

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Mooresville Regional Office
County: Stanly
NC Facility ID: 8400012
Inspector's Name: Jim Westmoreland
Date of Last Inspection: 07/07/2005
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Michelin Aircraft Tire Corporation Facility Address: Michelin Aircraft Tire Corporation 40589 South Stanly School Road Norwood, NC 28128 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: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 8400012.06A Date Received: 11/02/2005 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05835/T13 Existing Permit Issue Date: 09/05/2002 Existing Permit Expiration Date: 08/31/2007
Donald Matthews Safety and Environmental Manager (704) 474-7726 40589 South Stanly School Road Norwood NC, 28128	Clarence Kegler Plant Manager (704) 474-7757 40589 South Stanly School Road Norwood NC, 28128	Donald Matthews Safety and Environmental Manager (704) 474-7726 40589 South Stanly School Road Norwood NC, 28128	
Review Engineer: Ken Babb Review Engineer's Signature: _____ Date: _____		Comments / Recommendations:	
		Issue 05835/T14 Permit Issue Date: Permit Expiration Date:	

1. Purpose of Application

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (05835T13) was issued on September 5, 2002 and was scheduled to expire on August 31, 2007. The renewal application was received 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. The renewal request has been consolidated with an earlier name change request.

2. Facility Description

This facility manufactures aircraft tires for use in the aviation industry. The facility currently produces approximately 600 tires per day, or 1.2 million pounds of tires per month. No Banbury operations are located at this particular facility. All compounds arrive for use "pre-mixed." The facility currently operates three eight-hour shifts, five days per week, 50 weeks per year, and employs approximately 370 people.

3. Application Chronology

The application chronology is detailed on the attached IMPAQ Comprehensive Application Report.

4. Permit Modification/Changes

No changes have been made to the permit since the issuance of the initial Title V permit. However, several changes need to be made to the permit at this time. As mentioned above, the facility has previously submitted an application for a name change. Also, after several years of opacity observations with no violations, some lessening of frequency of observation is warranted. Finally, the two methods of showing compliance with the 250 ton sulfur dioxide emissions limit in the current permit (limit on No. 6 Fuel oil use and calculation of emissions) are redundant. Because the fuel oil use limit is low enough that the 250 ton limit on sulfur dioxide emissions could never be exceeded no matter how much natural gas is combusted, the fuel oil use limit is sufficient by itself. It will be the only method of showing compliance used in the new permit.

Old Page No.	New Page No.	Condition No.	Change
Letter and page 1	Letter and Page 1	Title Page	Revised Facility Name
Page 5	Page 5	B.2.c	Changed monitoring frequency from weekly to semiannual
Page 9	Page 8	C.2.c	Changed monitoring frequency from weekly to monthly
Page 11	Page 10	D.3.c	Changed monitoring frequency from weekly to monthly
Pages 12-13	Page 10	D.4	Edited to remove redundant compliance method

5. Regulatory Review

The facility is subject to the following regulations:

- 2D .0503 Particulates from Fuel Burning Indirect Heat Exchangers
- 2D .0515 Particulates from Miscellaneous Industrial Processes
- 2D .0516 Sulfur Dioxide Emissions from Combustion Sources
- 2D .0521 Control Of Visible Emissions
- 2D .0524 New Source Performance Standards (Subpart BBB)
- 2D .0530 Prevention of Significant Deterioration
- 2D .0958 Work Practices for Sources of Volatile Organic Compounds
- 2D .1100 Control of Toxic Air Pollutants
- 2Q .0711 Emission rates Requiring a Permit

However, no regulatory review is required at this time since there are no new applicable regulations for this permit revision (renewal).

**6. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM
NSPS**

The only New Source Performance Standards (NSPS) applies to this facility is Subpart BBB – Standards of Performance for the Rubber tire Manufacturing Industry. The requirements of this Subpart have previously been included in this facility's permit.

NESHAP/MACT

This facility is not currently subject to any requirements under National Emission Standards for Hazardous Air Pollutants (NESHAP). The Reciprocating internal combustion engine standard is not applicable because the emergency generator is an existing source at a facility that is not major for HAPs. Again, because the facility is not a major HAP source, the boiler MACT is not applicable.

PSD

This facility's permit contains an avoidance of Prevention of Significant Deterioration (PSD) stipulation. This stipulation previously required two methods of demonstrating compliance – a fuel use limit and a requirement to actually calculate sulfur dioxide emissions and report them. The two boilers that produce the sulfur dioxide emissions, ES-4A and 4B, are each permitted to combust both natural gas and No. 6-fuel oil. The fuel oil limit contained in the permit (1,000,000 gallons per 12-month period) is so low (producing only 165 tons) that the 250 ton limit could not be exceeded even if the boilers used natural gas 8760 hours (producing only 0.24 tons). Therefore nothing beyond the fuel oil use limit and resulting reporting requirements are necessary for the facility to demonstrate compliance with the 250-ton sulfur dioxide limit.

Attainment Status

This facility is located in Stanley County which is in attainment for all pollutants according to the NC DAQ website.

112(r)

This 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.

CAM

Compliance Assurance Monitoring (CAM) (40 CFR Part 64) does not apply since there are no control devices on sources that are themselves major.

7. Facility Wide Air Toxics

No new toxics evaluation has been triggered at the facility for this renewal. The facility has previously conducted air-dispersion modeling for benzene. Several other NC TAP's are emitted at levels below their TPER's.

8. Facility Compliance Status

On January 25, 2006, Jim Westmoreland contacted Mr. Don Mathews Safety and Environmental Manager, and conducted an unannounced, targeted, compliance inspection of Michelin Aircraft Tire Company LLC, in Norwood. The facility was found to be in compliance.

9. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on the 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.

10. Facility Emissions Review

There is no change in emissions for this renewal.

11. Stipulation Review

All stipulations are standard for this type of facility.

12. Public Notice / EPA and Affected State Review

Pursuant to 2Q. 0521, a notice of the draft Title V Permit will be placed in a newspaper of general circulation in the area where the facility is located. The notice provided 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 and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant were provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected States for this facility.

13. 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.

RCO concurs with WSRO's recommendation to issue air permit.

No comments were received during the public notice period, therefore the permit will be issued identical to the public notice version.