

Air Permit Review

Permit Issue Date: ??

Region: Raleigh Regional Office
County: Johnston
NC Facility ID: 5100159
Inspector's Name: Brian Bland
Date of Last Inspection: 04/27/2011
Compliance Code: 3 / Compliance - inspection

| | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| Facility Data | | | Permit Applicability (this application only) | | |
| Applicant (Facility's Name): Structural Coatings Inc. Facility Address: Structural Coatings Inc. 8027 US Highway 70 East Clayton, NC 27520 SIC: 3441 / Fabricated Structural Metal NAICS: 332312 / Fabricated Structural Metal Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V | | | SIP: 15A NCAC 2Q .0501(c)(1) NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A | | |
| Contact Data | | | Application Data | | |
| Facility Contact | Authorized Contact | Technical Contact | Application Number: 5100159.08B Date Received: 11/25/2008 Application Type: Modification Application Schedule: TV-1st Time Existing Permit Data Existing Permit Number: 07357/R04 Existing Permit Issue Date: 10/01/2008 Existing Permit Expiration Date: 09/30/2013 | | |
| John Dabinett Safety Director (919) 553-3034 8029 Highway 70 West Clayton, NC 27520 | Ray Hales President (919) 553-3034 8029 US Hwy 70 W Clayton, NC 27520 | John Dabinett Safety Director (919) 553-3034 8029 Highway 70 West Clayton, NC 27520 | | | |
| Review Engineer: Brian Bland Review Engineer's Signature: _____ Date: ?? | | | Comments / Recommendations: Issue 07357/T05 Permit Issue Date: ?? Permit Expiration Date: September 30, 2013 | | |

1. Purpose of Application:

Structural Coatings Inc. is a facility located in the Clayton, Johnston County, North Carolina. This facility is requesting a first time Title V in accordance with 15A NCAC 2Q .0501(c)(1). Application No. 5100159.08B was received by the Division of Air Quality (DAQ) on November 25, 2008 along with the application fee and was considered complete on that date. Air Permit Nos. 07357R03 and 07357R04 contained a "Specific Condition" requiring that this facility submit a Title V permit application by November 29, 2008 (one year from the issuance of permit revision 09566R03), and Application No. 5100159.08B fulfilled that requirement. No new emission sources or control devices were added as part of this application.

2. Description of Facility:

The facility is an applicator of protective coatings for fabricated steel products.

The permitted items at the facility include two MACT subpart Mmmm painting operations, two metalizing operations and one outdoor sandblasting operation.

3. Permit Modification/Changes

| New Page(s) | Section | Description of Change(s) |
|-------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ALL | Entire Permit | +Change permit format from a state only (2Q .0300) permit to the current Title V permit standards (2Q .0500) +Federally enforceable limitations, monitoring, recordkeeping and reporting requirements were added to all permit conditions (with the exception of the "State Enforceable Only" conditions) |

| New Page(s) | Section | Description of Change(s) |
|-------------|-------------------------------------------|--------------------------------------------------------------------|
| N/A | Specific Condition A.13 (Revision R04) | +Remove 15A NCAC 2Q .0504 (Title V Permit Application requirement) |
| 21-end | General Conditions | +Update General Conditions to version 3.4 |

4. Regulatory Review

The permit language was updated and expanded as needed, but the requirements of these existing stipulations remained essentially unchanged:

15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0541, Control of Emissions from Abrasive Blasting
15A NCAC 2D .0705, Existing Facilities and SIC Calls
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 (40 CFR 63, Subpart Mmmm)
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0512, Permit Shield and Application Shield

5. NSPS, NESHAPS, PSD, CAM and 112r:

NSPS

The facility is not currently subject to any new source performance standards. This permit application does not affect this status.

NESHAP

The facility is subject to MACT Subpart Mmmm – National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products. This modification does not include any changes to the MACT requirements. The permit language was updated to reflect current Title V Subpart Mmmm language.

As discussed in Mark Cuilla's permit review for R04: This requirement was added to the permit with revision R03 on November 29, 2007. The facility was operating under a MACT avoidance condition; however, increased emissions caused these limits to be exceeded in spring of 2006. As a result the facility applied for a fee class modification to Title V. At that time the MACT requirements were also added. 63.3883(c)(2) indicates that the facility's compliance date is "...1 year after the area source becomes a major source or January 2, 2007, whichever is later." The compliance date of this MACT was set as one year from permit issuance (i.e., November 29, 2008 – *See Joe Voelker's permit review for R03*).

Compliance with the MACT is expected. The facility has been submitting semi-annual reports meeting the general use emission limits of 2.6 lb HAP/ gal solid per 40 CFR 63.3890(b).

PSD

The facility is not currently subject to any Prevention of Significant Deterioration requirements. This permit application does not affect this status.

CAM

As detailed in the review for R04: The facility operates three panel filters, one each on the two painting operations (ID Nos. ES-PO1 and ES-PO2) and one on the collective stack for the metalizing operations (ID Nos. ES-MO1 and ES-MO2). CAM applicability has previously been determined (see Joe Voelker's permit review for R03). In summary, CAM is not applicable to the painting operations because they are subject to a MACT standard. CAM is also not applicable to the metalizing operations because potential pre-control emissions are not greater than major source thresholds. Thus CAM does not apply to any of the sources at this facility. The "Permit Shield for Non-applicable Requirements" language was carried forward from R04.

112r

The facility does not store materials in quantities subject to 112r.

6. Facility-wide Air Toxics:

15A NCAC 2D .1100 "Control of Toxic Air Pollutants" - The facility is currently subject to modeled emission rates for methyl ethyl ketone, methyl isobutyl ketone, toluene, and xylene. A refined modeling analysis was submitted to DAQ in October 2007 and incorporated into 07357R03. This permit application does not affect this status.

7. Facility Emissions Review

There are no changes in equipment or processes for this application.

The following table represents the latest available reviewed emission inventory from the facility:

| Pollutant | 2009 Actual Emissions (tpy) |
|------------------|----------------------------------------|
| VOC | 48.36 |
| PM10 | 2.4 |
| Xylene | 22.63 |

8. Facility Compliance Status:

The last full inspection of this facility was completed on April 27, 2011 by the Raleigh Regional Office. At this time, the facility appeared to be operating in compliance with applicable requirements.

9. Draft Permit Review Summary:

Dena Pittman of the Raleigh Regional Office was provided a draft permit and draft permit review document on April 26, 2011. The RRO's only comments involved formatting and these issues were resolved.

John Dabinett of Structural Coatings Inc. was provided a draft permit for review on April 26, 2011. No comments were received at the time of permit issuance.

U.S. EPA was provided a draft permit for review on <DATE>. <SUMMARY OF COMMENTS>.

A 30-day public notice period was initiated on <DATE>. <SUMMARY OF COMMENTS>.

10. Recommendation

Issuance of Air Permit No. 07357T05.