

TITLE V AIR PERMIT REVIEW

APPLICANT: VALDESE MANUFACTURING COMPANY MERIDIAN INDUSTRIES, INC.	SITE LOCATION: VALDESE	COUNTY: BURKE	
TECHNICAL CONTACT: EDDIE WOODS	PHONE: (704)874-2151	RESPONSIBLE OFFICIAL: ROB SETLIFF	TITLE: PRESIDENT
REVIEW ENGINEER: JENNY SHEPPARD	SIGNATURE:	DATE: FEBRUARY 19, 2004	
REGIONAL CONTACT: BRENDAN DAVEY	REGIONAL OFFICE: ASHEVILLE	SIC CODE: 2281	
APPLICATION NUMBER: 1200060.02A	EXISTING PERMIT NUMBER: 00504T09	NEW PERMIT NUMBER: 00504T10	

1. Purpose of Application

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (00504T09) was issued on August 1, 2001 and expired on April 30, 2003. The renewal application was received on July 30, 2002 or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

Meridian Industries, Incorporated is a fabric dyeing and finishing facility located in Valdese, North Carolina. Air emissions primarily result from the combustion of coal and fuel oils. The facility is Title V for its SO₂, NO_x and PM-10 emissions.

3. Application Chronology

July 30, 2002 - Air permit application was received by the Division of Air Quality (DAQ), Raleigh Central Office (RCO). Permit application was considered complete as of July 30, 2002.

March 3, 2003 - Told by RO to hold for CAM Plan, later determined that a CAM plan is not required.

4. Permit Modification/Changes

The following table represents the changes to the current Title V permit:

Old Page No.	New Page No.	Condition No.	<i>draft</i> Change
Page 1	Page 1	Cover Letter	
Page 2	Page 2		
Page 3	Page 3	Part I Section 1	
Pages X	Pages X	Part I Section 2.1 A.	
Pages X	Pages X		
Pages X-X	Pages X-X	Part I General Conditions	Updated the General Conditions with the latest version available

5. Regulatory Review

The facility is subject to the following regulations:

2D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"

2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"

2D .0521 "Control Of Visible Emissions"

2D .0958 "Work Practices for Sources of Volatile Organic Compounds"

2D .1100 "Control of Toxic Air Pollutants "

However, no regulatory review is required at this time since there are no new applicable regulations for this permit revision (renewal).

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

draft

NSPS

New Source Performance Standards (NSPS) do not apply to this facility.

NESHAP/MACT

This facility is not currently subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP). Once promulgated the facility may be subject to the Fabric Coating, Printing and Dyeing NESHAP (40 CFR 63 Subpart OOOO). The Screen Printing applicability will fall under the Fabric Coating Subcategory of the Fabric Coating, Printing and Dyeing Source Category which was proposed July 11, 2002.

PSD

This facility is not a major Prevention of Significant Deterioration (PSD) source.

Attainment Status

This facility is located in Beaufort County which is in attainment according to 2D .0902.

112(r)

This 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.

CAM

Compliance Assurance Monitoring (CAM) (40 CFR Part 64) does not apply since there are no control devices present at this facility.

7. Facility Wide Air Toxics

The facility must comply with the emission limitations and other requirements of 2D .1100. A toxics evaluation was triggered during the last modification; therefore, the facility performed a dispersion modeling analysis for emissions of acetic acid, ammonia and formaldehyde to demonstrate compliance with their respective Acceptable Ambient Levels (AALs) under 2D .1104. The other toxic air pollutant emission rates were below their respective Toxics Permitting Emissions Rates (TPERs) under 2Q .0711.

8. Facility Compliance Status

The facility was inspected on October 3, 2000 by Brian Joyner, WARO. The facility was considered to be in compliance pending results of the analysis performed on No. 6 fuel oil. Based on a telcon with Yongcheng Chen, WARO dated August 14, 2002 there are presently no compliance issues and no outstanding Notices of Violations (NOVs) for this facility. Yongcheng Chen, WARO plans on doing an inspection of the facility during the week of August 19-23 to verify his compliance statement.

9. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection, the facility was in compliance with all applicable requirements. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these 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.

10. Facility Emissions Review

There is no change in emissions for this renewal.

11. Stipulation Review

All stipulations are standard for this type of facility.

Based on the last inspection report dated October 3, 2000, inspection date of September 14, 2000:

Mr. Joyner stated that the facility needs to be reviewed for Screen Printing NESHAP (MACT) applicability.

Based on information obtained from the EPA, the Screen Printing applicability will fall under the Fabric Coating Subcategory of the Fabric Coating, Printing and Dyeing Source Category. This MACT was proposed on July 11, 2002 with promulgation tentatively scheduled a year later. The EPA contact is Mr. Vinson Hellwig, EPA/OAQPS/ESD/CCPQ, and his telephone number is (919) 541-2317.

12. Public Notice / EPA and Affected State Review

Pursuant to 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 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant 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. There are no affected States for this facility.

13. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WARO recommends issuance of the permit per Yongcheng Chen's review received XX, XX.

RCO concurs with WARO's recommendation to issue air permit.

File path and name C:\DOCUME~1\DAVEWI~1\DESKTOP\00504T10.REV

III. Facility Description

Meridian Industries, Incorporated is a fabric dyeing and finishing facility located in Valdese, North Carolina. Air emissions primarily result from the combustion of coal and fuel oils. The facility is Title V for its SO₂, NO_x and PM-10 emissions.

IV. Statement of Compliance

draft

The DAQ has reviewed the compliance status of this facility. Based on its latest inspection, the facility was in compliance with all applicable requirements; however, the boilers (ID No. ES-1 and ES-2) have a history of noncompliance with 15A NCAC 2D .0521. The Regional Office has requested a condition requiring a stack test to demonstrate compliance with 2D .0503 “Particulates From Fuel Burning Indirect Heat Exchangers”. The current permit contains a particulate matter testing condition for the 27 million Btu per hour boiler (ID No. ES-1). A requirement is being added at this time for the 40 million Btu per hour boiler (ID No. ES-2) to address Regional Office concerns of the compliance status of this source with particulate matter. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these 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.

V. Summary of Emission Sources and Control Devices

The following table identifies all emission sources and associated control devices for which the Initial Title V Operating Permit is being issued.

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1	Coal-fired Boiler No.1 (27 million Btu per hour heat input rate)	CD-1	Multicyclone (25 nine-inch diameter tubes)
ES-2	Coal-fired Boiler No.2 (40 million Btu per hour heat input rate)	CD-2	Multicyclone (30 nine-inch diameter tubes)
ES-3	Natural Gas/No. 6 Fuel-Oil Fired Boiler No. 3 (51.7 million Btu per hour heat input rate)	None	None

VI. Emission Source-by-Source Evaluation

draft

A. Coal-Fired Boiler No. 1 (ID No. ES-1)

1. Description

This is a coal-fired boiler using a multicyclone to control particulate emissions.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.38 pounds per million Btu heat input	2D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	2D .0516
Sulfur dioxide	See Section VII	2D .0501(e)
visible emissions	40 percent opacity	2D .0521

a.) 2D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"

(1) Regulation Analysis

The boiler is subject to this regulation since coal is used for combustion. The allowable emission rate of particulate matter shall be calculated as follows:

$$E=1.090 Q^{-0.2594}$$

where E = allowable emissions, lb/million BTU

Q = maximum heat input in million BTU/hr

The total maximum heat input of all fuel burning indirect heat exchangers at the plant site was limited to 60 million Btu per hour in 1977 and is used to determine the allowable emission limit (Q= 60 million Btu per hour input capacity, see Section VII. Multiple Emission Source Limits, E= 0.38 pounds per million Btu heat input). Compliance is demonstrated using source testing and the 60 million Btu per hour combined heat input rate.

(2) Testing Requirements

- (A) If emissions testing is required by DAQ or EPA, or the Permittee submits emissions testing to the Division in support of a permit application, the Permittee shall perform such testing in accordance with the appropriate EPA reference method(s) as approved by the DAQ. The Permittee must request approval from the DAQ for an alternate test method or procedure in writing.
- (B) Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the boiler (ID No. ES-1) for particulate emissions (1) utilizing EPA Reference Method No. 5, contained in 40 CFR 60, Appendix A. **OR** (2) in accordance with a testing protocol approved by the Division of Air Quality. Details of the emissions testing and reporting requirements can be found in Section 3 - General Condition II. Testing shall be completed within one (1) year of issuance of the permit unless an alternate date is approved by DAQ.

(3) Monitoring Requirements

To ensure that optimum control efficiency of particulate matter is maintained by the multicyclone, monthly inspections and any required maintenance will be performed as recommended by the manufacture. If manufacturer's recommendations are not available, as a minimum, inspections will include checking the multicyclone to ensure structural integrity and the unit ductwork and material collection for leaks.

(4) Recordkeeping Requirements

The Permittee will keep records of the following:

- (i) the results of each monthly inspection, and
- (ii) any maintenance performed on the multicyclone.

(5) Reporting Requirements

The Permittee will submit the results of any maintenance performed on the multicyclone within 30 days of a written request by DAQ. A summary report of monitoring shall be submitted by January 30th and July 30th of each year.

b.) 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

draft

(1) Regulation Analysis

The boiler is subject to this regulation since it is a combustion source that vents through a stack. The allowable emission rate of sulfur dioxide from this facility shall not exceed 2.3 pounds per million Btu heat input.

(2) Monitoring/Recordkeeping Requirements

The sulfur content of the coal received shall be 1.5 percent or less by weight and will be monitored using supplier certification to ensure compliance with the emission limit of 2.3 pounds of sulfur dioxide per million Btu. Stack testing is not required to ensure compliance with this regulation.

(3) Reporting Requirements

The Permittee will report January 30th and July 30th of each year records of supplier certification.

c.) 2D .0521 “Control of Visible Emissions”

(1) Regulation Analysis

This boiler was existing as of July 1, 1971 and therefore is subject to 2D .0521(c). Per this regulation, visible emissions shall not be more than 40 percent opacity when averaged over a six-minute period except that six-minute period averaging not more than 90 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. Compliance is demonstrated with this regulation because the latest inspection report did not cite any opacity exceedances.

(2) Monitoring Requirements

Monitoring requirements include those specified for 2D .0503 and at least once daily a visual observation of the emission stack.

(3) Recordkeeping Requirements

Recordkeeping requirements include those specified above in VI.A.2.a.(3) and a log of the daily visible emission stack observation.

(4) Reporting Requirements

draft

Reporting requirements include those specified for 2D .0503 and a summary report of the daily visual observation log by January 30th and July 30th of each year.

3. Other Specific Permit Conditions

None.

B. Coal-Fired Boiler No. 2(ID No. ES-2)

1. Description

This is a coal-fired boiler using a multicyclone to control particulate emissions.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.38 pounds per million Btu heat input	2D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	2D .0516
Sulfur dioxide	See Section VII	2D .0501(e)
visible emissions	40 percent opacity	2D .0521

a.) 2D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”

(1) Regulation Analysis

The boiler is subject to this regulation since coal is used for combustion. The allowable emission rate of particulate matter shall be calculated as follows:

$$E=1.090 Q^{-0.2594}$$

where E = allowable emissions, lb/million BTU

Q = maximum heat input in million BTU/hr

The total maximum heat input of all fuel burning indirect heat exchangers at the plant site was limited to 60 million Btu per hour in 1977 and is used to determine the allowable emission limit (Q= 60 million Btu per hour input capacity, see section VII. Multiple Emission Source Limits, E= 0.38 pounds per million Btu heat input).

Compliance is demonstrated using source testing and the 60 million Btu per hour combined heat input rate. *draft*

(2) Testing Requirements

- (A) If emissions testing is required by DAQ or EPA, or the Permittee submits emissions testing to the Division in support of a permit application, the Permittee shall perform such testing in accordance with the appropriate EPA reference method(s) as approved by the DAQ. The Permittee must request approval from the DAQ for an alternate test method or procedure in writing.
- (B) Under the provisions of North Carolina General Statute 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the boiler (ID No. ES-2) for particulate emissions (1) utilizing EPA Reference Method No. 5, contained in 40 CFR 60, Appendix A. **OR** (2) in accordance with a testing protocol approved by the Division of Air Quality. Details of the emissions testing and reporting requirements can be found in Section 3 - General Condition II. Testing shall be completed within one (1) year of issuance of permit unless an alternate date is approved by DAQ.

(2) Monitoring Requirements

To ensure that optimum control efficiency of particulate matter is maintained by the multicyclone, monthly inspections and any required maintenance will be performed as recommended by the manufacture. If manufacturer's recommendations are not available, as a minimum, inspections will include checking the multicyclone to ensure structural integrity and the unit ductwork and material collection for leaks. Stack testing is not required to ensure compliance with this regulation.

(3) Recordkeeping Requirements

The Permittee will keep records of the following:

- (i) the results of each monthly inspection, and
- (ii) any maintenance performed on the multicyclone.

(4) Reporting Requirements

The Permittee will submit the results of any maintenance performed on the multicyclone within 30 days of a written request by DAQ. A summary report of monitoring shall be submitted by January 30th and July 30th of each year.

b.) 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources"

(1) Regulation Analysis

The boiler is subject to this regulation since it is a combustion source that vents through a stack. The allowable emission rate of sulfur dioxide from this facility shall not exceed 2.3 pounds per million Btu heat input.

(2) Monitoring/Recordkeeping Requirements

The sulfur content of the coal received shall be 1.5 percent by weight or less and will be monitored using supplier certification to ensure compliance with the emission limit of 2.3 pounds per hour of sulfur dioxide per million Btu. Stack testing is not required to ensure compliance with this regulation.

(3) Reporting Requirements

The Permittee will report January 30th and July 30th of each year records of supplier certification.

c.) 2D .0521 “Control of Visible Emissions”

(1) Regulation Analysis

This boiler was existing as of July 1, 1971 and therefore is subject to 2D .0521(c). Per this regulation, visible emissions shall not be more than 40 percent opacity when averaged over a six-minute period except that six-minute period averaging not more than 90 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. Compliance is demonstrated with this regulation because the latest inspection report did not cite any opacity exceedances.

(2) Monitoring Requirements

Monitoring requirements include those specified for 2D .503 and at least once daily a visual observation of the emission stack.

(3) Recordkeeping Requirements

Recordkeeping requirements include those specified above in VI.B.2.a.(3) and a log of the daily visible emission stack observation.

(4) Reporting Requirements

Reporting requirements include those specified for 2D .503 and a summary report of the daily visual observation log by January 30th and July 30th of each year.

3. Other Specific Permit Conditions

None.

C. Natural gas/No. 6 Fuel-oil fired Boiler No. 3 (ID No. ES-3)

draft

1. Description

This is a natural gas/ No. 6 fuel-oil fired boiler with no control.

2. Applicable Regulatory Requirements

The following provides a summary of limits and/or standards for the emission source(s) described above. A review of the information in the application was performed to ensure the appropriate limits and associated calculations used to show compliance were correct.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.38 pounds per million Btu heat input	2D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	2D .0516
Sulfur dioxide	See Section VII	2D .0501(e)
visible emissions	20 percent opacity	2D .0521

a.) 2D .0503 “Particulates from Fuel Burning Indirect Heat Exchangers”

(1) Regulation Analysis

The boiler is subject to this regulation since natural gas and No. 6 fuel-oil is used for combustion. The allowable emission rate of particulate matter shall be calculated as follows:

$$E=1.090 Q^{-0.2594}$$

where E = allowable emissions, lb/million BTU

Q = maximum heat input in million BTU/hr

The total maximum heat input of all fuel burning indirect heat exchangers at the plant site was limited to 60 million Btu per hour in 1977 and is used to determine the allowable emission limit (Q= 60 million Btu per hour input capacity, see section VII. Multiple Emission Source Limits, E= 0.38 pounds per million Btu heat input). Compliance is demonstrated using source testing and the 60 million Btu per hour combined heat input rate.

(2) Monitoring/Recordkeeping/Reporting Requirements

Since the potential particulate emissions are less than the allowables, no monitoring, recordkeeping, or reporting are required. Stack testing is not required to ensure compliance with this regulation. However, the test method condition will be put in the permit in the event that DAQ or EPA finds that due to improper

operation violations, etc., source testing is required.

draft

b.) 2D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

(1) Regulation Analysis

The boiler is subject to this regulation since it is a combustion source that vents through a stack. The allowable emission rate of sulfur dioxide from this facility shall not exceed 2.3 pounds per million Btu heat input.

Compliance is demonstrated for this source using AP-42 emission factors for natural gas and No. 6 fuel oil. Natural gas is the primary fuel and is inherently a low sulfur emitting fuel.

(2) Monitoring/Recordkeeping Requirements

The sulfur content of the No. 6 fuel oil received will be monitored using supplier certification to ensure compliance with the emission limit of 2.3 pounds per hour of sulfur dioxide per million Btu. The sulfur content by weight shall not exceed 2.1%. Stack testing is not required to ensure compliance with this regulation. However, the test method condition will be put in the permit in the event that DAQ or EPA finds that due to improper operation violations, etc., source testing is required.

(3) Reporting Requirements

The Permittee will report January 30th and July 30th of each year records of supplier certification.

c.) 2D .0521 “Control of Visible Emissions”

(1) Regulation Analysis

This boiler was existing after July 1, 1971 and therefore is subject to 2D .0521(d). Per this regulation, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period except that six-minute period averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour

period. Compliance is demonstrated with this regulation because the latest inspection report did not cite any opacity exceedances.

(2) Monitoring Requirements

The Permittee shall perform at least once daily a visual observation of the emission stack.

(3) Recordkeeping Requirements

The Permittee shall keep a log of the results of the daily visible emission stack observation.

(4) Reporting Requirements

The Permittee shall submit a summary report of the daily visual observation log by January 30th and July 30th of each year.

3. Other Specific Permit Conditions

None.

VII. Multiple Emission Source Limits

- A. The compliance demonstrations for 2D .0503 and 2D .0501 (NAAQS for SO₂) were both based on a maximum facility-wide heat input rate of 60 million Btu per hour. The limit was first taken in 1977 to show compliance with 2D .0503. In the early 1980's modelling was performed with the 60 million Btu per hour heat input limit to insure compliance with the NAAQS for SO₂. To insure compliance of this rate the facility is limited to an hourly steam flow of 35,451 pounds per hour (Based on a worst case boiler efficiency of 60 percent). This facility is required to monitor hourly heat output by continuously recording steam output per boiler on a chart.

The following emission source(s) and associated control device(s) are subject to this multiple emission source limit:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1	Coal-fired Boiler No. 1 (27 million Btu per hour heat input rate)	CD-1	Multicyclone (25 nine-inch diameter tubes)
ES-2	Coal-fired Boiler No. 2 (40 million Btu per hour heat input rate)	CD-2	Multicyclone (30 nine-inch diameter tubes)

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-3	Natural Gas/No. 6 fuel oil-fired Boiler No. 3 (51.7 million Btu per hour heat input rate)	NA	NA

The above emission sources are subject to these multiple emission source limits and/or standards:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate Matter	60 million Btu per hour heat input rate facility wide	2D .0503
Sulfur Dioxide	60 million Btu per hour heat input rate facility wide	2D .0501(e)

1. Monitoring

Each boiler shall be required to have a continuous steam output chart. The total steam output per boiler shall be totaled each day and an average facility-wide hourly steam output calculated using total operating hours per day.

2. Recordkeeping

The average hourly steam output per day shall be recorded in a log book daily and kept on site for a minimum of five years from the date of entry. The steam charts shall also be kept on site for a minimum of five years from the date of record.

3. Reporting

The facility shall report the highest hourly output for any one day for the previous reporting period (six months) biannually.

VIII. MACT Applicability and Requirements

Based on a review of the facility's current operations and emission sources, the facility will be subject to the MACT standards proposed for industrial boilers (11/15/00).

IX. Permit Shield (including non-applicable requirements)

draft

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.

X. Other Applicable Requirements

None.

XI. Insignificant Activities

The insignificant activities listed in the application have been reviewed and verified. Those sources which qualify for exemption from permitting under regulation NCAC 2Q .0102 (b) will be attached to the State only portion of the permit.

XII. 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.

XIII. Public Notice

Pursuant to 15A NCAC 2Q. 0521, a notice of the draft Title V Operating 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.

XIV. Recommendations

Valdese Manufacturing Company, Division of Meridian Industries, Incorporated initial Title V application 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 has made a preliminary determination that the facility is complying or will achieve compliance as specified in the draft permit with all applicable requirements. Therefore, the DAQ is proposing to issue the Title V Operating Permit upon completion of the public comment period and the EPA review.

ADDENDUM

Review Status:

draft

Permit package completed public notice and EPA review periods. There were no comments received from the public notice period and all EPA's comment's were addressed in a conference call with Doug Deakin and EPA was sent the final draft via e-mail on May 5, 1998.