



NORTH CAROLINA  
Environmental Quality

ROY COOPER  
Governor

ELIZABETH S. BISER  
Secretary

MICHAEL ABRACZINSKAS  
Director

XXXXXX xx, 2023

Ashraf Marzouk  
Site Director  
Loparex LLC  
816 Fieldcrest Road  
Eden, NC 27288

SUBJECT: Air Quality Permit No. 08031T16  
Facility ID: 7900138  
Loparex LLC  
Eden  
Rockingham County  
Fee Class: Title V  
PSD Class: Minor

Dear Mr. Marzouk

In accordance with your completed Air Quality Permit Application for a renewal with 502(b)(10) change of your Title V permit, we are forwarding herewith Air Quality Permit No. 08031T16 authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been identified as such in the permit. Please note the requirements for the annual compliance certification are contained in General Condition P in Section 4. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to file a petition for contested case hearing in the North Carolina Office of Administrative Hearings. Information regarding the right, procedure, and time limit for permittees and other persons aggrieved to file such a petition is contained in the attached "Notice Regarding the Right to Contest A Division of Air Quality Permit Decision."

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to existing emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS



North Carolina Department of Environmental Quality | Division of Air Quality  
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641  
919.707.8400

143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Rockingham County has triggered increment tracking under PSD for  $PM_{10}$ ,  $PM_{2.5}$ ,  $SO_2$ , and  $NO_x$ . However, this permit modification does not consume or expand increments for any pollutants.

Should you have any questions concerning this matter, please contact Jacob Larson at 919-707-8480 or [jacob.larson@ncdenr.gov](mailto:jacob.larson@ncdenr.gov).

Sincerely yours,

Mark J. Cuilla, EIT, CPM, Chief, Permitting Section  
Division of Air Quality, NCDEQ

Enclosure

c: Brad Akers, EPA Region 4 (Permit and Review)  
Laserfiche [7900138]  
Connie Horne (cover letter only)

**NOTICE REGARDING THE RIGHT TO CONTEST A DIVISION OF AIR QUALITY PERMIT  
DECISION**

**Right of the Permit Applicant or Permittee to File a Contested Case:** Pursuant to NCGS 143-215.108(e), a permit applicant or permittee who is dissatisfied with the Division of Air Quality's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 in the Office of Administrative Hearings within 30 days after the Division notifies the applicant or permittee of its decision. If the applicant or permittee does not file a petition within the required time, the Division's decision on the application is final and is not subject to review. The filing of a petition will stay the Division's decision until resolution of the contested case.

**Right of Other Persons Aggrieved to File a Contested Case:** Pursuant to NCGS 143-215.108(e1), a person other than an applicant or permittee who is a person aggrieved by the Division's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 within 30 days after the Division provides notice of its decision on a permit application, as provided in NCGS 150B-23(f), or by posting the decision on a publicly available Web site. The filing of a petition under this subsection does not stay the Division's decision except as ordered by the administrative law judge under NCGS 150B-33(b).

**General Filing Instructions:** A petition for contested case hearing must be in the form of a written petition, conforming to NCGS 150B-23, and filed with the Office of Administrative Hearings, 1711 New Hope Church Road, Raleigh NC, 27609, along with a fee in an amount provided in NCGS 150B-23.2. A petition for contested case hearing form may be obtained upon request from the Office of Administrative Hearings or on its website at <https://www.oah.nc.gov/hearings-division/filing/hearing-forms>. Additional specific instructions for filing a petition are set forth at 26 NCAC Chapter 03.

**Service Instructions:** A party filing a contested case is required to serve a copy of the petition, by any means authorized under 26 NCAC 03 .0102, on the process agent for the Department of Environmental Quality:

William F. Lane, General Counsel  
North Carolina Department of Environmental Quality  
1601 Mail Service Center  
Raleigh, North Carolina 27699-1601

If the party filing the petition is a person aggrieved other than the permittee or permit applicant, the party **must also** serve the permittee in accordance with NCGS 150B-23(a).

\* \* \*

Additional information is available at <https://www.oah.nc.gov/hearings-division/hearing-process/filing-contested-case>. Please contact the OAH at 984-236-1850 or [oah.postmaster@oah.nc.gov](mailto:oah.postmaster@oah.nc.gov) with all questions regarding the filing fee and/or the details of the filing process.

## Summary of Changes to Permit

The following changes were made to Air Permit No. 08031T15:\*

Page No.	Section	Description of Changes
--	Cover page and throughout permit	<ul style="list-style-type: none"> <li>Updated all dates and permit revision numbers.</li> </ul>
3	Cover page	<ul style="list-style-type: none"> <li>Added "Notice Regarding The Right To Contest A Division Of Air Quality Permit Decision" page</li> </ul>
4	Summary of Changes to Permit	<ul style="list-style-type: none"> <li>Added summary of changes made to Permit No. 08031T15 according to the most recent requirements of the renewal Title V permit</li> </ul>
2	Table of Contents	<ul style="list-style-type: none"> <li>Added Section 3.0 as "Insignificant Activities List"</li> <li>Added Section 4.0 as "General Permit Conditions"</li> </ul>
3	List of Acronyms	<ul style="list-style-type: none"> <li>Added "List of Acronyms"</li> </ul>
4	Permitted Emissions Table	<ul style="list-style-type: none"> <li>Removed ES-08 and CD-05 from table and replaced with ES-42 on "Silicone Coating Line 1"</li> </ul>
16	Section 2.1.D.4.n	<ul style="list-style-type: none"> <li>Inserted paragraph "n"</li> </ul>
16	Section 2.1.D.4.q	<ul style="list-style-type: none"> <li>Updated CDX hyperlink</li> </ul>
17-23	Section 2.2.A	<ul style="list-style-type: none"> <li>MACT JJJ condition was updated to the most recent shell version</li> </ul>
25	Section 2.2 B	<ul style="list-style-type: none"> <li>Added 15A NCAC 02Q .0308(a) and .0309(b) for PFAS Disclosure</li> </ul>
26	Section 3	<ul style="list-style-type: none"> <li>Added Insignificant Activities as Section 3 of the Title V Permit</li> </ul>
26	Section 3	<ul style="list-style-type: none"> <li>Added paper shredder and compaction machine (IES-10) to Insignificant Activities</li> </ul>
26	Section 3	<ul style="list-style-type: none"> <li>Removed additional information link in footnote because site no longer exist.</li> </ul>
27-39	Section 4	<ul style="list-style-type: none"> <li>Added updated version of General Conditions as section 4 of Title V Permit</li> </ul>

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



State of North Carolina  
Department of Environmental Quality  
Division of Air Quality

## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
08031T16	08031T15	XXXX*	XXXX**

NOTE: Per General Condition K, a permit application for the renewal of this Title V permit shall be submitted no later than **[enter date six months prior to expiration date]**

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

**Permittee:** **Loparex, LLC**  
**Facility ID:** **7900138**  
**Primary SIC Code:** **2672 / Paper Coated And Laminated, Nec**  
**NAICS Code:** **322222 / Coated and Laminated Paper Manufacturing**

**Facility Site Location:** **816 Fieldcrest Road**  
**City, County, State, Zip:** **Eden, Rockingham County, North Carolina, 27288**  
**Mailing Address:** **816 Feildcrest Road**  
**City, State, Zip:** **Eden, North Carolina 27288**

**Application Number(s):** **7900138.22A and 7900138.21A**  
**Complete Application Date(s):** **March 7, 2022 and March 10, 2021**

**Division of Air Quality,**  
**Regional Office Address:** **Winston-Salem Regional Office**  
**450 West Hanes Mill Road, Suite 300**  
**Winston-Salem, North Carolina 27105**

Permit issued this the **XX** day of **XXXXXX**, **XXXX**

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Mark J. Cuilla, EIT, CPM, Chief, Air Permitting Section  
By Authority of the Environmental Management Commission

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- SECTION 4: GENERAL PERMIT CONDITIONS

## List of Acronyms

<b>AOS</b>	Alternative Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>BAE</b>	Baseline Actual Emissions
<b>Btu</b>	British thermal unit
<b>CAA</b>	Clean Air Act
<b>CAM</b>	Compliance Assurance Monitoring
<b>CEMS</b>	Continuous Emission Monitoring System
<b>CEDRI</b>	Compliance and Emissions Data Reporting Interface
<b>CFR</b>	Code of Federal Regulations
<b>CO</b>	Carbon Monoxide
<b>COMS</b>	Continuous Opacity Monitoring System
<b>CSAPR</b>	Cross-State Air Pollution Rule
<b>DAQ</b>	Division of Air Quality
<b>DEQ</b>	Department of Environmental Quality
<b>EMC</b>	Environmental Management Commission
<b>EPA</b>	Environmental Protection Agency
<b>FR</b>	Federal Register
<b>GACT</b>	Generally Available Control Technology
<b>GHGs</b>	Greenhouse Gases
<b>HAP</b>	Hazardous Air Pollutant
<b>LAER</b>	Lowest Achievable Emission Rate
<b>MACT</b>	Maximum Achievable Control Technology
<b>NAA</b>	Non-Attainment Area
<b>NAAQS</b>	National Ambient Air Quality Standards
<b>NAICS</b>	North American Industry Classification System
<b>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAP</b>	National Emission Standards for Hazardous Air Pollutants
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NSPS</b>	New Source Performance Standard
<b>NSR</b>	New Source Review
<b>OAH</b>	Office of Administrative Hearings
<b>PAE</b>	Projected Actual Emissions
<b>PAL</b>	Plantwide Applicability Limitation
<b>PM</b>	Particulate Matter
<b>PM<sub>2.5</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 2.5 Micrometers or Less
<b>PM<sub>10</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
<b>POS</b>	Primary Operating Scenario
<b>PSD</b>	Prevention of Significant Deterioration
<b>PTE</b>	Potential to Emit
<b>RACT</b>	Reasonably Available Control Technology
<b>SIC</b>	Standard Industrial Classification
<b>SIP</b>	State Implementation Plan
<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>TAP</b>	Toxic Air Pollutant
<b>tpy</b>	Tons Per Year
<b>VOC</b>	Volatile Organic Compound

## SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>Extrusion Laminating Operations</b>			
ES-01 and ES-04 <b>MACT JJJJ</b>	Two direct-fired natural gas-fired floatation dryers (1.5 million Btu per hour maximum heat input rate, each)	NA	NA
ES-02, ES-05, and ES-07	Three corona treaters	CD-02A, CD-02B, and CD-02C	Three ozone destruction systems, one each
ES-03 and ES-06 <b>MACT JJJJ</b>	Two extrusion laminators	NA	NA
<b>Silicone Coating Line No. 1</b>			
ES-42	Plasma Treater	NA	NA
ES-09 <b>NSPS RR MACT JJJJ</b>	One direct-fired two-zone (Nos. 3 and 4) natural gas-fired silicone dryer No. 1 (7.0 million Btu per hour maximum heat input rate) <i>AOS1 – Solvent-based coatings</i> <i>AOS2 – Solvent-less-based coatings</i> <i>AOS3 – Compliant water-based coatings</i>	NA ( <i>for all AOS</i> )	NA
ES-11 <b>NSPS RR MACT JJJJ</b>	One direct-fired two-zone (Nos. 1 and 2) natural gas-fired silicone dryer No. 1 (8.5 million Btu per hour maximum heat input rate) <i>AOS1 – Solvent-based coatings</i> <i>AOS2 – Solvent-less-based coatings</i> <i>AOS3 – Compliant water-based coatings</i>	CD-01 ( <i>for AOS1 only</i> );  NA <i>for AOS2 and AOS3</i> )	One natural gas-fired recuperative thermal oxidizer (21.0 million Btu per hour maximum heat input rate)
<b>Silicone Coating Line No. 2</b>			
ES-21	Silicone corona treater No. 2	NA	NA
ES-22 <b>NSPS RR MACT JJJJ</b>	One direct-fired single-zone (No. 3) natural gas-fired silicone dryer (2.0 million Btu per hour maximum heat input rate) <i>AOS1 – Solvent-based coatings</i> <i>AOS2 – Solvent-less-based coatings</i> <i>AOS3 – Compliant water-based coatings</i>	NA ( <i>for all AOS</i> )	NA
ES-24 <b>NSPS RR MACT JJJJ</b>	One direct-fired two-zone (Nos. 1 and 2) natural gas-fired silicone dryer No. 2 (10.35 million Btu per hour maximum heat input rate) <i>AOS1 – Solvent-based coatings</i> <i>AOS2 – Solvent-less-based coatings</i> <i>AOS3 – Compliant water-based coatings</i>	CD-04 ( <i>for AOS1 only</i> );  NA <i>for AOS2 and AOS3</i> )	One natural gas-fired recuperative thermal oxidizer (14.8 million Btu per hour maximum heat input rate)
<b>Silicone Coating Line No. 3</b>			
ES-35	Silicone corona treater No. 3	NA	NA
ES-36 <b>NSPS RR MACT JJJJ</b>	One direct-fired two-zone (Nos. 1 and 2) natural gas-fired silicone dryer No. 3 (11.5 million Btu per hour maximum heat input rate)	NA	NA
ES-37 <b>NSPS RR MACT JJJJ</b>	One direct-fired two-zone (Nos. 3 and 4) natural gas-fired silicone dryer (11.5 million Btu per hour maximum heat input rate)	NA	NA

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>Pilot Coaters</b>			
ES-38	Silicone corona treater, Coater No. 4	NA	NA
ES-39 <b>MACT JJJJ NSPS RR</b>	One direct-fired single-zone natural gas-fired Pilot coater No. 4 (0.7 million Btu per hour maximum heat input rate) <i>AOS1 – Solvent-based coatings</i> <i>AOS2 – Solvent-less-based coatings</i> <i>AOS3 – Compliant Water-based coatings</i>	NA	NA
ES-40	Silicone corona treater, Coater No. 5	NA	NA
ES-41 <b>MACT JJJJ</b>	One direct-fired single-zone natural gas-fired Pilot coater No. 5 (0.7 million Btu per hour maximum heat input rate)	NA	NA
<b>Miscellaneous Fugitive Sources</b>			
ES-12	Mix room No. 1	NA	NA
ES-13	Flood testing booth	NA	NA
ES-14	Chemical storage room	NA	NA
ES-25	Mix room No. 2	NA	NA
<b>Horizontal Fixed Roof Organic Liquid Storage Tanks</b>			
ES-29 <b>MACT EEEE</b>	Toluene storage tank (12,000 gallon capacity)	NA	NA
ES-30	Heptane storage tank (12,000 gallon capacity)	NA	NA
ES-31	Isopropyl alcohol storage tank (12,000 gallon capacity)	NA	NA
<b>Miscellaneous Fuel Burning Source</b>			
ES-BL02 <b>MACT DDDDD</b>	One natural gas-fired boiler (4.2 million Btu per hour maximum heat input rate)	NA	NA
ES-BL01 <b>MACT DDDDD</b>	One natural gas-fired boiler (4.185 million Btu per hour maximum heat input rate)	NA	NA

*AOS = Alternative Operating Scenario*

## SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

### 2.1 Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

#### A. Extrusion Laminating Operations including:

- three corona treaters (ID Nos. ES-02, ES-05, and ES-07) with associated ozone destruction systems (ID Nos. CD-02A, CD-02B, and CD-02C), respectively
- two extrusion laminators (ID Nos. ES-03 and ES-06), and
- two direct-fired natural gas-fired floatation dryers (ID Nos. ES-01 and ES-04)

The following provides a summary of limits and/or standards for the emission sources described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	<p><b><u>For ID Nos. ES-01, ES-3, ES-04 and ES-06 only</u></b>  <math>E = 4.10 \times P^{0.67}</math>            Where: E = allowable emission rate in pounds per hour            P = process weight in tons per hour</p>	15A NCAC 02D .0515
Sulfur dioxide	<p><b><u>For Dryers (ID Nos. ES-01 and ES-04) only</u></b>            2.3 pounds per million Btu heat input</p>	15A NCAC 02D .0516
Visible emissions	<p><b><u>For ID Nos. ES-01, ES-3, ES-04 and ES-06 only</u></b>            20 percent opacity</p>	15A NCAC 02D .0521
Hazardous air pollutants	See Section 2.2 A	15A NCAC 02D .1111 (40 CFR 63, Subpart JJJJ)
Volatile organic compounds	See Section 2.2 B.1	15A NCAC 02Q .0317 (PSD Avoidance)
Odors	State-enforceable Only See Section 2.2 B.2	15A NCAC 02D .1806

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources (**ID Nos. ES-01, ES-03, ES-04, and ES-06**) shall not exceed an allowable emission rate as calculated by the following equation:

$E = 4.10 \times P^{0.67}$  Where: E = allowable emission rate in pounds per hour  
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall maintain production records such that the process rates “P” in tons per hour, as specified by the formula contained above can be derived, and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the production records are not maintained or the types of materials and finishes are not monitored.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. No reporting is required for particulate emissions from these sources.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources (**ID Nos. ES-01 and ES-04**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combination of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02D .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in these sources.

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources (**ID Nos. ES-01, ES-03, ES-04, and ES-06**) 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.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once every six months the Permittee shall observe these sources (**ID Nos. ES-01, ES-03, ES-04, and ES-06**) for any visible emissions above normal. The six-month observation must be made once for each six-month period of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.3.a above. If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.
- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. 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
  - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. 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 of this permit must be clearly identified.

**B. Silicone Coating Operations including:**

**Silicone Coating Line No. 1**

- one direct-fired two-zone (Nos. 3 and 4) natural gas-fired silicone dryer No. 1 (ID No. ES-09)
- one direct-fired two-zone (Nos. 1 and 2) natural gas-fired silicone dryer No. 1 (ID No. ES-11) with associated natural gas-fired recuperative thermal oxidizer (ID No. CD-01) or no control

**Silicone Coating Line No. 2**

- one direct-fired single-zone (No. 3) natural gas-fired silicone dryer (No. 2) (ID No. ES-22)
- one direct-fired two-zone (Nos. 1 and 2) natural gas-fired silicone dryer No. 2 (ID No. ES-24) with associated natural gas-fired recuperative thermal oxidizer (ID No. CD-04) or no control

**Silicone Coating Line No. 3**

- one direct-fired two-zone (Nos. 1 and 2) natural gas-fired silicone dryer No. 3 (ID No. ES-36)
- one direct-fired two-zone (Nos. 3 and 4) natural gas-fired silicone dryer (ID No. ES-37)

**Pilot Coaters**

- one direct-fired single zone natural gas-fired silicone dryer No. 4 (ID No. ES-39)
- one direct-fired single zone natural gas-fired silicone dryer No. 5 (ID No. ES-41)

The following provides a summary of limits and/or standards for the emission sources described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ Where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 02D .0515
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Volatile organic compounds	<b>For Silicone Coating Lines Nos. 1, 2, and 3 Only</b> 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month - or - Demonstrate for each affected facility the required (up to 90%) overall VOC emission reduction as calculated over a calendar month	15A NCAC 02D .0524 (40 CFR 60, Subpart RR)
Hazardous air pollutants	See Section 2.2 A	15A NCAC 02D .1111 (40 CFR 63, Subpart JJJJ)
Volatile organic compounds	See Section 2.2 B.1	15A NCAC 02Q .0317 (PSD Avoidance)
Odors	State-enforceable Only See Section 2.2 B.2	15A NCAC 02D .1806

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources (**ID Nos. ES-09, ES-11, ES-22, ES-24, ES-36, ES-37, ES-39, and ES-41**) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad \text{Where: } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall maintain production records such that the process rates "P" in tons per hour, as specified by the formula contained above can be derived, and shall make these records available to a DAQ authorized representative upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the production records are not maintained or the types of materials and finishes are not monitored.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. No reporting is required for particulate emissions from these sources.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources (**ID Nos. ES-09, ES-11, ES-22, ES-24, CD-01, CD-04, ES-36, ES-37, ES-39, and ES-41**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combination of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02D .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in these sources.

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources (**ID Nos. ES-09, ES-11, ES-22, ES-24, CD-01, CD-04, ES-36, ES-37, ES-39, and ES-41**) 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.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once every six months the Permittee shall observe these sources (**ID Nos. ES-09, ES-11, ES-22, ES-24, CD-01, CD-04, ES-36, ES-37, ES-39, and ES-41**) for any visible emissions above normal. The six-month observation must be made once for each six-month period of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:

- i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
- ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 B.3.a above.

If the above-normal emissions are not corrected per i. above or if the demonstration in ii. above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. 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
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. 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 of this permit must be clearly identified.

**4. 15A NCAC 02D .0524: NEW SOURCE PERFORMANCE STANDARDS**

Paragraph 60.442(a) of the “Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations” (i.e. 40 CFR Part 60, Subpart RR) applies to these sources (**ID Nos. ES-09, ES-11, ES-22, ES-24, ES-36, and ES-37**) as the volatile organic compound (VOC) input to each coating line is greater than 45 megagrams (50 tons) per 12 month period.

**Standards** [40 CFR 60.442]

- a. The Permittee shall limit monthly VOC emissions from the affected facilities according to one of the following standards:
  - i. Discharge into the atmosphere from the affected facilities shall not exceed 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or
  - ii. Demonstrate for each affected facility:
    - A. A 90 percent overall VOC emission reduction over a calendar month; or
    - B. The percent overall VOC emission reduction calculated according to the following equation, as provided in 40 CFR 60.443(b), over a calendar month:

$$R_Q = \frac{G - 0.20}{G} * 100$$

Where:  $R_Q$  = the required overall VOC emission reduction (in % by weight); and  
 $G$  = the calculated weighted average of the mass of solvent used per mass of coating solids applied, calculated according to Section 2.1 B.4.d.i of this permit (in kg VOC/kg solids).

If  $R_Q$  is less than or equal to 90 percent, then the required overall VOC reduction is  $R_Q$ .

If  $R_Q$  is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.

**Testing** [15A NCAC 02Q .0508(f) and 40 CFR 60.444(c)]

- b. The Permittee completed initial performance test of recuperative thermal oxidizer (**ID No. CD-01**) on **April 15, 2010** in accordance with the provisions of 40 CFR 60.444(c). The Permittee completed an initial performance test of recuperative thermal oxidizer (**ID No. CD-04**) on **May 7, 2010** in accordance with the provisions of 40 CFR 60.444(c).

**Compliance Procedures** [40 CFR 60.443]

- c. The VOC content per unit of coating solids applied shall be determined by either Reference Method 24 or by manufacturers' formulation data. In the event of any inconsistency between a Method 24 test and manufacturers' formulation data, the Method 24 test will govern. The DAQ may require an owner or operator to perform Method 24 tests during such months. For Reference Method 24, the coating sample must be a one-liter sample taken into a one-liter container at a point where the sample will be representative of the coating applied to the web substrate.
- d. Each month, the Permittee shall determine compliance with one of the emission standards provided in Section 2.1 B.4.a.i or ii for the previous calendar month, as follows:
  - i. To determine compliance with Section 2.1 B.4.a.i, calculate a weighted average of the mass of solvent used per mass of coating solids applied (in kg VOC/kg solids) for the previous calendar month according to the following equation:

$$G = \frac{\sum_{i=1}^n W_{oi} M_{ci}}{\sum_{i=1}^n W_{si} M_{ci}}$$

Where:  $W_{oi}$  = weight fraction of organics applied of each coating (i) applied during the previous calendar month as determined from Method 24 or coating manufacturer's formulation data (in kg VOC/kg coating);  
 $M_{ci}$  = total mass of each coating (i) applied during the previous calendar month as determined from production records (in kg); and  
 $W_{si}$  = weight fraction of solids applied of each coating (i) applied during the previous calendar month as determined from Method 24 or coating manufacturer's formulation data (in kg solids/kg coating).

- ii. To determine compliance with Section 2.1 B.4.a.ii, the Permittee shall:
  - A. Monitor and record the 3-hour average temperature in the combustion chamber of the thermal oxidizers (**ID Nos. CD-01 and CD-04**) whenever they are in use. The Permittee shall not take credit for any emissions reductions from the associated oxidizer(s) for any 3-hour period during which the 3-hour average combustion chamber temperature of the oxidizer(s) is more than 50 °F below the average temperature during the most recent performance test.
  - B. Once per calendar month, calculate the overall VOC emissions reduction at the silicone coating lines during the previous calendar month according to the following equation:

$$\zeta_{\text{Overall}} = \left( \frac{\sum_{i=1}^n \left( Q_{L1,i} * M_{\text{CD-01}} * \frac{\zeta_{\text{CD-01}}}{100\%} \right) + \sum_{j=1}^m \left( Q_{L2,j} * M_{\text{CD-04}} * \frac{\zeta_{\text{CD-04}}}{100\%} \right)}{\sum_{i=1}^n Q_{L1,i} + \sum_{j=1}^m Q_{L2,j}} \right) * 100\%$$

- Where:  $\zeta_{\text{overall}}$  = Facility-wide overall VOC emission reduction achieved during the previous calendar month (wt%);
- $Q_{L1,i}$  = Quantity of the solvent (i.e., VOC) applied at sources (**ID Nos. ES-09 and ES-11**) in each 3-hour averaging period (in lbs);
- $M_{\text{CD-01}}$  = The mass fraction of the solvent applied at sources (**ID Nos. ES-09 and ES-11**) that is routed to thermal oxidizer CD-01 in each 3-hour averaging period;
- $\zeta_{\text{CD-01}}$  = 95.13% efficiency as demonstrated in the latest performance test during periods when the 3-hour average combustion temperature is greater than or equal to 50°F below the average temperature during that performance test as shown in Section 2.1 B.4.d.ii.A above;
- = 0, otherwise;
- $Q_{L2,j}$  = Quantity of the solvent (i.e., VOC) applied sources (**ID Nos. ES-22 and ES-24**) in each 3-hour averaging period (in lbs);
- $M_{\text{CD-04}}$  = The mass fraction of the solvent applied at sources (**ID Nos. ES-22 and ES-24**) that is routed to thermal oxidizer CD-04 in each 3-hour averaging period;
- $\zeta_{\text{CD-04}}$  = 98.86% efficiency as demonstrated in the latest performance test during periods when the 3-hour average combustion temperature is greater than or equal to 50°F below the average temperature during that performance test as shown in Section 2.1 B.4.d.ii.A above; and
- = 0, otherwise.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if a monthly compliance demonstration is not completed as provided above or if the compliance demonstration shows an exceedance of the applicable limit provided in Section 2.1 B.4.a.i or ii above.

**Monitoring and Recordkeeping** [40 CFR 60.445]

- e. The Permittee shall maintain the following monthly records of each coating used at the affected facilities during the previous calendar month:
- the quantity of each coating applied (in kg);
  - the weight fraction of each coating applied as determined from Method 24 or coating manufacturer's formulation data (in kg VOC/kg coating); and
  - the weight fraction of solids of each coating applied as determined from Method 24 or coating manufacturer's formulation data (in kg VOC/kg coating applied).
- If these records are not retained, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524.
- f. The Permittee shall install, calibrate, maintain, and operate a continuous monitoring device that continuously records the combustion temperature of the thermal oxidizers (**ID No. CD-01 and CD-04**) during coating operations. The monitoring device shall have an accuracy of the greater of  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius or 2.5 °C. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if the combustion temperature is not monitored and recorded.
- g. The Permittee shall record all 3-hour periods (during actual coating operations) when the average monitored combustion temperature of the thermal oxidizers (**ID No. CD-01 and CD-04**) is more than 50 °F below the average temperature during the most recent performance test.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if the records are not maintained.
- h. The Permittee shall install, calibrate, maintain, and operate a monitoring device that continuously indicates that the hood or enclosure is operating. No continuous monitor shall be required if the owner or operator can demonstrate that the hood or enclosure system is interlocked with the affected facility's oven recirculation air system.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if the records are not maintained.
- i. Required records, as provided above, shall be retained for at least two years following the date of the measurements. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if the records are not maintained.

**Reporting** - [15A NCAC 02Q .0508(f), 40 CFR 60.447 and 40 CFR 60.7(c)]

- j. The Permittee shall submit a quarterly exceedance report to the Regional Supervisor within 30 days after each calendar year quarter, postmarked on or before January 30 for the preceding three-month period between October and December, April 30 for the preceding three-month period between January and March, July 30 for the preceding three-month period between April and June, and October 30 for the calendar year for the preceding three-month period between July and September. The quarterly exceedance report shall include either:
- A statement that the facility has been in continuous compliance with the emissions limitations and monitoring

- provisions provided in 40 CFR Part 60, Subpart RR; or
- ii. A list of all deviations with the provisions of 40 CFR Part 60, Subpart RR, including the following:
  - A. Each instance where VOC emissions from the source exceed the applicable limit provided in Section 2.1 B.4.a.i or ii above.
  - B. Each instance that the 3-hour average combustion temperature of the control device (**ID No. CD-01 and CD-04**) is more than 50 °F below the average temperature during the most recent performance test; and
  - C. The date and time identifying each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of the system repairs or adjustments.

**C. Horizontal Fixed Roof Organic Liquid Storage Tank**

- one toluene storage tank (ID No. ES-29)
- one heptanes storage tank (ID No. ES-30), and
- one isopropyl alcohol storage tank (ID No. ES-31)

**Miscellaneous Fugitive Sources including:**

- Mix room No. 1 (ID No. ES-12),
- Flood testing booth (ID No. ES-13),
- Chemical storage room (ID No. ES-14), and
- Mix room No. 2 (ID No. ES-25)

The following provides a summary of limits and/or standards for the emission source described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Hazardous air pollutants	<b>For tank (ID No. ES-29) Only</b> No applicable standards	15A NCAC 02D .1111 (40 CFR 63, Subpart EEEE)
Volatile organic compounds	See Section 2.2 B.1	15A NCAC 02Q .0317 (PSD Avoidance)
Odors	State-enforceable Only See Section 2.2 B.2	15A NCAC 02D .1806

**1. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

**Applicability** [40 CFR 63.2338(b)(1) and 40 CFR 63.2406]

- a. This source (**ID No. ES-29**) is an affected “organic liquid” storage tank. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1111 “Maximum Achievable Control Technology” as promulgated in 40 CFR 63, Subpart EEEE “National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (Non-Gasoline)” including Subpart A “General Provisions.”

**Standards/Monitoring/Recordkeeping** [15A NCAC 02D .1111, 40 CFR 63.2346 and Table 2]

- b. The affected source has no applicable standards or associated monitoring or recordkeeping requirements pursuant to 40 CFR 63.2346.

**D. Two natural gas-fired boilers (ID Nos. ES-BL01 and ES-BL02)**

The following provides a summary of limits and/or standards for the emission sources described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.60 pounds per million Btu heat input	15A NCAC 02D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Hazardous air pollutants	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	15A NCAC 02D .1111 (40 CFR 63, Subpart DDDDD)

**1. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from the combustion of natural gas that are discharged from these sources into the atmosphere shall not exceed 0.60 pounds per million Btu heat input.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

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

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources 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.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in these sources.

**3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources 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.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

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

**4. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

**Applicability** [40 CFR 63.7485, 63.7490, 63.7499(1)]

- a. For these sources (ID Nos. ES-BL01 and ES-BL02) (a new unit designed to burn gas 1 fuels only), the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" and Subpart A "General Provisions."

**Definitions and Nomenclature** [40 CFR 63.7575]

- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.7575 shall apply.

**40 CFR Part 63 Subpart A General Provisions** [40 CFR 63.7565]

- c. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A General Provisions according to the applicability of Subpart A to such sources as identified in Table 10 to 40 CFR Part 63, Subpart DDDDD.

**Compliance Date** [40 CFR 63.7495(a)]

- d. The Permittee shall comply with the applicable requirements upon startup of these sources.

**Notifications** [40 CFR 63.7545]

- e. As specified in 40 CFR 63.9(b)(4) and (5), the Permittee shall submit an Initial Notification not later than 15 days after the actual date of startup of the affected source.
- f. The Permittee shall submit an initial Notification of Compliance Status to the DAQ. The notification must be signed by a responsible official and sent before the close of business on the 60th day following the completion of the initial tune-up. The notification shall contain the following:
  - i. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, and description of the fuel(s) burned.
  - ii. the following certification(s) of compliance:
    - (A) “This facility completed the required initial tune-up for all the boilers and process heaters covered by 40 CFR part 63 subpart DDDDD at this site according to the procedures in 40 CFR 63.7540(a)(10)(i) through (vi) (i.e., Section 2.1 D.4.g.i through g.v and l. ii)”.  
[40 CFR 63.7545(e)]

**Work Practice Standards** [15A NCAC 02Q .0508(f)]

- g. The Permittee shall conduct a tune-up every five years as specified below.
  - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary. The Permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled shutdown but the burner must be inspected at least once every 72 months.
  - ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
  - iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown).
  - iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject.
  - v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.  
[40CFR 63.7500(a), 63.7540(a)(10), (a)(12)]
- h. For **these sources**, each 5-year tune-up shall be conducted no more than 61 months after the previous tune-up. The initial tune-up shall be conducted no later than 61 months after the initial startup of the source. [40CFR 63.7515(d)]
  - i. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.[40 CFR 63.7540(a)(13), 63.7515(g)]
  - j. At all times, you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.7500(a)(3)]
- k. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.1 D.4.e through j are not met.

**Recordkeeping Requirements** [15A NCAC 02Q .0508(f)]

- l. The Permittee must keep the following:
  - i. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status, or 5-year compliance report that has been submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). [40 CFR 63.7555(a)(1)]
  - ii. Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (A) through (C) below:
    - (A) The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and

oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

(B) A description of any corrective actions taken as a part of the tune-up; and

(C) The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

[40 CFR 63.7540(a)(10)(vi)]

- iii. The associated records for Section 2.1 D.4.e through k.
- m. The Permittee shall:
  - i. maintain records in a form suitable and readily available for expeditious review;
  - ii. keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record; and
  - iii. keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee can keep the records offsite for the remaining 3 years. [40 CFR 63.7560, 63.10(b)(1)]
- n. For units that are subject only to a requirement to conduct a 5-year tune-up according to § 63.7540(a)(10), (11), or (12), respectively, and not subject to emission limits or operating limits, you may submit only a 5-year compliance report, as specified in paragraphs (b)(1) through (4) of this section, instead of a semi-annual compliance report.
- o. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if records are not maintained pursuant to Section 2.1 D.4.l through m.

**Reporting Requirements** [15A NCAC 02Q .0508(f)]

- p. The Permittee shall submit compliance reports to the DAQ on a 5-year basis. The first report shall cover the period beginning on the compliance date specified in Section 2.1 D.4 d and ending on the earliest December 31<sup>st</sup> less than 5 years from the compliance date. Subsequent annual reports shall cover the periods from January 1 to December 31. The Permittee shall submit the compliance reports postmarked on or before January 30. [40 CFR 63.7550(a), (b), 63.10(a)(4), (5)]
- q. The compliance report must also be submitted electronically via the Compliance and Emissions Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>) You must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §63.13. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. [40 CFR 63.7550(h)(3)]
- r. The compliance report must contain the following information:
  - i. Company name and address;
  - ii. Process unit information, emissions limitations, and operating parameter limitations;
  - iii. Date of report and beginning and ending dates of the reporting period;
  - iv. Include the date of the most recent tune-up for each unit required according to Section 2.1 D.4.g. Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.
  - v. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [40 CFR 63.7550(a) and (c), Table 9]
- s. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the reporting requirements in Section 2.1 D.4.p through r are not met.

## 2.2 Multiple Emission Sources Specific Limitations and Conditions

### A. All facilities subject to 40 CFR 63, Subpart JJJJ (15A NCAC 02D .1111): NESHAP (MACT) for PAPER AND OTHER WEB COATING

#### Collection of all Web Coating Lines:

- Two extrusion laminators (ID Nos. ES-03 and ES-06)
- Two floatation dryers (ID Nos. ES-01 and ES-04)
- Silicone Dryer No. 1 (zones 1 and 2, ID No. ES-11) controlled by thermal oxidizer (ID No. CD-01)
- Silicone Dryer No. 1 (zones 3 and 4, ID No. ES-09)
- Silicone Dryer No. 2 (zones 1 and 2, ID No. ES-24) controlled by thermal oxidizer (ID No. CD-04)
- Silicone Dryer No. 2 (zone 3, ID No. ES-22)
- Silicone Dryer No. 3 (zones 1 and 2, ID No. ES-36)
- Silicone Dryer No. 3 (zones 3 and 4, ID No. ES-37)
- Pilot coater No. 4 (ID No. 39)
- Pilot coater No. 5 (ID No. 41)

#### 1. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

##### Applicability [40 CFR 63.3300]

- a. For these web coating lines, the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR Part 63, Subpart JJJJ – "National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating" and Subpart A "General Provisions."

##### Definitions and Nomenclature

- b. For the purposes of this permit condition (Section 2.2 A.1), the definitions and nomenclature contained in 40 CFR 63.3310 shall apply.

##### 40 CFR Part 63 Subpart A General Provisions

- c. The Permittee shall comply with the requirements of 40 CFR Part 63 Subpart A General Provisions according to the applicability of Subpart A to such sources as identified in Table 2 to 40 CFR Part 63, Subpart JJJJ. [40 CFR 63.3340]

##### General Compliance Requirements [15A NCAC 02Q .0508(f)]

- d. The following general compliance requirements apply:
  - i. Each source shall be in compliance with the emission limits specified in Section 2.2 A.1.e below, and the operating limits specified in Section 2.2 A.1.h below at all times, including periods of startup, shutdown, and malfunction. [40 CFR 63.3340(a)]
  - ii. The Permittee shall operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the DAQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.3340(b)]

The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these general compliance requirements are not met.

##### Emission Standards [15A NCAC 02Q .0508(b)]

- e. For the web coating lines the Permittee shall limit:
  - i. the organic HAP emissions to no more than 5 percent of the organic HAP applied each month (95 percent reduction) [40 CFR 63.3320(b)(1)]; or

- ii. during any period of time in which an operating limit deviation, as defined in Section 2.2 A.1.f.ii below, occurs, the organic HAP emission rate based on coating solids applied is no more than 0.20 kg organic HAP per kg coating solids applied. [40 CFR 63.3370(l)(4)]

**Compliance Determination Method**

- f. The following compliance determination method applies:
  - i. The Permittee shall determine compliance with the emission limits in Section 2.2 A.1.e by the use of a capture and control system(s) consisting of permanent total enclosure(s) and thermal oxidizers. [40 CFR 63.3370(a)(5)(i)]
  - ii. For purposes of determining compliance with Section 2.2 A.1.e, an operating limit deviation occurs on a given web coating line for each 3-hour period:
    - (A) where the 3-hour average thermal oxidizer combustion temperature falls more than 50 degrees F below the temperature established in 2.2 A.1.e below, or
    - (B) the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established at Section 2.2 A.1.k. [40 CFR 63.3370(l)(3)]
  - iii. If an operating limit deviation occurs during the monthly averaging period, the Permittee, for each 3-hour period in which an operating limit deviation occurred, shall assume no capture or control of emissions for that web coating line. [40 CFR 63.3370(l)(4)]
  - iv. For each period in which an operating limit deviation occurred, the Permittee shall determine compliance with the emission limits in Section 2.2 A.1.e.ii.
  - v. For each month in which an operating limit deviation did not occur, the requirements in paragraph f.iv above do not apply. The Permittee shall comply with the emission limits in Section 2.2 A.1.e.i by complying with the operating limits in Section 2.2 A.1.g and Section 2.2 A.1.h.

The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these compliance determination requirements are not met or if the emission limits in Section 2.2 A.4.e. are not met.

**RTO Monitoring** [15A NCAC 02Q .0508(f)]

- g. For each thermal oxidizer, the average combustion temperature in any 3-hour period shall not fall more than 50°F below combustion temperature limit established during the last performance test in accordance with 40 CFR 63.3360(e)(3)(i).
- h. For each thermal oxidizer, the Permittee shall:
  - i. Install, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications.
  - ii. Install, operate, and maintain a temperature monitoring device equipped with a continuous recorder.
    - (A) The device must be capable of monitoring temperature with an accuracy of  $\pm 1$  percent of the temperature being monitored in degrees Celsius, or  $\pm 1.8$  degrees Fahrenheit, whichever is greater.
    - (B) The temperature sensor must be installed in the combustion chamber at a location in the combustion zone.
  - iii. For temperature sensors, you must develop a quality control program that must contain, at a minimum, a written protocol that describes the procedures for verifying that the temperature sensor is operating properly using at least one of the methods in paragraphs (iii)(A) through (F) below. The owner or operator shall keep these written procedures on record for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the DAQ:
    - (A) Semiannually, compare measured readings to a National Institute of Standards and Technology (NIST) traceable temperature measurement device or simulate a typical operating temperature using a NIST traceable temperature simulation device. When the temperature measurement device method is used, the sensor of the calibrated device must be placed as close as practicable to the process sensor, and both devices must be subjected to the same environmental conditions. The accuracy of the temperature measured must be 2.5 percent of the temperature measured by the NIST traceable device or 5 degrees Fahrenheit whichever is greater.
    - (B) Annually validate the temperature sensor by following applicable mechanical and electrical validation procedures in the manufacturer owner's manual.
    - (C) Annually request the temperature sensor manufacturer to certify or re-certify electromotive force (electrical properties) of the thermocouple.
    - (D) Annually replace the temperature sensor with a new certified temperature sensor in lieu of validation.
    - (E) Permanently install a redundant temperature sensor as close as practicable to the process temperature sensor. The sensors must yield a reading within 2.5 percent of each other for thermal oxidizers and catalytic oxidizers.

- (F) Permanently install a temperature sensor with dual sensors to account for the possibility of failure.
- iv. Conduct the validation checks in paragraphs (iii)(A), (B), or (C) above any time the temperature sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- v. At least quarterly, inspect temperature sensor components for proper connection and integrity or continuously operate an electronic monitoring system designed to notify personnel if the signal from the temperature sensor is interrupted.[40 CFR 63.3350(e)(10)]

The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these RTO monitoring requirements are not met.

**Permanent Total Enclosure Monitoring** [15A NCAC 02Q .0508(f)]

- i. For each permanent total enclosure, the Permittee shall maintain the permanent total enclosure operating parameter(s) at an average value greater than or less than (as appropriate) the operating parameter value(s) established pursuant to the site-specific monitoring plan specified in Section 2.2 A.4.1 below. [40 CFR 63.3370(l)(3)]  
The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these requirements are not met.
- j. Each permanent total enclosure shall meet the following criteria as defined pursuant to 40 CFR 51 Appendix M, Method 204, Section 6:
  - i. Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator.
  - ii. The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
  - iii. The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure.
  - iv. All access doors and windows whose areas are not included in (B) and are not included in the calculation in (C) shall be closed during routine operation of the process.
  - v. All VOC emissions must be captured and contained for discharge through a control device.  
[40 CFR 63.3360(f)(1)]  
The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these requirements are not met.
- k. For each permanent total enclosure, the Permittee shall:
  - i. develop a site-specific monitoring plan containing the information below. The monitoring plan must:
    - (A) identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained;
    - (B) explain why this parameter is appropriate for demonstrating ongoing compliance;
    - (C) identify the specific monitoring procedures; and
    - (D) specify the operating parameter value or range of values that demonstrate compliance with the emission standards in 40 CFR 63.3320 (Section 2.2 A.1.e.). The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.  
[40 CFR 63.3350(f)(1), (2)]
  - ii. monitor the capture system in accordance the plan. The Permittee shall make the monitoring plan available for inspection by the permitting authority upon request. [40 CFR 63.3350(f)(3)]
  - iii. Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit. [40 CFR 63.3350(f)(4)]
  - iv. review and update the capture system monitoring plan at least annually.[40 CFR 63.3350(f)(5)]The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these monitoring requirements are not met.

**Continuous Parameter Monitoring Systems (CPMS) Requirements** [15A NCAC 02Q .0508(f)]

- l. The Permittee shall install, operate, and maintain each CPMS for each thermal oxidizer and permanent total enclosure as specified in Sections 2.2 A.1.h and j above, as follows [40 CFR 63.3350(e)]:
  - i. Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. The Permittee shall have a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.
  - ii. The Permittee shall have valid data from at least 90 percent of the hours during which the process operated.
  - iii. The Permittee shall determine the hourly average of all recorded readings as follows:
    - (A) To calculate a valid hourly value, the Permittee shall have at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.
    - (B) Provided all of the readings recorded in accordance with this paragraph iii clearly demonstrate continuous

compliance with the standard that applies to you, then you are not required to determine the hourly average of all recorded readings.

- iv. The Permittee shall determine the 3-hour block average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, the Permittee shall have at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).
- v. Except for temperature sensors, the Permittee shall develop a quality control program that must contain, at a minimum, a written protocol that describes the procedures for each of the operations in 40 CFR 63.3350(e)(5)(i) through (vi). The owner or operator shall keep these written procedures on record for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the DAQ. If the performance evaluation plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the performance evaluation plan on record to be made available for inspection, upon request, by the DAQ, for a period of 5 years after each revision to the plan. For temperature sensors, the Permittee shall follow the requirements in 40 CFR 63.3350(e)(10).
  - (A) initial and any subsequent calibration of the continuous monitoring system (CMS);
  - (B) determination and adjustment of the calibration drift of the CMS;
  - (C) preventative maintenance of the CMS, including spare parts inventory;
  - (D) data recording, calculations, and reporting;
  - (E) accuracy audit procedures, including sampling and analysis methods; and
  - (F) program of corrective action for a malfunctioning CMS.
- vi. The Permittee shall record the results of each inspection, calibration, and validation check of the CPMS.
- vii. At all times, the Permittee shall maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- viii. Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the Permittee shall conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in 40 CFR 63.3370. The Permittee shall use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- ix. Any averaging period for which the Permittee does not have valid monitoring data and such data are required constitutes a deviation, and the Permittee shall notify the DAQ in accordance with 40 CFR 63.3400(c). [40 CFR 63.3350(e)(1) through (9)]  
The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these monitoring requirements are not met.

**Testing** [15A NCAC 02Q .0508(f)]

- m. The following testing requirements apply:
  - i. All tests shall be conducted in accordance with 40 CFR 63.3340(c), 63.3360 and 63.7, as applicable. If the results of this test are above the limits given in Section 2.2 A.1.e above, the Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111.
  - ii. The Permittee shall perform a periodic test once every 5 years for each thermal oxidizer to determine the destruction or removal efficiency according to 40 CFR 63.3360(e). [40 CFR 63.3360(a)]
  - iii. Each test shall be conducted within 60 months of the previous performance test. [40 CFR 63.3330(a)(2)]
  - iv. Process information of the conditions in existence at the time of each performance test shall be collected according to 40 CFR 63.3360(e)(2).
  - v. The Permittee shall confirm or reestablish the operating limits in 2.2 A.1.g above, during performance tests. [40 CFR 63.3360(e)(3)]
  - vi. Multiple performance tests may be required to obtain all permitted representative operating conditions consistent with 63.3360(c).

The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these testing requirements are not met.

**Notifications** [15A NCAC 02Q .0508(f)]

- n. The Permittee shall as necessary:
  - i. submit a Notification of Performance Test as specified in 40 CFR 63.7 and 40 CFR 63.9(e). This notification

and the site-specific test plan required under 40 CFR 63.7(c)(2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. [40 CFR 63.3400(d)]

- ii. submit the Notification of Performance Test at least 60 calendar days before the performance test is scheduled to begin to allow the DAQ to review and approve the site-specific test plan required under 40 CFR 63.7(c), if requested by the DAQ, and to have an observer present during the test. [40 CFR 63.7(b)(1)]

If these requirements are not met, the Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- o. The Permittee shall
  - i. maintain the records specified in 40 CFR 63.10(b)(2)[i.e., *Start up, shut down, malfunction, maintenance and CPMS records*] of all measurements needed to demonstrate compliance with this standard on a monthly basis, including the following:
    - (A) control device and capture system operating parameter data in accordance with the requirements of Sections 2.2 A.1.g through k.
    - (B) organic HAP content data for the purposes of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(c).
    - (C) volatile matter and coating solids content data for the purposes of demonstrating compliance in accordance with the requirements of 40 CFR 63.3360(d).
    - (D) overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of 40 CFR 63.3360(e) and(f).
    - (E) material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of 40 CFR 63.3370(b), (c), and (d). [40 CFR 63.3410(a)(1)]
  - ii. maintain the following records for each CPMS (CMS) on a monthly basis:
    - (A) all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
    - (B) the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
    - (C) the date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7);
    - (D) the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of the affected source;
    - (E) the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shutdowns, and malfunctions of the affected source;
    - (F) the nature and cause of any malfunction (if known);
    - (G) the corrective action taken or preventive measures adopted;
    - (H) the nature of the repairs or adjustments to the CMS that was inoperative or out of control;
    - (I) the total process operating time during the reporting period; and
    - (J) all procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d). [40 CFR 63.3410(a)(2), 40 CFR 63.10(c)]
  - iii. For each deviation from an operating limit occurring at an affected source, the Permittee shall record the following information.
    - (A) The total operating time the web coating line(s) controlled by the corresponding add-on control device and/or emission capture system during the reporting period.
    - (B) Date, time, duration, and cause of the deviations.
    - (C) If the facility determines by its monthly compliance demonstration, in accordance with 40 CFR 63.3370, as applicable, that the source failed to meet an applicable emission limit of this subpart, you must record the following for the corresponding affected equipment:
      - (1) Record an estimate of the quantity of HAP (or VOC if used a surrogate in accordance with 40 CFR 63.3360(d)) emitted in excess of the emission limit for the month, and a description of the method used to estimate the emissions.
      - (2) Record actions taken to minimize emissions in accordance with 40 CFR 63.3340(a)(Section 2.2 A.4.e.i) , and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

[40 CFR 63.3410(c)]

- iv. maintain files of all information (including all reports and notifications) required by Sections 2.2 A.1.a through n in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. [40 CFR 63.10(b)(1)]

The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these recordkeeping requirements are not met.

**Reporting** [15A NCAC 02Q .0508(f)]

**Semiannual reporting**

- p. The following semiannual reporting requirements apply:

- i. The Permittee shall submit a summary report of monitoring and recordkeeping activities to the DAQ, 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. [40 CFR 63.3400(c)(1)] All instances of noncompliance from the requirements of this permit must be clearly identified.
- ii. In addition to Section 2.2 A.1.p.i above, prior to the electronic template being available in CEDRI for one year, the summary report must also be postmarked or delivered by the aforementioned dates to the EPA. After the electronic template has been available in CEDRI for one year, the next full report must be submitted electronically as described in 40 CFR 63.3400(h).[40 CFR 63.3400(c)(1)(ii)]
- iii. The summary reports shall contain the following:
  - (A) Company name and address.
  - (B) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
  - (C) Date of report and beginning and ending dates of the reporting period.
  - (D) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
  - (E) For each deviation from an emission limit at an affected source where you are using a CPMS to comply with the emission limitation in this subpart, the report must include the following information:
    - (1) The total operating time of web coating line(s) during the reporting period.
    - (2) The date and time that each CPMS, if applicable, was inoperative except for zero (low-level) and high-level checks.
    - (3) The date and time that each CPMS, if applicable, was out-of-control, including the information in 40 CFR 63.8(c)(8).
    - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.
    - (5) A summary of the total duration (in hours) of each deviation during the reporting period and the total duration of each deviation as a percent of the total source operating time during that reporting period.
    - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.
    - (7) A summary of the total duration (in hours) of CPMS downtime during the reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that reporting period.
    - (8) A breakdown of the total duration of CPMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.
    - (9) The date of the latest CPMS certification or audit.
    - (10) A description of any changes in CPMS or controls since the last reporting period.
    - (11) An estimate of the quantity of each regulated pollutant emitted over the emission limits in 40 CFR 63.3320 for each monthly period covered in the report if the source failed to meet an applicable emission limit of this subpart.

[40 CFR 63.3400(c)(2)]

The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if these reporting requirements are not met.

**Performance Test Reports**

- q. The following performance testing reporting requirements apply:
  - i. The Permittee shall submit performance test reports as specified in 40 CFR 63.10(d)(2). Within 60 days after the date of completing each performance test, the performance test report shall be submitted to the EPA following the procedures specified in 40 CFR 63.3400(f)(1) through (3). The report shall be submitted electronically using the procedure in 40 CFR 63.3400(h). [40 CFR 63.3400(f)] The Permittee shall be deemed in non-compliance with 15A NCAC 02D .1111 if this reporting requirement is not met.
  - ii. The performance test reports shall continue to be submitted to the DAQ pursuant to General Condition D.
  - iii. The Permittee shall confirm or reestablish the monitoring parameters in 2.2 A.1.g during the performance tests. If, during performance testing, the parameter values are not adhered to and:
    - (A) are more stringent (i.e, the temperature(s) is greater), the permittee shall submit a request to revise the value(s) in the permit at the same time the test report required pursuant to General Condition JJ is submitted. The permit revision will be processed pursuant to 15A NCAC 02Q .0514.
    - (B) are less stringent (i.e, the temperature(s) is less), the Permittee may request to revise the value(s) in the permit pursuant to 15A NCAC 02Q .0515.

**B. Facility-Wide Emission Sources**

The following provides a summary of limits and/or standards for the emission sources described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Volatile organic compounds	Less than 250 tons per consecutive 12-month period	15A NCAC 02Q .0317 (PSD Avoidance)
Odors	<b>State-enforceable Only</b> Odorous emissions must be controlled	15A NCAC 02D .1806
PFAS Disclosure	<b>State-enforceable Only</b> Duty to disclose presence of materials containing fluorinated chemicals	15A NCAC 02Q .0508(f) and .0518.

**1. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS**

**for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of 15A NCAC 02D .0530, volatile organic compound emissions from all emission sources at the facility shall be less than 250 tons per consecutive twelve-month period. To ensure emissions do not exceed the emissions limitation above, the following restrictions shall apply:
  - i. The Permittee shall limit the amount of silicone coating applied at Silicone Dryer No. 1 (**ID Nos. ES-09 and ES-11**), Silicone Dryer No. 2 (**ID Nos. ES-22 and ES-24**), and Silicone Dryer No. 3 (**ID Nos. ES-36 and ES-37**), Pilot coaters No. 4 and No. 5 (**ID Nos. ES-39 and ES-41**) to no greater than 8,964,000 pounds per consecutive 12-month period, each; and
  - ii. The Permittee shall not extrude more than 42,048,000 pounds per consecutive 12-month period at the extrusion laminators (**ID Nos. ES-03 and ES-06**).

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- b. Each month, the Permittee shall create and retain a record of the total silicone coating usage at each of the silicone dryers (**ID Nos. ES-09, ES-11, ES-22, ES-24, ES-36, ES-37, ES-39, and ES-41**) during the previous calendar month and the previous 12-month period for each alternative operating scenario. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the monthly records are not retained or if records indicate an exceedance of the limit provided in Section 2.2 B.1.a.i above.
- c. Each month, the Permittee shall create and retain a record of the total amount of resin extruded at the extrusion laminators (**ID Nos. ES-03 and ES-06**) during the previous calendar month and the previous 12-month period for each alternative operating scenario. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the monthly records are not retained or if records indicate an exceedance of the limit provided in Section 2.2 B.1.a.ii above.
- d. To comply with the provisions of this permit and ensure that emissions do not exceed the regulatory limits, the Permittee shall perform periodic inspection and maintenance (I&M) of the thermal oxidizers (**ID Nos. CD-01 and**

**CD-04** as recommended by the manufacturer. As a minimum, the Permittee shall perform an annual internal inspection of the primary heat exchanger and associated inlet/outlet valves to ensure structural integrity.

- e. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the dates and results of each inspection;
  - ii. the results of any maintenance performed on the thermal oxidizers; and
  - iii. the date and time of each corrective action.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- f. 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 amount of silicone coating formulation applied to each of the silicone coating lines for each of the previous seventeen (17) calendar months for each alternative operating scenario;
  - ii. The total, 12-month rolling silicone coating formulation application rates to each of the silicone coating lines for each of the previous seventeen (17) calendar months;
  - iii. The amount of resin pellets extruded onto paper/film for each of the previous seventeen (17) calendar months for each alternative operating scenario;
  - iv. The total, 12-month rolling resin pellet extrusion rates for each of the previous seventeen (17) calendar months; and
  - v. All instances of deviations from the requirements of this permit must be clearly identified.

**State-enforceable Only**

**2. 15A NCAC 02D .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.

**State-enforceable Only**

**3. Disclosure of Information Relating to Emissions of Fluorinated Chemicals [15A NCAC 02Q .0508(f) 15A NCAC 02Q .0518. ]**

- a. The Permittee shall have an ongoing duty to disclose the presence of materials containing fluorinated chemicals at the facility that have the potential to result in the emission of fluorinated chemicals to the environment. Such disclosures shall be in writing and submitted to the Regional Office Supervisor within thirty days of the Permittee becoming aware of such information unless such information has already been disclosed to DAQ by the Permittee. The disclosure shall describe the identity, quantity, and use of such material to the extent known. DAQ may require the permittee to conduct analysis or testing of fluorinated chemical emissions as necessary to properly evaluate emissions sources at the facility. As used in this condition, the term "fluorinated chemicals" includes but is not limited to per- and polyfluoroalkyl substances (PFAS).

**SECTION 3 - INSIGNIFICANT ACTIVITIES PER 15A NCAC 02Q .0503(8)**

Emission Source ID	Emission Source Description
IES-10	Paper shredding and compaction machine
IES-18	Plastic resin pellet silo #1
IES-19	Plastic resin pellet silo #2
IES-20	Plastic resin pellet silo #3
IPR-01	Pellet receiver
IPR-02	Pellet receiver
IPR-03	Pellet receiver
IPR-04	Pellet receiver
I2	Lab hoods in QC Lab
I3	Small parts washer in Maintenance
I5	One direct-fired natural gas-fired flame treater (1.6 million Btu per hour maximum heat input rate)
I6	Water-based ink printer station
I7 (MACT Subpart ZZZZ)	One diesel-fired emergency generator (35 Hp, 25 kW)
I8	2-Headed Printer Operation located across Fieldcrest Road
I9	1-Headed Printer Operation located across Fieldcrest Road
ES-BLO1	One natural gas-fired boiler (4.185 million Btu per hour maximum heat input rate)
ES-BLO2	One natural gas-fired boiler (4.2 million Btu per hour maximum heat input rate)

<sup>1</sup> Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement (Federal or State) or that the Permittee is exempted from demonstrating compliance with any applicable requirement.

<sup>2</sup> When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."

## SECTION 4 - GENERAL CONDITIONS (version 6.0, 01/07/2022)

This section describes terms and conditions applicable to this Title V facility.

- A. **General Provisions** [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]
1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02Q.
  2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.
  3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
  4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
  5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
  6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.
- B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]  
The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application(s) and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of Department of Environmental Quality upon request.
- C. **Severability Clause** [15A NCAC 02Q .0508(i)(2)]  
In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.
- D. **Submissions** [15A NCAC 02Q .0507(e) and 02Q .0508(i)(16)]  
Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:
- Supervisor, Stationary Source Compliance  
North Carolina Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641
- All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).
- E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]  
The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. **Title V Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 02Q .0514]  
The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02Q .0514.
2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505]  
The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q.0524 and 02Q .0505.
3. Minor Permit Modifications [15A NCAC 02Q .0515]  
The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.
4. Significant Permit Modifications [15A NCAC 02Q .0516]  
The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.
5. Reopening for Cause [15A NCAC 02Q .0517]  
The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Reporting Requirements [15A NCAC 02Q .0508(f)]  
Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application;
  - b. changes that modify equipment or processes; or
  - c. changes in the quantity or quality of materials processed.If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.
2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]
  - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
  - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
    - i. the changes are not a modification under Title I of the Federal Clean Air Act;
    - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
    - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
    - iv. the Permittee shall attach the notice to the relevant permit.
  - c. The written notification shall include:
    - i. a description of the change;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.
  - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
3. Off Permit Changes [15A NCAC 02Q .0523(b)]  
The Permittee may make changes in the operation or emissions without revising the permit if:
  - a. the change affects only insignificant activities and the activities remain insignificant after the change; or
  - b. the change is not covered under any applicable requirement.
4. Emissions Trading [15A NCAC 02Q .0523(c)]  
To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).

**I.A. Reporting Requirements for Excess Emissions** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

1. "Excess Emissions" - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. (*Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.*)
2. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
3. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
  - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
    - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
      - name and location of the facility;
      - nature and cause of the malfunction or breakdown;
      - time when the malfunction or breakdown is first observed;
      - expected duration; and
      - estimated rate of emissions;
    - ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
    - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

**I.B. Reporting Requirements for Permit Deviations** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

1. "Permit Deviations" - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.
2. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) quarterly by notifying the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

**I.C. Other Requirements under 15A NCAC 02D .0535**

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

**J. Emergency Provisions** [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

1. An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3. below are met.
3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
  - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - b. the permitted facility was at the time being properly operated;

- c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
  - d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

K. **Permit Renewal** [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least six months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.

L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. **Duty to Provide Information (submittal of information)** [15A NCAC 02Q .0508(i)(9)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 02Q .0508(f) and 02Q .0508(l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303 or through the EPA CEDRI) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all terms and conditions in the permit (including emissions limitations, standards, or work practices), except for conditions identified as being State-enforceable Only. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. whether compliance was continuous or intermittent;
4. the method(s) used for determining the compliance status of the source during the certification period;

5. each deviation and take it into account in the compliance certification; and
6. as possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (CAM) occurred.

Q. **Certification by Responsible Official** [15A NCAC 02Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

R. **Permit Shield for Applicable Requirements** [15A NCAC 02Q .0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
  - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
  - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
  - c. the applicable requirements under Title IV; or
  - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

S. **Termination, Modification, and Revocation of the Permit** [15A NCAC 02Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

T. **Insignificant Activities** [15A NCAC 02Q .0503]

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. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

U. **Property Rights** [15A NCAC 02Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

V. **Inspection and Entry** [15A NCAC 02Q .0508(l) and NCGS 143-215.3(a)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
  - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. **Confidential Information** [15A NCAC 02Q .0107 and 02Q .0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 02Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.

AA. **Standard Application Form and Required Information** [15A NCAC 02Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.

BB. **Financial Responsibility and Compliance History** [15A NCAC 02Q .0507(d)(3)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 02Q .0501(d)]

1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 02Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. **National Emission Standards Asbestos – 40 CFR Part 61, Subpart M** [15A NCAC 02D .1110]

The Permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

FF. **Title IV Allowances** [15A NCAC 02Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. **Air Pollution Emergency Episode** [15A NCAC 02D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.

HH. **Registration of Air Pollution Sources** [15A NCAC 02D .0202]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).

II. **Ambient Air Quality Standards** [15A NCAC 02D .0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. **General Emissions Testing and Reporting Requirements** [15A NCAC 02Q .0508(i)(16)]

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .1110, or .1111 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance for emission sources subject to Rules .0524, .1110, or .1111, the Permittee shall provide and submit all notifications, conduct all testing, and submit all test reports in accordance with the requirements of 15A NCAC 02D .0524, .1110, or .1111, as applicable. Otherwise, if emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
  - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
    - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
    - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
    - iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in 15A NCAC 02D .2600 if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
  - b. The Director may authorize the DAQ to conduct independent tests of any source subject to a rule in 15A NCAC 02D to determine the compliance status of that source or to verify any test data submitted relating to that source.

Any test conducted by the Division of Air Quality using the appropriate testing procedures described in 15A NCAC 02D .2600 has precedence over all other tests.

**KK. Reopening for Cause [15A NCAC 02Q .0517]**

1. A permit shall be reopened and revised under the following circumstances:
  - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
  - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
  - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. the Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

**LL. Reporting Requirements for Non-Operating Equipment [15A NCAC 02Q .0508(i)(16)]**

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. When permitted equipment is not in operation, the requirements for testing, monitoring, and recordkeeping are suspended until operation resumes.

**MM. Fugitive Dust Control Requirement [15A NCAC 02D .0540]**

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas, stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

**NN. Specific Permit Modifications [15A NCAC 02Q .0501 and .0523]**

1. For modifications made pursuant to 15A NCAC 02Q .0501(b)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
2. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (Air Permitting Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303 or through the EPA CEDRI) in writing at least seven days before the change is made.
  - a. The written notification shall include:
    - i. a description of the change at the facility;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.

- b. In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

OO. **Third Party Participation and EPA Review** [15A NCAC 02Q .0521, .0522 and .0525(7)]

For permits modifications subject to 45-day review by the federal EPA, EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.