



AIR QUALITY TITLE V PERMIT

Permit No.	Effective Date	Expiration Date	Modification Date(s)	Replaces Permit No(s)
16-01V-225	May 24, 2016	May 24, 2021		11-02V-225

In accordance with the provisions of the Mecklenburg County Air Pollution Control Ordinance, and by the authority granted under the North Carolina General Statute (NCGS) Chapter 143, Article 21B, and until such time as this permit expires or is modified or revoked, the Permittee is hereby authorized to construct/operate emission sources and control devices as outlined in Parts 1 and 2 of this permit. The purpose of this permit is to assure compliance with the requirements of Title V of the Clean Air Act (CAA) and 40 CFR Part 70.

Permittee Name: Industrial Container Services - NC, LLC

Site Name (if different): Industrial Container Services - NC, LLC (Charlotte)

Permitted Facility Location: 2900 West Trade Street

City, State, Zip: Charlotte, North Carolina 28208

Facility Mailing Address: 2810 West Trade Street

City, State, Zip: Charlotte, North Carolina 28202

Primary SIC Code: 7699 – Repair Shops and Related Services
(other non-automotive transportation equipment and industrial machinery and equipment)

Renewal Application Due: May 24, 2020

Program Manager, Air Quality Program

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PART 1

Facility Conditions and Limitations

PART 1

Facility Conditions and Limitations

The entire facility is subject to the conditions and limitations contained in Part 1 (below). The facility shall comply with all applicable Air Quality rules and regulations whether or not these regulations are specifically identified in the permit.

A. LOCAL AND FEDERAL REQUIREMENTS

Mecklenburg County Air Quality (MCAQ) and the United States Environmental Protection Agency (EPA) have the authority to enforce the terms, conditions, and limitations contained in this section.

ADMINISTRATIVE PROVISIONS

A-1. Applicability

The facility shall be operated in accordance with the Mecklenburg County Air Pollution Control Ordinance (MCAPCO) **Regulations 1.5211 - “Applicability” and 1.5502 - “Applicability”**. An owner or operator shall have received a permit from the Department and shall comply with the conditions of such permit before constructing, modifying or operating any air pollution source or entering into a contract to construct or install any air cleaning device. This permit does not relieve the facility from the responsibility of acquiring any other permits that may be required.

A-2. Permit Application

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(16)**, the construction and operation of emission sources and control devices listed in this permit shall be in accordance with all plans, specifications, operating parameters, and other information submitted and which is the basis for the issuance of this permit. The facility shall comply with all applicable Air Quality rules and regulations whether or not these rules and regulations are included as part of the permit.

Applications shall be submitted in accordance with **MCAPCO Regulations 1.5212 - “Applications”, 1.5505 - “Application Submittal Content”, and 1.5507 - “Applications”** and shall be accompanied by the appropriate fee as listed in **MCAPCO Regulation 1.5231 - “Air Quality Fees”**. The owner or operator of a new or modified facility may choose to obtain a construction and operation permit pursuant to **MCAPCO Regulation 1.5504 - “Option for Obtaining Construction and Operation Permit”**.

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. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

A-3. General Duties and Powers of the Director

In accordance with **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, with Approval of the Board”**, the Director or his authorized representative may request performance testing of any emission source to ensure compliance.

A-4. Confidential Information

In accordance with **MCAPCO Regulation 1.5217 - “Confidential Information”**, the Permittee may request that submitted information be treated as confidential. The Permittee must make this request at the time of submittal and include both confidential and public copies of the information for MCAQ files.

A-5. Retention of Permit

In accordance with **MCAPCO Regulation 1.5219 - “Retention of Permit at Permitted Facility”**, a copy of this permit shall be retained at the facility.

A-6. Property Rights

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(8)**, this permit does not convey property rights of any sort, or any exclusive privileges.

A-7. Annual Fee Payment

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(10)**, the Permittee shall pay fees required under **MCAPCO Regulation 1.5231 - “Air Quality Fees”**.

A-8. Inspection and Entry

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Paragraph (l)**, the Permittee shall allow authorized representatives of MCAQ and the EPA to:

- 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, at reasonable times and using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements.

PERMIT CHANGES

A-9. Changes Not Requiring a Permit Modification

a. Section 502(b)(10) Changes:

Changes allowed under Section 502(b)(10) of the federal Clean Air Act are changes that contravene an express permit term. 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. In accordance with **MCAPCO Regulation 1.5523 - “Changes Not Requiring Permit Revisions”** Paragraph (a), the Permittee may make changes without having this permit revised if:

1. the changes are not a modification as defined under **MCAPCO Article 2.0000** or Title I of the federal Clean Air Act;
2. the changes do not cause the allowable emissions under the permit to be exceeded;
3. the Permittee notifies the Director and EPA with written notification as described in **MCAPCO Regulation 1.5523- “Changes Not Requiring Permit Revisions”** Subparagraph (a)(2) at least seven days before the change is made; and,
4. the Permittee shall attach the notice to the relevant permit.

b. Off-Permit Changes:

In accordance with **MCAPCO Regulation 1.5523 - “Changes Not Requiring Permit Revisions”** Paragraph (b), the Permittee may make changes in his operation or emissions without revising the permit if:

1. the change affects only insignificant activities and the activities remain insignificant after the change, or
2. the change is not covered under any applicable requirement.

c. Emissions Trading:

To the extent that emissions trading is allowed under **MCAPCO Article 2.0000**, emissions trading shall be allowed without permit revisions provided that:

1. all applicable requirements are met,
2. the Permittee complies with all terms and conditions of the permit in making the emissions trade,
3. the Permittee notifies the Director and EPA with written notification as described in **MCAPCO Regulation 1.5523 - “Changes Not Requiring Permit Revisions”** Subparagraph (c)(3) at least seven days before making the emissions trade.

A-10. Permit Modifications and Administrative Amendments

a. Administrative Permit Amendments shall be made in accordance with **MCAPCO Regulation 1.5514 - “Administrative Permit Amendments”**.

b. Transfer of Ownership or Operation:

Transfer of ownership or operations shall be made in accordance with **MCAPCO Regulation 1.5524 - “Ownership Change”** which states that applications for ownership change shall contain information as required in **MCAPCO Regulation 1.5505 - “Application Submittal Content” Paragraph (4)** and shall follow the procedures described in **MCAPCO Regulation 1.5212 - “Applications” Paragraph (e)**.

c. Minor Permit Modifications shall be made in accordance with **MCAPCO Regulation 1.5515 - “Minor Permit Modifications”**.

- d. Significant Permit Modifications shall be made in accordance with **MCAPCO Regulation 1.5516 - “Significant Permit Modification”**.

A-11. Reopening for Cause

In accordance with **MCAPCO Regulation 1.5517 - “Reopening for Cause”, Paragraph (a)**, a permit shall be reopened and revised under the following circumstances:

- a. additional requirements become applicable to a facility with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement, and no such reopening is required if the effective date of requirement is later than the expiration date of this permit;
- b. MCAQ 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
- c. MCAQ or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

A-12. Termination, Modification, Revocation of Permits

A permit may be terminated, revoked, or modified as outlined in **MCAPCO Regulations 1.5232 - “Issuance, Revocation, and Enforcement of Permits”, 1.5231 - “Air Quality Fees”, and/or 1.5519 - “Termination, Modification, Revocation of Permits”**.

In accordance with the above-referenced regulations, MCAQ may terminate, modify, or revoke and reissue a permit if:

- a. the information contained in the application or presented in support thereof is determined to be incorrect;
- b. the regulations or conditions under which the permit or permit renewal was granted have changed;
- c. violations of conditions contained in the permit have occurred;
- d. construction of the permitted equipment does not commence within 18 months of permit issuance or, once construction has begun, it ceases prior to completion for a period of 18 consecutive months;
- e. operation of a permitted facility or process ceases permitted activities for a period of 18 consecutive months;
- f. the permit holder fails to pay fees required within 30 days after being billed;
- g. the Permittee refuses to allow the Director or his authorized representative to enter the premises where a source of emissions is located, have access to records required to be kept under the terms and conditions of the permit, inspect any source of emissions, control equipment, and monitoring equipment or methods required in the permit, or collect samples from any emission source; or,
- h. the EPA requests that the permit be revoked under **40 CFR Part 70.7 Paragraph (f) or (g)**.

A-13. Permit Renewal and Expiration

In accordance with **MCAPCO Regulation 1.5513 - “Permit Renewal and Expiration”**, permit expiration terminates the facility’s right to operate unless a complete renewal application has been submitted at least nine months before the date of permit expiration. To ensure the application is timely and complete, the *renewal application shall be submitted one year prior to the permit expiration date*. The renewal application should include the complete application forms for all permitted equipment and any modifications. Permits being renewed are subject to the procedural requirements of **MCAPCO Section 1.5500 - “Title V Procedures”**, including those for

public participation and affected States and EPA review. Upon receipt of a timely and complete application for renewal, the Permittee may continue to operate under the conditions of this permit, subject to final action by MCAQ on the renewal application. If a complete renewal application is not received as required, the permit will expire at the end of its term.

NOTIFICATIONS AND REPORTS

A-14. Commencement of Operation

The facility shall be operated in accordance with **MCAPCO Regulation 1.5214 - “Commencement of Operation”**. Upon completion of construction, alteration or installation pursuant to this permit, the permit holder shall notify the Director in writing of such completion and of the holder’s intent to commence operation.

A-15. Malfunction and Excess Emissions Provisions:

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content”** Subparagraph (f)(2), the Permittee shall report malfunctions, emergencies, and other upset conditions promptly as prescribed in **MCAPCO Regulations 2.0524 - “New Source Performance Standards”**, **2.0535 - “Excess Emissions Reporting and Malfunctions”** (except Paragraph (g)), **2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, or **2.1111 - “Maximum Achievable Control Technology”**.

The permittee shall report to the Director within two business days after becoming aware of any deviation not covered by **MCAPCO Regulations 2.0524 - “New Source Performance Standards”**, **2.0535 - “Excess Emissions Reporting and Malfunctions”** (except Paragraph (g)), **2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, or **2.1111 - “Maximum Achievable Control Technology”**.

All reports of deviations and excess emissions shall be certified by a responsible official. After a malfunction or breakdown has been corrected, the Director may require the source to conduct a performance test to demonstrate compliance.

MCAPCO Regulation 2.0535 – “Excess Emissions Reporting and Malfunctions” Paragraph (g) is not a SIP enforceable provision and therefore the conditions and allowances allowed therein are considered as Local only requirements (see Facility Condition and Limitation No. B-8).

A-16. Monitoring Data Recordkeeping and Reporting

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Paragraph (f):**

- a. 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 instrumentation and copies of all reports required by the permit.)

- b. The Permittee shall submit reports of any required monitoring as listed in Part 2 of this Permit to MCAQ at least every six months. The reports should include a summary of data and observations, identification of any deviations from normal operating parameters, and any corrective action taken to return the monitored emission source to normal operating conditions. Normal operating parameters shall be determined from information on file and any operating ranges listed in Part 2 of this permit.

A-17. Annual Emissions Reporting

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(14)**, the Permittee shall submit annual reports of actual and potential emissions as required under **MCAPCO Regulation 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”** and as specified in the Permit.

A-18. Duty to Provide Information

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(9)**, the Permittee shall furnish to MCAQ, in a timely manner, any reasonable information that MCAQ 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. The Permittee shall furnish to MCAQ copies of records required to be kept by the permit when such copies are requested by the Director.

A-19. Submissions

In accordance with **MCAPCO Section 1.5500 - “Title V Procedures”**, any document submitted shall be certified by a responsible corporate official as being true, accurate and complete. Reports, test data, monitoring data, notifications and requests for renewal shall be submitted to:

Director
Mecklenburg County Air Quality
2145 Suttle Avenue
Charlotte, NC 28208-5237

A-20. Information Submittal

The owner or operator shall submit all reports or information as may be required by MCAQ.

OPERATIONAL REQUIREMENTS/STANDARDS

A-21. Equipment and Control Device Operation

Unless otherwise specified by this permit, no equipment may be operated without the concurrent operation of the permitted air emissions control devices.

A-22. National Emission Standards for Hazardous Air Pollutants

The facility shall be operated in accordance with **MCAPCO Regulation 2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, which refers to Title 40 of the Code of Federal Regulations Part 61.140 to 61.157, Subpart M, National Emission Standard for Asbestos, when conducting any renovation or demolition activities.

A-23. Visible Emissions

The facility shall be operated in accordance with **MCAPCO Regulation 1.5107 - “Control and Prohibition of Visible Emissions”**, such that visible emissions shall not be more than 20% opacity for an aggregate of more than six (6) minutes in any one hour or more than twenty (20) minutes in any 24-hour period.

Facilities subject to a visible emission standard as specified by applicability to **MCAPCO Regulations 2.0524 - “New Source Performance Standards”**, or **2.1110 - “National Emission Standards for Hazardous Air Pollutants”**, shall comply with the more stringent standard, but, in no case shall the source’s visible emissions exceed 20% opacity.

A-24. Dust and Related Material

The facility shall be operated in accordance with **MCAPCO Regulation 1.5108 - “Dust and Related Material”**, such that dust shall not be discharged into the atmosphere in such quantities that the ambient air quality standards are exceeded at the property line or in such quantities or of such toxic or corrosive nature that may be injurious to humans or animals or may cause damage to the property of others.

A-25. Fugitive Dust Emission Sources

As required by **MCAPCO Regulation 2.0540 - “Particulates from Fugitive Dust Emission Sources”**, the permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints.

- a. If fugitive dust emissions cause or contribute to substantive complaints, the permittee shall:
 1. within 30 days upon receipt of written notification from the Director of a second substantive complaint in a 12-month period, submit to the Director a written report that includes the identification of the probable source(s) of the fugitive dust emissions causing complaints and what immediate measures can be made to abate the fugitive emissions;
 2. within 60 days of the initial report submitted under Subparagraph (1) of this Paragraph, submit to the Director a control plan as described in Paragraph (f) of this Regulation; and
 3. within 30 days after the Director approves the plan, be in compliance with the plan.
- b. The Director may require that the permittee develop and submit a fugitive dust control plan as described in MCAPCO 2.0540(f) if:
 1. ambient air quality measurements or dispersion modeling as provided in Paragraph (e) of MCAPCO Regulation 2.1106 – “Determination of Ambient Air Concentrations” show violation or potential for a violation of an ambient air quality standard for particulates in MCAPCO Section 2.0400 - “Ambient Air Quality Standards”; or

2. if MCAQ observes excessive fugitive dust emissions from the facility beyond the property boundaries for six minutes in any one hour using Reference Method 22 in 40 CFR 60, Appendix A.

A-26. Protection of Stratospheric Ozone

In accordance with **MCAPCO Regulation 1.5501 - "Purpose of Section and Requirement for a Permit" Paragraph (e)**, the Permittee is subject to all the applicable requirements and standards for recycling and emissions reduction pursuant to:

- a. **40 CFR Part 82, Subpart F - "Recycling and Emissions Reduction"** including the following:
 1. persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant **40 CFR 82.156**;
 2. equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to **40 CFR 82.158**;
 3. persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to **40 CFR 82.161**;
 4. persons disposing of small appliances, motor vehicle air conditioners (MVACs), and MVAC-like appliances (as defined in **40 CFR 82.152**) must comply with recordkeeping requirements pursuant to **40 CFR 82.166**;
 5. persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to **40 CFR 82.156**; and
 6. owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to **40 CFR 82.166**; and,
- b. **40 CFR Part 82, Subpart B - "Servicing of Motor Vehicle Air Conditioners"**, if the facility maintains, services, repairs, or disposes of MVACs.

A-27. Chemical Accident Prevention Provisions

In accordance with **40 CFR Part 68.215 - "Permit Content and Air Permitting Authority or Designated Agency Requirements"**, any stationary source subject to the Chemical Accident Prevention Provisions of **40 CFR Part 68** shall comply with such provisions, including but not limited to the submittal of a Risk Management Plan (Subpart G).

A-28. Insignificant Activities

The facility shall be operated in accordance with **MCAPCO Regulation 1.5508 - "Permit Content", Subparagraphs (i)(15) and (i)(16)** such that all insignificant activities as defined in **MCAPCO Regulation 1.5503 - "Definitions"** shall be included in the permit and shall comply with any applicable requirement in MCAPCO.

COMPLIANCE PROVISIONS

A-29. Duty to Comply with this Permit

In accordance with **MCAPCO Regulation 1.5508 - "Permit Content" Subparagraph (i)(3)**, noncompliance with any term, condition, or limitation of this permit is grounds for enforcement action; for permit termination, revocation and reissuance or modification; or for denial of a permit renewal application.

In accordance with **MCAPCO Regulation 1.5508 - "Permit Content" Subparagraph (i)(4)**, a Permittee shall not claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit as a defense in an enforcement action.

A-30. Enforcement/Variations/Judicial Review

Violation of any applicable MCAPCO regulation or condition listed herein could result in administrative fines and/or legal action as prescribed in **MCAPCO Section 1.5300 - "Enforcement; Variations; Judicial Review"**.

A-31. Duty to Comply with Other Regulations

This permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or local water quality or land quality control authority.

A-32. Determination of Compliance

This permit contains provisions which require a specific test method, monitoring, or recordkeeping to be used as a demonstration of compliance with permit limits, but are not intended as the only means of demonstration or certifying compliance with permit limits. Unless otherwise specified, the averaging times for all specified emission standards are tied to or based on the run time of the test method(s) used for determining compliance. Compliance with MCAPCO, including the specific conditions herein, shall be determined by source testing, surveillance, visual observations, data review, plant inspections, and any other credible evidence.

A-33. Compliance Certification

In accordance with **MCAPCO Regulation 1.5508 - "Permit Content" Paragraph (n)**, the Permittee shall submit to MCAQ and EPA by April 30 of each year, a compliance certification by a responsible official with all terms and conditions in the permit, including emissions limitations, standards, or work practices. The certification shall specify:

- a. the identification of each term or condition of the permit that is the basis of the certification;
- b. the compliance status as shown by monitoring data and other information reasonably available to the Permittee;
- c. whether compliance was continuous or intermittent;
- d. the method(s) used for determining the compliance status of the source, currently and over the reporting period; and,
- e. such other facts as the permit may specify to determine the compliance status of the source.

The compliance certification shall identify each deviation and take it into account in the compliance certification. 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.

All compliance certifications shall be submitted to MCAQ and the EPA at the following addresses:

Director	and	Environmental Protection Agency
Mecklenburg County Air Quality		Attn: APTMD Air & EPCRA Enforcement Branch
2145 Suttle Avenue		Atlanta Federal Center
Charlotte, NC 28208-5237		61 Forsyth Street, SW
		Atlanta, GA 30303-3104

In accordance with **MCAPCO Regulation 1.5520 - “Certification by Responsible Official”**, a responsible official shall certify the truth, accuracy, and completeness of the compliance certification. The certification shall state that, based on information and belief formed after reasonable inquiry, the statement and information in the document are true, accurate, and complete.

A-34. Permit Shield

In accordance with **MCAPCO Regulation 1.5512 - “Permit Shield and Application Shield”**, and pursuant to the terms, conditions, and limitations of this permit, the facility shall be deemed in compliance with all applicable requirements as of the date of permit issuance except as follows:

- a. This permit shield shall not apply to any change made at this facility that does not require a permit revision.
- b. This permit shield shall not extend to minor permit modifications made under **MCAPCO Regulation 1.5515 - “Minor Permit Modifications”**.
- c. Nothing in this permit shall alter or affect:
 1. the power of the Director, Mecklenburg County Air Quality under NCGS 143-215.112 or MCAPCO or EPA under Section 303 of the federal Clean Air Act;
 2. the liability of an owner or operator of a facility for any violation of applicable requirements prior to or at the time of permit issuance;
 3. the applicable requirements under Title IV; or
 4. the ability of MCAQ (or EPA under Section 114 of the federal Clean Air Act) to obtain information to determine compliance of the facility with its permit.

A-35. Severability Clause

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(2)**, the provisions of this permit are severable. Upon any administrative or judicial challenge, or if any provision of this permit is held invalid, all permit requirements, except those being challenged, will remain valid and enforceable.

A-36. Enforcement Clause

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(3)**, noncompliance with any condition of the permit is grounds for enforcement action. In addition, noncompliance with any condition may result in permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

In accordance with **MCAPCO Regulation 1.5508 - “Permit Content” Subparagraph (i)(4)**, the Permittee may not use as a defense 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.

B. LOCAL ONLY REQUIREMENTS

Only Mecklenburg County Air Quality (MCAQ) has the authority to enforce the terms, conditions, and limitations contained in this section. The EPA does not have the authority to enforce the terms, conditions, and limitations contained in this section.

B-1. Incorrect Information and Facility Operation

This permit is subject to revocation or modification by MCAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. 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.

B-2. Violations Prior to Effective Permit Date

This issuance of this permit in no way absolves the Permittee of liability for any potential legal action and/or penalties which may be assessed for violations of local regulations which have occurred prior to the effective date of this permit.

B-3. Operation and Maintenance Reports

Reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Director, Mecklenburg County Air Quality at such intervals and in such form and detail as may be required by MCAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.

B-4. Violation of Terms or Conditions

A violation of any Locally enforceable term or condition of this permit shall subject the Permittee to enforcement pursuant to **MCAPCO Section 1.5300 - “Enforcement; Variances; Judicial Review”**, including assessment of civil penalties.

B-5. Toxic Air Pollutants

In accordance with **MCAPCO Section 1.5700 - “Toxic Air Pollutant Procedures”** and/or **MCAPCO Regulation 2.1104 - “Toxic Air Pollutant Guidelines”**, the toxic air pollutants (TAP) emitted by existing processes have been reviewed for regulatory applicability by MCAQ. If applicable, Appendix A lists the relevant permits and associated TAPs.

In accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”**, **2.0605 - “General Recordkeeping and Reporting Requirements”**, and/or **2.0903 - “Recordkeeping: Reporting: Monitoring”**, the facility shall report any process additions, modifications or deletions which affect the emissions of any TAP listed in **MCAPCO Section 1.5700 - “Toxic Air Pollutant Procedures”** as prescribed by the following:

- a. If the process modifications will result in a facility-wide TAP emission rate that exceeds the rate listed in **MCAPCO Regulation 1.5711 - “Emission Rates Requiring a Permit”** for any TAP, apply and receive an air toxics permit before the process modification occurs; or
- b. If the process modifications will result in facility-wide TAP emission rates that are below the rates listed in **MCAPCO Regulation 1.5711- “Emission Rates Requiring a Permit”**, submit the new emission rates to MCAQ 15 days prior to the initial change; or
- c. If the process modifications will not result in a net TAP emission increase, provide MCAQ with demonstration (15 days prior to the initial change) that the proposed modification will not result in a net TAP emission increase at the facility.

The facility is required to maintain documentation such that upon request by MCAQ, the facility can make a demonstration that facility-wide emissions of TAPs have or have not exceeded the rates listed in **MCAPCO Regulation 1.5711**.

B-6. Nuisance

The facility shall be operated in accordance with **MCAPCO Regulation 1.5109 - “Nuisance”**. The source shall not discharge any air contaminants or other material to cause injury, detriment, nuisance, annoyance, or endanger the comfort, repose, health or safety of the public or property.

B-7. Odorous Emissions

The facility shall be operated in accordance with **MCAPCO Regulation 1.5110 - “Control and Prohibition of Odorous Emissions”**. The owner or operator of a facility 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.

PART 2

Emission Source Conditions and Limitations

PART 2

Emission Source Conditions and Limitations

In accordance with MCAPCO Section 1.5500-"Title V Procedures", the facility shall comply with all applicable rules and regulations whether or not these rules and regulations are specifically identified in the permit. The emission sources and control devices listed in the following table are subject to the Emission Source Conditions and Limitations contained in Part 2 as referenced in the table.

Emission Source ID	Emission Source Description (type, manufacturer and capacity)	Installation(I)/ Modification (M) Dates	Control Device ID	Control Device Unit or Method (type, model, manufacturer, installation/modification)	Emission Source Conditions and Limitations			
					Local and Federal Requirements	Local Only Requirements	Federal Only Requirements	
Drum Furnace Operation	EU-100	One 18 million Btu/hr drum reclamation furnace (primary chamber) fueled by natural gas or No. 2 fuel oil with a modified afterburner (secondary chamber)	(I) 1991	None	D-1, D-2, D-8, D-11	E-1, E-2	None	
Shot Blasting Operation	EU-200	Drum Shot Blast Unit	(I) 1967 (M) 1995	CD-200-1	D-4, D-5, D-9, D-10, D-11	E-1	None	
		Plug Shot Blast Unit						Baghouse (Torit)
		Ring Shot Blast Unit		CD-200-2				
		Lid Shot Blast Unit						
Surface Coating Operation	EU- 300	Interior lining drum spray booth	(I) 1956	None	D-1, D-2, D-3, D-6, D-7, D-8, D-11	E-1	None	
		Interior lining cure oven (natural gas)	(I) 1956					
		Exterior drum coating spray booth	(I) 1997					
		Exterior coating cure oven (natural gas)	(I) 1997					

		Interior/Exterior lid coating spray booth	(I) 1997				
		Ring Dip tank	(I) 2005				
Facility Wide Fugitives	EU-400	Spray contact cement application		None	D-3, D-11	E-1	None
		Booth coat application					
		Odor masking compound application					
		Miscellaneous cleaning operations					
Facility Wide Insignificant Activities	ES-IA	Maintenance lubricating oil & grease usage		None	D-3, D-11	E-1	None
		Drum expander, chime sealer & lid straightener					
		3,000 gallon diesel fuel tank					
		Leak tester – sodium nitrate usage					
		Air leak tester				None	

ALTERNATIVE OPERATING SCENARIOS

The following alternative operating scenarios (AOS) may be implemented by the facility without providing notification to MCAQ.

Emission Source ID	Emission Source Description	Alternative Operating Scenario No.	AOS Description	Emission Source Conditions and Limitations		
				Local and Federal Requirements	Local Requirements	Federal Requirements
None						

NOTE: If an alternative operating scenario includes construction or installation of new equipment (equipment not currently on-site), the new equipment will be subject to MCAPCO Regulation 1.5232- "Issuance, Revocation, and Enforcement of Permits" Subparagraph (a)(5) which states in part: if "construction of the permitted equipment does not commence within 18 months of permit issuance or once construction has begun, it ceases prior to completion for a period of 18 consecutive months", the permit may be revoked or modified.

EMISSION SOURCE CONDITIONS AND LIMITATIONS

D. LOCAL AND FEDERAL REQUIREMENTS

Mecklenburg County Air Quality (“MCAQ”) and the United States Environmental Protection Agency (“EPA”) have the authority to enforce the terms, conditions, and limitations contained in this section.

- D-1. The facility shall be operated in accordance with **MCAPCO Regulation 2.0515 - “Particulates from Miscellaneous Industrial Processes”**, such that particulate emissions from any stack, vent or outlet shall not exceed the allowable emission rate. The allowable emission rate shall be determined using the appropriate formula below:

$E = 4.10 * P^{0.67}$
For process weight rates greater than 30 tons/hr the following formula shall be used: $E = 55.0 * P^{0.11} - 40$
E = maximum allowable emission rate for particulate matter in lbs/hr P = process rate in tons/hr

- D-2. The facility shall be operated in accordance with **MCAPCO Regulation 2.0516 - “Sulfur Dioxide Emissions from Combustion Sources”**, such that sulfur dioxide emissions from any vent, stack or chimney shall not exceed 2.3 pounds per million Btu input.
- D-3. The facility shall be operated in accordance with **MCAPCO 2.0958 - “Work Practices For Sources Of Volatile Organic Compounds”**. The owner or operator of emission sources subject to this regulation shall:
- A. store all material, including waste material, containing volatile organic compounds in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
 - B. clean up spills as soon as possible following proper safety procedures,
 - C. store wipe rags in closed containers,
 - D. not clean sponges, fabric, wood, paper products, and other absorbent materials,
 - E. drain solvents used to clean supply lines and other coating equipment into closable containers and close containers immediately after each use,
 - F. clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent, closing the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be poured into a closed container.
- When cleaning parts, the owner or operator of any facility subject to this Regulation shall:
- A. flush parts in the freeboard area,
 - B. take precautions to reduce the pooling of solvent on and in the parts,
 - C. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
 - D. not fill cleaning machines above the fill line,
 - E. not agitate solvent to the point of causing splashing.

Sources on which a control device was installed to comply with **MCAPCO Regulation 2.0518 - “Miscellaneous Volatile Organic Compound Emissions”** Paragraph (d) (now repealed) shall continue to maintain and operate the control device providing at least 85% control efficiency, unless the Director determines that the removal of the control device shall not cause or contribute to a violation of the ozone ambient standard.

- D-4. The facility shall be operated in accordance with **MCAPCO Regulation 2.0541 - “Control of Emissions From Abrasive Blasting”**, such that all abrasive blasting operations shall be conducted within a building unless otherwise allowed by the Regulation and there shall be no violation of **MCAPCO Regulation 1.5107 - “Control and Prohibition of Visible Emissions”**.
- D-5. The affected emission source, EU-200: Shot Blasting Operation, specifically control device CD-200-1: Baghouse (Torit), shall be operated in accordance with **40 CFR 64 – “Compliance Assurance Monitoring”**. Compliance with this federal standard shall be achieved by complying with the standards and requirements listed in D-9 of this permit.
- D-6. The facility shall be operated in accordance with **MCAPCO Regulation 2.1111 - “Maximum Achievable Control Technology”** and **40 CFR Part 63 - “National Emission Standards For Hazardous Air Pollutants For Source Categories”**. The requirements are stated in **40 CFR 63.1 to 63.15 Subpart A - “General Provisions”**, and **40 CFR 63.3880 to 63.3981 Subpart MMMM – “National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products”**, which includes the following pertinent sections:
- A. **63.3880-63.3882 – “What this Subpart Covers”**
 - B. **63.3883 – “Compliance dates”**
 - (1) *New or reconstructed affected sources:*
 - a. *If the initial start-up is before January 2, 2004, the compliance date is January 2, 2004*
 - b. *If the initial start-up is after January 2, 2004, the compliance date is the date of the initial start-up of the affected source*
 - (2) *Existing affected source – the compliance date is the date 3 years after January 2, 2004*
 - C. **63.3890–63.893 - “Emission Limitations”**

Portions of this section require that:

 - (1) *For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg organic HAP per liter coating solids (or 2.6 lb organic HAP/gal coating solids) used during each 12-month compliance period.*
 - (2) *Compliant material*
 - (3) *Emission rate without add-on controls*
 - a. *Demonstrate that...the organic HAP emission rate for the coating operation is less than or equal to the applicable emission limit in § 63.3890 calculated as a rolling 12-month emission rate and determined on a monthly basis.*
 - b. *You must meet all the requirements of §§ 63.3950, 63.3951 and 63.3952 to demonstrate compliance with the emission limit using this option.*
 - (4) *Emission rate with add on controls*
 - D. **63.3900-63.3901 – “General Compliance Requirements”**
 - E. **63.3910 –63.3931 - “Notifications, Reports, and Records”**
 - F. **63.3940-63.3942 – “Compliance Requirements for the Compliant Material Option”**
 - G. **63.3950-63.3952 – “Compliance Requirements for the Emission Rate without Add-on Controls Option”**

- H. **63.3960-63.3968 – “Compliance Requirements for the Emission Rate with Add-on Controls Option”**
- I. **63.3980 –63.3981 - “Other Requirements and Information”**

- D-7. The facility shall be operated in accordance with **MCAPCO Regulation 2.0967 - “Miscellaneous Metal and Plastic Parts Coatings”** such that emissions of volatile organic compounds before control for baked surface coating of reconditioned drums shall not exceed:
- A. For interior coating:
4.2 pounds VOC/gallon coating before control; and,
 - B. For exterior coating:
3.5 pounds VOC/gallon coating before control.

MONITORING AND RECORDKEEPING REQUIREMENTS

- D-8. In accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”** and **2.0605 – “General Recordkeeping and Reporting Requirements”** the facility shall monitor and record the following operating parameters for the emission sources as listed below:

EMISSION SOURCE	OPERATING PARAMETER	PARAMETER RANGE	MINIMUM MONITORING FREQUENCY (Once per...)
Drum Furnace Operation (EU-100)	Secondary chamber temperature	Min. temperature = 1600°F	Continuous
	Number of drums processed per day	Average ≤ 200 drums/hr	Daily
	Number of hours the furnace was in operation (excluding down time for breaks, maintenance, etc.)	Hours of operation/day	Daily
	Calculations documenting the daily average number of drums/hour	Show calculations	Daily
40 CFR 63 emission sources Refer to 40 CFR 63.3930 and 63.3931 for specific monitoring and recordkeeping requirements related to 40 CFR 63 emission sources			Refer to 40 CFR 63.3930 and 63.3931

The facility shall maintain the above-specified operating records as well as any maintenance records for activity conducted on the equipment for a period of not less than 5 years, unless otherwise specified by the permit. The records shall be available for inspection by MCAQ personnel upon request.

- D-9. In accordance with **MCAPCO Regulations 1.5111 - “General Recordkeeping, Reporting and Monitoring Requirements”**, **2.0605 – “General Recordkeeping and Reporting Requirements”**, and/or **40 CFR Part 64 - “Compliance Assurance Monitoring”**, the facility shall monitor and record the following operating parameters for the emission sources and control devices as listed below:

EMISSION SOURCE	CONTROL DEVICE	OPERATING PARAMETER	PARAMETER RANGE	MINIMUM MONITORING FREQUENCY (Once per...)
Shot Blast Operation (EU-200)	Torit Baghouse CD-200-1 (Only CAM affected source)	Pressure drop across the fabric filter	1-5 inches H ₂ O	Weekly
		Observation of visible emissions exhausting from baghouse. If visible emissions are observed, these observations and any addressing action taken shall be recorded		Operating shift
	Wheelabrator Baghouse CD-200-2	Pressure drop across the fabric filter	1-5 inches H ₂ O	Weekly
		Observation of visible emissions exhausting from baghouse. If visible emissions are observed, these observations and any addressing action taken shall be recorded.		Operating shift

The facility shall maintain the above-specified operating records as well as any maintenance records for activity conducted on the equipment for a period of not less than 5 years, unless otherwise specified by the permit. The records shall be available for inspection by MCAQ personnel upon request.

- D-10. The Shot Blast Operation (EU-200) shall be operated concurrently with the associated control device(s) specified in this Permit to Construct/Operate except when:
- ▶ subject to the provisions of **MCAPCO Regulation 2.0535 - “Excess Emissions Reporting and Malfunctions”**; or,
 - ▶ during such times as allowed by **MCAPCO Regulation 2.0541**.
- The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution.

NOTIFICATION AND REPORTING REQUIREMENTS

- D-11. The facility shall be operated in accordance with **MCAPCO Regulation 1.5111 - “General Recordkeeping: Reporting: Monitoring Requirements”**, **2.0605 – “General Recordkeeping and Reporting Requirements”**, and/or **2.0903 – “Recordkeeping: Reporting: Monitoring”** and **MCAPCO Regulation 1.5508 - “Permit Content”**, such that the following specific reports and/or notifications shall be submitted to MCAQ by the specified dates:

(1) NOTIFICATIONS TO MCAQ

POLLUTANT/ PARAMETER	NOTIFICATION REQUIREMENT	SUBMITTAL DATES
VOCs regulated under MCAPCO 2.0900	For each new coating or solvent, calculations that demonstrate compliance with the applicable VOC standard (pounds VOC/gallon)	20 days prior to initial use

(2) REPORTS TO MCAQ

POLLUTANT/ PARAMETER	REPORTING REQUIREMENT*	EMISSION PERIOD (For previous)	SUBMITTAL DATES (Postmarked by)
PM (PM ₁₀ , PM _{2.5}) VOC HAP SO ₂ NO _x CO	A report of facility-wide emissions (in tons) emanating from the emission sources listed on this permit to include, at a minimum, the following information: <ol style="list-style-type: none"> 1. Emission calculations including all supporting documentation. (Calculations for previously submitted periods do not need to be re-submitted) 2. The annual amount of Natural Gas and No. 2 Fuel Oil used by the drum furnace and curing ovens associated with the Surface Coating Operation (EU-300). 3. The hours of operation for each emission source and the facility operating hours for the year. 4. VOC and HAP emissions to include for each coating used on the coating lines and each miscellaneous product: <ol style="list-style-type: none"> a. Product name and type b. VOC and HAP content c. Annual amount (gallons) used 	Calendar year	April 30 of following year
Title V Monitoring Reports (MCAPCO 1.5508)	Submit a report, certified by a responsible company official, of all required monitoring parameters as found in Facility Condition and Limitation No. A-16 and Emission Source Condition and Limitation No(s). D-8 and D-9. The report should include a discussion of monitoring excursions	6 months	April 30 October 30
Semiannual Compliance Report & Excess Emissions Report	Refer to 40 CFR 63.10 and 63.3920 for specific reporting requirements for 40 CFR 63 emission sources.	January 1 – June 30 July 1 – December 31	July 31 January 31

(3) COMPLIANCE CERTIFICATION TO BOTH EPA AND MCAQ

PARAMETER	REPORTING REQUIREMENT	EMISSION PERIOD (For previous)	SUBMITTAL DATE (Postmarked by)
Certification by Responsible Official	Identify each term and condition of the Permit and the facility's compliance status for each as described in Condition and Limitation No. A-33.	Calendar year	April 30 of the following year

E. LOCAL ONLY REQUIREMENTS

Only Mecklenburg County Air Quality has the authority to enforce the terms, conditions and limitations contained in this section. The EPA does not have the authority to enforce the terms, conditions and limitations contained in this Section.

- E-1. Permit No. 11-02V-225 shall be void upon issuance of this Permit.
- E-2. By authority of **MCAPCO Regulation 1.5104 - “General Duties and Powers of the Director, with the Approval of the Board”**, the drum reclamation furnace shall be maintained and operated in compliance with the following conditions:
- A. The drum reclamation furnace shall be equipped with a continuous operational temperature monitor and recorder for the secondary chamber (afterburner). The monitors and recorders shall be installed, calibrated, tested, maintained and operated to measure and record the operating parameters of the drum furnace. All recorded data shall be kept on file for a period for at least five years and be made available to MCAQ upon request.
 - B. The following minimum temperature shall apply at all times drums are being processed including startup and shutdown:
Minimum Temperature
 - Secondary chamber (afterburner) 1600 degrees Fahrenheit
 - C. The retention time in the secondary chamber (afterburner) shall be a minimum of 0.5 seconds; and
 - D. The drum reclamation furnace shall be operated at an average daily rate of no greater than 200 drums per hour.

F. FEDERAL ONLY REQUIREMENTS

Only the EPA has the authority to enforce the terms, conditions, and limitations contained in this section. Mecklenburg County Air Quality does not have the authority to enforce the terms, conditions, and limitations contained in this Section.

- THERE ARE NO FEDERAL ONLY REQUIREMENTS FOR THIS PERMIT -



APPENDIX A: TOXIC AIR POLLUTANT REVIEW

Facility Name: Industrial Container Services - NC, LLC (Charlotte)

Facility Address: 2900 West Trade Street, Charlotte, NC 28202

Date Issued: May 24, 2016

As a result of a process modification or SIC call, the above-referenced facility has been reviewed for toxic air pollutant emissions under MCAPCO Regulation 1.5700 - "Toxic Air Pollutant Procedures" and been found to emit the following substances:

Reviewed Toxic Air Pollutant (TAP)	CAS No.	Toxic Permit Emission Rate (TPER) as listed in MCAPCO Regulation 1.5711 - "Emission Rates Requiring a Permit"				Is TAP also a Hazardous Air Pollutant (HAP)?	Compliance Demonstration Method	
		lb/ year	lb/ day	lb/ hour	lb/ hour		Actual emission rate below TPER?	Air Dispersion Modeling Conducted?
benzene	71-43-2	8.1				Y	Y	N

ATTACHMENT 1

COMMONLY USED ABBREVIATIONS AND ACRONYMS

BACT	Best Available Control Technology
Btu	British Thermal Unit
CAAA	Clean Air Act Amendments
CAM	Compliance Assurance Monitoring
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CO	Carbon Monoxide
EPA	Environmental Protection Agency
HAP	Hazardous Air Pollutant
HCFC	Halogenated ChloroFluoroCarbon
MACT	Maximum Achievable Control Technology
MCAPCO	Mecklenburg County Air Pollution Control Ordinance
MCAQ	Mecklenburg County Air Quality
million Btu	Million British Thermal Units
MVAC	Motor Vehicle Air Conditioner
MW	Megawatt
NCGS	North Carolina General Statute
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 micrometers
PM _{2.5}	Particulate Matter less than 2.5 micrometers
PSD	Prevention of Significant Deterioration
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TAP	Toxic Air Pollutant
VOC	Volatile Organic Compound