What are my compliance dates?**

- (a) The Permittee must achieve compliance with the applicable provisions as follows:
- (1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, the Permittee must achieve compliance with the work practice or management standard no later than **March 21, 2012**.
  - (3) If the existing affected boiler is subject to the energy assessment requirement, the Permittee must achieve compliance with the energy assessment requirement no later than **March 21, 2014**.

**Emission Limits, Work Practice Standards, Emission Reduction Measures, and Management Practices**

**63.11201 - What standards must I meet?**

- (b) The Permittee must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after **January 1, 2008** that meets the requirements in Table 2 to this subpart satisfies the energy assessment portion of this requirement.
- (d) These standards apply at all times.

**General Compliance Requirements**

**63.11205 - What are my general requirements for complying with this subpart?**

- (a) At all times the Permittee must operate and maintain any affected source 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 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.

**Initial Compliance Requirements**

**63.11210 - What are my initial compliance requirements and by what date must I conduct them?**

- (c) For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, the Permittee must demonstrate initial compliance no later than the compliance date that is specified in 63.11196 and according to the applicable provisions in 63.7(a)(2).

**63.11214 - How do I demonstrate initial compliance with the work practice standard, emission reduction measures, and management practice?**

- (b) If you own or operate an existing biomass-fired boiler, the Permittee must conduct a performance tune-up according to 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.
- (c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, the Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report.

## **Continuous Compliance Requirements**

### **63.11223 - How do I demonstrate continuous compliance with the work practice and management practice standards?**

- (a) For affected sources subject to the work practice standard or the management practices of a tune-up, the Permittee must conduct a biennial performance tune-up according to paragraphs (b) of this section and keep records as required in 63.11225(c) to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
- (b) The Permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in the following:
  - (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months).
  - (2) 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.
  - (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
  - (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
  - (5) 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).
  - (6) Maintain onsite and submit, if requested by the Administrator, biennial report containing the following information:
    - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler.
    - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
    - (iii) The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler.
  - (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

### **63.11225 - What are my notification, reporting, and recordkeeping requirements?**

- (a) The Permittee must submit the following notifications:
  - (1) All of the notifications in 63.7(b); 63.8(e) and (f); 63.9(b) through (e); and 63.9(g) and (h) that apply to you by the dates specified in those sections.
  - (2) Per 63.9(b)(2), the Initial Notification no later than 120 calendar days after **May 20, 2011** or within 120 days after the source becomes subject to the standard.
  - (4) The Notification of Compliance Status in accordance with 63.9(h) no later than 120 days after the applicable compliance date specified in 63.11196. In addition to the information required in 63.9(h)(2), your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
    - (i) "This facility complies with the requirements in 63.11214 to conduct an initial tune-up of the boiler."
    - (ii) "This facility has had an energy assessment performed according to 63.11214(c)."
    - (iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

- (b) The Permittee must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the following information. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section:
- (1) Company name and address.
  - (2) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
  - (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
  - (4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under 241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of 241.3, and the total fuel usage amount with units of measure.
- (c) The Permittee must maintain the following records:
- (1) As required in 63.10(b)(2)(xiv), a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.
  - (2) Records to document conformance with the work practices, emission reduction measures, and management practices required by 63.11214 as follows:
    - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
    - (ii) Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by you or EPA, and the total fuel usage amount with units of measure. If you combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in 241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under 241.3(c), you must keep a record that documents how the fuel satisfies the requirements of the petition process.
  - (4) Records of the occurrence and duration of each malfunction of the boiler.
  - (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (d) Your records must be in a form suitable and readily available for expeditious review, according to 63.10(b)(1). As specified in 63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. You must keep each record onsite for at least 2 years after the date of each recorded action according to 63.10(b)(1). You may keep the records off site for the remaining 3 years.
- (g) If you intend to switch fuels, and this fuel switch may result in the applicability of a different subcategory or a switch out of subpart JJJJJ due to a switch to 100 percent natural gas, you must provide 30 days prior notice of the date upon which you will switch fuels. The notification must identify:

- (1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice.
- (2) The currently applicable subcategory under this subpart.
- (3) The date on which you became subject to the currently applicable standards.
- (4) The date upon which you will commence the fuel switch.

Table 2 to Subpart JJJJJ of Part 63 – Work Practice Standards, Emission Reduction Measures, and Management Practices [As stated in 63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:]

<b>If your boiler is in this subcategory</b>	<b>You must meet the following</b>
3. Existing biomass	Conduct a tune-up of the boiler biennially as specified in 63.11223.
4. Existing biomass (units with heat input capacity of 10 million Btu per hour and greater).	<p>Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after <b>January 1, 2008</b>, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. The energy assessment must include:</p> <ol style="list-style-type: none"> <li>1. a visual inspection of the boiler system.</li> <li>2. an evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.</li> <li>3. inventory of major systems consuming energy from affected boiler(s).</li> <li>4. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.</li> <li>5. a list of major energy conservation measures.</li> <li>6. a list of the energy savings potential of the energy conservation measures identified.</li> <li>7. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.</li> </ol>

Because there are no permit conditions currently approved by the DAQ Permit Workgroup (process has begun) for this permit condition, the following placeholder language has been added as Section 2.1 B.4 of the renewed permit:

**4. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

- a. *For this source (ID No. ES-B-2), the Permittee shall demonstrate compliance by the dates specified in 40 CFR 63.11196 with all applicable requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR 63 Subpart JJJJJ “National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers.”*

**PSD** – The Permittee is not currently subject to any Prevention of Significant Deterioration requirements. 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 any 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 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. The following table indicates the current equipment/control device relationships:

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES-B-2	One wood-fired boiler (14.0 million Btu per hour maximum heat input) burning wood waste generated from onsite engineered flooring operations	CD-1	One multicyclone (25 six inch diameter tubes)
ES-1	Woodworking operations	CD-2 CD-3  CD-4	Two bagfilters (6,032 square feet of filter area each)  One bagfilter (693 square feet of filter area)
ES-P-300	Flat line finishing system including woodworking operations	CD-TC-1  CD-3	One transfer cyclone (96 inches in diameter)  One bagfilter (6,032 square feet of filter area)

The following table outlines the specific permit conditions for each source/control device arrangement and if the control device is installed to comply with that requirement:

<b>Emission Source ID No(s).</b>	<b>Control Device ID No(s).</b>	<b>Permit Condition(s)*</b>	<b>Control Equipment Installed to Meet Permit Limit?</b>
ES-B-2	CD-1	15A NCAC 2D .0504 15A NCAC 2D .0516	Particulates. Yes Sulfur dioxide. No
ES-1	CD-2 CD-3 CD-4	15A NCAC 2D .0512	Particulates. Yes
ES-P-300	CD-TC-1 CD-3	15A NCAC 2D .0512	Particulates. Yes

\* The following permit conditions, where applicable, are not included in the CAM analysis:

1. *15A NCAC 2D .0521 – This regulation limits visible emissions to specific opacity levels based on equipment manufacture date. Visible emissions are not criteria pollutants subject to CAM analysis.*
2. *15A NCAC 2Q .0711 – This regulation defines State-enforceable emission limits for toxic air pollutants. These emission limits are not criteria pollutants subject to CAM analysis.*
3. *15A NCAC 2D .0958 – This regulation establishes work practice standards for sources of volatile organic compounds. These standards are not subject to CAM analysis.*

The facility was analyzed for CAM applicability during the last TV permit renewal process. No control devices were indicated to be applicable because potential uncontrolled PM<sub>10</sub> emissions were determined to be less than applicability thresholds (See Purva Prabhu's **May 10, 2007** permit application review for **07085T11**). No permit applications to add sources/control devices or modify existing equipment have been processed since that last permit renewal. Therefore CAM continues to not apply to this facility. This permit renewal does not affect this status.

## VII. Facility Wide Air Toxics

The Permittee is subject to the following state-enforceable only regulations for the control of NC Air Toxics:

1. 15A NCAC 2D .1100 – This regulation requires the Permittee limit formaldehyde emissions from the gluing operations (**ID No. ES-GP-1**) to less than 0.169 pounds per hour. To ensure compliance with this limit, the Permittee shall not process more than 5 batch per hour, use resins with less than 0.2 percent formaldehyde by weight, use resins at a rate higher than 360 pounds per batch, and emit more than 4.7 percent formaldehyde as a percent of excess formaldehyde in resins. The current permit includes recordkeeping and reporting requirements. As part of this permit renewal, the reporting requirements are being amended from semi-annual to quarterly reporting per NC General Statute requirements. No other modifications are necessary as part of this permit renewal.
2. 15A NCAC 2Q .0711 – The Permittee has made a demonstration that emissions of toluene and Xylene from the flat line finishing (**ID No. ES-P-300**) and gluing (**ID No. ES-GP-1**) operations do not exceed their respective toxic permit emission rates (TPERs). A permit to emit these toxics in quantities above the TPERs is required prior to exceeding these limits. No monitoring/recordkeeping/reporting requirements are included in the current permit. 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)	2009 Actual Emissions (tpy)	2010 Actual Emissions (tpy)
CO	6.48	9.29
NO <sub>x</sub>	5.39	7.65
PM <sub>10</sub>	7.27	9.63
SO <sub>2</sub>	0.26	0.38
VOC	15.998	15.62
Total HAP/TAP	7.10	6.59

**IX. Stipulation Review**

The facility was last inspected by Jim Hafner of the MRO on **April 12, 2011**. At that time, the facility appeared to be in compliance with the applicable air quality regulations.

**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 Mecklenburg and Forsyth County Local Programs are each affected areas within 50 miles of the 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.

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

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