

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Winston-Salem Regional Office
County: Davidson
NC Facility ID: 2900106
Inspector's Name: Stephen Moser
Date of Last Inspection: 08/02/2011
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)	
Applicant (Facility's Name): Owens-Brockway Glass Container Plt 6 Facility Address: Owens-Brockway Glass Container Plt 6 9698 Old US Highway 52 Lexington, NC 27295 SIC: 3221 / Glass Containers NAICS: 327213 / Glass Container Manufacturing 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: 2900106.11A Date Received: 03/31/2011 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 01491/T19 Existing Permit Issue Date: 01/31/2007 Existing Permit Expiration Date: 12/31/2011	
Jeff Beckelhimer Plant Engineer (336) 764-7230 9698 Old U.S. Highway 52 Lexington, NC 27295	Lloyd Taylor Plant Manager 9698 Old U.S. Highway 52 South Lexington, NC 27295	James Amburgey Environmental Administrator (567) 336-7909 One Michael Owens Way - Plaza 2 Perrysburg, OH 43551+2999		
Review Engineer: Joseph Voelker Review Engineer's Signature: Date:			Comments / Recommendations: Issue 01491/T20 Permit Issue Date: Permit Expiration Date:	

I. Introduction and Purpose of Application

Owens-Brockway Glass Container Plt 6 (O-B) produces beer bottles. The purpose of this application is to renew the air permit:

II. Chronology

Date	Description
March 31, 2011	A TV permit application was received in the RCO and assigned application no. 11A
April 4, 2011	An acknowledgement letter was sent to the Plant Manager. The application was accepted for processing.
August 31, 2011	An email was received from James Amburgey confirming that the emissions from all refiners and forehearths are emitted in a fugitive manner (i.e., no stacks)

Date	Description
September 22, 2011	Draft permit was sent to Permittee for review.
October 15, 2011	Comments on Draft permit were received via email, the most important being: <i>Would like to discuss source testing requirement for Furnace B under 6S requirements prior to draft permit being sent to public comment.</i>
October 28, 2011	James Amburgey, after multiple conversations concerning the testing language, agreed to the proposed DRAFT MACT 6S condition language.
MM/DD/YYYY	Public Notice for the renewal was published on the DAQ website.
MM/DD/YYYY	Public comment period ended. No comments received.
MM/DD/YYYY	EPA comment period ended. No comments received.

III. Modification Description

In addition to the renewal, O-B requests the following changes and updates:

Update the insignificant activities list (IAL)

A.

The permittee requests the removal of the following sources from the IAL

Emission Source ID No.	Emission Source Description
I-DE1	one diesel engine - cooling tower pump backup (79HP rated capacity)
I-DE2	one diesel engine - cooling tower pump backup (68HP rated capacity)
I-T2	No. 6 fuel oil storage tank (250,000 gallon capacity)

B.

Revise the following

Emission Source ID No.	Emission Source Description
I-EG	one diesel emergency generator (150KW rated capacity)

To its correct description:

Emission Source ID No.	Emission Source Description
I-EG	one diesel emergency generator (125KW rated capacity)

As an existing emergency IC engine at an area source, this engine is subject MACT ZZZZ. In the IAL, the source will be identified as being subject to MACT Subpart ZZZZ. No compliance requirements will be included in the air permit; however footnote 3 to the IAL identifies where the requirements can be found.

C.

Revise the following

Emission Source ID No.	Emission Source Description
I-DE4	one diesel engine - side wall cooling fan backup (46HP rated capacity)

To its correct description:

Emission Source ID No.	Emission Source Description
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Emission Source ID No.	Emission Source Description
I-DE4	one natural gas-fired engine - side wall cooling fan backup (46HP rated capacity)

As an existing emergency IC engine at an area source, this engine is subject MACT ZZZZ. In the IAL, the source will identified as being subject to MACT Subpart ZZZZ. No compliance requirements will be included in the air permit; however footnote 3 to the IAL identifies where the requirements can be found.

D.

Add the following:

Emission Source ID No.	Emission Source Description
I-DE5 MACT ZZZZ, NSPS IIII	one diesel-fired emergency engine (363 KW/486 HP rated capacity)

Note that this engine has a PTE for each regulated pollutant (at 500 hours per year of operation as allowed for emergency engines) less than 5 tpy. Hence this source is considered an insignificant activity as defined in 15A NCAC 2Q .0503(8) and meets the permitting exemption at 2Q .0102(c)(2)(B)(v)(III)

(v) emergency use generators and other internal combustion engines not regulated by rules adopted under Title II of the Federal Clean Air Act, except self-propelled vehicles, that have a rated capacity of no more than:

(III) 590 kilowatts (electric) or 900 horsepower for diesel-fired or kerosene fired engines;

Note that this source is subject to NSPS Subpart IIII and MACT Subpart ZZZZ.

However, NSPS Subpart IIII is an “exemption” to the “exclusion to the 2Q .0102 exemptions” (see 2Q. 0102(b)(1)(f)). So it still meets the exemption requirements regardless of its NSPS IIII status.

With respect to MACT ZZZZ, which per 2Q .0102(b)(2), is an “exclusion to the exemptions” hence the source cannot avail itself of the exemptions. However, this engine is a new engine at an area source and pursuant to 40 CFR 63.6590(c), which states:

63.6590(c) Stationary RICE subject to Regulations under 40 CFR Part 60.

An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

63.6590(c)(1)

A new or reconstructed stationary RICE located at an area source;

Thus, although the MACT applies, the engine is simply subject to the requirements of NSPS IIII, which is an “exemption” to the “exclusion to the 2Q .0102 exemptions.” As such, it is the NCDAQs policy to allow the source to avail itself of the exemptions allowed under 2Q .0102.

In the IAS, the source will identified as being subject to MACT Subpart ZZZZ and NSPS Subpart IIII. No compliance requirements will be included in the air permit; however footnote 3 to the IAS identifies where the requirements can easily be found outside of the permit.

Note that since this source does not require permitting under 2Q .0300 it does not trigger a toxics review per 2Q .0705.

IV. Regulatory Review

Section 2.1.A.

A. The following sources:

Emission Source ID No.	Emission Source Description
GF-A.FURN	one No. 6 fuel-oil/natural gas-fired furnace (170 tons per day maximum glass pull rate and 35.4 million Btu per hour maximum heat input) consisting of a melter with electric boost and regenerative checkers
GF-A.RF	a natural gas-fired molten glass refiner (3.2 million Btu per hour maximum heat input rate) and a natural gas-fired forehearth (3.2 million Btu per hour maximum heat input)
GF-B.FURN	one No. 6 fuel-oil/natural gas-fired furnace (175 tons per day maximum glass pull rate and 36.45 million Btu per hour maximum heat input) consisting of a melter with electric boost and regenerative checkers;
GF-B.RF	a natural gas-fired molten glass refiner (2.8 million Btu per hour maximum heat input) and a natural gas-fired forehearth (2.8 million Btu per hour maximum heat input)
GF-C.FURN	one No. 6 fuel-oil/natural gas-fired furnace (300 tons per day maximum glass pull rate and 57.3 million Btu per hour maximum heat input) consisting of a melter with electric boost and regenerative checkers
GF-C.RF	a natural gas-fired molten glass refiner (5.2 million Btu per hour) and two natural gas-fired forehearth (5.2 million Btu per hour maximum heat input total)

NCAC 02D .0515: PARTICULATE EMISSIONS FROM MISCELLANEOUS INDUSTRIAL PROCESSES

Based on review of the past few permit inspection reports the actual emissions of these sources are much less than those allowed under this rule.

From the 2010 inspection report

The following table documents the furnaces allowable particulate emissions vs. their actual emissions as reported on the 2009 emissions inventory:

Furnace	Allowable pounds per hour	Actual pounds per hour
A	9.55 PM	4.28 PM
B	9.74 PM	Unable to calculate
C	13.98 PM	9.24 PM

The hourly particulate emissions were derived by averaging the particulate emissions as reported on the 2009 inventory. This methodology should be reasonable, since the process stays fairly steady state, but is not exact. Again, furnace B only operated about 3 days in 2009, so this sort of calculation cannot be done reliably on this furnace. Compliance with 2D .0515 is documented for furnaces A and C.

No substantive changes will be made to this permit condition which require no M/R/R/. This is typical for glass furnaces. All minor changes to the condition will be presented in Section V.

15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

The Permittee has supplied information in previous applications (most recently in APP 09A) that most of the SO₂ emitted from these sources is a result of the conversion to SO₂ from the melting of the raw material sodium sulfate. Through chemistry considerations and mass balance the Permittee estimate SO₂ emissions to be on average 2.86 lb/ton of glass produced. For potential emissions considerations the Permittee estimates this to be 3.6 lb/ton of glass produced.

Thus the PTE for each furnace is as follows:

A – 25.5 lb/hr

B – 26.25 lb/hr
C – 45 lb/hr

The rule requires SO₂ emissions not to exceed 2.3 pounds per million Btu heat input. For each furnace (excluding the refiner and forehearth which makes the calculation even more conservative for our purposes here) the allowable SO₂ emissions are:

A – 81.4 lb/hr
B – 83.8 lb/hr
C – 131.8 lb/hr

Hence a wide margin of compliance assuming no contribution from fuel combustion.

No monitoring, recordkeeping and reporting is required in the current permit except for when firing No.6 fuel oil which is limited to 1.5% sulfur. Natural gas contributions to SO₂ formation are negligible.

No substantive changes will be made to this permit condition. All minor changes to the condition will be presented in Section V.

15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

The permit requires daily VE readings. The Permittee has not requested a reduction in frequency so these will remain the same.

The permit condition will be revised to current DAQ policy which allows for:

- c. *If visible emissions from these sources are observed to be above normal, the Permittee shall either:*
 - i. *take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or*
 - ii. *demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.3. a. above.*

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

All changes to the condition will be presented in Section V.

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

On October 13, 2010, the facility submitted a notification to the EPA and the NC DAQ that it became subject to 40 CFR 63, SUBPART SSSSSS—“National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources” (MACT 6S) on September 28, 2010.

On this date O-B “introduced production of the glass product that contains glass manufacturing metal HAP”, into Furnace (ID No. GF-B) which triggered applicability under 40 CFR 63.11448.

Since O-B does not utilize control devices, the requirements are essentially the performance of a source test to meet the following emission limitation and subsequent recordkeeping.

Emission Limitations [40 CFR 63.11461]

- h. *For each furnace that produces glass at an annual rate of at least 45 Mg/yr (50 tpy) and is charged with glass manufacturing metal HAP as raw materials, the Permittee shall meet one of the following emission limits:*
 - i. *The 3-hour block average production-based PM mass emission rate must not exceed 0.1 gram per kilogram (g/kg) (0.2 pound per ton (lb/ton)) of glass produced; OR*
 - ii. *The 3-hour block average production-based metal HAP mass emission rate must not exceed 0.01 g/kg (0.02 lb/ton) of glass produced.*

O-B is required to submit a Notification of Compliance Status, including the performance test results for this furnace, before the close of business on the 60th day following the completion of the performance test, which is required within 180 days after its compliance date, which is September 28, 2012.

However, O-B has ceased using the “glass manufacturing metal HAP” and has not conducted the required performance test. O-B does not have immediate plans to use the HAP material in the near future but does not want to rule it out via permit

enforceable conditions. Hence it is possible that it will not resume the use of the HAP materials prior to its compliance date (if at all).

To resolve this, the DAQ will include a permit condition that requires a performance test within 180 days upon the **reintroduction** of the glass product that contains glass manufacturing metal HAP into the furnace. In this manner, the facility will not be required to introduce the HAP material into its process arbitrarily to conduct the required source test.

Note that it is the DAQs interpretation that this rule applies requirements on a furnace by furnace basis. Hence each furnace will need to submit a Notification of Compliance Status and perform source testing (with some exceptions allowed by the rule). Thus, O-B is an affected facility under MACT 6S but Furnaces A and C to date have no applicable requirements under MACT 6S. The permit condition however, will be crafted such that it will be clear what the currently not affected furnaces will be required to do upon triggering applicability of MACT 6S.

B. The following sources:**Table 2.1.B.**

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-BH	batch house fugitive sources	n/a	n/a
ES-SS1 and ES-SS2	two sand silos (20,900 cubic feet and 9.345 cubic feet capacity)	CD-SSFF	one bagfilter (68 square feet of filter area)
ES-MBE	one mix batch elevator	CD-MBEFF	one bagfilter (68 square feet of filter area)
ES-MBAE	east mix batch bin for furnace A (550 cubic feet capacity)	CD-MAEFF	one bagfilter (68 square feet of filter area)
ES-MBAW	west mix batch bin for furnace A (550 cubic feet capacity)	CD-MBAWFF	one bagfilter (68 square feet of filter area)
ES-MBBE	east mix batch bin for furnace B (550 cubic feet capacity)	CD-MBBEFF	one bagfilter (68 square feet of filter area)
ES-MBBW	west mix batch bin for furnace B (550 cubic feet capacity)	CD-MBBWFF	one bagfilter (68 square feet of filter area)
ES-MBCE and ES-MBCW	east and west mix batch bin for furnace C (1,100 cubic feet capacity each)	CD-MBCFF	one bagfilter (68 square feet of filter area)
ES-08	one grit blaster	CD-08FF	one filter cartridge dust collector (486 square feet of filter area)
ES-09	one grit blaster	CD-09FF	one bagfilter (80 square feet of filter area)
ES-ML	mold lubrication	n/a	n/a

These sources are primarily PM sources.

1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

With the exception of two sources the use of bagfilters will ensure compliance with emission limits of this rule. The other sources have potential PM emissions below their respective allowable emissions under 2D .0515, hence no required controls or monitoring.

No substantive changes will be made to this permit condition. All minor changes to the condition will be presented in Section V.

15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

The permit requires VE readings every three months. Although VE problems are not anticipated for these sources, one reading per quarter is not consistent with current DAQ practice, even for sources with expected large margins of compliance. The frequency will be increased to once per month.

The permit condition will be revised to current DAQ policy which allows for:

- c. *If visible emissions from these sources are observed to be above normal, the Permittee shall either:*
- i. *take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or*
 - ii. *demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.3. a. above.*

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.

All changes to the condition will be presented in Section V.

C. The following source:

Emission Source ID No.	Emission Source Description
ES-HST	one surface treatment system

15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

Historically this emission source has had no visible emissions. No changes will be made to the existing permit condition.

2.2-Multiple Emission Source(s) Specific Limitations and Conditions

STATE-ONLY REQUIREMENT

15A NCAC 2D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

There have been no noted compliance issues with this regulation. No changes will be made to the permit.

15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

In the current permit this rule applied specifically only to the surface treatment system (ID No. ES HST). Although this source uses VOC containing materials, such materials are also used elsewhere in the facility.. Also, since last permit issuance the 15 pound per day applicability threshold has been removed from 15A NCAC 2D .0902 APPLICABILITY. Thus, this rule applies to all sources at a facility regardless of the rate of emissions from the sources. In the revised permit this rule will be included in the permit in the multiple source section of the permit.

STATE-ONLY REQUIREMENT

15A NCAC 2D .1100: TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REPORTING REQUIREMENT

Since last renewal no modifications have been made to the facility that would trigger a revised toxics analysis. No substantive changes will be made to the condition.

STATE-ONLY REQUIREMENT

TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT

Since last renewal no modifications have been made to the facility that would trigger a revised toxics analysis. The permit condition will be changed to reflect the current language that addresses 2Q .0711. No substantive changes will be made to the condition.

IV. NSPS, NESHAP, PSD and CAM Applicability

All regulatory discussion necessary is included in Section III.

CAM is not applicable as all PM sources utilizing control devices have uncontrolled PM emissions less than 100 tpy.

V. Changes to Existing Title V Air Permit

Existing Condition No.	New Condition No.	Changes
Cover Letter	Same	<ul style="list-style-type: none"> • Used current shell language, updated permit numbers, dates, etc. • Revised Authorized Contact

Existing Condition No.	New Condition No.	Changes
Insignificant Activities List	Same	<ul style="list-style-type: none"> Revised to show that it is an attachment to the cover letter, not the permit Added three footnotes per current permit shell standards The following sources were removed from the facility <ul style="list-style-type: none"> I-DE1, IDE2, I-T2 I-DE4 was revised to fire only natural gas I-EG was revised to reflect 125kW output ADDED indicators that read <u>MACT ZZZZ</u> to indicate these sources are subject to MACT ZZZZ <ul style="list-style-type: none"> I-DE3, IDE4, I-EG Added new source I-ES5 to the list
Table of Contents	Same	<ul style="list-style-type: none"> Removed PART I and PART II indicators as TV permits are no longer issued in this manner
Permit page 3	same	<ul style="list-style-type: none"> Removed PART I indicator as TV permits are no longer issued in this manner Removed first two paragraphs per current DAQ policy
Permitted equipment list	Same	<ul style="list-style-type: none"> Added MACT Subpart SSSSSS applicability indicator to furnace (ID No GF-B)
Global changes	Same	<ul style="list-style-type: none"> For all testing requirements the regulatory citation was revised to 2Q .0508(f)
2.1.A.		
Affected sources	same	<ul style="list-style-type: none"> Revised list of affected sources into a tabular format
Summary table	Same	<ul style="list-style-type: none"> Added reference to 2Q .0958 as it applies facility wide
2.1.A.1	same	2D .0515 condition
a.	Same	<ul style="list-style-type: none"> Revised specific reference to the individual sources to “these sources”. The condition applies to all sources in this section.
		<ul style="list-style-type: none">
2.1.A.2		2D .0516 condition
a.	Same	<ul style="list-style-type: none"> Revised specific reference to the individual sources to “these sources”. The condition applies to all sources in this section.
d.	Same	<ul style="list-style-type: none"> Removed regulatory citation as it is redundant
2.1.A.3.		2D .0521
a.	Same	<ul style="list-style-type: none"> Revised specific reference to the individual sources to “these sources”. The condition applies to all sources in this section.

Existing Condition No.	New Condition No.	Changes
c.	Same	<ul style="list-style-type: none"> This condition was substantially revised per current DAQ monitoring requirements to remove the following <p><i>(a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or</i></p> <p><i>(b) demonstrate that the percent opacity from the emission points of the emission sources in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 A.3. a. above.</i></p> <p><i>If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.</i></p> <p>And replace it with the following language</p> <p><i>i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or</i></p> <p><i>ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.4. a. above.</i></p> <p><i>If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.</i></p>
na	2.1.A.5	<ul style="list-style-type: none"> Added MACT SSSSSS condition
2.1.B.		
Affected sources	same	<ul style="list-style-type: none"> Revised list of affected sources into a tabular format
Summary table	Same	<ul style="list-style-type: none"> Added reference to 2D .1806, 2D .1100 and 2Q .0711 as these regulations apply facility-wide
2.1.B.1		2D .0515 condition
a.	Same	<ul style="list-style-type: none"> Revised specific reference to the individual sources to “these sources”. The condition applies to all sources in this section.
c.	Same	<ul style="list-style-type: none"> Revised the following language: <p><i>Particulate matter emissions from the sand silos, mix batch elevator, mix batch bins, and grit blasters shall be controlled by the nine bagfilters (ID Nos. CD-SSFF, CD-MBEFF, CD-MBAEFF, CD-MBAWFF, CD-MBBEFF, CD-MBBWFF, CD-MBCFF, CD-08FF, and CD-09FF).</i></p> <p>To read:</p> <p><i>Particulate matter emissions from these sources shall be controlled as described in Table 2.1.B.</i></p>
2.1.B.2.		2D .0521
a.	Same	<ul style="list-style-type: none"> Revised specific reference to the individual sources to “these sources”. The condition applies to all sources in this section.

Existing Condition No.	New Condition No.	Changes
c.	Same	<ul style="list-style-type: none"> This condition was substantially revised per current DAQ monitoring requirements to remove the following <p><i>(a) be deemed to be in noncompliance with 15A NCAC 2D .0521 or</i></p> <p><i>(b) demonstrate that the percent opacity from the emission points of the emission sources in accordance with 15A NCAC 2D .0501(c)(8) is below the limit given in Section 2.1 A.3. a. above.</i></p> <p><i>If the demonstration in (b) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.</i></p> <p>And replace it with the following language</p> <p><i>i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or</i></p> <p><i>ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 2D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.4. a. above.</i></p> <p><i>If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0521.</i></p>
2.1.C.		
Affected sources	Same	<ul style="list-style-type: none"> Revised list of affected sources into a tabular format
Summary table	Same	<ul style="list-style-type: none"> Added reference to 2Q .0711 as it applies facility-wide For the reference to to 2D .1100 , the reference to ammonia was corrected to hydrochloric acid
2.1.C.1.	2.2.A.4.	<p style="text-align: center;">2D.0958 condition</p> <ul style="list-style-type: none"> This condition was relocated to the multiple source section of the permit as it applies facility-wide
a.	same	<ul style="list-style-type: none"> Removed the following language as it is no longer valid due to change in the 2D .0902 Applicability Rule <i>“and whose emissions of VOC are greater than 15 pounds per day”</i>
c	Same	<ul style="list-style-type: none"> Added regulatory citation
d	Same	<ul style="list-style-type: none"> Added regulatory citation
e.	same	<ul style="list-style-type: none"> Added regulatory citation
2.2.A	Same	<ul style="list-style-type: none"> This section now addresses facility-wide sources
2.2.B.1	2.2.A.3	<ul style="list-style-type: none"> Simple renumbering Revised the 2D.1100 condition to current standards; no substantive changes were made
2.2.B.2.	2.2.A.4	<ul style="list-style-type: none"> Simple renumbering Revised the condition to current DAQ standards; no changes in intent were made
General Conditions	Same	<p>Revised to current version 3.5 Changes include:</p> <ul style="list-style-type: none"> Condition D – Added the following language: <i>All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).</i> Condition H – Added Reporting Requirements (current H.1. requirements) Renumbered existing conditions Condition O – revised regulatory reference Condition BB. – revised regulatory citation to 2Q .0507(d)(4) Condition JJ – This condition has been substantially revised Condition MM – Added fugitive dust control requirements Condition NN – Added regulatory citations (15A NCAC 2Q .0501 and .0523) Condition OO – Added third party participation and EPA review condition

VI. Compliance History

According to the most recent compliance inspection report, the facility appeared to be in compliance with all applicable air quality regulations.

VII. Permit History Since Last TV Permit Renewal

Permit No.	Issuance Date	Description
T19	January 31, 2007	TV permit renewed
T19	None-No permit modification necessary	On May 26 2009, the North Carolina Division of Air Quality (NCDAQ) received an application (2900106.09A) from Owens-Brockway Glass Container, Inc. (O-B) describing a furnace repair project that was primarily a result of a partial collapse of the crown and division wall of the furnace (ID No. GF-B.FURN) regenerator structure. NCDAQ has reviewed your application and concluded that the repair, maintenance and replacement activities, as described in your application, would <u>not</u> be considered a major modification under the PSD program, a modification under the New Source Performance Standards (NSPS). Therefore, no permit modification is necessary

VIII. Public Notice

See Chronology.

IX. Comments and Conclusions

~~No comments received on draft permit.~~

X. Recommendations

~~It is recommended that permit no. 05678T36 be issued.~~