

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2008**

Region: Fayetteville Regional Office
County: Scotland
NC Facility ID: 8300019
Inspector's Name: Robert Hayden
Date of Last Inspection: 06/04/2007
Compliance Code: 4/In Compliance - Certification

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Railroad Friction Products Corp Facility Address: Railroad Friction Products Corp 13601 Airport Road Maxton, NC 28352 SIC: 3069 / Fabricated Rubber Products, Nec NAICS: 326299 / All Other Rubber Product 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: 8300019.07B and 8300019.07C Date Received: 04/30/2007 and July 2, 2007 Application Type: Modification Application Schedule: TV-Significant and Admin. Amendment Existing Permit Data Existing Permit Number: 02941/T23 Existing Permit Issue Date: 12/10/2007 Existing Permit Expiration Date: 02/29/2012		
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Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2008			Comments / Recommendations: Issue 02941/T24 Permit Issue Date: date, 2008 Permit Expiration Date: date, 2012		

I. Purpose of Application

On March 28, 2007, the DAQ Fayetteville Regional Office conducted a compliance inspection of the facility and a letter was sent to the facility (dated April 3, 2007) that listed a number of discrepancies on the equipment listing of the air permit. The purpose of this permit modification application is to examine these discrepancies and either clarify or correct them accordingly. The letter required that the Permittee submit no later than April 30, 2007, in response to FRO's concerns.

The following clarifications have been requested by the Permittee as part of the submitted permit application. A cross-reference to FRO's original comments (See Section IX of this Document for a listing of comments) are also shown in italics following the respective clarifications:

1. The filter areas for bagfilters (**ID Nos. CD-01 and CD-03**) are listed in reverse on the permit. The correct filter area is 12,800 square feet for bagfilter CD-01 and 11,700 square feet for bagfilter CD-03.

2. On the current permit, the eleven mold lines (**ID Nos. ES-04A.L1 through L9, ES-4B.L10, and ES-4B.L11**) are inadvertently represented in two places in the permit. These lines are equivalent to the eleven press lines (**ID Nos. ES-25.1 through ES-35.4**). The mold lines should be removed since they are not vented to a control device and are already correctly designated as the press lines. *[DAQ Letter – Item 1]*
3. The current permit lists the six trim/scrap saws as being controlled by the bagfilter (**ID No. CD-01**). However, only one (**ID No. ES-05F**) is controlled by CD-01. The others (**ID Nos. ES-05A through ES-05E**) are controlled by CD-03.
4. The dry mixer (**ID No. ES-07B**) is listed as controlled only by bagfilter (**ID No. CD-01**). The dry mixer is actually controlled by both bagfilters (**ID Nos. CD-01 and CD-03**).
5. Emissions from the scrap grinder (**ID No. ES-06**) are exhausted to bagfilter (**ID No. CD-02**) as well as additional capture hoods venting to bagfilters (**ID Nos. CD-01 and CD-03**). These additional control devices should be added to the scrap grinder control orientation.
6. Trim/scrap saw (**ID No. ES-08**) has been physically removed from the facility and should be removed from the permit.
7. The wet mix room (**ID No. ES-03**) should be deleted from the permit as these sources are addressed elsewhere in the permitted equipment.
8. The description for the backing plate spray/dip application (**ID No. ES-17**) should read “with panel filter consisting of **two** spray guns” not “four.” *[DAQ Letter – Item 5]*
9. Granulator (**ID No. F-01**) is not uncontrolled as currently listed in the permit, but is exhausted to bagfilter (**ID No. CD-03**). *[DAQ Letter – Item 4]*
10. The storage silo for recycled brake material is listed as controlled by a bin vent filter (**ID No. CD-Silo**) in the current permit. This bin vent filter has been removed and the silo exhausts to bagfilter (**ID No. CD-03**). *[DAQ Letter – Item 2]*
11. Three natural gas fired post bake ovens (**ID Nos. ES-20 through ES-22**) are each listed as having a 500,000 Btu per hour maximum heat input. The correct heat input should be 1.0 million Btu per hour. *[DAQ Letter – Item 7]*
12. Two natural gas fired post bake ovens (**ID Nos. ES-23 and ES-24**) are each listed as having a 500,000 Btu per hour maximum heat input. The correct heat input should be 1.5 million Btu per hour. *[DAQ Letter – Item 7]*

The Permittee is also requesting the following additions to the permitted emission source list:

13. one granulator (**ID No. F-02**) controlled by bagfilter (**ID No. CD-03**). *[DAQ Letter – Item 4]*
14. miscellaneous weigh stations (**ID No. ES-52**). *[DAQ Letter – Items 6 and 9]*
15. recycled brake dust unloading station (**ID No. ES-53**).
16. rubber grinding operations including storage hopper, storage bin, and process cyclone (**ID No. ES-54**). *[DAQ Letter – Item 8]*
17. calcium carbonate unloading operation (**ID No. ES-55**).
18. calcium carbonate conveying operation (**ID No. ES-56**). *[DAQ Letter – Item 8]*
19. R&D milling machine (**ID No. ES-57**).

The Permittee is requesting the following modifications to the insignificant activities list:

20. remove NABCO parts cleaner (**ID No. IES-52**).
21. remove steel parts cleaner (**ID No. IES-53**).
22. remove steel parts rinse (**ID No. IES-54**).
23. add manual welder (**ID No. IES-57**)
24. add R&D vacuum (**ID No. IES-58**). *It should be noted that this requested ID number should not be given because the permit already lists ES-58. To avoid potential confusion if the insignificant activity is ever permitted, it will be permitted as ID No. IES-60.*

It should be noted that there is no new construction as a result of this permit modification. All “new” equipment was found during the most recent annual inspection to already have been installed at the facility.

II. Facility Description

The facility produces brake shoes for much of the principal railroad lines in the US and many for various subways and trolleys. Steel shoes are supplied by a shop in Fayetteville, and are washed and modified as necessary, and sprayed with a compound that enhances adhesion. The raw materials are mixed with binders/resins, heated slightly and then pressed into pads under high pressure and temperature onto steel shoes. The pads/shoes are then trimmed to remove flash, cured, painted, packed, and shipped. Materials lost in the process (dust from bag houses, reject pads and fugitive hexane) are recycled wherever possible.

III. History/Background/Application Chronology

March 29, 2007 – Permit **02941T21** issued as a title V renewal.

April 30, 2007 – Permit application **8300019.07B** was received as a one-step Title V significant modification to address issues raised on the permitted equipment by FRO in their latest inspection of the facility. The application was deemed complete for processing.

May 21, 2007 – Received addendum to application **8300019.07B** to increase throughput to the new source (**ID No. ES-53**).

May 24, 2007 – Permit **02941T22** issued as a minor modification for the addition of a new shredder (**ID No. ES-Shred**) and a spraybooth replacement (**ID No. ES-19new**).

July 2, 2007 – Permit application **8300019.07C** was received as an administrative amendment to complete the requirements for submittal of normal operating ranges for equipment subject to the Compliance Assurance Monitoring requirements. Application was deemed complete for processing and consolidated into application **8300019.07B**.

December 10, 2007 – Permit **02941T23** issued as the first of the two-step Title V significant process for the installation of a new bagfilter (**ID No. CD-07**) and Blanchard grinder (**ID No. ES-59**) and Banbury weigh station (**ID No. ES-58**).

March 20, 2008 – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review.

April 4, 2008 – Received email comments on DRAFT permit from Permittee. See Section X of this Document for a discussion.

April 16, 2008 – Received email concurrence on DRAFT permit language from FRO.

Date, 2008 – DRAFT permit sent to 30-day public notice and 45-day EPA review prior to issuance.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the modification process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant activities	-added/removed sources per permit application -amended permit revision number
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3-5	Equipment table	-added/removed sources per permit application
6	2.1 A	-amended list of applicable equipment
7	2.1 A (table) 2.1 A.1.a 2.1 A.1.c	-added equipment IDs to applicable standard -amended ID Nos. -amended ID Nos.
8	2.1 A.1.e 2.1 A.2.a 2.1 A.2.c	-amended ID Nos. -amended ID Nos. -amended ID Nos.
9	2.1 A.3.b.i 2.1 A.3.b.ii.(C)	-amended ID Nos. -clarified equipment sizes per application
10	2.1 A.3.c	-amended CAM table to indicate normal operating ranges
11	2.1 B	-amended list of applicable equipment
13	2.1 C	-amended list of applicable equipment
14	2.2 A	-amended list of applicable equipment
19-22	2.2 A.6	-added MACT language (Subpart QQQQQ)
22-28	2.2 A.7	-added MACT language (Subpart MMMM)

The following table indicates the modifications to ESM as a result of this permit modification:

Current Description	Change resulting from permit modification
NABCO parts cleaner (ID No. IES-48)	End-dated
Steel parts cleaner (ID No. IES-53)	End-dated
Steel parts rinse (ID No. IES-54)	End-dated
NA	Manual welder (ID No. IES-60)
NA	R&D vacuum (ID No. IES-61)
One bagfilter (11,700 square feet of filter area; ID No. CD-01)	One bagfilter (12,800 square feet of filter area; ID No. CD-01)
Nine mold lines (ID Nos. ES-04A.L1 through ES-04A.L9)	End-dated duplicate sources
Two mold lines (ID Nos. ES-04B.L10 and ES-04B.L11)	End-dated duplicate sources
Six trim/scrap saws (ID Nos. ES-05A through ES-05F) controlled by one bagfilter (ID No. CD-01)	One trim/scrap saw (ID No. ES-05F) controlled by one bagfilter (ID No. CD-01) Five trim/scrap saws (ID Nos. ES-05A through ES-05E) controlled by one bagfilter (ID No. CD-03)
One dry mixer (ID No. ES-07B) controlled by one bagfilter (ID No. CD-01)	One dry mixer (ID No. ES-07B) controlled by two bagfilters (ID Nos. CD-01 and CD-03)

Current Description	Change resulting from permit modification
NA	Miscellaneous weigh stations and grinders (ID No. ES-52)
NA	Rubber grinding operations including storage hopper, storage bin, and process cyclone (ID Nos. ES-54.1 through ES-54.3)
Storage silo for recycled brake material (ID No. ES-Silo) controlled by one bin vent cartridge-type filter (ID No. CD-Silo)	Storage silo for recycled brake material (ID No. ES-Silo) controlled by one bagfilter (ID No. CD-03) End-dated bin vent filter (ID No. CD-Silo)
Reclaim scrap grinder (ID No. ES-06) controlled by one bagfilter (ID No. CD-02)	Reclaim scrap grinder (ID No. ES-06) controlled by three bagfilters (ID Nos. CD-01, CD-02, and CD-03)
One wet mix room (miscellaneous capture hoods; ID No. ES-03)	End-dated per Permittee
One bagfilter (12,800 square feet of filter area; ID No. CD-03)	One bagfilter (11,700 square feet of filter area; ID No. CD-03)
One trim/scrap saw (ID No. ES-08)	End-dated per Permittee
NA	Recycle unloading station (ID No. ES-53)
NA	Calcium carbonate unloading operation (ID No. ES-55)
NA	Milling machine (ID No. ES-57)
NA	One simple cyclone (ID No. CD-06)
NA	Calcium carbonate conveying operation (ID No. ES-56)
NA	One granulator (ID No. F-02) controlled by one bagfilter (ID No. CD-03)
One granulator (ID No. F-01)	One granulator (ID No. F-01) controlled by one bagfilter (ID No. CD-03)
One backing plate spray/dip application process with panel-filter consisting of four spray guns (ID Nos. ES-17.1a, ES-17.1b, ES-17.2a and ES-17.2b)	One backing plate spray/dip application process with panel-filter consisting of two spray guns (ID Nos. ES-17.1a and ES-17.1b)
Five natural gas-fired Post Bake Ovens (500,000 Btu per hour maximum heat input each; ID Nos. ES-20 through ES-24)	Three natural gas-fired Post Bake Ovens (1.0 million Btu per hour maximum heat input each; ID Nos. ES-20 through ES-22) Two natural gas-fired Post Bake Ovens (1.5 million Btu per hour maximum heat input each; ID Nos. ES-23 and ES-24)

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0614, Compliance Assurance Monitoring
- 15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
- 15A NCAC 2D .1100, Control of Toxic Air Pollutants
- 15A NCAC 2D .1111, Maximum Achievable Control Technology
- 15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
- 15A NCAC 2Q .0705, Existing Sources and SIC Calls
- 15A NCAC 2Q .0711, Emission Rates Requiring a Permit

The proposed new equipment does not add to this list of current regulations.

The requested new sources (**ID Nos. ES-52 through ES-57**) are subject to the following regulations:

- 15A NCAC 2D .0515
- 15A NCAC 2D .0521

The following summary table indicates compliance with the particulate standard as follows:

Source ID	Throughput (lbs/yr)	Throughput (tons/hour) "P"	Allowable Emission Rate (lbs/hour) "E"	Potential Emission Rate (lbs/hour)
ES-52	14259000	0.814	3.572	0.0173
ES-53	3600000	0.205	1.420	0.0044
ES-54	135000	0.008	0.157	0.0019
ES-55	90000	0.005	0.120	0.0001
ES-56	45000	0.003	0.075	0.0001
ES-57	14500	0.001	0.035	0.0002

The granulator (**ID No. F-02**) is also subject to the following regulation:

- 15A NCAC 2D .0958

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is not currently subject to any New Source Performance Standards. This permit modification does not affect this status.

NESHAPS/MACT – The facility is subject to the following Maximum Achievable Control Technology Standards (MACT):

- 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts.
- 40 CFR 63, Subpart QQQQ, National Emission Standards for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities.

This permit modification does not affect this status. The following language has been included as part of this significant permit modification:

Subpart MMMM was promulgated on **January 2, 2004**. In order for a facility to be subject to this Subpart, it must be a major source of hazardous air pollutants (HAP) and use greater than 250 gallons per year or more of a HAP containing coating. An affected source is defined as the collection of all coating operations, storage containers and mixing vessels used for coatings, thinners, and other additives, cleaning materials, and wastes, and manual and automated conveying equipment and containers used for coating, thinners, and other additives, cleaning materials and wastes. The Permittee operates subject equipment (**ID Nos. ES-17 and ES-18**) that utilize HAP-containing coatings which are subject to this Subpart. The Permittee has elected to comply with this Subpart via the Compliant Coatings Option. It should be noted that as such, both 63.3950, Initial Compliance Demonstration Deadline for Compliance with the Emission Rate without Add-on Controls Option and 63.3960, Initial Compliance Demonstration Deadline for Compliance with the Emission Rate with Add-on Controls Option, are not applicable to the facility. The following language has been included as Section 2.2 A.7 in the modified permit specifying the applicable requirements:

7. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. *The Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart MMMM, "National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products", by **January 2, 2007** for the existing source(s) (**ID No(s). ES-17 and ES-18**).*

Emission Limits [40 CFR 63.3890]

- b. *For each existing rubber-to-metal coating affected source (**ID Nos. ES-17 and ES-18**), the Permittee shall limit organic HAP emissions to the atmosphere to no more than 4.5 kg (37.7 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.*

Compliance Options [40 CFR 63.3891]

- c. *The Permittee shall include all coatings, thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Section 2.2 A.7.b above. To make this determination, the Permittee shall demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Section 2.2 A.7.b above, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The Permittee shall meet all of the following requirements to demonstrate compliance with the applicable emission limit using this option:*
- i. *The Permittee shall complete the initial compliance demonstration for the initial compliance period ending **January 31, 2008**, according to the requirements in Section 2.2 A.7.c.ii below. The demonstration shall include the calculations and supporting documentation showing that during the initial compliance period, the Permittee used no coating with an organic HAP content that exceeded the applicable emission limit in Section 2.2 A.7.b above, and that he used no thinners and/or other additives, or cleaning materials that contained organic HAP.*
- ii. *The Permittee may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in Section 2.2 A.7.b above and must use no thinner and/or other additive, or cleaning material that contains organic HAP. The Permittee shall conduct a separate initial compliance demonstration for each rubber-to-metal coating operation.*

- A. Determine the mass fraction of organic HAP for each material used. The Permittee shall determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the following options:
1. Method 311 (appendix A to 40 CFR part 63). The Permittee may use Method 311 for determining the mass fraction of organic HAP by using the following procedures:
 - (a) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, the Permittee does not have to count it. Express the mass fraction of each organic HAP for which the Permittee counts, as a value truncated to four places after the decimal point (e.g., 0.3791)
 - (b) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).
 2. Method 24 (appendix A to 40 CFR part 60). For coatings, the Permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the Permittee may use the alternative method contained in appendix A to subpart PPPP of this part, rather than Method 24. The Permittee may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP of this part, as a substitute for the mass fraction of organic HAP.
 3. Alternative method. The Permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. The Permittee shall follow the procedure in 63.7(f) to submit an alternative test method for approval.
 4. Information from the supplier or manufacturer of the material. The Permittee may rely on information other than that generated by the test methods specified in Section 2.2 A.7.c.ii.A.1 through 3 above, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, the Permittee does not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the Permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to Section 2.2 A.7.c.ii.A.1 through 3 above, then the test method results will take precedence unless, after consultation, the Permittee demonstrates to the satisfaction of DAQ that the formulation data are correct.

5. Solvent blends. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP, which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the Permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 of Subpart MMMM. If the Permittee uses the tables, he shall use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and may use Table 4 only if the solvent blends in the materials do not match any of the solvent blends in Table 3 and he knows only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, he demonstrates to the satisfaction of DAQ that the formulation data are correct.
- B. Determine the volume fraction of coating solids for each coating. The Permittee shall determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in Section 2.2 A.7.c.ii.B.1 through 4 below. If test results obtained according to Section 2.2 A.7.c.ii.B.1 below do not agree with the information obtained under Section 2.2 A.7.c.ii.B.2 or 3 below, the test results will take precedence unless, after consultation, the Permittee demonstrates to the satisfaction of DAQ that the formulation data are correct.
1. ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003). The Permittee may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see Sec. 63.14), or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see 63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.
 2. Alternative method. The Permittee may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. The Permittee shall follow the procedure in 63.7(f) to submit an alternative test method for approval.
 3. Information from the supplier or manufacturer of the material. The Permittee may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.
 4. Calculation of volume fraction of coating solids. The Permittee may determine the volume fraction of coating solids using the following equation:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where: V_s = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{\text{volatiles}}$ = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see 63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation the Permittee demonstrates to the satisfaction of DAQ that the formulation data are correct.

- C. Determine the density of each coating. Determine the density of each coating used during the compliance period from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see 63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475-98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation the Permittee demonstrates to the satisfaction of DAQ that the formulation data are correct.
- D. Determine the organic HAP content of each coating. Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using the following equation:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

Where: H_c = Organic HAP content of the coating, kg (lb) organic HAP emitted per liter (gal) coating solids used.

D_c = Density of coating, kg (lb) coating per liter (gal) coating, determined according to Section 2.2 A.7.c.ii.C above.

W_c = Mass fraction of organic HAP in the coating, kg (lb) organic HAP per kg (lb) coating, determined according to Section 2.2 A.7.c.ii.A above.

V_s = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to Section 2.2 A.7.c.ii.B above.

- E. *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in Section 2.2 A.7.b above; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to Section 2.2 A.7.c.ii.A above. The Permittee shall keep all records required by Section 2.2 A.7.g below. As part of the notification of compliance status required in Section 2.2 A.7.f below, the Permittee shall identify the coating operation(s) for which he used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because he used no coatings for which the organic HAP content exceeded the applicable emission limit in Section 2.2 A.7.b above, and he used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in Section 2.2 A.7.c.ii.A above.
- iii. A. For each compliance period to demonstrate continuous compliance, the Permittee shall use no coating for which the organic HAP content (determined using Equation 2 of Section 2.2 A.7.c.ii.D above) exceeds the applicable emission limit in Section 2.2 A.7.b above, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to Section 2.2 A.7.c.ii.A above. A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in Section 2.2 A.7.c.i above, is the end of a compliance period consisting of that month and the preceding 11 months.
- B. If the Permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in Section 2.2 A.7.c.iii.A above is a deviation from the emission limitations that must be reported as specified in Section 2.2 A.7.f below.
- C. As part of each semiannual compliance report required by Section 2.2 A.7.h below, the Permittee shall identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit in Section 2.2 A.7.b above, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because he used no coatings for which the organic HAP content exceeded the applicable emission limit in Section 2.2 A.7.b above, and he used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to Section 2.2 A.7.c.ii.A above.
- D. The Permittee shall maintain records as specified in Section 2.2 A.7.g below.

Operating Limits/Work Practice Standards [40 CFR 63.3892 and 63.3893]

- d. The Permittee is not required to meet any operating limits or work practice standards.

Notifications [40 CFR 63.3910]

- e. The Permittee shall submit the notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in Section 2.2 A.7.f below.
- f. The Permittee shall submit the notification of compliance status required by 63.9(h) by **March 3, 2008**. The notification of compliance status must contain the following information and the information in 63.9(h).
- i. Company name and address;
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report;

- iii. *Date of the report and beginning and ending dates of the reporting period;*
- iv. *Identification of the compliance option specified in Section 2.2 A.7.c above that you used on each coating operation during the initial compliance period;*
- v. *Statement of whether or not the affected source achieved the emission limitations for the initial compliance period;*
- vi. *If the Permittee had a deviation, include the following information:*
 - A. *A description and statement of the cause of the deviation; and*
 - B. *If the Permittee failed to meet the applicable emission limit in Section 2.2 A.7.b above, include all the calculations used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. The Permittee does not need to submit information provided by the materials' suppliers or manufacturers, or test reports;*
- vii. *For each of the following data items, an example of how the Permittee determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to Sections 2.2 A.7.c.ii.B or C above. The Permittee does not need to submit copies of any test reports.*
 - A. *Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material;*
 - B. *Volume fraction of coating solids for one coating; and*
 - C. *Density for one coating, one thinner and/or other additive, and one cleaning material, except that if the Permittee uses the compliant material option, only the example coating density is required; and*
- viii. *The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliant material option, an example calculation of the organic HAP content for one coating, using Equation 2 of Section 2.2 A.7.c.ii.D above.*

Recordkeeping [40 CFR 63.3930]

- g. *The Permittee shall collect and keep records of the data and information specified below. Failure to collect and keep these records is a deviation from the applicable standard.*
 - i. *A copy of each notification and report submitted to comply with this subpart, and the documentation supporting each notification and report;*
 - ii. *A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the Permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, he shall keep a copy of the complete test report. If the Permittee uses information provided by the manufacturer or supplier of the material that was based on testing, he shall keep the summary sheet of results provided by the manufacturer or supplier. The Permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier;*
 - iii. *For each compliance period, the records specified below:*
 - A. *A record of the coating operations; and*
 - B. *A record of the calculation of the organic HAP content for each coating, using Equation 2 of Section 2.2 A.7.c.ii.D above.*
 - iv. *A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the Permittee is using the compliant material option for all coatings at the source, he may maintain purchase records for each material used rather than a record of the volume used;*

- v. *A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight;*
- vi. *A record of the volume fraction of coating solids for each coating used during each compliance period; and*
- vii. *The Permittee shall keep records of the date, time, and duration of each deviation. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if the above records are not maintained.*

Reporting [40 CFR 63.3920]

- h. *The Permittee shall submit a summary report of the monitoring and recordkeeping activities 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. All instances of deviations from the requirements of this permit must be clearly identified. The report shall contain the following information:*
 - i. *Company name and address;*
 - ii. *Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report*
 - iii. *Date of report and beginning and ending dates of the reporting period;*
 - iv. *Identification of the compliance option that you used on each coating operation during the reporting period;*
 - v. *If there were no deviations from the emission limitations in Section 2.2 A.7.b. above that apply, a statement that there were no deviations from the emission limitations during the reporting period;*
 - vi. *If there was a deviation from the applicable organic HAP content requirements in Section 2.2 A.7.b above, the following information:*
 - A. *Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used;*
 - B. *The calculation of the organic HAP content (using Equation 2 of Section 2.2 A.7.c.ii.D above) for each coating identified in Section 2.2 A.7.h.vi.A above. The Permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports);*
 - C. *The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in Section 2.2 A.7.h.vi.A above. The Permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports); and*
 - D. *A statement of the cause of each deviation.*

Subpart QQQQ was promulgated on **October 18, 2002**. In order for a facility to be subject to this Subpart, it must be a friction materials manufacturing facility that is a major source of hazardous air pollutants (HAP). An affected source is defined as each new, reconstructed or existing solvent mixer at the facility. The Permittee operates subject equipment (**ID No. ES-10**) that utilizes a solvent recovery system for compliance with this Subpart. For the purposes of this Subpart, the Permittee operates a "large solvent mixer" and has previously submitted the initial compliance demonstration to the FRO per the deadlines in the Subpart. For continued compliance, the following language has been included as Section 2.2 A.6 in the modified permit specifying the applicable requirements:

6. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

- a. The Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart QQQQQ, "National Emission Standards for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities", by October 18, 2005 for the existing source(s) (**ID No. ES-10**).

Emission Limitations [40 CFR 63.9500]

- b. The Permittee shall limit HAP solvent emissions from this source (**ID No. ES-10**) to the atmosphere to no more than 30 percent of that which would otherwise be emitted in the absence of solvent recovery and/or solvent substitution, based on a 7-day block average.
- c. The Permittee shall be in compliance with the emission limitation in this subpart at all times, except during periods of startup, shutdown, or malfunction.
- d. The Permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i).
- e. The Permittee shall develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3).
- f. The Permittee shall install, operate and maintain a weight measurement device to measure the weight of HAP solvent loaded into the solvent mixer and the weight of HAP solvent recovered for each mix batch per the requirements of 40 CFR 63.9525(a) through (e).

Monitoring [40 CFR 63.9530]

- g. The Permittee shall demonstrate continuous compliance with the emission limitations for solvent mixers in 40 CFR 63.9500(a) and (b) according to the following provisions:
- i. Except for during malfunctions of the weight measurement device and associated repairs, the Permittee shall collect and record the following information at all times that the affected source is operating and record all information needed to document conformance with these requirements:
- A. the date and time of each mix batch;
 - B. the identity of each mix batch using a unique batch ID;
 - C. measure and record the weight of HAP solvent loaded into the solvent mixer for each mix batch;
 - D. measure and record the weight of HAP solvent recovered for each mix batch;
 - E. (for the use of solvent recovery) determine the percent of HAP solvent discharged to the atmosphere for each mix batch according to the following equation:

$$P_b = (1 - S_{rec}/S_{mix}) \times (100)$$

Where: P_b = percent of HAP solvent discharged to the atmosphere for each mix batch, percent.

S_{rec} = weight of HAP solvent recovered for each mix batch, pounds.

S_{mix} = weight of HAP solvent loaded into the solvent mixer for each mix batch, pounds.

- F. (for the use of solvent substitution) record the use of non-HAP material as a substitute for a HAP solvent for that mix batch and assign a percent of HAP solvent discharged to the atmosphere for that mix batch (P_b).
- G. determine the 7-day block average percent of HAP solvent discharge to the atmosphere according to the following equation:

$$P_7 = 1/n \sum_{i=1}^n P_b$$

Where: % P_7 = 7-day block average percent of HAP solvent discharged to the atmosphere, percent

i = mix batch

n = number of mix batches in 7-day block average

- H. have valid data for at least 90 percent of the mix batches over the 7-day averaging period.
- ii. Maintain the 7-day block average percent of HAP solvent discharged to the atmosphere at or below 30 percent of that which would otherwise be emitted in the absence of solvent recovery and/or solvent substitution.
- h. The Permittee shall report each instance in which the facility did not meet the emission limitations for solvent mixers in 40 CFR 63.9500(a) and (b). This includes periods of startup, shutdown, or malfunction. These instances are deviations from the emission limitations in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.9540.
- i. During periods of startup, shutdown, or malfunction, the Permittee shall operate in accordance with the startup, shutdown, and malfunction plan.
- j. Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction are not violations if the Permittee demonstrates to the Administrator's satisfaction that the facility was operating in accordance with the startup, shutdown, and malfunction plan. The Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in 40 CFR 63.6(e).

Monitoring [40 CFR 63.9535]

- k. The Permittee shall submit all of the notifications in 40 CFR 63.8(f)(4) and 63.9(b), (c), (d), and (h) that apply to the facility by the specified dates.
- l. The Permittee shall submit a notification of compliance status according to 40 CFR 63.9(h)(2)(ii). The Permittee shall submit the notification of compliance status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.

Recordkeeping [40 CFR 63.9545]

- m. The Permittee shall keep the following records:
 - i. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any initial notification or notification of compliance status submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
 - ii. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, or malfunction.
- n. The Permittee shall keep the records required in 40 CFR 63.9525 to show proper operation and maintenance of the weight measurement device.
- o. The Permittee shall keep the records required in 40 CFR 63.9530 to show continuous compliance with the emission limitations for solvent mixers in 40 CFR 63.9500(a) and (b).

Reporting [40 CFR 63.9540]

- p. *The Permittee shall submit a summary report of the monitoring and recordkeeping 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 period between January and June. The report must include the following information:*
- i. *Company name and address.*
 - ii. *Statement by a responsible official, with the official's name, title, and signature, certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.*
 - iii. *Date of report and beginning and ending dates of the reporting period.*
 - iv. *If the facility had a startup, shutdown, or malfunction during the reporting period and took actions consistent with the startup, shutdown, and malfunction plan, the compliance report must include the information in 40 CFR 63.10(d)(5)(i).*
 - v. *If there were no deviations from the emission limitations for solvent mixers in 40 CFR 63.9500(a), a statement that there were no deviations from the emission limitations during the reporting period.*
 - vi. *If there were no periods during which a monitoring system was out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which a monitoring system was out-of-control during the reporting period.*
- q. *For each deviation from an emission limitation occurring at an affected source, the Permittee shall include the information in 40 CFR 63.9540(b)(i) through (iv) and the following information. This includes periods of startup, shutdown, or malfunction.*
- i. *The total operating time of each affected source during the reporting period.*
 - ii. *Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.*
- r. *If the facility had a startup, shutdown, or malfunction during the semiannual reporting period that was not consistent with the startup, shutdown, and malfunction plan, the Permittee shall submit an immediate startup, shutdown, and malfunction report according to the requirements in 40 CFR 63.10(d)(5)(ii).*

PSD – The facility is a pre-existing major stationary source for PSD, with actual and potential VOC emissions greater than 250 tons per year. Any modification would be evaluated for PSD significance levels. The PSD VOC bottleneck is the adhesive spray operations. This permit modification does not add to the facility-wide emissions of VOC. The proposed modification will also not be subject to PSD for PM or PM₁₀ because emissions of PM and PM₁₀ total less than the Significant Emission Rate (SER) of 25 tons per year and 15 tons per year respectively, for either pollutant.

112(r) – The 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. This permit modification does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. Only the control devices (**ID Nos. CD-01 and CD-03**) are currently subject to CAM requirements. No new control devices are being added as part of this permit modification. Therefore, the current CAM requirements remain the only requirements in the permit.

It should be noted that permit **02941T22** required that the Permittee administratively modify the existing permit to add the normal operating ranges for the subject control devices. Permit application **8300016.07C** was received on **July 2, 2007**, and included this information. The current CAM language has been modified to reflect these normals.

VII. Facility Wide Air Toxics

The facility is currently subject to both 15A NCAC 2D .1100 for the modeled toxic air pollutants methyl ethyl ketone, ammonia, formaldehyde, phenol, and toluene and 15A NCAC 2Q .0711 for epichlorohydrin. This permit modification does not affect this status. In addition, as 40 CFR 63, Subpart MMMM is the last applicable MACT to this facility, a demonstration is required to be submitted indicating compliance with NC Air Toxics (15A NCAC 2Q .0705) by the same compliance date of that last MACT (**January 2, 2006**). Compliance with this requirement was demonstrated and the recently issued renewed permit indicates compliance.

The Permittee commented in response to FRO's letter that hexane emissions have been calculated via a mass balance approach which assumes that all hexane used (except for that hexane which is reclaimed and recycled into the process) is emitted. The Permittee utilizes a condensing system on the Sigma mixer which reclaims approximately 40 percent of the hexane used in the mixing process. The Permittee has previously reduced hexane usage at the facility by discontinuing the process of thinning the adhesive coating with hexane. The facility currently mixes both hexane-containing rubber batches as well as batches which contain no hexane. The Permittee is continually evaluating reformulations of the batch processes to eliminate hexane from the process altogether.

Note. An area of concern for FRO is the large tank (**ID No. ES-50**). Hexane used in the process is stored in a 15,000-gallon bulk storage tank. Reclaimed hexane (from the condenser associated with the Sigma mixer) is returned via a closed loop process to this tank after being intermediately stored in a smaller tank. The Permittee estimates emissions using EPA's TANKS 4.0 model to estimate breathing and working losses from the tanks. The Permittee made the following assumptions:

Actual/Potential hours of operation = 8760 hours per year
Potential hexane throughput = 351,648 gallons per year
Turnovers per year = 23

Breathing losses are calculated as 898.07 pounds per year. Working losses as 1665 pounds per year.
Total losses = 2563.08 pounds per year (**1.28 tons per year**)

VIII. Facility Emissions Review

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2005 Actual Emissions (tpy)	2006 Actual Emissions (tpy)
CO	0.84	1.08
NO _x	1.01	1.28
PM ₁₀	1.91	2.28
SO ₂	0.01	0.01
VOC	234.67	200.01
Total HAP/TAP	223.28	185.35

IX. Stipulation Review

Robert Hayden of FRO, in a Compliance Additional Information letter to the Permittee dated **April 3, 2007**, lists the following permit discrepancies on the equipment listing of the air permit (*Permittee response to each of these items is included in Section I of this Document*):

1. ES-04A, L1 through L9, One Mold Area; ES-04B, L10 and L11, also controlled by bagfilter, CD-01. It is unclear what this particular source is referring to. The presses in the mold area are vented but uncontrolled, and there are no controls elsewhere around the lines. There are positive pressure cooling vents on each line that could have been misconstrued for emissions collectors.
2. ES-Silo, Storage silo for reclaimed brake material, controlled by a bin vent cartridge filter. This silo's filling operation appears to be controlled by (routed to) bagfilter CD-03, not by a bin vent filter.
3. The 2005 emissions inventory lists hexane emissions from the 15,000-gallon storage tank (ES-50) as around 35,000 gallons. Please explore this source for emissions estimation accuracy, and address feasible controls or work practices to reduce.
4. The permit lists "one granulator, F-01, controlled by a glycol condenser, CD-05a. Rather it appears there are two, separate granulator operations, each controlled by a bagfilter, CD-03.
5. The baking plate spray/dip application process, ES-17, lists 4 spray guns. There appear to be only two.
6. There appear to be 14 material weighing processes that are not mentioned on the permit. Three of them with identification numbers 7, 8, and 10, appear to be controlled by a bagfilter, CD-01, and should be listed on the permit.
7. The post-bake ovens are listed as 500,000 Btu per hour, but they appear to be 600,000.
8. There is an unpermitted device that mixes granulated rubber with calcium carbonate, and whose particulate emissions appear to be controlled by a small, unpermitted bagfilter on the roof.
9. There is an unpermitted device referred to as a France Grinder whose particulate emissions appear to be controlled by (routed to) bagfilter CD-03.
10. As bagfilter efficiencies are affected by flow rates and pollutant stream characteristics, please check if a reevaluation is necessary due to changes in the source-controls configurations since DAQ approval.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall 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 shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina is an affected State within 50 miles of this facility.

The following comments, on the DRAFT permit and review, were submitted by the Permittee prior to public notice:

1. There is some confusion regarding the control device CD-07. The April 30, 2007 permit modification lists CD-07 as the control device for ES-56. However, the permit application mailed September 27, 2007 also details a new control device CD-07 that only controls emission sources ES-58 and ES-59. This CD-07 is not the same piece of equipment as the CD-07 controlling ES-56. Perhaps a renaming of the control device for ES-56 is needed. In summary we have: (1) small bin vent filter (needs renaming) for ES-56, and (2) CD-07 dust collector for ES-58 and ES-59 (same correction on pages 4 and 6). *Agree, change made.*
2. Section 2.1, Page 6: There should be five (5) trim/scrap saws (ID Nos. ES-05A through ES-05E), not four (4). *Agree, change made.*
3. Part II, Section 1, Table 1, Page 40: CD-03 is 11,700 square feet of filter area, not 12800. *Agree, change made.*
4. Air Permit Review, Part III History/Background/Application Chronology: I do not see the September permit application I detail above listed. *No change, shown as December 10, 2007 entry.*
5. Page 4: CD-06 is a 70 square foot bagfilter and is not a cyclone (same correction on pages 6, 7, and 8). *Agree, change made.*
6. Condition No. 2.2 A.2 – n-Hexane should be changed to daily limits to coincide with the DAQ regulations (if you remember, we discussed this with FRO). Note. On March 17, 2008 RFPC mailed a letter to Air Permit Section and FRO requesting a change in the n-hexane limit from hourly limits to daily limits. *No change, part of application 8300019.08A and will be addressed at that time.*
7. I have read both NESHAP conditions and they appear to be consistent with Subparts QQQQQ and MMMM. I have no comments on QQQQQ. However in 2.2 A.7.c.i. January 1, 2008 needs to be changed to January 31, 2008 to be consistent with MMMM and there are typos in 2.2 A.7.h: “ix” is listed three times and should be changed to “iv.” *Agree, change made.*
8. If the permit is going to public notice, why does RFPC need to submit a significant modification within 12 months of startup of ES-58 and ES-59? It would appear that the current notice should be sufficient and pre-empt a future application submittal and public notice. *No change, each permit modification is treated separately. The permit application to add the sources (ID Nos. ES-Shred and ES-19new) was a one step minor modification. Those Part II requirements should have been removed from the DRAFT permit because no second step was required following the July 2007 date. This public notice completes the actions for those equipment. However, the permit application to add the sources (ID Nos. ES-58 and ES-59) was a two step significant modification. The first step allowed you to construct and operate those equipment and should have been processed within 90 days of receipt of that application. The trade off for the quicker turnaround of a significant modification is the requirement that a second title V application be submitted within 12 months of the first piece of new equipment being placed into service.*

Its this second step that goes to notice and EPA review. As you have not submitted this second step, the Part II requirements will be kept until they are fulfilled.

9. Section 2.2 A.2.a. This is the table that lists the emission limits of pollutants. We had stated in earlier correspondence that the ES-9 sigma mixer was incorrectly listed and it should be ES-03 wet mix room. However, we have asked to delete ES-03 from the permit because any emission sources in the wet mix room are being correctly addressed as new permitted sources. So I am not sure what needs to be out in for the emission source for this. I will discuss with Trinity Consultants and advise. *No change, part of application 8300019.08A and will be addressed at that time.*

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was presented for this modification. Aimee Andrews, PE (#029987) of Trinity Consultants, sealed the application that she prepared on behalf of Railroad Friction.

A consistency determination request was presented with the application.

FRO recommends issuance of the permit and **was presented** with a DRAFT permit prior to issuance (See Section III of this Document for a permit history listing).

RCO concurs with FRO's recommendation to issue the modified air permit.