

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date:**

**Region:** Asheville Regional Office  
**County:** Caldwell  
**NC Facility ID:** 1400101  
**Inspector's Name:** Patrick Ballard  
**Date of Last Inspection:** 10/28/2004  
**Compliance Code:** 4/In Compliance - Certification

<b>Facility Data</b>			<b>Permit Applicability (this application only)</b>		
<b>Applicant (Facility's Name):</b> Meridian Automotive Systems, Inc.  <b>CDS No.:</b> 3702700101  <b>Facility Address:</b> Meridian Automotive Systems, Inc. 601 Hibriten Drive SW Lenoir, NC 28645  <b>SIC:</b> 3083 / Laminated Plastics Plate And Sheet <b>NAICS:</b> 32613 / Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V			<b>SIP:</b> 2D .0503, .0515, .0516, .0521, and .0958 <b>NSPS:</b> <b>NESHAP:</b> 2D .1111 (MACT Subpart WWWW) <b>PSD:</b> <b>PSD Avoidance:</b> <b>NC Toxics:</b> 2D .1100, 2Q .0705 and .0711 <b>112(r):</b> <b>Other:</b> 2D .1806 (Odor – State only)		
<b>Contact Data</b>					
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			<b>Application Data</b>		
			<b>Application Number:</b> 1400101.00A <b>Date Received:</b> 03/27/2000 <b>Application Type:</b> Modification <b>Application Schedule:</b> TV-1st Time <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 04667/R11 <b>Existing Permit Issue Date:</b> 12/28/2004 <b>Existing Permit Expiration Date:</b> 05/31/2007		
<b>Review Engineer:</b> Jeff Twisdale			<b>Comments / Recommendations:</b>		
<b>Review Engineer's Signature:</b>		<b>Date:</b>		<b>Issue</b> 04667/T12 <b>Permit Issue Date:</b> <b>Permit Expiration Date:</b>	

**I. Introduction**

The U.S. Environmental Protection Agency (EPA) has given final approval to North Carolina's Title V operating permits program effective on October 1, 2001. This EPA approval triggered the requirements for Title V facilities to submit permit applications to the Division of Air Quality (DAQ). Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA.

This 1<sup>st</sup> Time Title V Air Permit Application Review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the DRAFT Title V operating permit. The primary source of information used to construct the DRAFT permit is the above referenced air permit application.

## II. Background Information

The DRAFT Title V operating permit will replace an existing Air Quality Construction and Operation Permit No. 04667R11 that was issued on December 22, 2004 and is currently scheduled to expire on May 31, 2007.

Pursuant to 15A NCAC 2Q .0504 Meridian Automotive Systems submitted its Title V application to the DAQ on March 27, 2000. The application was considered complete for processing on June 23, 2006. The DRAFT permit will go through the public notice process pursuant to 15A NCAC 2Q .0521.

## III. Facility Description

This facility manufactures plastic automotive parts (e.g. engine and valve covers, fan shrouds) from Azdel (a polypropylene/ fiberglass composite) and from Sheet Molding Compound "SMC" (a polystyrene resin/fiberglass composite), and has recently added plastic home construction molding (e.g. shower pans and air conditioning bases). The facility is Title V for Hazardous Air Pollutant (HAP) emissions since styrene emissions from the processing of SMC are greater than 10 tons per year. No styrene emissions are assumed from the processing of Azdel (polypropylene/fiberglass composite).

## IV. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on its latest inspection, the facility was in compliance with all applicable requirements. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

## V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the Title V Operating Permit is being issued:

<b>Emission Source ID</b>	<b>Emission Source Description</b>	<b>Control System ID</b>	<b>Control System Description</b>
101 through 105, 107, 110 through 116, and 119 through 122 <b>MACT Subpart WWWW</b>	17 thermosetting presses including press release and cleaning activities installed on a sheet molding compound (SMC) processing operation	N/A	N/A
ES-2	Plastic parts sanding/drilling/ etching operations <i>associated w/ parts molded in thermosetting presses (ID Nos. 105, 107, 110 - 116 and 119 - 122)</i>	CD-2	One bagfilter (4,710 square feet of filter area)
ES-3	Plastic parts sanding/drilling/ etching operations <i>associated w/ parts molded in thermosetting presses (ID Nos. 101 - 104)</i>	CD-3	One bagfilter (4,210 square feet of filter area)
B-1 and B-2	Two No. 2 fuel oil/natural gas-fired boilers (3.4 million Btu per hour each)	N/A	N/A
OV-C	One natural gas-fired curing oven (0.8 million Btu per hour maximum heat input)	N/A	N/A

## VI. Emission Source-by-Source Evaluation

### A. Two No. 2 fuel oil/natural gas-fired boilers (ID Nos. B-1 and B-2)

#### 1. Description

The two boilers manufactured in 1998 typically burn natural gas with No. 2 fuel oil as backup. Since the boiler heat inputs are each less than 10 million Btu per hour, NSPS Subpart Dc does not apply.

#### 2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.6 pounds per million Btu heat input	15A NCAC 2D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Visible emissions	20 percent opacity	15A NCAC 2D .0521

The boilers are subject to the regulations listed above. The criteria pollutant emissions from the combustion of No. 2 fuel oil (worst case) and natural gas are estimated by the attached spreadsheets. Therefore, compliance is demonstrated with above standards since the emission rates are less than the allowable emission rates. See below for a more thorough analysis.

#### a. 2D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"

##### i. Regulatory Analysis

These boilers are subject to 2D .0503 since natural gas or No. 2 fuel oil can be burned for the primary purpose of producing heat by indirect heat transfer. The allowable emission rate is a function of maximum, plant-wide, indirect-fired heat exchanger heat input from non-wood fuels and is calculated by the following equation:

$$E = 1.090 * Q^{-0.2594}$$

where E = allowable particulate emission rate (pounds per hour), and  
Q = maximum heat input rate in million Btu per hour

These boilers were established after the effective date of the regulation (February 1, 1983). The maximum heat input of all non-wood fuel burning indirect-fired heat exchangers in existence at the plant site (Q = 6.8 million Btu per hour) at the time of original permitting for the boilers was used to calculate the allowable emission limit (E = 0.66 pounds per million Btu) for these boilers.

Worst case particulate matter emissions are estimated to be less than 0.6 pounds per million Btu (actually 1.5E-2 pounds per million Btu), based on the 5th edition of AP-42 and the heat input for these boilers. Therefore, compliance is indicated since potential emissions are less than the allowable limit.

##### ii. Monitoring/Recordkeeping/Reporting Requirements

Since potential emissions are less than allowable emissions, no monitoring, recordkeeping or reporting is required.

b. 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

i. Regulation Analysis

These boilers are sources of emissions from combustion that discharges through a stack, and therefore, is subject to 2D .0516(a). Allowable emissions from these sources while firing natural gas or No. 2 fuel oil shall not exceed 2.3 pounds per million Btu heat input.

Natural gas, although containing sulfur compounds, is an inherently low sulfur emitting fuel. The maximum sulfur content of No. 2 fuel oil is normally 0.5% by weight. The worst case sulfur dioxide emissions (1.72 lb/hr) based on No. 2 fuel oil with a sulfur content of 0.5%, are 0.51 pounds per million Btu heat input. Compliance is indicated with this regulation since the estimated emissions are less than the allowable.

ii. Monitoring/Recordkeeping/Reporting Requirements

No monitoring, recordkeeping or reporting is required when firing natural gas or No. 2 fuel oil in these boilers.

c. 2D .0521 “Control of Visible Emissions”

i. Regulation Analysis

These boilers were established after July 1, 1971 (actually in 1998) and are subject to 2D .0521(d). Per this regulation, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period except that six-minute period averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. Compliance with this regulation should be indicated since the particulate matter emissions are basically insignificant (0.05 pounds per hour).

ii. Monitoring/Recordkeeping/Reporting Requirements

No monitoring, recordkeeping or reporting is required when burning natural gas or No. 2 fuel oil in this boiler.

**B. One natural gas-fired curing oven (ID No. OV-C)**

1. Description

The oven burns natural gas and cures a 2-part silicon adhesive at 360 degrees Fahrenheit.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Volatile organic compounds	Work practice standards (facility-wide)	15A NCAC 2D .0958
Toxic air pollutants (xylene)	<b>State-enforceable Only</b> (less than TPERS)	15A NCAC 2D .0705
Odorous emissions	<b>State-enforceable Only</b> Prevent odorous emissions from the facility	15A NCAC 2D .1806

a. 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

i. Regulation Analysis

The curing oven is source of emissions from combustion which discharges through a stack, and therefore, is subject to 2D .0516(a). Allowable emissions from this source while firing natural gas shall not exceed 2.3 pounds per million Btu heat input. Natural gas, although containing sulfur compounds, is an inherently low sulfur emitting fuel. Therefore, compliance is indicated.

ii. Monitoring/Recordkeeping/Reporting Requirements

No monitoring, recordkeeping or reporting is required when firing natural gas in the curing oven.

b. 2D .0958 “Work Practices for Sources of Volatile Organic Compounds”

i. Regulation Analysis

This emission source discharges VOCs to the atmosphere due to the curing of the adhesive for the plastic (SMC) molding process. Therefore, this emission source is subject to 2D .0958 and shall follow work practices that reduce the potential emission of VOCs.

Compliance should be demonstrated with this regulation since the work practices are generally housekeeping requirements for usage, clean up and storage of VOCs. Minimum monitoring/record keeping/reporting is required for compliance with the work practices.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. The results of the inspections shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request.

iii. Reporting Requirements

A summary report of monitoring shall be submitted by January 30th and July 30th of each year.

c. 2Q .0705 “Existing Facilities and SIC Calls” **State only Requirement**

i. Regulation Analysis

The adhesive contains a toxic air pollutant (TAP) that is emitted during curing process. The actual emission rate of xylene was estimated to be 270 pounds per year from the emission inventory. Therefore, compliance should be demonstrated with this regulation since the estimated actual emission rate is significantly less than the Toxic Permit Emission Rates (TPERs) per 2Q .0711. Also, note that styrene has been previously modeled and demonstrated compliance with 2D .1100.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall maintain records (at the facility) of operational information sufficient for demonstrating to DAQ staff that actual TAPs are less than the TPERs listed in 2Q .0711.

iii. Reporting Requirements

No reporting required *unless* the TPERs are exceeded, and an air permit to emit TAPs and for demonstrating compliance with the requirements of 2D .1100 is needed.

d. 2D .1806 [Control and Prohibition of Odorous Emissions] State only Requirement

i. Regulation Analysis

The Permittee shall prohibit (and control if necessary) objectionable odorous emissions. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility’s boundary. Since there was no mention of odor complaints and/or violations in the most recent inspection report, the facility is assumed to be operating in compliance with the regulation. No monitoring/ record keeping or reporting is required for compliance.

C. 17 thermosetting presses (ID Nos. 101 - 105, 107, 110 – 116 and 119 - 122) including press release and cleaning activities installed on a sheet molding compound (SMC) processing operation

1. Description

The thermosetting presses utilize tools to shape charges of SMC with heat and pressure.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
Volatile organic compounds	Work practice standards	15A NCAC 2D.0958
Toxic air pollutants	<b>State-enforceable Only</b> 39.05 pounds per hour	15A NCAC 2D .1100
Hazardous air pollutants	Work practice standards - See Section VIII	15A NCAC 2D .1111 (40 CFR 63 Subpart WWWW)
Odorous emissions	<b>State-enforceable Only</b> Prevent odorous emissions from the facility	15A NCAC 2D .1806

a. 2D .0958 “Work Practices for Sources of Volatile Organic Compounds”

i. Regulation Analysis

These emission sources discharge VOCs (primarily styrene) to the atmosphere due to the use of styrene as a catalyst for the plastic (SMC) molding process. Therefore, these emission sources are subject to 2D .0958 and shall follow work practices that reduce the potential emission of VOCs.

Compliance should be demonstrated with this regulation since the work practices are generally housekeeping requirements for usage, clean up and storage of VOCs. Minimum monitoring/ record keeping/reporting is required for compliance with the work practices.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. The results of the inspections shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request.

iii. Reporting Requirements

A summary report of monitoring shall be submitted by January 30th and July 30th of each year.

b. 2D .1100 “Control of Toxic Air Pollutants” State only Requirement

i. Regulation Analysis

SMC contains a toxic air pollutant (styrene) that is emitted during molding of the uncured resin into plastic parts. The total potential emission rate of styrene is 39.05 pounds per hour for all presses considering 13% styrene in the SMC with 3.6% loss based on empirical data and a maximum SMC usage rate per press.

Compliance should be demonstrated with this regulation since the modeled emission rate is significantly less than the AAL. The Permittee will be required to report the highest hourly emission rate (in pounds per hour) achieved over the previous semiannual period to ensure compliance with 2D .1100. Note that ARO requested relaxation of frequency from quarterly.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall monitor the styrene content in the SMC and the hourly SMC production rate. The Permittee shall maintain records of this operational information, in written or electronic format, on site for a minimum of 3 years, and those records shall be made available to an authorized representative upon request.

iii. Reporting Requirements

For the respective semiannual periods, the maximum one-hour styrene emissions from the thermosetting presses, the maximum one-hour facility-wide SMC production rate, and the maximum styrene content in the SMC processed shall be submitted to the Regional Supervisor, DAQ by January 30th and July 30th of each year.

c. 2D .1806 “Control and Prohibition of Odorous Emissions” State only Requirement

ii. Regulation Analysis

The Permittee shall prohibit (and control if necessary) objectionable odorous emissions. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility’s boundary. Since there was no mention of odor complaints and/or violations in the most recent inspection report, the facility is assumed to be operating in compliance with the regulation. No monitoring/ record keeping or reporting is required for compliance.

**D. Two plastic parts sanding/drilling/etching operations (ID Nos. ES-2 and ES-3) and two associated bagfilters (ID Nos. CD-2 and CD-3)**

1. Description

Plastic parts are sanded/drilled/etched for the required holes/designs of the newly molded plastic parts. Particulate matter emissions are emitted from these sources, and there is concern that styrene is emitted due to deflashing. Stack testing for styrene emissions will still be required in the Title V permit.

- a. **one pulse jet-type bagfilter (4,710 square feet of filter area; ID No. CD-2) installed on plastic parts sanding/drilling/etching operation (ID No. ES-2)** – These units (22 total stations) are mobile (temporary hook-ups to the dust collection system) and are moved between the associated thermosetting presses (ID Nos. 105, 107 110 – 116, and 119 – 122).
- b. **one reverse air-type bagfilter (4,210 square feet of filter area; ID No. CD-3) installed on plastic parts sanding/drilling/etching operation (ID No. ES-3)** – These units (including 3 drilling, 4 sanding and 5 etching stations) are mobile (temporary hook-ups to the dust collection system) and are moved between the associated thermosetting presses (ID Nos. 101 – 104).

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where E = allowable emission rate in pounds per hour and P = process weight in tons per hour	2D .0515
Visible emissions	20 percent opacity	2D .0521
Toxic air pollutants	<b>State-enforceable Only</b> 1.31 pounds per hour	2D .1100

- a. 2D .0515 “Particulates from Miscellaneous Industrial Processes”

i. Regulation Analysis

The allowable particulate emission limit is calculated by the following equation:

$$E = 4.10 P^{0.67}$$

where E = allowable emission rate for particulate matter in pounds per hour, and

P = process weight in tons per hour

The particulate matter (PM) emission estimates are based on worst case process scenario. The maximum process rate of plastic parts into the units (ID Nos. ES-2 and ES-3), 3.61 tons per hour as given in the application, is used to calculate the allowable emission rate of 9.69 pounds per hour. The applicant estimates the uncontrolled PM emissions were estimated at 0.015 lb/part or 3 lb/ton of plastic processed. At a maximum production rate of 3.61 tph, uncontrolled PM emissions are estimated at 10.83 lb/hr (47.4 tpy), with controlled PM emissions estimated at 0.043 lb/hr (0.19 tpy). All controlled PM is assumed to be PM<sub>10</sub>. Therefore, compliance is demonstrated with this regulation with adequately designed control.

### Bagfilter Design

According to the application, the bagfilter (ID No. CD-2) is a pulse jet collector with automatic cleaning. The filter area is 4,710 square feet with airflow of 80,000 CFM for an air-to-cloth ratio of 16.9:1. This air-to-cloth ratio is slightly higher than the typical range of 5:1 to 14:1 for this type of design. The application states that the bagfilter is equipped with felted filter cloth bags with an efficiency of 99.5 percent for PM down to 0.8 microns (compared to the stated 99.6 percent in the application). The particle size distribution, also provided, indicates that only 0.09 percent of the incoming stream is expected to be 0.8 microns or below in size. Therefore, the bagfilter is adequately designed.

According to the application, the bagfilter (ID No. CD-3) is a reverse flow design with automatic cleaning. The filter area is 4,210 square feet with airflow of 20,600 CFM for an air-to-cloth ratio of 5:1. This air-to-cloth ratio is slightly above the typical ratio of 4:1 for this type of design. The application states that the bagfilter is equipped with felted polyester bags, and efficiency is estimated at a conservative 99 percent in the application. The particle size distribution indicates that 100 percent of the incoming stream is expected to be 10 to 25 microns in size. Therefore, the bagfilter is adequately designed.

#### ii. Monitoring/Recordkeeping Requirements

A monthly visual inspection of the system ductwork, bagfilters, and material collection unit for leaks as well as an annual internal inspection of the bagfilters' structural integrity will be required. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. Stack testing is not required to ensure compliance with this regulation. However, the test method condition will be put in the permit in the event that DAQ or EPA finds that due to improper operation violations, etc., source testing is required.

#### iii. Reporting Requirements

A summary report of the monitoring will be submitted by January 30 and July 30 of each year. The Permittee shall also submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.

### b. 2D .0521 "Control of Visible Emissions"

#### i. Regulation Analysis

The plastic parts sanding/drilling/etching operations were manufactured after July 1, 1971, and therefore are subject to 2D .0521(d) since the start-up of this facility was 1980 and the additional equipment (ID No. ES-3) was relocated from Meridian's Newton Plant. Per this regulation, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period except that six-minute period averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. During the last couple of inspections, no visible emissions have been observed from similar sources and/or the bagfilters. There are no violations of 2D .0521 indicated in past inspection reports, and continued compliance is expected.

#### ii. Monitoring Requirements

The Permittee will either observe the emission points of the sources once a month for visible emissions above normal. The Permittee will establish normal for the sources in the first 30 days following permit issuance. Monthly observations should provide reasonable assurance of compliance.

iii. Recordkeeping Requirements

The results of the observations and tests along with any corrective actions taken to reduce visible emissions shall be recorded in a logbook (written or electronic format).

iv. Reporting Requirements

A summary report of the observations will be submitted by January 30 and July 30 of each year.

c. 2D .1100 "Control of Toxic Air Pollutants" State only Requirement

i. Regulation Analysis

SMC contains a TAP (styrene) that is emitted during molding of the uncured resin into plastic parts (see above under Section C. for the thermosetting press analysis for more details). There is concern that styrene is emitted due to sanding and/or deflashing of these plastic parts. Styrene emissions were not estimated from these sources in the application; however, a previous modification for installation of similar equipment and control (ID Nos. ES-2 and CD-2) estimated styrene emissions using an emission factor derived from flame ionization detector (FID) testing of the bagfilter exhaust (See Laura Herbert's review dated June 19, 2002 for Permit No. 04667R10). Using this maximum flow rate and the styrene concentration (0.87 ppm average) as a basis for emission calculations, the maximum emission rate for styrene was calculated at 1.11 lb/hr. Note that modeling was done at an emission rate of 1.31 lb/hr based on production during the testing and a derived emission factor of 0.363 lb styrene/ton SMC (most conservative factor). During the testing, production was ~5,300 lbs/hr. Using the corrected emission rates, the emission factor was 0.2872 lb styrene/ton of SMC processed. Therefore, the total allowable emission rate of styrene is 1.31 pounds per hour for all sanding/drilling/ etching operations based a maximum SMC process rate of 3.61 tons per hour.

Compliance should be demonstrated with this regulation since the modeled emission rate is significantly less than the AAL. The Permittee will be required to report the highest hourly SMC production rate (in tons per hour) achieved over the previous semiannual period to ensure compliance with 2D .1100. Note that ARO requested relaxation of frequency from quarterly. Also, note that stack testing on the existing sanding/drilling/etching operations is still required and should provide a better estimation of styrene emissions from the sanding/drilling/etching operations. The test results shall be submitted to Regional Supervisor, DAQ by January 1, 2007.

ii. Monitoring/Recordkeeping Requirements

The Permittee shall monitor the styrene content in the SMC and the hourly SMC production rate. The Permittee shall maintain records of this operational information, in written or electronic format, on site for a minimum of 3 years, and those records shall be made available to an authorized representative upon request.

iii. Reporting Requirements

For the respective semiannual periods, the maximum one-hour styrene emissions from the thermosetting presses, the maximum one-hour facility-wide SMC production rate, and the maximum styrene content in the SMC processed shall be submitted to the Regional Supervisor, DAQ by January 30th and July 30th of each year.

## **VIII. MACT Applicability and Requirements**

Based on a review of the facility's current operations and emission sources, the facility is subject to 40 CFR 63 (MACT) Subpart WWWW for Reinforced Plastic Composites Production. Since the facility has greater than 10 tpy of any HAP (styrene), the facility is considered to be a major source of HAPs. Therefore, MACT Subpart WWWW does apply (specifically work practice standards for SMC thermosetting presses that are considered to be closed molding processes). The work practice standards (ref. 40 CFR 63.5805(b) and Table 4 of MACT Subpart WWWW) require the Permittee to uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. The Permittee shall conduct weekly inspections to verify that the work practice requirements are actually being implemented and record the results of these inspections in a form (e.g. logbook) suitable for inspection. The logbook shall include the results of the monitoring (e.g. weekly inspections) and a certified statement that the Permittee is in compliance with the work practice standards. The logbook shall be kept on-site and made available to an authorized representative upon request. The Permittee shall submit a semiannual summary report of the monitoring and recordkeeping requirements (including a statement that there were no deviations from the requirements of the work practice standards OR the information in 40 CFR 63.5910(d) if there was a deviation from any work practice standard during the reporting period) by January 30<sup>th</sup> and July 30<sup>th</sup>.

Since Meridian is an existing source for MACT Subpart WWWW, compliance should have been demonstrated with the MACT by April 21, 2006. In accordance with 40 CFR 63.5860(a) and Table 9 of MACT Subpart WWWW, Meridian shall submit a certified statement in the notice of compliance status that only one charge is uncovered, unwrapped or exposed per mold cycle per compression/injection molding machine. In accordance with 40 CFR 63.5900(a), Meridian shall demonstrate continuous compliance with work practice standards by performing the work practice required for closed molding operation.

## **IX. NSPS, PSD/NSR, CAM, 112(r)**

### **NSPS**

New Source Performance Standards (NSPS) do not apply to this facility.

### **PSD/NSR Issues**

This facility is currently classified as minor for PSD/NSR purposes. This facility is located in Caldwell County that is currently in attainment for all pollutants except ozone; however, Caldwell County is part of the Early Action Compact (EAC) that defers designation of nonattainment for ozone until December 2007. The minor source baseline has not been triggered in Caldwell County for any regulated pollutants.

### **CAM**

This modification is not subject to Compliance Assurance Monitoring (CAM) since the sanding/drilling/etching operations (ID Nos. ES-2 and ES-3) are not considered to be major Pollutant Specific Emission Units (PSEUs) and do not have an uncontrolled potential to emit (47.4 tpy) greater than 100 tpy of PM.

### **112r**

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

## **X. Permit Shield (including non-applicable requirements)**

In accordance with 2Q .0512 the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists then it shall be presumed not to provide such a shield.

## **XI. Other Applicable Requirements**

None

## **XII. General Conditions**

The "General Conditions" section of the Title V Operating Permit lists additional applicable rule requirements that the Permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, severability, etc.

## **XIII. Insignificant Activities**

The insignificant activities listed in the application have been reviewed and verified. Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.

## **XIV. Public Notice**

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Operating Permit will 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 will be sent to persons on the Title V mailing list, the counties of Buncombe, Forsyth and Mecklenburg, the states of Tennessee, South Carolina and Virginia, and EPA.

## **XV. Recommendations**

Meridian's Title V application has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. DAQ has made a preliminary determination that the facility is complying or will achieve compliance as specified in the draft permit with all applicable requirements. A draft permit was forwarded to Mr. Patrick Ballard of ARO, and Mr. Aaron Swartley of Meridian, on June 23, 2006 for their review. No adverse comments were received. Therefore, DAQ proposes to issue the Title V Operating Permit once the public and EPA review periods have closed.