

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Asheville Regional Office
County: Caldwell
NC Facility ID: 1400228
Inspector's Name: Michael Koerschner
Date of Last Inspection: 08/31/2022
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Automated Solutions, LLC</p> <p>Facility Address: Automated Solutions, LLC 621 Virginia Street SW Lenoir, NC 28645</p> <p>SIC: 3086 / Plastics Foam Products NAICS: 32615 / Urethane and Other Foam Product (except Polystyrene) Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0515, 15A NCAC 02D .0516, 15A NCAC 02D .0521, 15A NCAC 02D .0524, 15A NCAC 02D .1806, 15A NCAC 02Q .0317 NSPS: Subpart JJJ NESHAP: Subpart ZZZZ PSD: N/A PSD Avoidance: 15A NCAC 2D .0530 VOCs NC Toxics: N/A 112(r): Yes Other:</p>
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Contact Data			<p style="text-align: center;">Application Data</p> <p>Application Number: 1400228.22A Date Received: 04/25/2022 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 10460/T04 Existing Permit Issue Date: 01/09/2020 Existing Permit Expiration Date: 11/30/2022</p>
Facility Contact	Authorized Contact	Technical Contact	
Dean Barrett Operations Manager (828) 396-9900 PO Box 1068 Sawmills, NC 28630	Tony Smith Sr. Director of Operations (828) 234-4828 4101 US Hwy 321-A Sawmills, NC 28630	Tommy Green Maintenance Manager (828) 238-8496 PO Box 1068 Sawmills, NC 28630	

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	---	0.2100	346.01	0.0100	---	0.0002	0.0001 [Hexane, n-]
2020	---	0.0100	356.45	0.0100	---	0.0002	0.0001 [Hexane, n-]
2019	---	0.0100	413.51	0.0100	---	0.0002	0.0001 [Hexane, n-]
2018	---	0.0100	315.68	0.0100	---	0.0002	0.0001 [Hexane, n-]
2017	---	0.0113	211.60	0.0102	---	0.0002	0.0001 [Hexane, n-]

<p>Review Engineer: Alice M. Wessner</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 10460/T05 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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1. Purpose of Application

Automated Solutions, LLC. (Automated) currently holds Title V Permit No. 1046T04 with an expiration date of November 30, 2022, for a polyethylene foam manufacturing facility in Lenoir, Caldwell County, North Carolina. This permit application is for a permit renewal without modification. The renewal application was received on April 25, 2022, or at least six 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 and Process Description

The existing facility consists of two polyethylene (PE) foam extrusion lines and various insignificant supporting activities. The extrusion process involves melting solid pellets of PE, mixing the melted PE with a blowing agent under high heat and pressure, and then forcing the mixture through an extrusion die. At this facility, the blowing agent is a combination of isobutane, propane, and other hydrocarbon gasses. All the gasses are considered volatile organic compounds ("VOC"; i.e., the blowing agent is 100% VOC). Upon exiting the die, the blowing agent expands rapidly, creating PE foam. The PE foam is cut, shaped, handled, and stored as necessary.¹ According to the most recent compliance inspection performed on August 31, 2022, by Michael Koerschner, PE of our Asheville Regional Office, *the extruded sheets are collected on rolls that are then taken to a curing area before being shipped. Estimated time on-site for each roll is approximately one week. Off-spec material is collected and recycled on-site. Particulate emissions from the recycling process do not vent outside the building. The facility currently operates around-the-clock Monday thru Friday (24 hours/day; 5 days/week) and employs approximately 44 people.*

As the facility operates, 100% of the blowing agent is emitted from the facility, and the blowing agent is the only source of VOC emissions. Emissions of VOC are limited to 250 tons per year per line.¹

Automated estimates that most of the blowing agent is emitted in the vicinity of the extrusion die. The remainder of the blowing agent is emitted elsewhere in the facility (e.g. in storage awaiting shipping). The facility installed an RTO to reduce VOC emissions and allow for increased production at the facility. The RTO will only collect the blowing agent emitted near the extrusion die.¹

Thermal oxidation, the principle behind the RTO, only occurs at relatively high temperatures. To maintain high temperatures within the oxidization chamber, the RTO is equipped with a 4.5238 MMBtu/hour natural gas-fired burner. The combustion of the blowing agent reduces the need for natural gas combustion when the system is operating normally. Additionally, the RTO is called "regenerative" because energy is transferred from the hot exhaust gasses to the incoming gas stream via a bed of ceramic media. By transferring energy from the exhaust gasses to the inlet gasses, the need for supplemental heat from the natural gas-fired burner is reduced.¹

The facility operates the RTO such that VOC emissions comply with the PSD avoidance limit mentioned above.

Automated is a Title V facility because potential VOC emissions are greater than 100 tons per year.

3. History/Background/Application Chronology

History/Background

December 29, 2017 First time Title V Permit No. 10460T03 was issued.

¹ From Permit Review dated January 9, 2020, by Russell Braswell for Application No. 1400228.19A minor modification (adding RTO)

November 18, 2019 Application 1400228.19A was submitted for permit modification as allowed by 15A NCAC 02Q .0515 "Minor Permit Modification" to add a new regenerative thermal oxidizer ("RTO") to the facility.

January 9, 2020 Air Permit No. 10460T04 was issued. DAQ agrees that this application meets the requirements 02Q .0515(a) and (b). The facility may therefore begin implementing the proposed modification (adding the control device ID No. CD-RTO) as allowed by 02Q .0515(f) before the modified Title V permit is issued. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on March 9, 2020. Until this date, the affected permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 02Q .0515(f). (See Russell Braswell's TV review for Permit No. 10460T04 dated January 9, 2020)

Application Chronology

April 25, 2022 Received permit application 1400228.22A for renewal.

April 28, 2022 Sent acknowledgment letter indicating the application for permit modification was complete.

March 29, 2023 Draft permit and review forwarded the Booker Pullen, supervisor, for review.

April 4, 2023 Draft permit and review comments received from Booker Pullen, supervisor. Edits incorporated into permit and draft.

April 4, 2023 Draft permit and review sent to Samir Parekh of the Stationary Source Compliance Branch, and Michael Koerschner, PE of the Asheville Regional Office

April 6, 2023 Received comments via email from Samir Parekh of the Stationary Source Compliance Branch.

April 12, 2023 Received comments via email from Michael Koerschner, PE of the Asheville Regional Office.

April 17, 2023 Draft permit sent to Tony Smith, Senior Director of Operations, Automated Solutions, LLC.

May 9, 2023 Received comments via email from Tony Smith, Senior Director of Operations, Automated Solutions, LLC. Minor edits were incorporated in the draft permit. Review by the Permittee was delayed because they were waiting for their environmental consultant to review the draft.

May 10, 2023 Forwarded draft for final TVEE review.

May 10, 2023 Draft permit and permit review forwarded to public notice via DAQ website.

May XX, 2023 Public comment period ends. Comments were/were not received.

May XX, 2023 EPA comment period ends. Comments were/were not received.

May XX, 2023 Permit issued.

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process. This summary is not meant to be an exact accounting of each change but a summary of those changes.

The following changes were made to Air Permit No. 10460T04:*

Page No.	Section	Description of Changes
Cover letter and throughout permit	--	<ul style="list-style-type: none"> Updated all dates and permit revision numbers Changed Sawmills to Lenoir on cover page. Reformatted permit in accordance with current TV permitting shell Deleted reference to Section 2.2 in Table of Contents
3	1 – Table	<ul style="list-style-type: none"> Removed Page Nos. column Removed asterisk next to CD-RTO and removed footnote
4	2.1 A - Table	Added reference to Sulfur Dioxide and Risk Management Program to table
7	2.1 A	<ul style="list-style-type: none"> Moved 15A NCAC 02D .0516 Sulfur Dioxide Emissions from Combustion Sources from Section 2.1 A.5 to Section 2.1 A.2 Renumbered following conditions
5-7	2.1 A.4	<ul style="list-style-type: none"> Updated 15A NCAC 02Q .0317 Avoidance Conditions language Added operating temperature for RTO Added footnote for most recent testing conducted by Permittee
8	Section 2.2	Moved 15A NCAC 02D .2100 Risk Management Program to Section 2.1
	Attachment to Permit	Moved “List of Insignificant Activities” to Section 3 in accordance with the updated formatting for TV permits
9-17	Section 3	Updated General Permit Conditions with most current version (version 6.0, 01/07/2022) and moved to Section 4
18	--	“List of Acronyms” moved to Page 3 of current permit

* This list is not intended to be a detailed record of every change made to the permit but a summary of those changes.

This permit renewal is being processed without modification, and no changes to the Title V Equipment Editor are needed.

5. Regulatory Review

Automated Solutions, LLC is subject to the following regulations. The facility’s equipment and operations have not changed since the last permit action in 2020. The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

- 15A NCAC 02D .0515
- 15A NCAC 02D .0516
- 15A NCAC 02D .0521
- 15A NCAC 02D .1806
- 15A NCAC 02D .2100
- 15A NCAC 02Q .0317 Avoidance Conditions for 15A NCAC 02D .0530 PSD

15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes – This rule establishes an allowable emission rate for particulate matter (PM) from any stack, vent or outlet resulting from any industrial process for which no other emission control standards are applicable. The allowable particulate emission rate, per 2D .0515, is a function of process weight rate and for process rates less than 30 tons per hour, the allowable particulate emissions are calculated as:

$$E = 4.10(P)^{0.67} \quad \text{where} \quad P = \text{process rate (tons/hr)}$$

$$E = \text{allowable emission rate (lbs/hr)}$$

The maximum process rate for the polyethylene foam extrusion process is 0.4 tons per hour (800 pounds per hour of polyethylene resin beads as referenced in the Air Permit Application 1400228.15A dated August 12, 2015). The

allowable particulate emissions are calculated to be 2.22 pounds per hour. Little to no particulate matter is generated by this process and compliance is indicated.

The facility shall maintain production records such that the process rates “P” in tons per hour and shall make these records available to DAQ. The facility will be deemed in noncompliance with 15A NCAC 02D .0515 if the production records are not maintained.

15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources - This rule limits emissions of sulfur dioxide from any combustion source. The RTO is subject to this rule. The RTO will burn only natural gas. According to the emission factors published in EPA's AP-42, natural gas will comply with 15A NCAC 02D .0516 by default.²

The RTO will be used to control VOCs in the form of the blowing agent. The blowing agent does not contain any sulfur. Because sulfur dioxide is a product of burning sulfur compounds, oxidation of the blowing agent will not contribute to emissions of sulfur dioxide and will not affect compliance with this rule.² No monitoring, recordkeeping, or reporting required to comply with this rule.

15A NCAC 02D .0521, Control of Visible Emissions – The two polyethylene foam extruders (**ID Nos. ES-1 and ES-2**) were manufactured after July 1, 1971, and must not have visible emissions of more than 20 percent opacity when averaged over a six-minute period, except as specified in 15A NCAC 02D .0521(d). The facility is required to make monthly visible emission observations and conduct associated recordkeeping and reporting to demonstrate compliance with 02D .0521.

The permit conditions will be updated to reflect the current permitting language for 15A NCAC 02D .0521 under this renewal. Continued compliance for all emission sources is anticipated.

15A NCAC 02Q .0317, Avoidance Conditions – Automated Solutions has accepted a PSD avoidance limit for VOCs of 250 tons per consecutive 12-month period for each of the two polyethylene foam extruders (**ID Nos. ES-1 and ES-2**). No changes to the permit are required other than minor updates to the most current permitting language. See Section 6 for further discussion.

15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions – The purpose of this rule is to provide for the control and prohibition of objectionable odorous emissions. The permit condition states that 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. Complaints will be addressed by the regional office through an onsite investigation, including an odor investigation if necessary. Compliance with this rule is expected.

15A NCAC 02D .2100, Risk Management Program – This rule will be discussed further below in Section 6.

6. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS

This facility is subject to New Source Performance Standards (NSPS), 40 CFR 60. This permit renewal does not change this status. 40 CFR 60, Subpart JJJJ, “Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: Subpart JJJJ” is applicable to the natural gas-fired emergency generator (**ID No. I-4**). Since this piece of equipment is an insignificant activity, the facility shall still be required to comply with all applicable provisions including the notification, testing, reporting, recordkeeping, and monitoring requirements. Compliance is expected and will be verified during facility inspections.

NESHAP/MACT

² From Permit Review dated January 9, 2020, by Russell Braswell for Application No. 1400228.19A minor modification (adding RTO)

This facility is a minor source for HAPs emissions and is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63. This permit renewal does not change this status. 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines is for area sources and applies to the natural gas-fired emergency generator (**ID No. I-4**). According to 40 CFR 63.6590(c), this generator meets the requirements of 40 CFR 63 Subpart ZZZZ by complying with requirements under 40 CFR 60 Subpart JJJ for spark ignition engines. Compliance is demonstrated through meeting NSPS Subpart JJJ standards.

PSD

Caldwell County is in attainment of NAAQS for all criteria pollutants. This facility is a “250 tons” industrial category source. According to the permit review dated October 15, 2015, by Christopher Scott for Permit No. 10460R00, the potential emissions for VOCs for ES-1 are 630.72 tons and the potential emissions for ES-2 (ref. Permit Review dated October 23, 2017, by Urva Patel for 10460R02) are 946.08 tons. The facility wide potential emissions are 1,576.8 tons (before control-potential) and less than 500 tons (after control-potential). Therefore, the Permittee has accepted two separate 250 tons per year PSD avoidance limits, to avoid applicability of 15A NCAC 02D .0530, for each polyethylene foam extruder with scrap reprocessing (ID Nos. ES-1 and ES-2) and is classified as a major source for PSD. Compliance with this regulation is monitored through VOC emission calculations, recordkeeping, and reporting.

In order to demonstrate compliance with the monthly VOC emission limits, the capture efficiency, the destruction efficiency and the RTO minimum average operating temperature was determined through testing protocol approved by DAQ. Sampling protocol testing approval was given by an earlier DAQ memo from the SSCB on August 16, 2021.

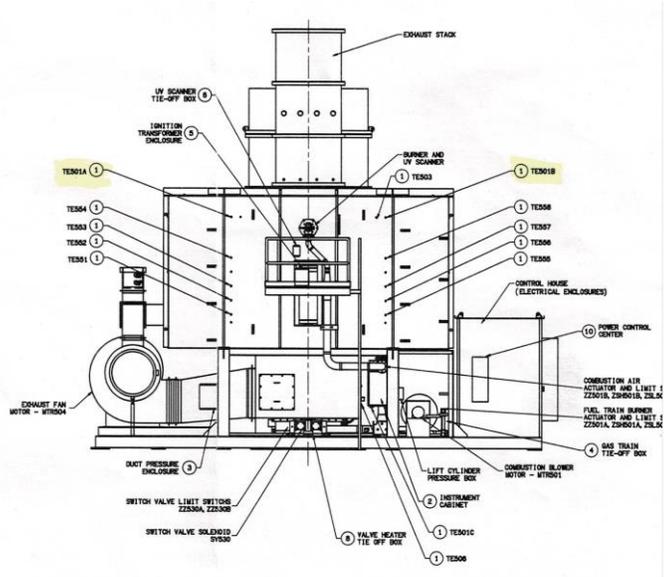
A memo from Shannon Vogel of SSCB to Brendan Davey, P.E., of the Asheville Regional Office dated December 1, 2022, concerning Automated Solutions’ VOC Emissions and Capture Efficiency Testing performed on November 3, 2021 (within 180 days of the startup of the RTO) for the Polyethylene Foam Extruders (ID Nos. ES-1 and ES-2) and the Regenerative Thermal Oxidizer (ID No. CD-RTO) stated that the results of the tests were acceptable to calculate VOC emissions as required by Permit No.10460T04. The findings from the memo are as follows:

GCI performed EPA Methods 1, 2, 3A, 4, and 25A at the inlet and outlet of the RTO to determine capture efficiency (CE) and destruction efficiency (DE) of VOC emissions from foam extruders ES-1 and ES-2. They are polyethylene foam extruders with scrap processing, each operating within an enclosure. Natural gas-fired regenerative thermal oxidizer CD-RTO controls VOC emissions from ES-1 and ES-2 enclosures. 15A NCAC 2Q .0317 Avoidance Conditions applies to avoid the applicability of 15A NCAC 2D .0530 Prevention of Significant Deterioration. The permit specifies annual VOC emissions limits of 250 tons per 12-month period from each extruder and requires monthly emissions calculations.

The CE was calculated based on RTO inlet mass rates and isobutane injection rates. The average combined CE for both enclosures was 61.3%. The RTO DE is based on inlet/outlet VOC as carbon mass emissions rates as calculated from volumetric flow rate data for each source. The average DE demonstrated by the test results was 98.76%. The test results are acceptable. The results are tabulated below.

Location/Parameter	Test Results
Reported Isobutane Usage	201.3 lb/hr
Inlet Isobutane	123.5 lb/hr
Destruction Efficiency (DE)	98.76%
Inlet VOC as C	102.2 lb/hr
Outlet VOC as C	1.3 lb/hr
Capture Efficiency (CE)	61.3%

Please note that DAQ required volumetric flow rates be measured at the inlet and outlet. GCI initially proposed assuming inlet flow = outlet flow and measuring only at the outlet location. The outlet flows were approximately 50% higher than the inlet rates in standard cubic feet per minute. This erroneous assumption may have biased the CE/DE which may have underestimated VOC emissions by a factor of approximately 4.



Scan of the layout of the RTO submitted via email from Tommy Green, Maintenance Manager, Automated Solutions, LLC, On March 14, 2023 showing (highlighted in yellow) the sensors where the firebox temperatures were collected.

RTO Operating Temperatures

Date	Time	3 Hr. Average	
		Bed 1 Temp F	Bed 2 Temp F
11/3/2021	8:01 AM	1592	1596
11/3/2021	8:14 AM	1594	1594
11/3/2021	8:28 AM	1601	1603
11/3/2021	8:42 AM	1595	1599
11/3/2021	8:55 AM	1595	1596
11/3/2021	9:09 AM	1592	1593
11/3/2021	9:22 AM	1594	1597
11/3/2021	9:36 AM	1595	1599
11/3/2021	9:50 AM	1593	1594
11/3/2021	10:03 AM	1597	1598
11/3/2021	10:17 AM	1591	1595
11/3/2021	10:31 AM	1597	1601
11/3/2021	10:44 AM	1587	1589
11/3/2021	10:58 AM	1588	1591
11/3/2021	11:12 AM	1590	1595
11/3/2021	11:25 AM	1599	1601
11/3/2021	11:39 AM	1604	1604
11/3/2021	11:53 AM	1604	1607
11/3/2021	12:06 PM	1603	1607

An email from Tommy Green, Maintenance Manager with Automated Solutions, LLC. dated March 14, 2023, included a scan of their running temperatures for the day of testing on November 3, 2021, for the stack test. These temperatures were taken from the combustion chamber (or ‘firebox’) which is above the rotating bed chambers (see layout schematic and highlighted area above). Using this data, Michael Koerschner, PE of the Asheville Regional Office, took the reported temperatures pulled from the thermocouple loops for the stack test, averaged them for each 1-hour run for a total of three hours and then averaged the three temperatures into one temperature of 1597 degrees F. This temperature is in the permit as the ‘3-hour minimum’ meaning that if the Permittee is operating at or above this temperature, the demonstrated destruction efficiency is being achieved.

The monthly VOCs are calculated as follows:

Monthly VOC emissions (per line)

$$= BA_{w/oRTO} + \left(BA_{w/RTO} \times \left(1 - \left(\frac{CE}{100} \right) \left(\frac{DE}{100} \right) \right) \right) + VOC_{Other}$$

- Where:
- BA_{w/oRTO} = The total amount of blowing agent used in the extrusion line during periods when the RTO was not considered "in operation" (tons per month).
 - BA_{w/RTO} = The total amount of blowing agent used in the extrusion line during periods when the RTO was operating. (tons per month).
 - CE = Collection efficiency of the enclosure and ductwork associated with each extrusion line (**ID Nos. ES-1 or ES-2**). Determined by emission testing. (percent)
 - DE = Destruction efficiency of the RTO. Determined by emission testing. (percent)
 - VOC_{Other} = The total amount of non-blowing agent VOC emissions from the extrusion line. Calculated using applicable AP-42 factors or other methods approved by DAQ. (tons per month)

Automated Solutions is subject to 112(r) (Risk Management Plan) due to the storage of isobutane in an amount greater than 10,000 pounds. The regulated process at the facility consists of one 12,000-gallon isobutane storage tank and the associated polyethylene foam manufacturing equipment.

A full compliance evaluation of the 112(r) program was conducted on October 14, 2021, with the next due date for an update being October 14, 2026. No record of accident history in Section 6 of the most recent report. According to Amro Ali of our Asheville Regional Office, the submitted RMP is in the process of being sent to the EPA from the 112r coordinator. When the Permittee submits the Annual Compliance Certification required by General Condition P, the Permittee shall include a statement that the facility is in compliance with all requirements of 15A NCAC 02D .2100 Risk Management Program.

CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meets all three following criteria:

- the unit is subject to any (non-exempt: e.g., pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

CAM applies to a control device if it is being used to comply with a non-exempt emission standard. The regenerative thermal oxidizer (RTO) at this facility is only used for compliance with 15A NCAC 02Q .0317. According to 15A NCAC 02D .0614(b)(1)(E), an emission cap under 02Q .0300 or 02Q .0500 is exempt from CAM. Therefore, CAM will not apply to the RTO.

The following table summarizes CAM applicability at Automated Solutions, LLC:

Emission Unit	Criteria #1: Does the Source Use a Control Device?	Criteria #2: Pre-control PTE ≥100% of major source thresholds?	Criteria #3: Exempt Under 40 CFR 64.2(b)?	CAM Source?
ES-1	No	Yes (VOC)	VOC: No	No
ES-2	No	Yes (VOC)	VOC: No	No

7. Facility Wide Air Toxics

The facility is not subject to the requirements of air toxics permitting. Air toxics from the combustion of natural gas in the emergency generator are minimal. No unacceptable risk to human health is suggested. No further air toxics evaluation is required at this time.

8. Facility Emissions Review

The facility-wide potential emissions have not changed because of this TV permit renewal. Actual emissions for criteria pollutants and HAPs for the previous five years reporting periods are provided in the header of this permit review.

9. Compliance Status

DAQ has reviewed the compliance status of Automated Solutions. During the most recent inspection, conducted on August 31, 2022, by Michael Koerschner, P.E. of our Asheville Regional office, the facility appeared to be in compliance with all applicable requirements. Further, the facility has had no air quality violations within the last five years. The facility’s Annual Compliance Certification was received on January 30, 2023, and indicated compliance with all applicable requirements in 2022.

10. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of the permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .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 02Q .0521 above. No affected states or local agencies are within 50 miles of this facility.

11. Other Regulatory Considerations

- A P.E seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.

12. Recommendations

The permit renewal application for Automated Solutions, LLC. Has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 1046T05.