

**NORTH CAROLINA
DIVISION OF AIR QUALITY
Air Permit Review**

Region: Raleigh Regional Office
County: Wilson
NC Facility ID: 9800043
Inspector's Name: Will Wike
Date of Last Inspection: 09/26/2008
Compliance Code: 3 / In Compliance - Inspection

Permit Issue Date:

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Bridgestone Americas Tire Operations, LLC Facility Address: Bridgestone Americas Tire Operations, LLC 3001 Firestone Parkway Wilson, NC 27894 SIC: 3011 / Tires And Inner Tubes NAICS: 326211 / Tire Manufacturing (except Retreading) Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: Actuals PAL for VOC PSD Avoidance: NC Toxics: 112(r): Other: Name Change of the Facility
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 9800043.08A Date Received: 01/28/2008 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 01660/T58 Existing Permit Issue Date: 10/17/2008 Existing Permit Expiration Date: 09/30/2012
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Review Engineer: Rahul Thaker Review Engineer's Signature: _____		Date: June 5, 2009	Comments / Recommendations: Issue 01660/T59 Permit Issue Date: Permit Expiration Date:

1. Purpose of Application

Bridgestone Americas Tire Operations, LLC ("BATO") submitted a Title V Significant Modification [2Q .0501(c)(1)] application to obtain Actuals Plantwide Applicability Limitations (PAL) for VOC.

The company also requested a facility name change.

2. Facility Description

The facility manufactures passenger steel radial tires.

3. Application Chronology

The application chronology has been detailed in the IBEAM Report.

4. Permit Modification/Changes

4.1 Actuals PAL

As stated in Section 1 above, the company wishes to obtain Actuals PAL for VOC for the facility wide operations. Presently, the permitted emission sources at this facility have to comply under a number of different PSD avoidance limitations as per the current permit. By requesting Actuals PAL, the Permittee wishes to simplify compliance assurance, obtain operational flexibility, react quickly to market demand, and provide clarity for planning future modernization of the facility.

It should be stated here that the Permittee is not requesting to obtain approval for any new source nor it is asking to modify any existing equipment with this application.

Thus, the only applicable requirement for the requested change is 15A NCAC 2D .0530. The PAL provisions as implemented through 2D .0530 are included in 40 CFR 51.166(w) "Actuals PAL".

40 CFR 51.166(w) ACTUALS PAL

The PAL permit shall be written in accordance with §51.166(w)(7) "Contents of the PAL Permit". The following provides discussion on each element of this requirement.

§51.166(w)(7)(i) - Name of PAL Pollutant and Applicable Source-wide Emission Limit in Tons Per Year

As stated earlier, this PAL permit for BATO is for VOC emissions. The PAL limit in tons per year is **505**.

This limit has been established using the procedures in §51.166(w)(6) "Setting the 10-year Actuals PAL Level".

Specifically, the actuals PAL level for a major stationary source shall be established as the sum of the baseline actual emissions of the PAL pollutant for each emissions unit at the source plus an amount equal to the applicable significant level for the PAL pollutant. When establishing the actuals PAL level for a PAL pollutant, only one consecutive 24-month period must be used to determine the baseline actual emissions for all existing emissions units. However, a different consecutive 24-month period may be used for each different PAL pollutant. Emissions associated with units that were permanently shut down after this 24-month period must be subtracted from the PAL level. The permitting authority shall specify a reduced PAL level (in tons/yr) in the PAL permit to become effective on the future compliance date of any applicable Federal or State regulatory requirement(s) that the reviewing authority is aware of prior to issuance of the PAL permit. Finally, for newly constructed units (which do not include modifications to existing units) on which actual construction began after the 24-month period, in lieu of adding the baseline actual emissions, the emissions must be added to the PAL level in an amount equal to the potential to emit of the units.

The Permittee has calculated baseline actual emissions using the 1999-2000 production records. The Permittee has argued that this two-year (1999-2000) period represents the normal source operation for the facility. It adds that (i) In 2000, there was a major recall of tires manufactured at this facility and the production started to drop toward the end of 2000, (ii) Production levels in 2001 were below the normal levels and (iii) The facility had taken several years to recover.

The following Table shows production records from 2007-1997:

Year	Cured Tires, lbs
2007	289,380,954
2006	293,505,875
2005	287,975,791
2004	300,939,907
2003	291,825,165
2002	282,341,748

2001	266,386,006
2000	312,387,644
1999	325,242,637
1998	305,826,877
1997	283,055,659

As per 2D .0530(b)(1)(A), although the selected baseline period (1999-2000) falls outside the five-year window from the receipt of the completed application (Jan 2008-Feb 2003), DAQ can allow a different time period to be used for determining baseline actual emissions, not exceeding 10 years from the receipt of the completed application (Jan 2008-Feb 1998).

DAQ agrees with the company that the 1999-2000 production records do represent the normal source operation of this facility. Hence, it will allow the selected time period (1999-2000) for determining baseline actual emissions.

Thus, the baseline actual emissions are 408.3 tons per year. It should be noted here that several of the emissions units are currently subject to NSPS Subpart BBB requirements for VOC emissions. For example, emissions units UT-2, UT-3, SW-3, BCO-1, GT-6, GT-7, GT-8, GT-9, GT-10, GT-11, and GT-12, etc. Some of these units are also subject to VOC BACT. As per the Permittee, none of these emissions units operated during the selected baseline period (1999-2000) above the emission limits (NSPS or BACT as appropriate). Therefore, no adjustment to the baseline actual emissions is required.

The following is a Table for determination of Actuals PAL:

	Tons Per year
Baseline Actual Emissions [Average of 1999-2000]	408.3
Add PTE for generators (ID Nos. EGDD-3, EGDD-4, and EGDD-5) [2003]	1.1
Add PTE for mini-sidewall extrusion line run, flat sidewall reinforcement and bead filler cementing (ID Nos. SW-3, TU-2 and GT-9) [2004]	40
Remove PTE for doper (ID No. GT-5) [2004] and add PTE for doper (ID No. GT-10) [2005]	0
<i>Emissions offset each other</i>	
Remove PTE for generators (ID Nos. EGDD-3, EGDD-4, and EGDD-5) [2005]	-1.1
Add PTE for automated storage and retrieval system (ID No. GT-11) [2007]	0.59
Remove BAE for doper (ID No. GT-2)	-0.08
Add calender project (ID Nos. C-3, RMC-10, RMC-11 and TUC-3) [2007]	13.9
Add green tire doper (ID No. GT-2) [2008]	0.60
Add oil storage tanks (ID Nos. ES-1.1, ES-1.2, ES-2.1, ES-2.2, ES-3, ES-7, ES-8, ES-11, ES-12, and ES-13) [After 1999-2000]	1.83
Add significant emission rate	40
Actuals PAL	505.14

Thus, the Actuals PAL for VOC is **505 tons per rolling 12-months**.

§51.166(w)(7)(ii) -- PAL Permit Effective and Expiration Dates

The PAL Permit effective date will be the date upon which the revised Title V permit (containing PAL permit) for this facility is issued. The expiration date of the PAL permit is ten years from the effective date of PAL permit. Refer to §51.166(w)(8).

§51.166(w)(7)(iii) -- PAL Permit Expiration v/s Submittal of Renewal of PAL Permit

If the Permittee applies to renew the PAL permit in accordance with §51.166(w)(10) before the end of the PAL effective period, then the PAL permit shall not expire at the end of the PAL effective period. It shall remain in effect until a revised PAL permit is issued by the DAQ.

§51.166(w)(7)(iv) -- Accounting of Emissions Due to Start-ups, Shutdowns, and Malfunctions

The Permittee will be required to include in emissions calculations for compliance purposes, emissions from startups, shutdowns, and malfunctions.

§51.166(w)(7)(v) -- PAL Permit Expiration v/s Non-Submittal of Renewal of PAL Permit

Any PAL permit not renewed in accordance with §51.166(w)(10) shall expire at the end of the PAL effective period. Upon PAL permit expiration, the Permittee becomes subject to the requirements in §51.166(w)(9). The DAQ shall decide whether and how the PAL allowable emissions will be distributed and issue a revised permit incorporating allowable limits for each emissions unit, as the DAQ determines is appropriate. The DAQ shall retain the ultimate discretion to decide whether and how the allowable emissions will be allocated.

§51.166(w)(7)(vi) -- Calculation Procedures for Monthly and Annual Emissions

The PAL permit must include calculation procedures to convert the monitoring system data to monthly emissions and annual emissions based on a 12-month rolling total for each month.

The Permittee has proposed to use emission factors and mass balance approaches to calculate VOC emissions from various emission units on a monthly and 12-month basis. The following Section provides details on calculation procedures.

§51.166(w)(7)(vii) -- Monitoring Methods for Emissions Units

The Permittee shall comply with monitoring requirements for each emission unit in accordance with §51.166(w)(13). [This cite should be §51.166(w)(12) and not (w)(13). There is a typographical error in the rule.]

Any monitoring system authorized for use in the PAL permit must be based on sound science and meet generally acceptable scientific procedures for data quality and manipulation. Additionally, the information generated by such system must meet minimum legal requirements for admissibility in a judicial proceeding to enforce the PAL permit.

The PAL monitoring system must employ one or more of the four general monitoring approaches meeting the minimum requirements set forth in paragraphs (w)(12)(ii) (a) through (d) of §51.166 and must be approved by the reviewing authority.

The following are four acceptable monitoring approaches when conducted in accordance with the minimum requirements in §51.166(w)(12)(iii) through (ix).

Mass Balance Calculations for Coatings and Solvents

CEMS
CPMS or PEMS
Emission Factors

As indicated above, the Permittee has proposed to use emission factors and mass balance approaches to calculate VOC emissions.

§51.166(w)(12)(iii) Mass Balance Calculations for Coatings and Solvents

The Permittee shall perform mass balance calculations per month at the end of each month for each coating or solvent used in mixing, calendaring, extrusion, bead cementing, tire doping, curing, paint booths, coating/solvent equipment, carbon black and dry chemical/pigment handling, and miscellaneous emissions units.

VOC emissions shall be determined by multiplying the total amount of each type of coating or solvent consumed during the month by the VOC content of each coating or solvent. The Permittee shall provide a demonstrated means of validating the published content of VOC that is contained in or created by all materials used in or at the emissions unit. The Permittee shall assume that the VOC content is either 100 percent or obtain from the vendor of the material a certificate of analysis confirming the VOC content included in the material safety data sheet (MSDS) or formulation data. If the vendor of the material provides a range of VOC content for such material, the Permittee shall use the highest value of the range to calculate the VOC emissions unless the DAQ approves the site-specific data (such as Method 24 analysis) showing that another value in the range is more appropriate.

§51.166(w)(12)(vi) Emission Factors

The Permittee shall meet the following requirements:

- All emission factors shall be adjusted, if appropriate, to account for the degree of uncertainty or limitations in the factors' development.
- The emissions unit shall operate within the designated range of use for the emission factor, if applicable.
- If technically practicable, the owner or operator of a significant emissions unit that relies on an emission factor to calculate PAL pollutant emissions shall conduct validation testing to determine a site-specific emission factor within 6 months of PAL permit issuance, unless the reviewing authority determines that testing is not required.

The Permittee has proposed to use AP-42 emission factors in Draft Section 4.12 "Manufacture of Rubber Products", 11/08 for various rubber product operations, Section 1.3 "Fuel Oil Combustion", 9/98, Section 1.4 "Natural Gas Combustion", 7/98, Section 3.4 "Large Stationary Diesel and All Stationary Dual-Fuel Engines", 10/96, and vendor emission factors for other combustion sources and EPA TANKS program for solvent storage tank emissions.

As per the Permittee, Rubber Manufacturers Association (RMA) embarked on an intense emissions testing project in 1994-1996 to establish emission factors for rubber products operations. RMA informed and consulted with EPA with the intent that the developed emission factors would be included in AP-42. This testing program resulted in emission factors for the commonly used rubber compounds and tire manufacturing processes. RMA submitted this information to EPA and the EPA has posted it as AP-42 Section 4.12 on its web site as Draft. Participating companies were involved in identifying generic rubber formulations used in the mixing, milling, calendaring, extruder, and warm up mill tests. Testing of grinding and tire curing processes used tires from several of participating companies including BATO. The testing included 23 types of rubber compounds/mixtures. Compounds 1 through 7 are representative compounds for rubber processes at BATO. The facility uses the VOC emission factors from the RMA testing that represent the compounds used and the tires manufactured at the facility.

Emission factors used for calculating emissions from the use of ethanol producing pigment (EPP) were developed through emissions testing of mixing/milling and curing of BATO rubber stock with EPP. The BATO contractor performed emissions testing of ethanol emissions using extractive FTIR at BATO's Akron Ohio R&D facility. The Permittee argues that testing air emissions from bench and pilot scale equipment at the Akron facility is representative of tire plant unit operations because VOC emissions are not dependent on equipment size.

DAQ believes that the use of AP-42 Draft emission factors for rubber processes, EPP emission factors, combustion equipment AP-42 and vendor emission factors, and TANKS program emission factors for solvent storage tanks, is appropriate for this PAL permit and no validation testing is required for any significant emission unit.

The following are emission factors to be used for various types of emissions units:

→ The Permittee shall calculate VOC emissions per month after the end of each month for **mixing** as follows:

$$\text{VOC, tons/month} = \frac{\sum[\text{rubber throughput}_i, \text{ lb} \times \text{emission factor for generic rubber compound}_i, \text{ lb/lb rubber}]}{2000}$$

Where emission factors for generic rubber compounds used at the facility are as below:

- Compound #1 = 6.17×10^{-5} lb/lb rubber
 - Compound #2 = 3.91×10^{-5} lb/lb rubber
 - Compound #3 = 1.36×10^{-4} lb/lb rubber
 - Compound #4 = 3.88×10^{-5} lb/lb rubber
 - Compound #5 = 2.15×10^{-4} lb/lb rubber
 - Compound #6 = 3.86×10^{-5} lb/lb rubber
- i = 1 through 6

→ The Permittee shall calculate VOC emissions per month after the end of each month for **milling** as follows:

$$\text{VOC, tons/month} = \frac{\sum[\text{rubber throughput}_i, \text{ lb} \times \text{emission factor for generic rubber compound}_i, \text{ lb/lb rubber}]}{2000}$$

Where emission factors for generic rubber compounds used at the facility are as below:

- Compound #1 = 8.99×10^{-5} lb/lb rubber
 - Compound #2 = 1.10×10^{-4} lb/lb rubber
 - Compound #3 = 1.13×10^{-4} lb/lb rubber
 - Compound #4 = 8.37×10^{-5} lb/lb rubber
 - Compound #5 = 3.14×10^{-4} lb/lb rubber
 - Compound #6 = 5.64×10^{-5} lb/lb rubber
- i = 1 through 6

→ The Permittee shall calculate VOC emissions per month after the end of each month for **calendaring** as follows:

$$\text{VOC, tons/month} = \frac{\sum[\text{rubber throughput}_i, \text{ lb} \times \text{emission factor for generic rubber compound}_i, \text{ lb/lb rubber}]}{2000}$$

Where emission factors for generic rubber compounds used at the facility are as below:

- Compound #1 = 5.33×10^{-5} lb/lb rubber
- Compound #2 = 5.59×10^{-5} lb/lb rubber
- Compound #3 = 1.17×10^{-4} lb/lb rubber
- Compound #4 = 3.35×10^{-5} lb/lb rubber
- Compound #5 = 1.86×10^{-4} lb/lb rubber
- Compound #6 = 3.34×10^{-5} lb/lb rubber

i = 1 through 6

→ The Permittee shall calculate VOC emissions per month after the end of each month for **extrusion** as follows:

$$\text{VOC, tons/month} = \frac{\sum[\text{rubber throughput}_i, \text{ lb} \times \text{emission factor for generic rubber compound}_i, \text{ lb/lb rubber}]}{2000}$$

Where emission factors for generic rubber compounds used at the facility are as below:

Compound #1 = 1.48×10^{-5} lb/lb rubber

Compound #2 = 9.37×10^{-6} lb/lb rubber

Compound #3 = 3.25×10^{-5} lb/lb rubber

Compound #4 = 5.67×10^{-6} lb/lb rubber

Compound #5 = 5.15×10^{-5} lb/lb rubber

Compound #6 = 1.23×10^{-5} lb/lb rubber

Compound #7 = 2.92×10^{-5} lb/lb rubber

i = 1 through 7

→ The Permittee shall calculate VOC emissions per month after the end of each month for **curing** as follows:

$$\text{VOC, tons/month} = \frac{\sum[\text{rubber throughput, lb} \times \text{emission factor for tire curing or tire bladder curing, lb/lb rubber}]}{2000}$$

Where,

Emission factor for tire curing emissions units = See confidential information letter dated March 16, 2009, and

Emission factor for tire bladder curing emissions units for Compound #7 = 2.36×10^{-4} lb/lb rubber

→ The Permittee shall calculate VOC emissions per month after the end of each month for **grinding** as follows:

$$\text{VOC, tons/month} = \frac{\sum[\text{rubber throughput, lb} \times \text{emission factor for carcass or sidewall/whitewall, lb/lb rubber}]}{2000}$$

Where emission factors for Carcass = 5.21×10^{-4} lb/lb rubber, and

Sidewall/Whitewall = 1.59×10^{-2} lb/lb rubber

→ The Permittee shall calculate VOC emissions per month after the end of each month for **ethanol producing pigment process** using the emission factors included in the March 16, 2009 confidential information letter.

→ The Permittee shall calculate VOC emissions per month after the end of each month for **rubber cement mixer and solvent storage tanks, and oil storage tanks** as follows:

$$\text{VOC, tons/month} = \frac{\sum[\text{solvent throughput, lb} \times \text{emission factor for rubber cement mixer or solvent storage tanks, lb/lb of solvent}]}{2000}$$

Where emission factors for rubber cement mixer = 4.01×10^{-4} lb/lb solvent, and

solvent storage tanks = 2.83×10^{-3} lb/lb solvent (ST-1, ST-2 and ST-3) and 8.17×10^{-3} lb/lb solvent (ST-4)

The Permittee shall use a combined emission factor (rate) of 0.152 tons VOC per month for all oil storage tanks.

→ The Permittee shall calculate VOC emissions per month after the end of each month for **each boiler, peak shaving generator, emergency generator, emergency fire pump engine, and air compressor**, as follows:

$$\text{VOC, tons/month} = \frac{\Sigma[\{0.2 \text{ lb}/10^3 \text{ gallon} \times \text{A gallon/month}\} + \{0.28 \text{ lb}/10^3 \text{ gallon} \times \text{B gallon/month}\} + \{5.5 \text{ lb}/10^6 \text{ scf} \times \text{C scf/month}\} + \{2.16 \text{ lb/hr} \times \text{D hour/month}\} + \{0.240 \text{ lb/hr} \times \text{E hour/month}\} + \{0.00251 \text{ lb}/\text{hp-hr} \times \text{F hp-hr/month}\}]}{[2000 \text{ lbs/ton}]}$$

Where,

- A = No. 2 fuel oil usage in gallon per month for each boiler.
- B = No. 6 fuel oil usage in gallon per month for each boiler.
- C = natural gas usage in standard cubic feet per month for each boiler.

- D = operating time in hour per month for each diesel-fired peak shaving generator.
- E = operating time in hour per month for each diesel-fired air compressor.
- F = power output in hp-hr per month for each diesel fired emergency generator or each diesel fired emergency fire pump engine (≤ 600 hp)

§51.166(w)(12)(vii) Recording of Emissions during Unavailability of Monitoring Data

The Permittee shall record and report maximum potential emissions without considering enforceable emission limitations or operational restrictions for an emissions unit during any period of time that there is no monitoring data, unless another method for determining emissions during such periods is specified in the PAL permit.

§51.166(w)(12)(ix) Revalidation

The Permittee shall revalidate the emission factors and any other data used in emissions calculation procedures above for VOC emissions through performance testing or other scientifically valid means approved by the DAQ. The Permittee shall perform such testing once every five years after the issuance of the PAL permit in accordance with General Condition JJ.

§51.166(w)(7)(viii) -- Record keeping

The Permittee shall comply with all applicable record keeping requirements in §51.166(w)(13). The Permittee shall retain on site a copy of all records necessary to determine compliance with any requirement in §51.166(w) and of the PAL, including a determination of each emissions unit's 12-month rolling total emissions, for 5 years from the date of such record.

The Permittee shall retain a copy of the following records onsite, for the duration of the PAL effective period plus 5 years:

- A copy of the PAL permit application and any applications for revisions to the PAL; and
- Each annual certification of compliance pursuant to Title V and the data relied on in certifying the compliance. This requirement applies only to the data used to certify compliance with the terms of the actuals PAL permit

The above records may be retained in electronic format.

§51.166(w)(7)(ix) -- Reporting

The Permittee shall comply with all applicable reporting requirements in §51.166(w)(14).

The Permittee shall submit semi-annual monitoring reports and prompt deviation reports to the reviewing authority in accordance with the applicable Title V operating permit program. The reports shall meet the requirements in paragraphs §51.166(w)(14)(i) through (iii).

Semi-annual Report

The semi-annual report shall be submitted to the Regional Air Quality Supervisor postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. This report shall contain the information required in paragraphs §51.166(w)(14)(i)(a) through (g) as included below:

- The identification of Permittee and the permit number.
- Total annual emissions (tons/year) based on a 12-month rolling total for each month in the reporting period recorded pursuant to paragraph §51.166 (w)(13)(i).
- All data relied upon, including, but not limited to, any Quality Assurance or Quality Control data, in calculating the monthly and annual PAL pollutant emissions.
- A list of any emissions units modified or added to the major stationary source during the preceding 6-month period.
- The number, duration, and cause of any deviations or monitoring malfunctions (other than the time associated with zero and span calibration checks), and any corrective action taken.
- A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of the pollutant or the number determined by method included in the permit, as provided by paragraph (w)(12)(vii) of this section.
- A signed statement by the responsible official (as defined by the applicable Title V operating permit program) certifying the truth, accuracy, and completeness of the information provided in the report.

Deviation Report

The Permittee shall promptly submit reports of any deviations or exceedance of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to §70.6(a)(3)(iii)(B) of this chapter shall satisfy this reporting requirement. The deviation reports shall be submitted within the time limits prescribed by the applicable program implementing §70.6(a)(3)(iii)(B) of 40 CFR. The reports shall contain the following information:

- The identification of owner and operator and the permit number.
- The PAL requirement that experienced the deviation or that was exceeded.
- Emissions resulting from the deviation or the exceedance; and
- A signed statement by the responsible official (as defined by the applicable Title V operating permit program) certifying the truth, accuracy, and completeness of the information provided in the report.

Re-validation Results

The Permittee shall submit to the Regional Air Quality Supervisor the results of any re-validation within three months after completion of such re-validation.

4.2 Name Change

Bridgestone Firestone North American Tire, LLC changed its name effective January 1, 2009 to Bridgestone Americas Tire Operations, LLC. As per the company, only the company's name will change and no new entity will be created nor will any assets be transferred as a part of this name change. Finally, the company adds that the Wilson facility will operate as before without any other changes (except name change).

5. NSPS, NESHAPS, PSD, Attainment Status, 112(r), and CAM

NSPS

Not applicable to the proposed change.

NESHAP/MACT

Not applicable to the proposed change.

PSD

Refer to Section 4 for complete details.

Attainment Status

Wilson County is in attainment for all NAAQS.

112(r)

This facility is NOT subject to Section 112(r) of the Clean Air Act.

CAM

Not Applicable.

6. Facility Wide Air Toxics

The facility has been modeled for a number of air toxics. This application does not change this existing requirement.

7. Statement of Compliance

The facility was last inspected by RRO (Will Wike) on 10/2/08. The facility was appeared to be in compliance with all requirements of air permit 01660T57 at that time.

8. Facility Emissions Review

The following table represents facility wide emissions. Actual emissions are for year 2007 as reported by the facility in its emissions inventory and the potential emissions are from the application.

Pollutant	Actual Emissions (tons per year)	Potential Emissions (tons per year)
Particulate (TSP)	64	248.7
Particulate (PM-10)	57	198
Carbon Monoxide	35	126
Nitrogen Oxides	1	449
Sulfur Dioxide	311	2,387
Volatile Organic Compounds	375	504
Single largest HAP (HCl)	5.1	< 10
All HAPs (combined)	15.6	< 25

9. Stipulation Review

The following describes the changes to be performed to the current permit 01660T58:

Old Page No.	New Page No.	Condition No.	Changes
Insignificant Activity List		Section 1 Table Section 2.4	Remove insignificant activities “IS-1.1, IS-1.2, IS-2.1, IS-2.2, IS-3, IS-7, IS-8” from the list and include them in Section 1 Table and Section 2.4 “Actuals PAL”. In addition, include three new oil storage tanks with ID ES-11, ES-12 and ES-13 in Section 1 Table and Section 2.4.
Various	Various	Entire Permit	Change 2D .0958 requirement from Section 2.2 D.1. to Section 2.2 A.1. Change 2D .1806 requirement from Section 2.2 D.2. to Section 2.2 A.2. Change 2Q .0711 requirement from Section 2.2 D.3. to Section 2.2 A.3. Change 2D .1100 requirement from Section 2.2 D.4. to Section 2.2 A.4. Change 2Q .0317 requirement (MACT avoidance) from Section 2.2 F. to Section 2.2 A.5.
-	Various	Entire Permit	Include new applicable requirement as Section 2.4 “Actuals PAL” throughout the permit in various section tables.
Various	Various	Entire Permit	Update the citation for Testing condition to “15A NCAC 2D .2601”.
7	7	Section 2.1 A.2.c.	Update visible emissions monitoring condition.
10 and 11	10	Section 2.1 B.2.c. and d.	Update visible emissions monitoring conditions.
12	-	Section 2.1 C.2.	Remove this PSD avoidance condition for VOC.
19	19	Section 2.1 F.2.c.	Update visible emissions monitoring condition.
23	22	Section 2.1 H.3.c.	Update visible emissions monitoring condition.
28	-	Section 2.1 J.5.	Remove PSD avoidance condition for VOC only.
33 through 37	-	Section 2.2 A., B., and C.	Remove these PSD avoidance conditions for VOC.
-	39 through 44	Section 2.4	Include this new requirement for Actuals PAL for VOC.
45 through 53	45 through 54	Section 3	Update General Conditions.

10. Public Notice / EPA and Affected States Review

Pursuant to 40 CFR 51.166(w)(5) “Public Participation Requirements for PALs” and 15A NCAC 2Q .0521 “Public Participation”, a notice of the PROPOSED Title V Permit containing approval of PROPOSED PAL permit will be placed in the local newspaper (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 will also be sent to persons on the Title V mailing list.

Based upon the EPA's current policy, the proposed Title V permit for this facility will be sent to EPA for their 45-day review, simultaneously with noticing it in the newspaper for 30-day public review. The final permit will also be provided to EPA after issuance.

Also pursuant to 2Q .0522, a notice of the proposed Title V Permit will be sent to each affected State at or before the time notice provided to the public under 2Q .0521 above.

11. Conclusions, Comments, and Recommendations

- This application does not include approval for any new control device or a modification to any existing control device. Hence, PE seal requirement is not applicable.
- This application does not include any new source or control device or a modification to any existing equipment. Hence, local zoning consistency is not required for the proposed changes.
- The draft permit was sent to RRO on May 19, 2009 for review and comments. Charles McEachern replied on 5/26/09 as follows:

“I have looked over the draft permit and review for this facility and have no comment. Note that I have no familiarity with the PAL rule and don't have time to study it, so I will trust that you guys know what you are doing – it appears you have covered all the VOC emissions sources.”

- The draft permit was sent to company for review and comments on May 19, 2009. The company (consultant) responded on 5/29/09 with several comments/clarifications (The company comments from the RO were received via email on 6/3/09). The following provides company comments and DAQ response on each:

Company Comment 1:

In Section 2.1 A. Table, include 2D .0958 as an applicable requirement.

DAQ Response:

Agreed. This change will be made.

Company Comment 2:

Change the citation for opacity compliance method from 2D .2601 to .2610 in various sections of the permit.

DAQ Response:

DAQ agrees with the company that the opacity testing requirements including the Method 9 is included in rule 2D .2610. However, as a matter of policy, DAQ will continue using rule 2D .2601 “Purpose and Scope” for any requirement referring to compliance demonstration or stack testing for any pollutant.

No change to the draft permit will be made.

Company Comment 3:

In Section 2.1 J. Table, clarify that the PSD avoidance requirement is for PM/PM10, SO₂, CO, and NO_x.

DAQ Response:

Agreed. This change will be made.

Company Comment 4:

Include in Section 2.4, “PAL” as a prefix for “Emissions Units”.

DAQ Response:

Agreed. This change will be made in the entire Section 2.4.

Company Comment 5:

Include suffix “emissions units” for all PAL emissions units in the Section 2.4 a. Table. For example, instead of “Mixing”, modify it to read “Mixing Emissions Units”.

DAQ Response:

Agreed. This change will be made in Section 2.4 a. Table.

Company Comment 6:

Modify “Coating/Solvent” to read “Plantwide Coating/Solvent Emissions Units” and include ES-6 as permitted emissions unit in Section 2.4 a. Table.

DAQ Response:

Agreed. These changes will be made to the draft permit.

Company Comment 7:

Remove “Miscellaneous” emissions units from Section 2.4 a. Table.

DAQ Response:

Agreed. This change will be made to the draft permit.

Company Comment 8:

Include a condition underneath the Section 2.4 a. Table to state that the permittee can make changes to the existing emissions units or add to the existing units without requiring a significant modification to the PAL permit, if the emissions from the modified emissions units or the new emissions units are to be calculated using the approved (existing) monitoring methods and the actual VOC emissions remain below the PAL limit of 505 tons.

DAQ Response:

Agreed. This language will be included with a change: “modification” and not “significant modification”.

Company Comment 9:

In Section 2.4 e., remove the word “testing” and make it just “revalidation”. Also, include a language to state that if any emission factors are revised, the Permittee first needs to have the revised factors approved by DAQ through a modification to the permit before relying on it for compliance.

DAQ Response:

Agreed. This change will be made.

Company Comment 10:

In Section 2.4 g., remove air compressor, and peak shaving/emergency generators from a requirement to track fuel usage. This is not needed because the monitoring for hours of operation for these equipment will be sufficient which is already included in Section 2.4 h.

DAQ Response:

Agreed. These equipment will be removed from the requirement in Section 2.4 g.

Company Comment 11:

Remove the words “when ethanol producing pigment process (EPP) is not used” in Section 2.4 j. because the emission calculations in this section do not replace mixing emission calculations when EPP is used.

DAQ Response:

Agreed. This change will be made.

Company Comment 12:

In Section 2.4 j. through s., replace “at” with “after” for calculations of VOC emissions for different emissions units.

DAQ Response:

Agreed. This change will be made.

Company Comment 13:

In Section 2.4 r., correct the emission factor for all diesel-fired internal combustion engines (compressors, peak shaving/emergency generators/emergency fire pump engines) as per Section 3.3 of AP-42 instead of Section 3.4. In brief, include VOC emission factor of 0.00251 lb/hp-hr for these equipment.

DAQ Response:

Agreed. This change will be made.

Company Comment 14:

In Section 2.4.t, include the following language:

“Notwithstanding the foregoing, the Permittee may consider actual production or operating data in determining its emissions for such a period if the Permittee has written records of such data and if the data are substantially the same as or similar in form or content to the monitoring data required by the PAL permit.”

DAQ Response:

Agreed. This change will be made.

Company Comment 15:

In Section 2.4.w, include the following language:

“This requirement applies only to the data used to certify compliance with the terms of the actuals PAL permit in Section 2.4 of this permit and does change the record retention requirements for data relied upon to certify compliance with the Part 70 Title V Permit terms in Sections 2.1, 2.2 and 3 of this permit.”

DAQ Response:

Agreed. DAQ will clarify that the Permittee needs to keep records for 15 years (PAL effective period plus five years) for the data used to certify compliance with the terms of the PAL permit only.

Company Comment 16:

Modify Section 2.4.x.iii. to state “revalidation” instead of “test or method”.

DAQ Response:

Agreed. This change will be made.

- This engineer recommends issuing the revised permit after the completion of public comment and EPA review periods.