

Air Permit Review

Permit Issue Date: ??, 2010

Region: Raleigh Regional Office
County: Northampton
NC Facility ID: 6600166
Inspector's Name: Will Wike
Date of Last Inspection: 01/12/2010
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Fineline Industries East, Inc. Facility Address: Fineline Industries East, Inc. 400 Cherry Street Woodland, NC 27897 SIC: 3732 / Boat Building And Repairing NAICS: 336612 / Boat Building Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: N/A NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: 15A NCAC 2D .1109 <i>[112(j) – Part 2 MACT Hammer for Boilers & Process Heaters]</i>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 6600166.09A Date Received: 09/08/2009 Application Type: 112(j) Part I Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 09482/T02 Existing Permit Issue Date: ?? Existing Permit Expiration Date: 10/31/2015
Les Clark General Manager (252) 587-0405 400 Cherry Street Woodland, NC 27897	Les Clark General Manager (252) 587-0405 400 Cherry Street Woodland, NC 27897	Paul Zawila P.E. (864) 980-0168 8403 Hornwood Court Charlotte, NC 29649	
Review Engineer: Brian Bland Review Engineer's Signature: _____ Date: ??, 2010		Comments / Recommendations: Issue 09482/T03 Permit Issue Date: ??, 2010 Permit Expiration Date: October 31, 2015	

I. Purpose of Application

Fineline Industries East, Inc. operates a fiberglass boat production facility located in Woodland, Northampton County, North Carolina. Application No. 6600166.09A, received September 8, 2009, is a Part 2 MACT "Hammer" application for one (1) No. 2 fuel oil boiler rated at 2.9 MMBtu/hr.

Permit Modifications/Changes

The following table describes the modifications to the current permit.

Page(s)	Section	Description of Change(s)
1 - 27	All	Updated permit revision number and permit issuance date.
3	Section 1	Moved boiler B-01 from insignificant activities to permitted emission sources
3	Section 1	Added "2D .1100 Case-by-Case MACT" designation to boiler B-01
6-7	Section 2.1 D (and table)	Added .0503, .0516 and .0521 language for boiler B-01. Added 112(j) MACT Hammer language/requirements for boiler B-01.

II. Regulatory Review

1. 15A NCAC 2D .1109 –Case-by-Case MACT – On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General's office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT "hammer" provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On September 14, 2009, the NC DAQ received a Part 2 MACT "Hammer" application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ's recommendations.

No control technologies for the control of CO, metals, Hg, or HCl were identified for natural gas or No. 2 fuel oil-fired boilers in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA's AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas combustion sources of this size, consistent with the provisions in CAA § 112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boiler as follows:

To assure compliance, the Permittee shall perform an annual boiler inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:

- i. Inspect the burner, and clean or replace any components of the burner as necessary;
 - ii. Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,
 - iii. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.
- The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected boilers are not inspected and maintained as required above.

In addition, the Permittee will be required to record the results of the annual inspection in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

III. Draft Permit Review Summary

Charles McEachern of the Raleigh Regional Office was provided a draft permit and draft permit review document on November 2, 2010. The RRO recommends issuance of the revised permit.

Les Clark of Fineline Industries East, Inc was provided a draft permit for review on and draft permit review document on November 2, 2010.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on November 2, 2010. <SUMMARY OF COMMENTS>.

IV. Recommendations

This permit modification application for Fineline Industries East, Inc located in Woodland, Northampton County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Issue Permit No. 09482/T03