

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: XX

Region: Winston-Salem Regional Office
County: Randolph
NC Facility ID: 7600198
Inspector's Name: Jennifer White
Date of Last Inspection: 02/21/2006
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Ultracraft Company, Division of Norcraft Holdings, LP</p> <p>Facility Address: Ultracraft Company, Division of Norcraft Holdings, LP 6163 Old US 421 Liberty, NC 27298</p> <p>SIC: 2434 / Wood Kitchen Cabinets NAICS: 33711 / Wood Kitchen Cabinet and Countertop Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP:</p> <p>NSPS:</p> <p>NESHAP:</p> <p>PSD:</p> <p>PSD Avoidance:</p> <p>NC Toxics:</p> <p>112(r):</p> <p>Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 7600198.05D Date Received: 12/21/2005 Application Type: Modification Application Schedule: TV-1st Time Existing Permit Data Existing Permit Number: 05951/R16 Existing Permit Issue Date: 02/06/2006 Existing Permit Expiration Date: 09/30/2010</p>
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<p>Review Engineer: Kevin Godwin</p> <p>Review Engineer's Signature: _____ Date: _____</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 05951/T17 Permit Issue Date: XX Permit Expiration Date: XX</p>	

1. Introduction

The U.S. Environmental Protection Agency (EPA) has given final approval to North Carolina's Title V operating permits program effective on October 1, 2001. This EPA approval triggered the requirements for Title V facilities to submit permit applications to the Division of Air Quality (DAQ). Title V facilities are required to obtain an operating permit which addresses all applicable regulations under the State Implementation Plan, Federal Implementation Plan, and other provisions of the Clean Air Act (CAA). The Title V Operating Permit will define all of the facility's obligations under the CAA.

This 1st time Title V Air Permit application review intends to convey all pertinent emissions data, rules, policies, and engineering assumptions used to construct the Title V Operating Permit. The primary source of information used to construct the permit is the above referenced permit application.

2. Background Information

The 1st time Title V Operating Permit replaces an existing Air Quality Construction and Operation Permit No. 05951R16, which was issued on June 29, 2006 and is currently scheduled to expire on September 30, 2010.

Ultracraft Company is subject to the provisions of Title V due to potential VOC emissions exceeding the 100 tpy threshold. Pursuant to 15A NCAC 2Q .0506, Ultracraft Company submitted its 1st time Title V application (7600198.05D) to the DAQ on December 21, 2005. The application was considered complete for processing on December 21, 2005. The DRAFT permit will be taken to public notice pursuant to 15A NCAC 2Q .0521.

On June 2, 2006, Ultracraft submitted an application (7600198.06A) for the addition of one dry filter-type spray booth and a natural gas-fired bake oven (ID Nos. 16 and BO-3). This modification did not result in an emission increase as existing production is shifted to the new booth. P/N **05951R16** was issued as a state-only/502(b)(10) change under 15A NCAC 2Q .0523.

On December 21, 2005, Ultracraft submitted an application (7600198.05E) for the addition of four dry filter-type spray booths (ID Nos. 8, 13, 14, and 15). This modification did not result in an emissions increase as existing production is shifted to the new booths. P/N **05951R15** was issued as a state-only/502(b)(10) change under 15A NCAC 2Q .0523.

3. Facility Description

Ultracraft Company manufactures kitchen cabinets at this Randolph County site. Processes include woodworking, wood finishing, and gluing. Woodworking operations are vented to two (2) wood waste collection systems, which are controlled by a bagfilter. Wood finishing is accomplished in sixteen (16) dry filter-type spray booths. Ultracraft is also permitted to operate three (3) natural gas-fired bake ovens.

4. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. On its latest inspection conducted on February 21, 2006, by Mr. Michael Gendy (Winston-Salem Regional Office), the facility was found to be operating in compliance with all applicable requirements. The five-year compliance history is detailed in the February 22, 2006 inspection report. The applicant has certified that the facility will be in compliance with all applicable requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

5. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the 1st time Title V Operating Permit is being issued:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
WCS-1 and WCS-2	Two wood waste collection systems consisting of separate group processes	CY-1 and BF-1	One bagfilter (6,720 square feet of filter area)
SB-1 through SB-16	Sixteen dry filter-type spray booths and electric infrared ovens	N/A	N/A
GLU-1	One gluing operation	N/A	N/A
BO-1, BO-2, and BO-3	Three natural gas-fired bake ovens (0.8, 1.6, and 0.8 million Btu per hour heat input respectively)	N/A	N/A

6. Emission Source-by-Source Evaluation

A. Two (2) wood waste collection systems (ID Nos. WCS-1 and WCS-2) consisting of separate group processes and associated bagfilter (ID No. BF-1)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter including PM ₁₀	Adequate ductwork and properly designed collectors such that ambient standards are not exceeded beyond the property line	15A NCAC 2D .0512
Visible emissions	20 percent opacity	15A NCAC 2D .0521

i. 15A NCAC 2D 0512: “Particulates from Miscellaneous Wood Products Finishing Operations”

- a. This regulation required adequate ductwork and properly designed collectors on woodworking processes. The woodworking operations exhaust to two separate wood waste collection systems, which in turn vent to a bagfilter (ID No. BF-1). The applicant estimates that the control system removes 99.5% of the particulate matter. Analysis of the bagfilter indicates this control efficiency should be reasonably expected (ref. Bagfilter spreadsheet attached). Compliance with this regulation is indicated.

According to the inspection report, the wood waste collected in the bagfilter is fed to a bin through a closed-loop cyclone (80 inches in diameter). The cyclone does not require permitting.

Testing requirement

- b. Stack testing is not required to demonstrate compliance as there is no numerical emission standard.

Monitoring requirement

- c. The Permittee shall perform inspections of the bagfilter and ductwork as recommended by the manufacturer. As a minimum, the inspections will include monthly external inspection on the bagfilter and ductwork noting the structural integrity, and an annual internal inspection of the bagfilter noting structural integrity and condition of the filters.

Recordkeeping requirement

- d. The results of inspection and maintenance for the woodworking operations shall be maintained in a log (written or electronic format) on-site and made available to DAQ personnel upon request. The log shall record the date and time of each recorded action, the results of each inspection, and the results of maintenance performed on the filters.

Reporting requirement

- e. No reporting is required.

ii. 15A NCAC 2D .0521: Control of Visible Emissions”

- a. These sources were manufactured after July 1, 1971 and are therefore subject to 2D .0521(d). Visible emissions from these sources shall not exceed 20 percent opacity when averaged over a six-minute period. Compliance with this regulation is indicated because the latest inspection report did not cite any exceedances.

Monitoring requirement

- b. The Permittee shall establish “normal” visible emissions for these sources in the first 30 days following the permit effective date. Once a week, the Permittee shall observe the emission point for visible emissions above normal.

Recordkeeping requirement

- c. The results of the monitoring shall be maintained in a log on-site and made available to DAQ personnel upon request. The log shall record the date and time of each recorded action, the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with corrective actions taken to reduce visible emissions.

Reporting requirement

- d. The Permittee shall submit a summary report of the observations every six months.

B. Sixteen (16) dry filter-type spray booths (ID Nos. SB-1 through SB-16), electric infrared ovens (ID Nos. EO-1 and EO-2), and gluing operation (ID No. GLU-1)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter including PM ₁₀	Adequate duct work and properly designed collectors to ensure ambient standards are not exceeded beyond the property boundary	15A NCAC 2D .0512
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Volatile organic compounds	Work practice standards	15A NCAC 2D .0958
Volatile organic compounds	Less than 250 tons per consecutive 12-month period, See Section 7.	15A NCAC 2Q .0317 for avoidance of 15A NCAC 2D .0530
Hazardous air pollutants	Less than 10/25 tons per consecutive 12-month period, See Section 7.	15A NCAC 2Q .0317 for avoidance of 15A NCAC 2D .1111
Toxic air pollutants	Toxic air pollutant emissions shall not exceed the 2Q .0711 levels unless ambient standards are not exceeded, State-only requirement , See Section 7.	15A NCAC 2Q .0711
Toxic air pollutants	Formaldehyde emissions shall not exceed 0.633 pounds per hour, State-only requirement , See Section 7.	15A NCAC 2D .1100

i. 15A NCAC 2D .0512: “Particulates from Miscellaneous Wood Products Finishing Operations”

- a. This regulation requires adequate ductwork and properly designed collectors on woodworking processes. The spray booths are all equipped with dry filters. The applicant estimates that the filters remove 97% of the particulate matter. Compliance with this requirement is expected.

Testing requirements

- b. Stack testing is not required to demonstrate compliance as there is not a numerical emission standard.

Monitoring requirements

- c. The Permittee shall perform inspections of the filters and ductwork as recommended by the manufacturer. As a minimum, the inspections will include weekly inspection of the spray booths' filters noting the condition, and an annual (for each 12-month period following the initial inspection) inspection of the system ductwork noting structural integrity.
- d. Recordkeeping requirements
The results of inspection and maintenance for the spray booths shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the date and time of each recorded action, the results of each inspection, and the results of maintenance performed on any filters.

ii. 15A NCAC 2D .0521: "Control of Visible Emissions"

- a. These spray booths were manufactured after July 1, 1971 and are therefore subject to 2D .0521(d). Visible emissions from the spray booths shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. Compliance with this regulation is indicated because the latest inspection report did not cite any exceedances.

Monitoring requirements

- b. The Permittee shall establish "normal" visible emissions for these sources in the first 30 days following the permit effective date. Once a month the Permittee shall observe the emission points of these sources for any visible emissions above "normal."

Recordkeeping requirements

- c. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the date and time of each recorded action, the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and the results of any corrective actions performed.

Reporting requirements

- d. The Permittee shall submit a summary report of the observations 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 must be clearly identified.

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

- a. **Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day; the Permittee shall:**
 - i. store all material, including waste material, containing volatile organic compounds in tanks or in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
 - ii. clean up spills of volatile organic compounds as soon as possible following proper safety procedures,
 - iii. store wipe rags containing volatile organic compounds in closed containers,

- iv. not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
 - v. transfer solvents containing volatile organic compounds used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act,
 - vi. clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act. [15A NCAC 2D .0958(c)]
- b. When cleaning parts with a solvent containing a volatile organic compound, the Permittee shall:
- i. flush parts in the freeboard area,
 - ii. take precautions to reduce the pooling of solvent on and in the parts,
 - iii. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
 - iv. not fill cleaning machines above the fill line,
 - v. not agitate solvent to the point of causing splashing. [15A NCAC 2D .0958(d)]

Monitoring

- c. To assure compliance with paragraphs (a) and (b) above, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. If the required inspections are not conducted the permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Recordkeeping

- d. The results of the inspections shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- i. the date and time of each inspection; and
 - ii. the results of each inspection noting whether or not noncompliant conditions were observed.
- If the required records are not maintained the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

Reporting

- e. The Permittee shall submit a summary report of the observations by 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.

C. Three natural gas-fired bake ovens (ID Nos. BO-1, BO-2, and BO-3)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Visible emissions	20 percent opacity	15A NCAC 2D .0521

i. 15A NCAC 2D .0516: “Sulfur Dioxide Emissions from Combustion Sources”

- a. Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

Testing

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4). If the results of this test are above the limit, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.
- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in these sources.

ii. 15A NCAC 2D .0521: “Control of Visible Emissions”

- a. Visible emissions from **these bake ovens (ID Nos. BO-1, BO-2, and BO-3)** shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521 (d)]

Testing

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

Monitoring/Recordkeeping/Reporting

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas in these bake ovens.

7. Multiple Emission Source Limits

A. Facility-wide sources

The following table summarizes limits and standards for the above emission sources.

Regulated Pollutant	Limit/Standard	Applicable Regulation
Volatile organic compound	Less than 250 tons per consecutive 12-month period	15A NCAC 2Q .0317 for avoidance of 15A NCAC 2D .0530
Hazardous air pollutants	Less than 10/25 tons per consecutive 12-month period	15A NCAC 2Q .0317 for avoidance of 15A NCAC 2D .1111
Toxic air pollutants	State-enforceable only TAP emissions shall not exceed the TPER levels unless ambient standards are not exceeded	15A NCAC 2Q .0711
Toxic air pollutants	State-enforceable only Formaldehyde emissions shall not exceed 0.633 lb/hr	15A NCAC 2D .1100

**i. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS for avoidance of
15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of this regulation, the above emission sources shall discharge into the atmosphere less than 250 tons of VOCs per consecutive 12-month period. [15A NCAC 2D .0530] Monitoring/Recordkeeping
- b. Calculations of VOC emissions per month shall be made at the end of each month. VOC emissions shall be determined by multiplying the total amount of each type of VOC-containing material consumed during the month by the VOC content of the material. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the amounts of VOC containing materials or the VOC emissions are not monitored and recorded.
- c. Calculations and the total amount of VOC emissions shall be recorded monthly in a log (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the VOC emissions exceed this limit.

Reporting

- d. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of 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. The report shall contain the following:
 - i. The monthly VOC emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.

**ii. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS for avoidance of
15A NCAC 2D .1111: MAXIMUM AVAILABLE CONTROL TECHNOLOGY**

- a. In accordance with 15A NCAC 2Q .0317, to comply with this permit and avoid applicability of 15A NCAC 2D .1111 "Maximum Available Control Technology" as requested by the Permittee, hazardous air pollutant (HAP) emissions shall be limited as follows:

10 tons per consecutive 12-month period of each individual HAP, and 25 tons per consecutive 12-month period for combined HAPs.

Monitoring/Recordkeeping

- b. The Permittee shall maintain monthly consumption records of each material used containing HAP as follows:
 - the quantity of each HAP (in pounds per gallon) in each material used during the month,
 - the usage of each HAP (in pounds) for each material used during the month,
 - calculation of the 12-month total usage of each HAP (in pounds) for each material used during the 12-month period ending on that month,
 - the quantity of all HAPs combined (in pounds per gallon) in each material used,
 - the usage of all HAPs combined (in pounds) for each material used, and
 - calculation of the 12-month total usage of all HAPs combined (in pounds) for each material used during the 12-month period ending on that month.

Reporting

- c. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of 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. The report shall contain the following:

- the monthly individual HAP emitted in the greatest quantity for the previous 17 months emissions must be calculated for each of the 12-month periods over the previous 17 months; and
- the monthly combined HAP emissions for the previous 17 months.

STATE-ONLY REQUIREMENT:

- iii. **TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REQUIREMENT** - Pursuant to 15A NCAC 2D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limit shall not be exceeded:

Affected Source	Toxic Air Pollutant	Emission Limit
Facility-wide	Formaldehyde	0.633 lb/hr

- a. Recordkeeping Requirements - The following recordkeeping requirements apply:
- i. the facility-wide hourly formaldehyde emissions shall be recorded in a log,
 - ii. the formaldehyde emissions log shall be kept on-site and made available to DAQ personnel upon request,
 - iii. records of the facility-wide formaldehyde emissions shall be maintained on-site for a minimum of 2 years.
- b. Reporting Requirement - For compliance purposes, within 30 days after each calendar year quarter the following shall be reported to the Regional Supervisor, DAQ:
- i. the highest facility-wide hourly emission rate of formaldehyde during the previous calendar year quarter, and
 - ii. any facility-wide formaldehyde emission rates that exceeded the limit listed above during the previous calendar year quarter.

STATE-ONLY REQUIREMENT

- iv. **TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT** – Pursuant to 15A NCAC 2Q .0711 “Emission Rates Requiring a Permit,” for each of the below listed toxic air pollutants (TAPs), the Permittee has made a demonstration that facility-wide actual emissions do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711. The facility shall be operated and maintained in such a manner that emissions of any listed TAP from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711.

- a. A permit to emit any of the below listed TAPs shall be required for this facility if actual emissions from all sources will become greater than the corresponding TPERs.
- b. PRIOR to exceeding any of these listed TPERs, the Permittee shall be responsible for obtaining a permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D .1100 “Control of Toxic Air Pollutants”.
- c. In accordance with the approved application, the Permittee shall maintain records of operational information demonstrating that the TAP emissions do not exceed the TPERs as listed below:

Pollutant	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Di(2-ethylhexyl)phthalate (DEHP)	0.63		
Ethyl acetate		36	
Ethylene glycol monoethyl ether	2.5	0.48	

(component of GLYET)			
Methyl ethyl ketone	78		22.4
Methyl isobutyl ketone	52		7.6
Toluene	98		14.4
Toluene diisocyanate, 2, 4- and 2, 6- isomers	0.003		
Xylene	57		16.4

8. MACT Applicability and Requirements

Ultracraft Company has taken limits on individual HAP emissions (less than 10 tpy) and combined HAP emissions (less than 25 tpy) to avoid applicability of MACT Subpart JJ. Therefore, the final MACT state-only TAP demonstration under 15A NCAC 2Q .0705 is not required.

9. Compliance Assurance Monitoring (CAM) Requirements

Pursuant to 15A NCAC 2D .0614, a compliance assurance monitoring (CAM) applicability determination is required for this 1st time Title V permit because: (1) the facility is a Title V source with potential emissions that exceed the Title V major source thresholds without considering controls, and (2) there are sources subject to an emission standard that require controls in order to comply with that standard.

The emission sources that are potentially subject to CAM are: spray booths, furniture finishing operations, and the woodworking equipment.

A CAM plan is not required for the spray booths at this time. The applicant estimates uncontrolled PM₁₀ emissions from all sixteen (16) spray booths to be 260.77 tpy. When divided between the sixteen spray booths, pre-control emissions are less than 100 tpy per booth.

The furniture finishing operations do not have any VOC control devices, thus a CAM plan is not required.

The woodworking operations exhaust to two wood waste collection systems, which in turn vent to a bagfilter. The woodworking operations are exempt from a CAM plan because pre-control PM₁₀ emissions are estimated to be below 100 tpy. Using the DAQ spreadsheet "Woodworking Emissions Calculator," potential uncontrolled PM₁₀ emissions are calculated to be 55.4 tpy.

10. Permit Shield (including non-applicable requirements)

In accordance with 2Q .0512, the permit will contain a provision stating that compliance with the terms, conditions, and limitations of the Title V permit shall be deemed in compliance with applicable requirements specifically identified in the permit, as of the date of permit issuance. If the permit does not expressly state that a permit shield exists, then it shall be presumed not to provide such a shield.

11. Other Applicable Requirements

A. All emission sources

The following table provides a summary of limits and standards for the emission source(s) describe above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Odors	Odorous emissions must be controlled; State-enforceable only	15A NCAC 2D .1806

STATE-ONLY REQUIREMENT: ODOR REQUIREMENTS

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

- a. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

12. General Conditions

The General Conditions section of the Title V Operating Permit lists additional applicable rule requirements that the Permittee must adhere to, as with any other permit condition. These requirements in general are common to all Title V facilities. The general conditions include provisions such as annual fee payment, permit renewal and expiration, transfer of ownership or operation, property rights, submission of documents, inspections and entry procedures, reopen for cause, and severability.

13. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified. Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.

14. Public Notice and EPA Review

Pursuant to 15A NCAC 2Q .0521, a notice of the draft Title V Operating Permit will 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 will be sent to persons on the Title V mailing list and EPA.

15. EAC/NAA

Regarding attainment status, Randolph County is in a non-attainment area that has entered into an Early Action Compact (EAC). The maximum attainment date is December 2007. As emissions increases are not a result of change in method of operation, EAC/NAA review is not required.

16. Recommendations

The 1st time Title V application for Ultracraft Company has been reviewed by the DAQ to determine compliance with all procedures and requirements under 15A NCAC 2Q .0500 and 40 CFR Part 70. The DAQ had made a preliminary determination that the facility is complying or will achieve compliance as specified in the permit with all applicable requirements. Upon completion of the public notice and EPA review, the DAQ will take final action on the 1st time Title V permit.