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~~Sharon Beyer 207-262-6211~~

Ray Stewart

PERMITS SECTION

Andy
Call - 5/12/09
Email - 5/12/09

Andy Messner
Nicole Johnston



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

B. Keith Overcash, P.E.
Director

Dee Freeman
Secretary

April 27, 2009

Mr. Andrew Messner
Director of Operations
True Elkin, Inc.
304 E. Main St.
Elkin, NC 28621

336-526-6504

CERTIFIED MAIL 7002 2410 0003 0262 1235

andy.messner@truefash.com
nicole.johnston@ " " "

SUBJECT: Director's Call – Toxics Compliance Demonstration for Combustion Sources

Dear Mr. Messner:

This letter is a notification that your facility is subject to a Director's Call pursuant to 15A NCAC 2Q .0712 ("Calls By the Director"). Under the Director's Call, this facility must submit a permit application demonstrating through dispersion modeling that emissions of toxic air pollutants (TAPs) from your facility (including combustion sources) will not cause an acceptable ambient level listed in 15A NCAC 2D .1104 to be exceeded beyond your property boundary.

In preparation for this Director's Call, the North Carolina Division of Air Quality (NC DAQ) modeled impacts of TAP emissions from combustion sources at facilities throughout the state using the Human Exposure Model (HEM-3). The HEM-3 is a screening model that estimates human health risks resulting from emissions of air pollutants. Where HEM-3 presented a human health risk of one-in-one-million or greater, NC DAQ further evaluated the potential ambient impacts of the TAP emissions using an AERMOD model consistent with 15A NCAC 2D .1100. This Director's Call applies to all facilities for which the AERMOD model showed that TAP emissions from the combustion sources have the potential to exceed one or more acceptable ambient levels (AALs) listed in 15A NCAC 2D .1104.

The Director's Call requires that your facility submit a permit application that includes air dispersion modeling consistent with the provisions of 15A NCAC 2D .1106. The Director's Call only applies to those TAPs that are emitted from your combustion sources. However, if affected TAPs can also be emitted from other, non-combustion sources at your facility, these emissions must also be included in the modeling. The TAPs that are not emitted from the combustion sources are unaffected by this Director's Call.

The air dispersion modeling should be sufficient to demonstrate that the ambient concentrations of affected TAPs originating from your facility will not exceed the applicable AALs. The modeling shall be based on process, operational, and air pollution control equipment parameters and emission rates that are (or will be) contained in the facility's permit. Additional guidance on TAP emission modeling procedures in North Carolina is provided on our website (<http://daq.state.nc.us/permits/mets/Guidance.pdf>).

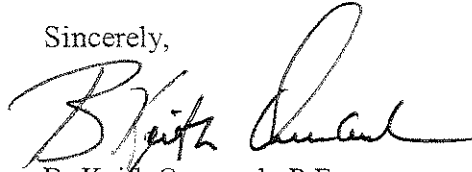
1641 Mail Service Center, Raleigh, North Carolina 27699-1641
2728 Capital Blvd., Raleigh, North Carolina 27604
Phone: 919-733-3340 \ FAX: 919-715-7175 \ Internet: www.daq.state.nc.us/



Mr. Messner
April 27, 2009
Page 2

This modeling demonstration must be submitted to NC DAQ within 90 days of your receipt of this letter. Failure to submit the required demonstration will be considered a violation and may subject your facility to civil penalties as described in N.C. Gen. Stat. § 143-215.114A. If you have any questions with regards to this matter, please feel free to contact Mr. Jim Roller at (919) 715-6262 for questions about modeling or Mr. William Willets at (919) 715-6252 for permitting or engineering questions.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Keith Overcash". The signature is fluid and cursive, with a large initial "B" and a long, sweeping underline.

B. Keith Overcash, P.E.
Director

BKO:FAP

Enclosure

cc: Winston-Salem Regional Office
Permits Section
Central Files