

Air Permit Review

Permit Issue Date: **ENTER DATE**

Region: Raleigh Regional Office
County: Chatham
NC Facility ID: 1900015
Inspector's Name: Steven Carr
Date of Last Inspection: 04/15/2010
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Uniboard USA LLC Facility Address: Uniboard USA LLC 985 Corinth Road Moncure, NC 27559 SIC: 2436 / Softwood Veneer And Plywood NAICS: 321212 / Softwood Veneer and Plywood Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: N/A NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: 15A NCAC 2D .1109 <i>[112(j) – Part 2 MACT Hammer for Boilers & Process Heaters]</i>
Contact Data			Application Data
Facility Contact	Authorized Contact	Facility Contact	Application Number: 1900015.09C Date Received: 08/31/2009 Application Type: 112(j) Part II Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 03449/T35 Existing Permit Issue Date: 10/15/2009 Existing Permit Expiration Date: 09/30/2014
Carolyn Underwood Environmental Manager (919) 542-2128 985 Corinth Road Moncure, NC 27559	Ricardo Hillmann Plant Manager (919) 542-2128 985 Corinth Road Moncure, NC 27559	Carolyn Underwood Environmental Manager (919) 542-2128 985 Corinth Road Moncure, NC 27559	
Review Engineer: Fern Paterson, P.E. Review Engineer's Signature: _____ Date: _____		Comments / Recommendations: Issue: 03449T36 Permit Issue Date: ENTER DATE Permit Expiration Date: 09/30/2014	

I. Purpose of Application

Uniboard USA LLC is located in Moncure, Chatham County, North Carolina. Application No. 9700001.09A, received September 17, 2009, is a Part 2 MACT "Hammer" application for one natural gas- and No. 2 fuel oil-fired boiler rated at 4.7 million British thermal units per hour (MMBtu/hr) and three natural gas-fired hot oil heaters, each rated at 24 MMBtu/hr.

II. Permit Modifications/Changes

The following table describes the modifications to the current permit.

Page(s)	Section	Description of Change(s)
1	Permit Cover Page	Amend permit revision numbers and issuance/effective dates.
4		Add "case-by-case MACT" designation to the affected heaters (ID Nos. ES-18, ES-19, and ES-20).
7	Section 1, Table	Add "case-by-case MACT" designation to the affected heater (ID No. Pr-Heat1).
18-19	2.1.E.5 (New)	Add Section to include applicable Case-By-Case MACT requirements for the affected heaters (ID Nos. ES-18, ES-19, and ES-20).

Page(s)	Section	Description of Change(s)
34	2.1.G.5 (New)	Add Section to include applicable Case-By-Case MACT requirements for the affected heater (ID No. Pr-Heat1).
42-50	Section 3	Update General Provisions with the most recent revision (v. 3.2)

III. Regulatory Review

1. **15A NCAC 2D .1109 –Case-by-Case MACT** – On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General’s office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA § 112(j), commonly referred to as the MACT “hammer” provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On August 21, 2009, the NC DAQ received a Part 2 MACT “Hammer” application from this facility asking that the NC DAQ establish 112(j) emissions limitations in accordance with NC DAQ’s recommendations.

No control technologies for the control of CO, metals, Hg, or HCl were identified for No. 2 fuel oil-fired or natural gas-fired combustion sources in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA’s AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas combustion sources of this size, consistent with the provisions in CAA § 112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boiler as follows:

To assure compliance, the Permittee shall perform an annual boiler inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:

- Inspect the burner, and clean or replace any components of the burner as necessary;*
- Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,*
- Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.*

The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected boilers are not inspected and maintained as required above.

In addition, the Permittee will be required to record the results of the annual inspection in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

IV. Draft Permit Review Summary

Steven Carr and Charles McEachern of the Raleigh Regional Office was provided a draft permit and draft permit review document on August 20, 2010. <SUMMARY OF COMMENTS>.

Carolyn Overcash of Uniboard was provided a draft permit for review on August 20, 2010. <SUMMARY OF COMMENTS>.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on <DATE>. <SUMMARY OF COMMENTS>.

V. Recommendations

This permit modification application for the Uniboard USA LLC facility located in Moncure, Chatham County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

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