

**NORTH CAROLINA
DIVISION OF AIR QUALITY
Air Permit Review**

Region: Mooresville Regional Office
County: Stanly
NC Facility ID: 8400013
Inspector's Name: Tonisha Dawson
Date of Last Inspection: 08/06/2010
Compliance Code: W / Violation - procedures

Permit Issue Date: xx

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Carolina Stalite Company Facility Address: Carolina Stalite Company 12423 Old Aquadale Road Norwood, NC 28128 SIC: 3295 / Minerals, Ground Or Treated NAICS: 212399 / All Other Nonmetallic Mineral Mining 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: 8400013.09C Date Received: 08/10/2009 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 03225/T36 Existing Permit Issue Date: 03/22/2010 Existing Permit Expiration Date: 04/30/2012		
Joe Konzelmann Environmental Coordinator (704) 474-3168 P. O. Box 1037 Salisbury, NC 28145	Charles Newsome Manager (704) 636-5231 P. O. Box 1037 Salisbury, NC 28145	Tim Agner Manager of Engineering Services (704) 279-2166 P. O. Box 1037 Salisbury, NC 28145			
Review Engineer: Rahul Thaker Review Engineer's Signature:		Date: November 23, 2010	Comments / Recommendations: Issue 03225/T37 Permit Issue Date: Permit Expiration Date:		

1. Purpose of Application

Division of Air Quality (DAQ) issued air permits 03225T32 and 03225T35 on July 31, 2008 and June 5, 2009, respectively, for construction and operation of Manufactured Soil Operation (MSO) and Supplemental Material Piles (FM-2), using the procedures in 2Q .0300 "Construction and Operation Permit". These permits required that the Permittee submit a permit application within 12 months of commencement of operation of the above equipment to DAQ, using the procedures in 2Q .0500 "Title V Procedures". Thus, Carolina Stalite Company ("Carolina Stalite" - Permittee) has submitted an application to satisfy the 2Q .0500 requirements for the above equipment [Application No. 8400013.09C].

Separately, the Permittee has submitted an application pursuant to 2Q .0515 "Minor Permit Modifications" [Application No. 8400013.10A], including a request to remove burning of non-RCRA regulated waste fuel and recycled No. 2 fuel oil in kilns, and removal of associated equipment and monitoring requirements from the air permit. This application [8400013.10A] has been consolidated into the above application [8400013.09C].

2. Facility Description

This facility makes lightweight aggregate.

3. Application Chronology

Refer to “Events Update” screen in the I-BEAM.

4. Statement of Compliance

The applicant has certified through submittal of E5 form that the facility is in compliance with all applicable requirements.

However, the regional office engineer (Tonisha Dawson of MRO) had concluded through a compliance inspection on 8/2/2010 that “this facility is in violation of the continuous monitoring and recordkeeping requirements under permit condition No. 2.1.B.1.g. An NRE will be sent to the facility.” The Mooresville Regional Office had issued a Notice of Violation and Recommendation for Enforcement” for these issue on 9/13/10.

It should be noted here that in this permit application, the Permittee has requested to remove condition (Section 2. 1 B.1.g.) from the permit.

5. Permit History

- Current air permit 03225T36 was issued on March 22, 2010, as per the procedures in 2Q .0501(c)(2) to allow construction and operation of new kiln and associated equipment.
- Air permit 03225T35 was issued on June 5, 2009, as per the procedures in 2Q .0501(c)(2), to allow construction and operation of two supplemental material storage piles.
- Air permit 03225T34 was issued on March 17, 2009, as per the procedures in 2Q .0515 “Minor Modification”, to allow replacement of existing baghouse.
- Air permit 03225T33 was issued on October 2, 2008, as per the procedures in 2Q .0515 “Minor Modification”, to remove all quarry operations sources.
- Air permit 03225T32 was issued on July 31, 2008, as per the procedures in 2Q .0501(c)(2), to add Manufactured Soil Operation.
- Air permit 03225T31 was issued on July 9, 2007, as per the procedures in 2Q .0514 “Administrative Permit Amendments”, to add omissions of equipment permitted in 03225T29.
- Air permit 03225T30 was issued on May 23, 2007, as per the procedures in 2Q .0513 “Title V Renewal and Expiration”, to renew the existing permit

6. Permit Modification/Changes

6.1 To construct and operate two, supplemental material storage piles (ID No. FM-2), as a portion of permitted finished product storage areas (ID No. FP).

The following review is copied from the air permit review supporting approval of this source in 03225T35.

This permit application includes a request to add limited amount of stockpiling, a total of 60,000 tons at any given time, in two supplemental material storage piles north of the railroad tracks. These stockpiles are identified as FM-2. The combined area for these two piles will be approximately 104,000 ft² (260 ft x 400 ft). The Permittee states that due to weakening economic situation, it will need more space to stockpile for its finished product.

It needs to be emphasized here that the current permit Condition 2.2 A.1.h. does not allow locating any finished product or the manufactured soil operations storage piles north of the railroad tracks. As per the Permittee, this permit restriction was included several years ago, based on the air dispersion modeling analysis to assure compliance with 2D .0501(e) [TSP SAAQS and PM10 NAAQS].

Also, it should be noted here that the permitted capacity of finished product storage areas (ID No. FP) is 165,000 tons at any given time, as per the current permit. The Permittee emphasizes that there will be no increase in product throughput or the amount of material allowed being stored. That is, the 60,000 tons amount of finished product to be stored in these new stockpiles is a part of 165,000 tons of finished product storage permit limit.

No new equipment is to be installed to load or unload the product in the new stockpiles. The material will be carried to these new piles using loader for storage until loaded into trucks for transport offsite in a manner similar to current operations.

No emission change (PM, PM10 or air toxics) is expected in the finished product storage areas (FP) due to operation of new stockpiles in the north of railroad tracks, because as indicated above, the new stockpiles are part of the permitted finished product storage areas.

The finished product storage areas (FP) including the supplemental material storage piles (FM-2) will continue to comply with the existing requirements under 2D .0540.

Compliance with 2D .0501(e)

The company has provided modeling analysis to demonstrate compliance with TSP SAAQS and PM10 NAAQS for the above operating scenario consisting of two; supplemental material storage piles located north of the railroad tracks. The AQAB has reviewed the final air dispersion modeling analysis submitted on 4/14/09. The following Table provides a summary of total predicted impacts using AERMOD for both TSP and PM10:

Pollutant	Total Predicted Impact (including background concentration) ug/m ³	SAAQS/NAAQS ug/m ³	Percent of SAAQS/NAAQS
TSP (24-hr)	92	150	61
TSP (Annual)	31	75	42
PM-10 (24-hr)	96	150	64
PM-10 (Annual)	40	50	80

The AQAB review dated 4/21/09 concludes “The modeling analysis did demonstrate compliance with the... National Ambient Air Quality Acceptable Ambient Standards (NAAQS), and State Ambient Air Quality Standard (SAAQS)...”

Compliance with 2D .1100

As per the DAQ request, the company has provided facility wide air toxics modeling analysis to demonstrate compliance with 2D .1100, due to the change in location of portion of finished product storage areas (FP). That is, the operation of two, new stockpiles north of the railroad tracks (FM-2).

The following Table provides a summary of predicted impacts using AERMOD, which incorporated the currently permitted emission rates for various sources for arsenic, beryllium, cadmium, non-specific chromium (VI) compounds as chromium (VI) equivalent, manganese, mercury, and nickel (these are the only pollutants affected by the change in location of portion of finished product storage areas FP (FM-2)).

Pollutant	Predicted Impact ug/m ³	AAL ug/m ³	Percent of AAL
Arsenic (Annual)	0.00011	2.3x10 ⁻⁴	48
Beryllium (Annual)	0.00091	4.1x10 ⁻³	22
Cadmium (Annual)	0.00128	5.5x10 ⁻³	23
Non-specific chromium (VI) compounds as chromium (VI) equivalent (Annual)	0.00002	8.3x10 ⁻⁵	24
Manganese and compounds (24-hr)	0.0279	31	< 1
Mercury (24-hr)	0.16	0.6	27
Nickel (24-hr)	0.78	6	13

Thus, the currently permitted emission rates for these pollutants will not change.

The AQAB review dated 4/21/09 concludes, “The modeling analysis did demonstrate compliance with Acceptable Ambient Levels (AAL).”

6.2 To add manufactured Soil Operation (ID No. ES-MSO) to the permit.

The following review is copied from the air permit review supporting approval of this source in 03225T35.

The purpose of this application is to add the MANUFACTURED SOIL OPERATIONS (ID No. ES-MSO) to the air permit. A full description of the process is included in the applicability determination request received by this office on May 6, 2008 and is excerpted below:

Carolina Stalite) is requesting a Permit Determination for a new activity planned at the Aquadale facility. A new product is under development identified as “Manufactured Soil”. It will be a composite mix of lightweight aggregate (LWA), sand, soil and compost. The sand, soil and compost materials will be brought in from off site sources for mixing with LWA produced on site. The Manufactured Soil (MS) is to be marketed as a bulk horticultural product.

It is proposed that the MS product be mixed at the Aquadale site in an area separate from the LWA processing area at a location between the plant entrance and the main plant area. The operation would occupy an area about 300 ft by 300 ft. It will be located adjacent to the entrance road, about 600 ft from the plant entrance gate and about 500 ft East of the weigh scale. A map with the proposed location is attached.

Mixing of the component materials will be accomplished by pile management with a self-propelled bucket loader. There will be a storage shed (3 walls and cover) capable of holding about 750 tons of material. It is anticipated that about 250 tons of material will be held outside on the concrete padded area adjacent to the shed for a total of 1000 tons of material on hand at any point in time. LWA will be trucked from the LWA storage area and the other ingredients will be trucked in from off site. Incoming trucks with non LWA material will be reloaded with MS product for trucking off site.

The operation will not have any equipment that requires permitting in that there will not be any conveyors, screens, etc. In regards to the potential emissions, the estimated potential PM emissions from the MS operation are about .1 ton/yr based on a potential production of 50,000 tons/yr. There are no controls per se, however, assuming 50% control for material handling practices the potential uncontrolled emissions are less than .3 ton/y PM. In addition there will also be a potential increase in emissions due to truck traffic of about .1 ton/yr of PM.

The Permittee had requested an applicability determination earlier this year (May 6, 2008) and it was determined that the language in permit condition 2.2.B.1.i.i. (sic) would not allow the soil operation because of its proposed location. The Permittee therefore submitted PM modeling to allow that restriction to be removed for the proposed location of the MANUFACTURED SOIL OPERATIONS. See Section IV for further discussion.

The primary pollutants are TSP and PM-10. However, since the product incorporates material used on site a TAP analysis was also submitted. This is primarily because of the unique history of the facility. It will be shown that the TAP AAL guideline impacts associated with the addition of this operation are minimal.

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

Visible emissions could result from the mixing process of the material as well as visible fugitive emissions when no mixing is occurring or from adjacent stockpiles. The fugitives will be covered by 2D .0540.

For 2D .0521, the Permittee will be required to make weekly observations for determining emissions above normal. Typical M/R/R will be included which is similar to the existing sources subject to 2D .0521 with non-point source particulate matter emissions.

15A NCAC 2D .0511 - PARTICULATES FROM LIGHTWEIGHT AGGREGATE PROCESSES

This regulation requires:

The Permittee shall not cause, allow, or permit any material to be produced, handled, transported, or stockpiled without taking measures to reduce to a minimum any particulate matter from becoming airborne to prevent the ambient air quality standards for particulate matter, both PM₁₀ and total suspended particulates, from being exceeded beyond the property line.

A number of non-point (particulate matter) sources are subject to this regulation in the current permit such as conveyors, screens and transfer points. Similar to these sources, for the MANUFACTURED SOIL OPERATIONS the Permittee will need to:

The Permittee shall control emissions from conveyors, screens, and transfer points, such that the applicable opacity standards are not exceeded.

No M/R/R will be required as is similar to the existing non-point particulate matter sources. In essence, compliance with this regulation is demonstrated by compliance with 2D .0521.

15A NCAC 2D .0540 PARTICULATES FROM FUGITIVE NON-PROCESS DUST EMISSION SOURCES

Under 2D .0540, fugitive dust emissions" means:

Particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas, stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

Thus, although there is some overlap with 2D .0511 in the definition, 2D .0540 picks up other fugitives from this operation as well as facility-wide emissions.

No specific requirements will be imposed on the MANUFACTURED SOIL OPERATIONS.

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

Given that this rule has been triggered for other sources, it will be applied to this source as well. It is unknown if this operation will contribute any significant odor.

No specific requirements will be imposed on the MANUFACTURED SOIL OPERATIONS.

15A NCAC 2D .0501(e) COMPLIANCE WITH NATIONAL AMBIENT AIR QUALITY STANDARDS

The current condition 2.2.B.1.i.i. (sic) states:

- i. The raw materials (argillite) (ID No. RM) and finished product storage areas (ID No. FP) shall not be located:
 - i. within 100 meters of the nearest property boundary or fence line, whichever is closest to the storage area with the exception that the railroad tracks shall constitute the storage area limit, in that no raw material or finished product storage areas shall be located or placed north (office/tank farm side) of the railroad tracks at any time;
 - ii. except for and along the railroad tracks, the Permittee shall install and maintain one or more 100 meter markers, as necessary or requested, to ensure and demonstrate that the 100 meter limitation between the storage areas and the nearest property boundary or fence line, whichever is closer, is not encroached upon inadvertently or otherwise.

Since the location of the MANUFACTURED SOIL OPERATIONS was to be placed north of the railroad tracks, a modeling analysis was submitted to show that the compliance of the particulate matter (TSP and PM10) would be maintained.

The modeling was approved by the AQAB in a memo dated June 24, 2008.

The condition will be modified to read as follows (changes in **BOLD UNDERLINE**):

- i. The raw materials (argillite) (ID No. RM) ~~and~~ finished product storage areas (ID No. FP) and **MANUFACTURED SOIL OPERATIONS (ID No. ES-MSO)** shall not be located:
- ii. within 100 meters of the nearest property boundary or fence line, whichever is closest to the storage area with the exception that the railroad tracks shall constitute the storage area limit, in that no raw material (**ID No. RM**) or finished product storage areas (**ID No. FP**) shall be located or placed north (office/tank farm side) of the railroad tracks at any time;
- iii. except for and along the railroad tracks, the Permittee shall install and maintain one or more 100 meter markers, as necessary or requested, to ensure and demonstrate that the 100 meter limitation between the storage areas and the nearest property boundary or fence line, whichever is closer, is not encroached upon inadvertently or otherwise.

15A NCAC 2D .1100 CONTROL OF TOXIC AIR POLLUTANTS

The Permittee submitted a TAP analysis since the product incorporates material used on site a TAP. This is primarily because of the unique history of the facility.

AERMOD was used to determine impacts and the highest impact was for arsenic at 0.3% of the AAL guideline. The following table shows the TAPs and their permitted emission rates and the impacts as a % of the AAL. Note the % of AAL impacts shown are related directly to the Manufactured Soil Operation. Given the level of the impacts this engineer felt it unnecessary to require a full facility-wide updated toxics analysis.

Pollutant	Permitted emission rate	Units	% AAL
Arsenic	1.82E-3	lb/year	0.28
Beryllium	3.9E-5	lb/year	0.00
Cadmium	1.6E-5	lb/year	0.00
Chromium VI	5.4E-5	lb/year	0.02
Manganese	1.75E-3	lb/day	0.10
Mercury	4.18E-8	lb/day	0.00
Nickel	1.02E-4	lb/day	0.00

Given the low impacts, no M/R/R will be required for the Manufactured Soil Operation.

6.3 To Remove Non-RCRA Regulated Waste Fuel and Recycled No. 2 Fuel Oil in Kilns (ES-7 and ES-8), and Associated Equipment and Monitoring Requirements from the Air Permit.

The current permit includes provisions for burning of non-RCRA regulated waste fuel and recycled No. 2 fuel oil in kilns (ES-7 and ES-8) and operation of the associated sources for storage (ST1 through ST6) and pumping (PMPHSE) of these fuels. With this permit revision, the Permittee has requested to remove all provisions associated with burning of these fuels and the removal of permitted source PMPHSE from the permit, and reclassify the permitted storage tanks ST1 through ST-6 as “insignificant activities” for storage of No. 2 fuel oil.

DAQ will remove the approval for burning of non-RCRA regulated waste fuel and recycled No. 2 fuel oil in kilns (ES-7 and ES-8) and approve removal of emission source PMPHSE from the permit. DAQ will reclassify the storage tanks (ST1 through ST-6) as “insignificant activities” as per 2Q .0503(8). Storage tanks ST-1 through ST-3 have a capacity of 10,000 gallons each while tanks ST-4 through ST-6 can store 20,000 gallons each. The potential VOC emissions are 0.015 tons/yr (each for ST-1 through ST-3) and 0.019 ton/yr (ST-4 through ST-6).

Finally, the Permittee has requested to remove all monitoring requirements associated with the above changes. These requested changes to various sections of the air permit have been listed in Section 10 below. DAQ will approve these requested changes. Few of the most critical changes to the monitoring requirements have been discussed below:

Section 2.1 B.1. f.

This stipulation requires the Permittee to record the inlet temperature of the flue gas entering the baghouse (CD-7B and CD-8B) and average it on a 15-minute rolling basis. It also states that if the 15-minute average temperature of 450° F is exceeded, the Permittee will be deemed in noncompliance with 2D .0511.

The Permittee argues that inlet temperature exceeding 450 °F can only occur in upset (malfunction) conditions and in the last 6 years, it never exceeded this inlet temperature requirement.

As requested, the Permittee has submitted information for each month since January 1, 2005, containing maximum monthly values of inlet temperatures on a 15-minute rolling average basis (the facility changed ownership from Carolina Solite to Carolina Stalite on 10/1/04, so it is appropriate to review all data pertaining to this issue after the change in ownership date). The submitted data indicates that the baghouse inlet temperature for each kiln never exceeded the permit requirement of 450 °F. DAQ believes that the kiln particulate emissions are satisfactorily controlled by the associated baghouses and the current inspection and maintenance requirement (monthly visual and annual internal inspections) for each baghouse is sufficient to comply with the “periodic monitoring” provision of Part 70. Thus, DAQ will remove the monitoring requirement for inlet temperature of the flue gas. It needs to be added that the MRO has no objection to the removal of this requirement. See the attached email of November 4th from Tonisha Dawson.

Section 2.1 B.1. g.

This stipulation requires the Permittee to continuously record the pressure drop across each baghouse (CD-7B and CD-8B) and if the pressure drop is found to be less than 1 inch or more than 9 inch on a 15-minute rolling average basis, then it will be deemed in noncompliance with 2D .0511.

As requested, the Permittee has submitted information for each month since January 1, 2005, containing minimum and maximum monthly values of pressure drop across each baghouse on a 15-minute rolling average basis. The submitted data indicates that the pressure drop on a 15-minute rolling average basis never decreased below 1 inch nor did it increased above 9 inches. DAQ believes that the kiln particulate emissions are satisfactorily controlled by the associated baghouses and the current inspection and maintenance requirement (monthly visual and annual internal inspections) for each baghouse is sufficient to comply with the “periodic monitoring” provision of Part 70. Thus, DAQ will remove the monitoring requirement for pressure drop across each baghouse. It needs to be added that the MRO has no objection to the removal of this requirement. See the attached email of November 4th from Tonisha Dawson.

Section 2.1 B.6.

This is a stipulation containing CAM plan for PM10 and SO₂ emissions from kilns (ES-7 and ES-8). The CAM plan for PM10 includes visible emissions and pressure drop as indicator parameters.

The Permittee contends that the pressure drop measurements are not needed as an indicator of compliance with 2D .0614 when the visible emissions measurements are sufficient to serve that purpose. It adds that at the time of processing of renewal application, it proposed and DAQ agreed to use the pressure drop measurements as another indicator parameter consistent with the similar monitoring to comply with the requirement in 2D .0511 (Section 2.1 B.1.g.), and because, in this permit application, the company had requested to remove this pressure drop requirement for 2D .0511 compliance from the permit, it now also wanted to remove the pressure drop as an indicator to comply with the requirements in 2D .0614.

As indicated above, DAQ has determined to remove the pressure drop monitoring to comply with 2D .0511. DAQ believes that the visible emissions as an indicator parameter for compliance (for PM limits under 2D .0511 and .0524) is sufficient to comply with the CAM requirement, and thus pressure drop as an indicator parameter will be removed from the CAM stipulation.

7. NSPS, NESHAPS, PSD, Attainment Status, 112(r), and CAM

NSPS

None of the proposed changes trigger applicability to any promulgated NSPS.

NESHAP/MACT

None of the proposed changes trigger applicability to any promulgated NESHAPS.

Attainment Status and PSD

Stanly County is in attainment of all NAAQS. PSD program applies to all “major” sources and “major modifications” in this County. None of the proposed changes trigger applicability to PSD.

112(r)

This facility is subject to Section 112(r) of the Clean Air Act requirements.

CAM

As stated in Section 6.3 above, the current permit includes CAM plan for the emissions of PM10 and SO₂ from two kilns (ES-7 and ES-8). Refer to Section 6.3 for discussion on changes to the CAM plan with respect to PM10 emissions.

8. Facility Wide Air Toxics

The current permit includes modeled emission rates for a number of air toxics complying with the requirements in 2D .1100. As stated above in Section 6, the Permittee has requested to remove from the permit applicable monitoring requirements associated with burning of non-RCRA regulated waste. Thus, the air toxics requirements associated with this fuel delisting are also affected. Please refer to Section 10 below for changes to the air toxics stipulation.

9. Facility Emissions Review

The following is an emission summary for the facility wide emissions. Actual emissions are 2009 actual emissions as included in the I-BEAM. The potential emissions estimate is from the permit application.

Pollutant	Actual Emissions tons/yr	Potential Emissions After Control tons/yr
PM	7.7	139
PM-10	5.4	91
PM-2.5	2.3	56
SO ₂	92.5	1,343
NO _x	54.2	724
CO	1.3	2
VOC	0.12	3
Single HAP (HCl)	1.26	1.26
Aggregate HAP	1.70	1.8

10. Stipulation Review

The following changes were made to the Carolina Stalite Company, Aquadale Properties, LLC, Air Permit No. 03225T36:

Old Page No. [Air Permit No. 03225T36]	New Page No. [Air Permit No. 03225T37]	Condition No.	Changes
4	4	Section 1 Table	Remove recycled No. 2 fuel oil and non-RCRA regulated waste fuel for kilns ES-7 and ES-8. Remove tanks ST-1 through ST-6 from this Section and attach to the cover letter to the permit as insignificant activities. Remove source PMPHSE.
14	-	Section 2.1 B.1.f. and g.	Remove these requirements.
15	-	Section 2.1 h.	Remove this requirement.
15	-	Section 2.1 B.1.k. and l.	Remove these requirements.
16	15	Section 2.1 B.2.c.iii.A.	Remove recycled No. 2 fuel oil.
19	18	Section 2.1 B.5.g.	Remove recycled No. 2 fuel oil and non-RCRA regulated waste fuel.
20	18	Section 2.1 B.5.h.i.	Remove this procedure to determine heat input rate.
20	-	Section 2.1 B.5.h.ii. B.	Remove this requirement.
21	19	Section 2.1 B.5.m. and n.ii.	Remove recycled No. 2 fuel oil and non-RCRA regulated waste fuel.
21	19	Section 2.1 B.5.n.iii.	Modify it to remove measurement and analytical results reporting.
22 and 23	20	Section 2.1 B.6.c. and Section 2.1 B.6.d.iii.	Remove pressure drop as an indicator parameter. Remove SO ₂ CAM plan. SO ₂ CEM is considered a continuous compliance determination method (CCDM) under Part 64. Emission unit having a CCDM is exempt from the CAM requirement.
23	21	Section 2.1 B.6.d.i.	Replace the filter area with the air-to-cloth ratio.

37	-	Section 2.2 B.	Remove emissions sources ST-1 through ST-6 and PMPHSE. For kilns ES-7 and ES-8, remove all air toxics associated with non-RCRA waste fuel.
58	-	Section 2.2 B.1.c., Section 2.2 B.1.f., and Section 2.2 B.1.g.	Delete these requirements.
60	50	Section 3	Update the General Conditions with the latest Title V Shell.

11. Public Notice / EPA and Affected States Review

Pursuant to 15A NCAC 2Q .0521, a notice of the draft Title V Operating Permit will be published on the DAQ website providing for a 30-day comment period, with an opportunity for a public hearing. Copies of the draft (proposed) permit, review and public notice will be sent to EPA (for their 45-day review), to persons on the Title V mailing list, and to the Permittee.

12. Conclusions, Comments, and Recommendations

- PE seal requirement in 2Q .0112 is not applicable.
- None of the changes in Section 6 above require zoning consistency determination from the Stanly County.
- The draft permit was e-mailed to Tonisha Dawson of MRO on November 8th for review and comment. Tonisha responded on November 16th with no comments.
- The draft permit was also e-mailed to the company on November 8th for review and comment. The company RO sent a few minor comments on November xx. The company comments and the DAQ response are the following:

Company Comment 1:

“On page 4, conveyors FCS 38 and FCS 43 have been constructed and reported to DAQ, so the footnote * indicating future construction can be removed for these units.”

“Also, the *** indicated for pile FP is no longer needed as the source is to being added to this Title V permit and the footnote *** is being removed.”

DAQ Response:

Agreed. These changes will be performed.

Company Comment 2:

“On page 22, item iii Rationale for Selection of Indicator Ranges, information addressing the SO₂ monitoring rationale at the end of the paragraph has been removed (see Permit T26 page 24). It appears this language may have been inadvertently deleted (unless it was deemed no longer needed in the permit).”

DAQ Response:

The SO₂ CAM plan will be removed in the revised permit. It is not required.

DAQ believes that the existing continuous emission monitoring requirement for SO₂, as specified in the current Title V permit to comply with 2D .0516, is in fact a “continuous compliance determination method” as defined

in Part 64. Thus, the control devices (flue gas desulfurization systems) associated with each kiln (ES7 and ES-8) are exempt from the CAM requirement for SO₂ emissions.

- Finally, this engineer recommends issuing the final permit.