



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

XX XX, 2010

Mr. Gary R. Ruth  
Senior Vice President, Manufacturing Operations  
Philip Morris USA Inc.  
Post Office Box 26603  
Richmond, Virginia 23261

Dear Mr. Ruth:

**SUBJECT: Air Quality Permit No. 03717T37**  
**Facility ID: 1300048**  
**Philip Morris USA Inc.**  
**Concord, Cabarrus County, North Carolina**  
**Fee Class: Title V**

In accordance with your completed Air Quality Permit Application for a significant modification of a Title V permit received December 31, 2007, we are forwarding herewith Air Quality Permit No. **03717T37** to Philip Morris USA, Inc., 2321 Concord Parkway South, Concord, North Carolina 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 2Q .0503(8) have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. **The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.**

**Pursuant to 15A NCAC 2Q .0203 (e), the Permittee shall be assessed annually, in addition to any otherwise applicable fee, a non-attainment RACT fee effective April 1, 2009.**

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.

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**Permitting Section**

1641 Mail Service Center, Raleigh, North Carolina 27699-1641  
2728 Capital Blvd., Raleigh, North Carolina 27604  
Phone: 919-715-6235 / FAX 919-733-5317 / Internet: [www.ncair.org](http://www.ncair.org)

One  
North Carolina  
*Naturally*

Mr. Gary R. Ruth

XX XX, 2010

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If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with **both** the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

**The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the 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 GS 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 GS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in GS 143-215.114A and 143-215.114B.**

This Air Quality Permit shall be effective from XX XX, 2010 until November 30, 2012, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein. Should you have any questions concerning this matter, please contact Mr. Charles F. Yirka at (919) 715-6250.

Sincerely yours,

Donald R. van der Vaart, Ph.D., P.E.  
Chief

Enclosure

c: Gregg Worley, EPA Region 4  
Ron Slack, Supervisor Mooresville Regional Office  
Central Files  
NAA Added Fee- Gladys Woods (cover letter only)

**ATTACHMENT - Insignificant Activities under 15A NCAC 2Q .0503(8)**

<b>ID No.</b>	<b>Emission Source Description</b>
I-TK-99-05	Boiler water treatment chemical storage tanks
I-PROCESS-19	Primary central vacuum system
I-PROCESS-216	Primary central vacuum system
I-CN-02-01	Maintenance carpentry shop
I-CN-05-01	ET basement central vacuum system
I-CN-06-01	Cut filler central vacuum system
I-EH-04-01	Maintenance paint spray booth
I-EG-02-01 <sup>1</sup>	One 350 kw diesel fuel fired emergency generator
I-EG-03-01 <sup>1</sup>	One 200 kw diesel fuel fired emergency generator
I-TK-13-01	One 350,000 gallon No. 6 fuel oil storage tank (yr/1982)
I-TK-14-01	One 40,000 gallon No. 2 fuel oil storage tank (yr/1982)
I-TW	Tobacco storage warehouses
I-AWS	Air wash systems
I-MM <sup>2</sup>	Exhaust heat from filter making machines
I-PU-02-01 <sup>1</sup>	Diesel Driven Fire Pump (rated at 99 BHP @1760 RPM) used to power fire pump
I-TP-01-01	Rows A and B tobacco transfer
I-TP-03-01	Rows C and D tobacco transfer
I-TP-05-01	Rows E and F tobacco transfer
I-TP-06-01	Rows G and H tobacco transfer
I-PU-03-01 <sup>1</sup>	Diesel fire pump (290 bhp)
I-PP-02-01	Cut Filler Boxing Station
I-GEN1 <sup>2</sup>	Portable diesel-fired generator (321 bhp)
I-GEN2 <sup>2</sup>	Portable diesel-fired generator (321 bhp)
I-PP-02-01	Cut Filler Boxing Station

**NOTES:**

General Note: All the above VOC sources are exempt from VOC RACT due to source emissions <15lb/day (15A NCAC 2D .0902(b)(1))

1. Emergency generators and fire pumps – Exempt from NOx RACT (15A NCAC 2D .1402(h)(3))
2. Insignificant source – exempt from NOx RACT (15A NCAC 2D .1402(h)(1))

## ATTACHMENT - Changes to Existing Title V Permit

The following table provides a summary of changes made to the permit 03717T36:

<b>EXIST PAGE</b>	<b>NEW PAGE</b>	<b>Section</b>	<b>Change</b>
Cover letter	Cover letter	N/A	-New cover letter; remove any reference to Part I and II. -Change Responsible Official title, permit and application number, indicate permit is significant modification -Insert non-attainment added fee requirement and cc: Vickie Woods
Attachment Insig List	Attachme nt Insig List	N/A	-Revise table insert explanatory footnotes re RACT exemptions for these sources
Permit Cover	Permit Cover	N/A	-Update permit number, language and dates
Table of Contents	Table of Contents	N/A	Remove all references to Part I and Part II according to SOP-policy.
3	4	NA	-Revise introductory paragraph to remove references Part I and II
3-8	4-9	Emission Source Table	-Add RACT designations -Add explanatory footnotes to sources that are subject to RACT with conditional statement indicating that a permit application and permit modification are required before resuming production.
8-9	10-11	2.1 A.	- Insert new rows in table indicating applicability of NOx RACT SIP rules - Insert new row in table indicating applicability of VOC RACT SIP rule
NA	11-12	2.1 A.3.	- Insert NOx RACT rule title V permit condition for 2D .1412.
NA	12-13	2.1 A.4.	- Insert NOx RACT rule title V permit condition for 2D .1407.
12	15-16	2.1 B.	- Insert new row in table indicating applicability of NOx RACT rule
14	17	2.1 C.	- Insert new rows in table indicating applicability of VOC RACT rule
18	21	2.1 D.	- Insert new rows in table indicating applicability RACT NOx and VOC rules
NA	24-25	2.1 D. 5.	-Insert RACT title V permit conditions for 2D .1414.
21	25	2.1 E.	- Insert new row in table indicating applicability VOC RACT rule
29	33	2.2 B.7.b.	-Correct typographical error 2D .0530 reporting of hours of operation now required semi-annually
NA	34-36	2.2 C.	-Insert RACT title V permit conditions for 2D .0951.
30	36	2.2 E.	-Correct MACT Subpart ZZZZ applicability date for area source.
30-39	37-46	3.0	- Replace General Conditions and acronyms with v 3.1

**State of North Carolina,  
Department of Environment,  
and Natural Resources**

**Division of Air Quality**



## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.	Effective Date	Expiration Date
<b>03717T37</b>	03717T36	<b>XX XX, 2010</b>	November 30, 2012

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, Subchapters 2D and 2Q, and other applicable Laws.

Pursuant to Title 15A NCAC Subchapter 2Q, 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:** Philip Morris USA Inc.  
**Facility Site Location:** 2321 Concord Parkway South  
**City, County, State, Zip:** Concord, Cabarrus County, North Carolina, 28027

**Mailing Address:** Post Office Box 26603  
**City, State, Zip:** Richmond, Virginia 23261

**Application Number:** 1300048.08A  
**Complete Application Date:** January 6, 2010  
**Primary SIC Code:** 2111

**Division of Air Quality,**  
**Regional Office Address:** Mooresville Regional Office  
610 East Center Avenue, Suite 301  
Mooresville, North Carolina 28115

Permit issued this the **XX<sup>th</sup>** day of **XX, 2010**

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Donald R. van der Vaart, Ph.D., P.E., Chief, Permits Section  
By Authority of the Environmental Management Commission

## Table Of Contents

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(Including specific requirements, monitoring/testing, recordkeeping, and reporting requirements)

2.2 Multiple Emission Sources Specific Limitations and Conditions.

(Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)

SECTION 3: GENERAL PERMIT CONDITIONS

ATTACHMENT

List of Acronyms

The Division of Air Quality (DAQ), the United States Environmental Protection Agency (EPA), and citizens as defined under the federal Clean Air Act have the authority to enforce the terms, conditions, and limitations contained in the permit unless otherwise specified.

Under Title 15A NCAC 2Q, the operation of emission source(s) and associated air pollution control device(s) listed in this permit is based on plans, specifications, operating parameters, and other information as submitted in the air permit application.

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

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

<b>Emission Source I.D. No.</b>	<b>Emission Source Description</b>	<b>Control Device I.D. No.</b>	<b>Control Device Description</b>
<b>Utilities</b>			
BO-01-01 <sup>2</sup>	One natural gas/No. 2 fuel oil/No. 6 fuel oil/coal <sup>1</sup> -fired boiler (112 million Btu per hour heat input for oil and coal and 121 million Btu per hour input for natural gas)	PE-01-01 (Coal-fired only <sup>1</sup> )	Inactive - one electrostatic precipitator <sup>1</sup>
BO-02-01 <sup>2</sup>	One natural gas/No. 2 fuel oil/No. 6 fuel oil/coal <sup>1</sup> -fired boiler (112 million Btu per hour heat input for oil and coal and 121 million Btu per hour input for natural gas)	PE-02-01 (Coal-fired only <sup>1</sup> )	Inactive - one electrostatic precipitator <sup>1</sup>
BO-03-01 <b>NOx RACT NSPS Subpart Dc</b>	One natural gas/No. 2 fuel oil/No. 6 fuel oil-fired boiler (96 million Btu per hour heat input)	NA	NA
EG-01-01 <b>MACT Subpart ZZZZ</b>	One diesel fuel fired emergency generator (750 kW)	NA	NA
SS-AH-1 <b>Inactive</b>	One coal/ash handling/storage system <sup>1</sup>	WS-1  BH-1, CC-1, and CC-2	<b>Inactive</b> (coal) - wet scrubber <sup>1</sup>  <b>Inactive</b> (ash) - one bagfilter with two cyclones <sup>1</sup>
<b>Process Line 1</b>			
PC-01-01 through PC-01-04	Four vacuum conditioners	NA	NA

<b>Emission Source I.D. No.</b>	<b>Emission Source Description</b>	<b>Control Device I.D. No.</b>	<b>Control Device Description</b>
CS-01-01 through CS-04-01  SP-01-01 through SP-01-03, SP-02-01 through SP-02-02, SP-03-01 through SP-03-03, SP-04-01 through SP-04-02  VS-09-01	Four pre-blend steam cylinders  Ten pre-blend separators  One tobacco classifier and discharge hood	BH-30-01	One bagfilter (3,876 square feet of filter surface area)
FC-01-01 <sup>3</sup> & FC-02-01 <sup>3</sup>	Two spray cylinders	NA	NA
DA-01-01 <sup>3</sup> & DA-02-01 <sup>3</sup>	Two steam dryers	NA	NA
CC-01-01 <sup>3</sup> & CC-02-01 <sup>3</sup>	Two top casing cylinders	NA	NA
CS-08-01 <sup>3</sup>	One total blend (cutter) steam cylinder	NA	NA
DR-01-01 <sup>4</sup> through DR-01-06 <sup>4</sup>  FC-03-01 <sup>4</sup> & FC-03-02 <sup>4</sup> , FC-04-01 <sup>4</sup> & FC-04-02 <sup>4</sup> FC-05-01 <sup>4</sup> & FC-05-02 <sup>4</sup> , FC-06-01 <sup>4</sup> & FC-06-02 <sup>4</sup> , FC-07-01 <sup>4</sup> & FC-07-02 <sup>4</sup>	Six after-cut steam dryers  Ten after-cut flavor cylinders	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 million Btu per hour heat input each)
PF-01-01	45 flavor preparation tanks	NA	NA
BS-01-01	Nine spray tanks	NA	NA

<b>Process Line 2</b>			
CS-11-01, CS-12-01, & CS-13-01	Three direct conditioning cylinders	SR-04-01, SR-05-01, SR-06-01, & SR-07-01	Four rotoclones (wet centrifugal fan)
BC-09-01, BC-10-01, & BC-11-01	Three outlet conveyor covers	SR-08-01	One rotoclone (wet centrifugal fan)
SP-07-01 <sup>3</sup> through SP-07-04 <sup>3</sup> , SP-08-01 <sup>3</sup> through SP-08-04 <sup>3</sup> , SP-09-01 <sup>3</sup> through SP-09-04 <sup>3</sup>	12 separators	BH-37-01	One bagfilter 6,397 square feet of filter surface area)
SE-01-01 <sup>3</sup> through SE-03-01 <sup>3</sup> , SP-10-01 <sup>3</sup> through SP-12-01 <sup>3</sup> , OD-01-01 <sup>3</sup> , OD-01-02 <sup>3</sup> , OD-02-01 <sup>3</sup> , OD-02-02 <sup>3</sup> , OD-03-01, & OD-03-02	Three slicers, three reject air leg separators, and six optical detectors	BH-38-01	One bagfilter (3,934 square feet of filter surface area)
FC-08-01 <sup>3</sup> FC-09-01 <sup>3</sup>	Two spray cylinders	NA	NA
DA-03-01 <sup>3</sup> DA-04-01 <sup>3</sup>	Two steam dryers	NA	NA
CC-04-01 <sup>3</sup> CC-05-01 <sup>3</sup>	Two top casing cylinders	NA	NA
CS-14-01 <sup>3</sup>	One total blend steam cylinder	NA	NA
DR-03-01 <sup>4</sup> DR-04-01 <sup>4</sup>  FC-10-01 <sup>4</sup> , FC-10-02 <sup>4</sup> , FC-11-01 <sup>4</sup> , FC-11-02 <sup>4</sup> , FC-12-01 <sup>4</sup> , & FC-12-02 <sup>4</sup>	Two after-cut dryers  Six after-cut flavor cylinders	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 million Btu per hr, each)
PF-02-01	45 flavor preparation tanks	NA	NA
BS-02-01	Nine spray tanks	NA	NA

<b>Expanded Tobacco</b>			
CS-05-01	One pre-blend steam cylinder	BH-30-01	One bagfilter (3,876 square feet of filter surface area)
CS-09-01	One direct conditioning cylinder	SR-01-01	One rotoclone (wet centrifugal fan)
SP-05-01 <sup>3</sup> through SP-05-04 <sup>3</sup> ,	Four ET separators	BH-36-01	One bagfilter (2,152 square feet of filter surface area)
TP-22-01 <sup>3</sup>	One conveyor discharge hood		
AT-01-01	One ET casing/steam cylinder	SR-02-01	One rotoclone (wet centrifugal fan)
<u>ET Line 1</u> M-01-01 through M-01-03, & <u>ET Line 2</u> M-02-01 through M-02-03	Treatment area/cold conveyors	NA	NA
<u>ET Line 1</u> FU-03-01 <sup>2.1</sup> <u>ET Line 2</u> FU-02-01 <sup>2.1</sup>	Two natural gas/No. 2 fuel oil fired indirect heat exchanger furnaces (6.6 and 6.5 million Btu per hour heat input)	NA	NA
<u>ET Line 1</u> CO-01-01 & RC-01-01, <u>ET Line 2</u> CO-02-01 & RC-02-01	ET covered conveyors/reordering chambers	SC-01-01	One tray scrubber
<u>ET Line 1</u> EH-05-01 <u>ET Line 2</u> EH-06-01	Humid air reordering discharge conveyors de-dust system	BH-40-01	One bagfilter (4,262 square feet of filter surface area)
<u>ET Line 1</u> SM-01-01 <sup>3</sup> & SM-01-02 <sup>3</sup> <u>ET Line 2</u> SM-05-01 <sup>3</sup> & SM-05-02 <sup>3</sup>	Two VT separators  Two VT separators	BH-01-01  BH-35-01	One bagfilter (1,847 square feet of filter surface area)  One bagfilter (2,500 square feet of filter surface area)
PP-01-01	ET boxing system	BH-02-01	One bagfilter (810 square feet of filter surface area)

<b>Cigarette Manufacturing</b>			
TP-07-01	<u>Pneumatic Transport</u> Row K tobacco transfer	BH-31-01	One bagfilter (599 square feet of filter surface area)
TP-23-01	Row L tobacco transfer	BH-41-01	One bagfilter (552 square feet of filter surface area)
TP-35-01	Rows M tobacco transfer	BH-53-01	One bagfilter (411 square feet of filter surface area)
TP-33-01	Rows P tobacco transfer	BH-51-01	One bagfilter (552 square feet of filter surface area)
TP-29-01	Rows R tobacco transfer	BH-47-01	One bagfilter (552 square feet of filter surface area)
TP-31-01	Rows S tobacco transfer	BH-49-01	One bagfilter (552 square feet of filter surface area)
TP-08-01	<u>Central Dust Collection System</u> Row K dust transfer	BH-32-01	One bagfilter (3,463 square feet of filter surface area)
TP-10-01	Row A dust transfer	BH-08-01	One bagfilter (3,875 square feet of filter surface area)
TP-11-01	Row B dust transfer	BH-09-01	One bagfilter (3,875 square feet of filter surface area)
TP-14-01	Row C dust transfer	BH-11-01	One bagfilter (3,875 square feet of filter surface area)
TP-15-01	Row D dust transfer	BH-12-01	One bagfilter (3,875 square feet of filter surface area)
TP-16-01	Row F dust transfer	BH-17-01	One bagfilter (3,875 square feet of filter surface area)
TP-17-01	Row E dust transfer	BH-18-01	One bagfilter (3,875 square feet of filter surface area)
TP-18-01	Row G dust transfer	BH-20-01	One bagfilter (3,875 square feet of filter surface area)
TP-19-01	Row H dust transfer	BH-21-01	One bagfilter (3,875 square feet of filter surface area)
TP-24-01	Row L dust transfer	BH-42-01	One bagfilter (3,463 square feet of filter surface area)
TP-30-01	Row R dust transfer	BH-48-01	One bagfilter (3,463 square feet of filter surface area)
TP-32-01	Row S dust transfer	BH-50-01	One bagfilter (3,463 square feet of filter surface area)
TP-34-01	Row P dust transfer	BH-52-01	One bagfilter (3,463 square feet of filter surface area)
TP-36-01	Row M dust transfer	BH-39-01	One bagfilter (3,996 square feet of filter surface area)
CY-29-01, CY-31-01, CY-31-02, CY-05-01, CY-52-01, CY-53-01, CY-54-01, CY-55-01	Reject Cigarette Ripping System (Line 1)	BH-03-01 BH-03-02 BH-03-03	Three bagfilters (646, 646, and 600 square feet of filter surface area, respectively)

DC-01-01,	<u>Cut Filler Recovery System (Line 1)</u> Dumper feeder	BH-04-01	One bagfilter (646 square feet of filter surface area)
SM-02-01,	Main VT separator	BH-05-01	One bagfilter (646 square feet of filter surface area)
SM-03-01	Secondary VT separator	BH-06-01	One bagfilter (646 square feet of filter surface area)
MF-01-01 <sup>5</sup>	Menthol on Foil	NA	NA
J-01-01 <sup>5</sup> J-02-01 <sup>5</sup>	110 pack printers 110 carton printers	NA	NA
<b>Support Facilities</b>			
TP-04-01	<u>Charcoal Filter</u> <u>Manufacturing/Transport</u> Pneumatic transport	BH-22-01, & BH-23-01	Two bagfilters (1,290 square feet of filter surface area each)
TP-20-01	Pneumatic transport	BH-33-01	One bagfilter (8,800 square feet of filter surface area)
TP-21-01	Pneumatic transport	BH-34-01	One bagfilter (8,800 square feet of filter surface area)

- 1 Combustion of coal in Boilers (**ID Nos. BO-01-01 or BO-02-01**) is prohibited until the Permittee submits an application documenting compliance with 15A NCAC 2D .0503 (Particulates from Fuel Burning Indirect Heat Exchanges) and the DAQ issues a modification to this Title V permit. Pursuant to 40 CFR 64, the application must also include a compliance assurance monitoring (CAM) plan.
- 2 These boilers are not operating (in “moth-balled” condition) but started-up for periodic maintenance testing. Add on NOx RACT equipment is not economically reasonable due to high cost of equipment annualized over short period of use. Alternative limitation proposed as per 15A NCAC 2D .1412. Source testing per 15A NCAC 2D .1407 and annual tune-ups per 15A NCAC 2D .1407 and 15A NCAC 2D .1414 are waived. Before operation of either of the Boilers (**ID Nos. BO-01-01 or BO-02-01**) beyond periodic maintenance testing, a permit application including a RACT assessment and permit modification shall be required. The Permittee shall submit an application within 60 days of beginning operation documenting compliance with NOx RACT e.g., 15A NCAC 2D .1407 or 15A NCAC 2D .1412.
- 2.1 The Furnaces are not operating. Annual tune-ups are required as per 15A NCAC 2D .1407 and 15A NCAC 2D .1414, however, tune-ups are waived while the furnaces are not operating.
- 3 Add on VOC RACT equipment not economically reasonable due to high cost of equipment annualized over short period of use. Before any production begins and operation of the designated sources (inactive or brought back on site) a permit application and permit modification shall be required. The Permittee shall submit an application before 60 days beginning production and operation documenting compliance with VOC RACT and the DAQ issues a modification to this Title V permit.
- 4 These sources have existing VOC control devices, thermal oxidizers (**ID Nos. IN-01-01 or IN-01-02**), installed. Control devices shall be operated as of the compliance date April 1, 2009 when any of these affected sources are in operation and emitting VOCs.
- 5 Add on VOC RACT equipment not economically reasonable due to high cost of equipment installed on fugitive sources.

## SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

### 2.1- Emission Source(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) listed below are subject to the following specific terms, conditions, and limitations, including the monitoring, recordkeeping, and reporting requirements to which those requirements apply:

#### A. Utilities - Natural gas/No. 2/No. 6 fuel oil-fired boilers (**ID Nos. BO-01-01, BO-02-01, BO-03-01**)

The following table provides a summary of limits and standards for the emission source(s) describe above:

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation (15A NCAC)</b>
Particulate matter	<i>Boiler BO-01-01:</i> 0.27 pounds per million Btu heat input <i>Boiler BO-03-01:</i> 0.24 pounds per million Btu heat input	15A NCAC 2D .0503
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Nitrogen oxides	<i>Boiler BO-03-01 RACT Limits:</i> 0.2 lbs per million Btu heat input firing natural gas 0.3 lbs per million Btu heat input firing oil; and annual stack testing	15A NCAC 2D .1407
Nitrogen oxides	<i>Boiler BO-01-01 and Boiler BO-02-01:</i> RACT is no additional control (Alternative RACT Limitation)	15A NCAC 2D .1412 Petition for Alternative Limitation
Nitrogen oxides	<i>Boiler BO-01-01 and Boiler BO-02-01:</i> Annual boiler tune-ups (waived)  <i>Boiler BO-03-01:</i> Annual boiler tune-ups	15A NCAC 2D .1414
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Sulfur dioxide Visible emissions	<i>Boiler BO-03-01:</i> 0.5 percent by weight sulfur fuel oil <i>Boiler BO-03-01:</i> 20 percent opacity	15A NCAC 2D .0524 (40 CFR Part 60, Subpart Dc)
Total suspended particulate PM <sub>10</sub> Sulfur dioxide Nitrogen oxide Volatile organic compounds Carbon monoxide	Emission limit (tons per 12 month period) for <i>Boilers BO-01-01, BO-02-01, plus BO-03-01:</i> 264.9 122.6 2256.6 818.9 2.3 41.2	15A NCAC 2Q .0317 (PSD Avoidance)
Volatile organic compounds	VOC RACT exempt due to source emissions < 15lb/day each	15A NCAC 2D .0902(b)(1)

**1. 15A NCAC 2D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from the burning of natural gas or Nos. 2 and 6 fuel oil that are discharged from boilers (**ID Nos. BO-01-01 and BO-02-01**) into the atmosphere shall not exceed **0.27 pounds per million Btu heat input** and from boiler (**ID No. BO-03-01**) shall not exceed **0.24 pounds per million Btu**. [15A NCAC 2D .0503]

**Testing** [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall perform in accordance with General Condition JJ found in Section 3. 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 2D .0503.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of natural gas, No. 2, or No. 6 fuel oils in the boilers.

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

- a. Emissions of sulfur dioxide from boilers (**ID Nos. BO-01-01 and BO-02-01**) 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. [15A NCAC 2D .0516]

**Testing** [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and 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 2D .0516.

**Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f) and 15A NCAC 2D .0501(c)(4)(A)]

- c. No monitoring or recordkeeping is required for sulfur dioxide emissions from the firing of natural gas or No. 2 fuel oil in boilers.
- d. The maximum sulfur content of any No. 6 fuel oil received and burned in boilers (**ID Nos. BO-01-01 and BO-02-01**) shall not exceed 2.1 percent by weight. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516 if the sulfur content of the fuel oil exceeds this limit.
- e. To assure compliance, the Permittee shall monitor the sulfur content of the No. 6 fuel oil by using fuel oil supplier certification per shipment received. The results of the fuel oil supplier certifications shall be recorded in a log (written or electronic format) on a quarterly basis and include the following information:
  - i. the name of the fuel oil supplier;
  - ii. the maximum sulfur content of the fuel oil received during the quarter;
  - iii. the method used to determine the maximum sulfur content of the fuel oil; and
  - iv. a certified statement signed by the responsible official that the records of fuel oil supplier certification submitted represent all of the No. 6 fuel oil fired during the period.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516 if the sulfur content of the oil is not monitored and recorded.

**Reporting** [15A NCAC 2Q .0508(f)]

- f. The Permittee shall submit a summary report of the fuel oil supplier certifications 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.

**3. 15A NCAC 2D .1412 PETITION FOR ALTERNATIVE LIMITATIONS**

- a. Sources subject to the requirements of 15A NCAC 2D .1407 that;
  - i. cannot achieve compliance with the applicable limitation after reasonable effort to satisfy the requirements of 15A NCAC 2D .1407 or if the requirements of 15A NCAC 2D .1407 are not RACT for the particular sources; and
  - ii. cannot provide reasonable assurance for overall compliance at a facility through the implementation of an emissions averaging plan as provided for in 15A NCAC 2D .1410; shall petition the Director for an alternative limitation according to Paragraph (b) or (c) of 15A NCAC 2D .1412.

Alternative Limitations are as follows:

<b>Emissions Source ID Nos.</b>	<b>Description</b>	<b>Alternative Limitation or Standards</b>
BO-01-01 and BO-02-01	Boilers #1 and #2	RACT is No Control /Based on limited life-cycle of less than 2 years (through 3/31/2011)

These units are not in operation but started-up for periodic maintenance testing. A permit application including a RACT assessment and operating permit modification shall be required before operating either of these affected units beyond periodic maintenance testing.

**Testing** [15A NCAC 2D .2600]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .2601 and General Condition JJ.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for these sources.

**4. 15A NCAC 2D .1407 BOILERS AND INDIRECT PROCESS HEATERS**

- a. The owner or operator of a fossil fuel-fired boiler (**ID No. BO-03-01**) with a maximum heat input rate less than or equal to 250 million Btu per hour but greater than 50 million Btu per hour shall comply by:
- maintenance, including annual tune-ups and recordkeeping; **and**
  - demonstration through source testing or continuous emission monitoring that the source complies with the following applicable limitation:

**MAXIMUM ALLOWABLE NOX EMISSION RATES FOR BOILERS AND INDIRECT PROCESS HEATERS (POUNDS PER MILLION BTU)**

<u>Fuel/Boiler Type</u>	<u>Firing Method</u>
Oil	0.30
Gas	0.20

**Testing** [15A NCAC 2D. 2600]

- b. Compliance with the limitation established for a boiler under 15A NCAC 2D .1407 shall be determined:
- using **annual source testing** according to 15A NCAC 2D .1415 for boilers with a maximum heat input rate less than or equal to 250 million Btu per hour but greater than 50 million BTU per hour with the exception allowed under 2.1.A.4.c.
- c. The Permittee may chose not to burn one or more of the permitted fuels in this boiler (ID No. BO-03-01) during the ozone season. If the Permittee chooses not to burn a particular fuel, the source testing required under 2.1.A.4.b.i shall not be required for that fuel.
- d. The testing shall be performed in accordance with 15A NCAC 2D.2600 and General Condition JJ. If the results of this test are above the limit given in a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .1407.
- e. The Permittee shall **complete the annual testing and submit the results on or by March 31<sup>st</sup>** for the previous calendar year unless an alternate date is approved by the DAQ.
- f. If two consecutive annual source tests show compliance, the Director may reduce the frequency of testing up to once every five years. In years that a source test is not done, the boiler or indirect-fired process heater shall comply with the annual tune-up requirements of 15A NCAC 2D .1414. If after the Director reduces the frequency of testing, a source test shows that the emission limit under 2.1.A.4.a.ii is exceeded, the Director shall require the boiler to be tested annually until two consecutive annual tests show compliance. Then the Director may again reduce the frequency of testing. [15 NCAC 2D 1407(g)]

**Monitoring** [15A NCAC 2D .1414(b), 15A NCAC 2Q .0508(f)]

- g. To assure compliance the Permittee shall perform an annual tune-up of the boiler on or by March 31<sup>st</sup> for the previous calendar year. The boiler tune-up shall be in accordance with the manufacturer's recommendations including the following [15A NCAC 2D .1414(b):
- inspect each burner and clean or replace any component of the burner as required;
  - inspect the flame pattern and make any adjustments to the burner, or burners, necessary to optimize the flame pattern to minimize total emissions of NOx and carbon monoxide;
  - inspect the combustion control system to ensure proper operation and correct calibration of components that control the air to fuel ratio and adjust components to meet the manufacturer's established operating parameters; and
  - inspect any other component of the boilers and make adjustments or repairs as necessary to improve combustion efficiency.

The Permittee shall perform the tune-up according to a unit specific protocol approved by the Director. The Director (or designee) shall approve the protocol if it meets the requirements of 15A NCAC 2D .1414. The protocol shall be submitted to the Regional Office for approval. If tune-ups and inspections are not conducted as per g.i. through iv. above, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .1407.

**Recordkeeping** [15A NCAC 2D .1414(d), 15A NCAC 2Q .0508(f)]

- h. The owner or operator shall maintain records of tune-ups performed to comply with 15A NCAC 2D .1414 according to 15A NCAC 2D .1404. The following information shall be included for the boiler:
  - i. identification of the boiler;
  - ii. the date and time the tune-up started and ended;
  - iii. the person responsible for performing the tune-up; and
  - iv. the checklist for inspection of the burner, flame pattern, combustion control system, and all other components of the boiler identified in the protocol, noting any repairs or replacements made;
  - v. any stack gas analyses performed after the completion of all adjustments to show that the operating parameters of the boiler have been optimized with respect to fuel consumption and output; at a minimum these parameters shall be within the range established by the equipment manufacturer to ensure that the emission limitation for nitrogen oxides has not been exceeded; and
  - vi. any other information requested by the Director (or designee) to show that the boiler is being operated and maintained in a manner to minimize the emissions of nitrogen oxides.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1407 if these records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- i. The Permittee shall submit the results of the annual boiler tune-up within 30 days of receipt of a written request by the DAQ.
- j. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**5. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from boilers (**ID Nos. BO-01-01 and BO-02-01**) 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. [15A NCAC 2D .0521(d)]

**Testing** [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.5.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas or No. 2 fuel oil in the boilers.
- d. To assure compliance, once a day the Permittee shall observe the emission points of the boilers (**ID Nos. BO-01-01 and BO-02-01**) for any visible emissions above normal when firing No. 6 fuel oil. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If visible emissions from this source 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 2D .0501(c)(8) is below the limit given in Section 2.1 A.5. 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 2D .0521.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- e. The results of the monitoring shall be maintained in a log (written or electronic format), kept on-site, and made available to an authorized representative upon request. The log 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 2D .0521 if these records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- f. 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.

**6. 15A NCAC 2D .0524: NSPS 40 CFR PART 60, SUBPART Dc**

- a. For boiler (**ID No. BO-03-01**), the Permittee shall comply with all applicable provisions, including the notification, testing, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 2D .0524 "New Source Performance Standards (NSPS) as promulgated in 40 CFR Part 60 Subpart Dc, including Subpart A "General Provisions." [15A NCAC 2D .0524]

**Emission Limitations** [15A NCAC 2D .0524]

- b. The maximum sulfur content of any fuel oil received and burned in the boiler (**ID No. BO-03-01**) shall not exceed 0.5 percent by weight.
- c. Visible emissions from the boiler (**ID No. BO-03-01**) shall not be more than 20 percent opacity when averaged over a six-minute period, except for one six-minute period per hour of not more than 27 percent opacity.

**Monitoring** [15A NCAC 2Q .0508(f)]

- d. When firing No. 6 fuel oil, a continuous emissions monitor for the opacity of emissions 60.6 quarterly shall be installed, calibrated, maintained, tested, and operated in accordance with 40 CFR Part 60 Appendix B "Performance Specifications" and Appendix F "Quality Assurance Procedures."
- e. Sulfur dioxide emissions shall be monitored as follows:
  - i. Distillate Oil - Fuel supplier certification shall be used to demonstrate compliance as described under 40 CFR 60.46c(e).
  - ii. Residual Oil - The Permittee shall sample and analyze the oil in the fuel tank after each new shipment of oil is received as described under 40 CFR 60.46c(d)(2) to demonstrate compliance. Results of the fuel analysis taken after each new shipment of oil received shall be used as the daily value when calculating the 30-day rolling average until the next shipment is received. The 30-day rolling average sulfur content shall be 0.5 percent by weight or less.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524 if sulfur dioxide emissions are not monitored as described above.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- f. In addition to any other recordkeeping required by 40 CFR 60.48c or recordkeeping requirements of the EPA, the Permittee shall record and maintain records of the amounts of No. 6 fuel fired during each day and the amounts of natural gas and No. 2 fuel oil fired each month. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0524 if these records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- g. In addition to any other reporting required by 40 CFR 60.48c or notification requirements to the EPA, the Permittee is required to **NOTIFY** the DAQ in **writing** of the following:
  - i. any excess opacity emission reports as measured by the continuous emission monitor (CEM), by January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year of each calendar year for the preceding six-month period between January and June. If there are no excess emissions during the reporting period, the Permittee shall submit a statement indicating that no excess emissions occurred during the reporting period; and
  - ii. a summary report, acceptable to the Regional Air Quality Supervisor, of the sulfur content of the distillate or residual fuel oil fired, by 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 as follows:

(A) Distillate Oil - Fuel supplier certification shall include the following information:

- (1) the name of the oil supplier;
- (2) a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60.41c; and
- (3) a certified statement signed by the owner or operator of an affected facility that the records of fuel supplier certification submitted represents all of the fuel fired during the semi annual period.

(B) Residual Oil - The report shall include the results of the fuel oil sampling and analysis as required in condition 2.1A.7.e.ii.

iii. All instances of deviations from the requirements of this permit must be clearly identified.

**7. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS**

**for 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of 15A NCAC 2D .0530(g), boilers (**ID Nos. BO-01-01, BO-02-01, and BO-03-01**) shall discharge into the atmosphere less than 264.9 tons of particulate matter, 122.6 tons of PM-10, 2256.6 tons of sulfur dioxide, 818.9 tons of nitrogen oxide, 2.3 tons of volatile organic compounds, and 41.2 tons of carbon monoxide per consecutive 12-month period.

**Testing** [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the Permittee shall perform such testing in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 A.7.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

**Monitoring/Recordkeeping** [15A NCAC 2Q .0508(f)]

- c. The Permittee shall keep monthly records in a log (written or electronic format) of the amount of each fuel fired and if fuel oil the percent by weight sulfur. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the amount of fuel used is not monitored.
- d. The use of fuels in these boilers (**ID Nos. BO-01-01, BO-02-01, and BO-03-01**) shall be limited such that actual criteria pollutant emissions shall not exceed the limits contained in Section 2.1 A.7.a. The emission calculations shall be made monthly and based on the latest AP-42 emission factors. These calculated monthly emissions shall be recorded in a log (written or electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the above records are not kept or the emissions exceed the limits contained in Section 2.1 A.7.a.

**Reporting** [15A NCAC 2Q .0508(f)]

- e. 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 monthly particulate matter, PM-10, sulfur dioxide, nitrogen oxide, volatile organic compounds, and carbon monoxide emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months;
  - ii. The monthly quantities of natural gas, No. 2 fuel oil and No. 6 fuel oil consumed for the previous 17 months; and
  - iii. The average sulfur content of the fuel oil.

**B. Utilities - Diesel fuel fired Emergency Generator (ID No. EG-01-01)**

The following table provides a summary of limits and standards for the emission source(s) describe above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516

Visible emissions	20 percent opacity	15A NCAC 2D .0521
Nitrogen oxides	RACT exempt – emergency generator	15A NCAC 2D .1402 (h)(3)

**1. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from the emergency generator (**ID No. EG-01-01**) 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. [15A NCAC 2D .0516]

**Testing** [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and 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 2D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of diesel fuel in the emergency generator (**ID No. EG-01-01**).

**2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from the emergency generator (**ID No. EG-01-01**) 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. [15A NCAC 2D .0521(d)]

**Testing** [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and 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 2D .0521.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from this source 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 2D .0501(c)(8) is below the limit given in Section 2.1 B.2. 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 2D .0521.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log 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 2D .0521 if these records are not maintained.

**Reporting** [15A NCAC 2Q .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.

### C. Process Lines 1 and 2

The following table provides a summary of limits and standards for the emission source(s) describe above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10P^{0.67}$ where: E = allowable emission rate in pounds per hour P = process weight rate in tons per hour	15A NCAC 2D .0515
Sulfur dioxide	<i>Thermal oxidizers (ID Nos. IN-01-01 and IN-01-02):</i> 2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Volatile organic compounds	Refer to Section 2.2(A)	15A NCAC 2D .0958
Total suspended particulate PM-10 Volatile organic compounds Sulfur dioxide Nitrogen oxide Carbon monoxide	Refer to Section 2.2(B)	15A NCAC 2Q .0317 (PSD Avoidance)
Volatile organic compounds	Refer to Section 2.2(C) RACT is no additional control  Thermal oxidizers operated at all times	15A NCAC 2D .0951 (VOC RACT)
Ammonia	<b>State-Enforceable Only</b> Refer to Section 2.2(D)	15A NCAC 2D .1100

#### 1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

The following emission sources and associated control devices are subject to 15A NCAC 2D .0515

Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
<b>Process Line 1</b>			
PC-01-01 - PC-01-04	Four vacuum conditioners	NA	NA
CS-01-01 - CS-04-01	Four preblend steam cylinders	BH -30-01	One bagfilter with a filter surface area of 3,876 square feet
SP-01-01 - SP-01-03, SP-02-01 - SP-02-02, SP-03-01 - SP-03-03, SP-04-01 - SP-04-02	Ten preblend separators		
VS-09-01	One tobacco classifier and discharge hood		

<b>Emission Source I.D. No.</b>	<b>Emission Source Description</b>	<b>Control Device I.D. No.</b>	<b>Control Device Description</b>
FC-01-01 & FC-02-01	Two spray cylinders	NA	NA
DA-01-01 & DA-02-01	Two steam dryers	NA	NA
CC-01-01 & CC-02-01	Two top casing cylinders	NA	NA
CS-08-01	One total blend (cutter) steam cylinder	NA	NA
DR-01-01 - DR-01-06	Six aftercut steam dryers	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 MMBTU/hr each)
FC-03-01 & FC-03-02, FC-04-01 & FC-04-02 FC-05-01 & FC-05-02, FC-06-01 & FC-06-02, FC-07-01 & FC-07-02	Ten aftercut flavor cylinders		
<b>Process Line 2</b>			
CS-11-01, CS-12-01, & CS-13-01	Three direct conditioning cylinders	SR-04-01, SR-05-01, SR-06-01, & SR-07-01	Four rotoclones (wet centrifugal fan)
BC-09-01, BC-10-01, & BC-11-01	Three outlet conveyor covers	SR-08-01	One rotoclone (wet centrifugal fan)
SP-07-01 - SP-07-04, SP-08-01 - SP-08-04, SP-09-01 - SP-09-04	12 separators	BH-37-01	One bagfilter with a filter surface area of 6,397 square feet
SE-01-01 – SE-03-01, SP-10-01 - SP-12-01, OD-01-01, OD-01-02, OD-02-01, OD-02-02, OD-03-01, & OD-03-02	Three slicers, three reject air leg separators, and six optical detectors	BH-38-01	One bagfilter with a filter surface area of 3,934 square feet
FC-08-01 FC-09-01	Two spray cylinders	NA	NA
DA-03-01 DA-04-01	Two steam dryers	NA	NA

Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
CC-04-01 CC-05-01	Two top casing cylinders	NA	NA
CS-14-01	One total blend steam cylinder	NA	NA
DR-03-01 DR-04-01	Two aftercut dryers	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 mBtu/hr. each)
FC-10-01, FC-10-02, FC-11-01, FC-11-02, FC-12-01, & FC-12-02	Six aftercut flavor cylinders		

- a. Emissions of particulate matter from these tobacco processing sources shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

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

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

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

**Testing** [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall perform in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. For Process Line 1, 15 particulate sources are controlled by bagfilter (**ID No. BH-30-01**), and 27 sources are uncontrolled. For Process Line 2, six particulate sources are controlled by rotoclones (**ID Nos. SR-04-01, SR-05-01, SR-06-01, SR-07-01, and SR-08-01**), 24 sources by bagfilters (**ID Nos. BH-37-01 and BH-38-01**) and 15 sources are uncontrolled. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
- i. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters for fabric and component integrity; and
  - ii. an annual (for each 12 month period following the initial inspection) internal inspection of the rotoclones [wet centrifugal fan] for clogging, corrosion, and component integrity, plus clean and calibrate instrumentation.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the bagfilters and rotoclones are not inspected and maintained.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of inspections and maintenance on the bagfilters and rotoclones shall be maintained in a log (written or electronic form) kept on site, and made available to DAQ personnel upon request. The log shall record the following:
- i. the date of actions;
  - ii. the results of any inspections and maintenance performed;
  - iii. for the rotoclones, record actions taken in response to low water flow alarms.
  - iv. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the above records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the bagfilters and rotoclones within 30 days of receipt of a written request by the DAQ.
- f. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

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

- a. Emissions of sulfur dioxide from the thermal oxidizers (**ID Nos. IN-01-01 and IN-01-02**) 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. [15A NCAC 2D .0516]

**Testing** [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.2.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of No. 2 fuel oil or natural gas in the thermal oxidizers.

**3. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from sources on Process Lines 1 and 2 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. [15A NCAC 2D .0521(d)]

**Testing** [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.3.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from this source 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 2D .0501(c)(8) is below the limit given in Section 2.1 C.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 2D .0521.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log 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 2D .0521 if these records are not maintained.

**Reporting** [15A NCAC 2Q .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.

**D. Expanded Tobacco**

The following table provides a summary of limits and standards for the emission source(s) describe above:

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
Particulate matter	<i>Furnaces (ID Nos. FU-02-01 and FU-03-01)</i> 0.24 pounds per million Btu heat input	15A NCAC 2D .0503
Particulate matter	$E = 4.10P^{0.67}$ where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
Sulfur dioxide	<i>Furnaces (ID Nos. FU-02-01 and FU-03-01)</i> 2.3 pounds per million Btu heat input	15A NCAC 2D.0516
Visible emissions	20 % opacity	15A NCAC 2D .0521
Volatile organic compounds	Refer to Section 2.2(C) RACT is no additional control	15A NCAC 2D .0951 (VOC RACT)
Nitrogen oxides	<i>Furnaces (ID Nos. FU-02-01 and FU-03-01)</i> Annual tune-ups for RACT (waived when not operating) See Section 1- Emission Source Table footnote 2.1	15A NCAC 2D .1414
Total suspended particulate PM-10 Volatile organic compounds Sulfur dioxide Nitrogen oxide Carbon monoxide	Refer to Section 2.2(B)	15A NCAC 2Q .0317 (PSD Avoidance)
Ammonia	<b>State-Enforceable Only</b> Refer to Section 2.2(D)	15A NCAC 2D .1100

**1. 15A NCAC 2D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from the burning of natural gas or No. 2 fuel oil that are discharged from furnaces (**ID Nos. FU-02-01 and FU-03-01**) into the atmosphere shall not exceed **0.24 pounds per million Btu heat input**. [15A NCAC 2D .0503]

**Testing** [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall perform 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 2D .0503.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of natural gas, or No. 2 fuel oils in these furnaces.

**2. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

The following emission sources and associated control devices are subject to 15A NCAC 2D .0515

<b>Emission Source I.D. No.</b>	<b>Emission Source Description</b>	<b>Control Device I.D. No.</b>	<b>Control Device Description</b>
<b>Expanded Tobacco</b>			
CS-05-01	One preblend steam cylinder	BH-30-01	One bagfilter-filter area 3,876 ft <sup>2</sup>
CS-09-01	One direct conditioning cylinder	SR-01-01	One rotoclone (wet centrifugal fan)
SP-05-01 - SP-05-04,  TP-22-01	Four ET separators  One conveyor discharge hood	BH-36-01	One bagfilter with a filter surface area of 2,152 square feet
AT-01-01	One ET casing/steam cylinder	SR-02-01	One rotoclone (wet centrifugal fan)
<u>ET Line 1</u> CO-01-01 & RC-01-01, <u>ET Line 2</u> CO-02-01 & RC-02-01	ET covered conveyors/reordering chambers	SC-01-01	One tray scrubber
<u>ET Line 1</u> EH-05-01 <u>ET Line 2</u> EH-06-01	Humid air reordering discharge conveyors dedust system	BH-40-01	One bagfilter with a filter surface area of 4,262 square feet
<u>ET Line 1</u> SM-01-01 & SM-01-02 <u>ET Line 2</u> SM-05-01 & SM-05-02	Two VT separators  Two VT separators	BH-01-01  BH-35-01	One bagfilter with a filter surface area of 1,847 sq. feet  One bagfilter with a filter surface area of 2,500 sq. feet
PP-01-01	ET boxing system	BH-02-01	One bagfilter with a filter surface area of 810 sq. feet

- a. Emissions of particulate matter from these expanded tobacco sources shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

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

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

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

**Testing** [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall perform 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 2D .0515.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. For the expanded tobacco process, three particulate sources are controlled by rotoclones (**ID Nos. SR-01-01, SR-02-01, and SR-03-01**), 13 sources by bagfilters (**ID Nos. BH-30-01, BH-36-01, BH-40-01, BH-01-01, BH-35-01, and BH-02-01**), and four sources by a tray scrubber (**ID No. SC-01-01**). To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there

is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters for fabric and component integrity; and
  - ii. an annual (for each 12 month period following the initial inspection) internal inspection of the rotoclones for clogging, corrosion, and component integrity, plus clean and calibrate instrumentation.
  - iii. an annual (for each 12 month period following the initial inspection) internal inspection of the tray scrubber for clogging, corrosion, and component integrity. Once weekly, check the water flow rate to the scrubber. The water flow rate shall be maintained at a minimum of 40 gallons per minute.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the bagfilters, rotoclones, and tray scrubber are not inspected and maintained.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of inspections and maintenance on the bagfilters, rotoclones, and tray scrubber shall be maintained in a log (written or electronic form) kept on site, and made available to DAQ personnel upon request. The log shall record the following:
  - i. the date of actions;
  - ii. the results of any inspections and maintenance performed;
  - iii. for the rotoclones, record actions taken in response to low water flow alarms;
  - iv. for the tray scrubber, record weekly the water flow rate; and
  - v. any variance from manufacturer's recommendations, if any, and corrections made.The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the above records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the bagfilters, rotoclones, and tray scrubber within 30 days of receipt of a written request by the DAQ.
- f. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**3. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from the process furnaces (**ID Nos. FU-02-01 and FU-03-01**) 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. [15A NCAC 2D .0516]

**Testing** [15A NCAC 2D .0501(c)(4)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(4) and 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 2D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of No. 2 fuel oil or natural gas in the process furnaces.

**4. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from sources on expanded tobacco 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. [15A NCAC 2D .0521(d)]

**Testing** [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.4.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from this source 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 2D .0501(c)(8) is below the limit given in Section 2.1 D.4. 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 2D .0521.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log 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 2D .0521 if these records are not maintained.

**Reporting** [15A NCAC 2Q .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.

**5. 15A NCAC 2D .1414 TUNE-UP REQUIREMENTS**

- a. The owner or operator of indirect process heaters (**ID Nos. FU-02-01 and FU-03-01**) with maximum heat input rate of less than or equal to 50 million Btu per hour shall comply with the annual tune-up requirements of 15A NCAC 2D .1414. [15A NCAC 2D .1407]

**Testing** [15A NCAC 2D. 2601]

- b. If emission testing is required, the testing shall be performed in accordance with 15A NCAC 2D. 2600 and General Condition JJ.

**Monitoring** [15A NCAC 2D .1414(b), 2Q .0508(f)]

- c. Primary Monitoring Scenario: Furnaces operating. To assure compliance, the Permittee shall perform an annual tune-up of the furnaces on or by March 31<sup>st</sup> for the previous calendar year according to the manufacturer's recommendations including the following [15A NCAC 2D .1414(b)]:
  - i. inspect each burner and clean or replace any component of the burner as required;
  - ii. inspect the flame pattern and make any adjustments to the burner, or burners, necessary to optimize the flame pattern to minimize total emissions of NOx and carbon monoxide;
  - iii. inspect the combustion control system to ensure proper operation and correct calibration of components that control the air to fuel ratio and adjust components to meet the manufacturer's established operating parameters; and
  - iv. inspect any other component of the boilers and make adjustments or repairs as necessary to improve combustion efficiency.

The Permittee shall perform the tune-up according to a unit specific protocol approved by the Director. The Director (or designee) shall approve the protocol if it meets the requirements of 15A NCAC 2D .1414. The protocol shall be submitted to the Regional Office for approval.

If tune-ups and inspections are not conducted as per b.i. through iv. above, the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .1407 [15A NCAC 2Q .0508(f)].

- d. Alternate Monitoring Scenario: Furnaces not operating. Annual tune-ups of the furnaces are waived. **Therefore, no additional monitoring, recordkeeping or reporting is required.**

**Recordkeeping** [15A NCAC .1414(d), 2Q .0508(f)]

- e. The owner or operator shall maintain records of tune-ups performed to comply with 15A NCAC 2D .1414 according to 15A NCAC 2D .1404. The following information shall be included for each furnace:
  - i. identification of the furnace;
  - ii. the date and time the tune-up started and ended;
  - iii. the person responsible for performing the tune-up; and
  - iv. for indirect-fired process heaters, the checklist for inspection of the burner, flame pattern, combustion control system, and all other components of the furnace identified in the protocol, noting any repairs or replacements made;
  - v. any stack gas analyses performed after the completion of all adjustments to show that the operating parameters of the furnace, have been optimized with respect to fuel consumption and output; at a minimum these parameters shall be within the range established by the equipment manufacturer to ensure that the emission limitation for nitrogen oxides has not been exceeded; and
  - vi. any other information requested by the Director (or designee) to show that the furnace is being operated and maintained in a manner to minimize the emissions of nitrogen oxides.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1407 if these records are not maintained [15A NCAC 2Q .0508(f)]

**Reporting** [15A NCAC 2Q .0508(f)]

- f. The Permittee shall submit the results of the annual furnace tune-ups within 30 days of receipt of a written request by the DAQ.
- g. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**E. Cigarette Manufacturing**

The following table provides a summary of limits and standards for the emission source(s) describe above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10P^{0.67}$ where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
Visible emissions	20 % opacity	15A NCAC 2D .0521
Volatile organic compounds	Refer to Section 2.2(A)	15A NCAC 2D .0958
Total suspended particulate PM-10 Volatile organic compounds Sulfur dioxide Nitrogen oxide Carbon monoxide	Refer to Section 2.2(B)	15A NCAC 2Q .0317 (PSD Avoidance)
Volatile organic compounds	Refer to Section 2.2(C) See Section 1- Emission Source Table footnote 5	15A NCAC 2D .0951 (VOC RACT)

Regulated Pollutant	Limits/Standards	Applicable Regulation
Ammonia	State-Enforceable Only Refer to Section 2.2(D)	15A NAC 2D .1100

**1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

The following emission sources and associated control devices are subject to 15A NCAC 2D .0515

Emission Source I.D. No.	Emission Source Description	Control Device I.D. No.	Control Device Description
<b>Cigarette Manufacturing</b>			
	<u>Pneumatic transport</u>		
TP-07-01	Row K tobacco transfer	BH-31-01	One bagfilter-filter area 599 ft <sup>2</sup>
TP-23-01	Row L tobacco transfer	BH-41-01	One bagfilter-filter area 552 ft <sup>2</sup>
TP-35-01	Rows M tobacco transfer	BH-53-01	One bagfilter-filter area 411 ft <sup>2</sup>
TP-33-01	Rows P tobacco transfer	BH-51-01	One bagfilter-filter area 552 ft <sup>2</sup>
TP-29-01	Rows R tobacco transfer	BH-47-01	One bagfilter-filter area 552 ft <sup>2</sup>
TP-31-01	Rows S tobacco transfer	BH-49-01	One bagfilter-filter area 552 ft <sup>2</sup>
	<u>Central Dust Collection System</u>		
TP-08-01	Row K dust transfer	BH-32-01	One bagfilter-filter area 3,463 ft <sup>2</sup>
TP-10-01	Row A dust transfer	BH-08-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-11-01	Row B dust transfer	BH-09-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-14-01	Row C dust transfer	BH-11-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-15-01	Row D dust transfer	BH-12-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-16-01	Row F dust transfer	BH-17-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-17-01	Row E dust transfer	BH-18-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-18-01	Row G dust transfer	BH-20-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-19-01	Row H dust transfer	BH-21-01	One bagfilter-filter area 3,875 ft <sup>2</sup>
TP-24-01	Row L dust transfer	BH-42-01	One bagfilter-filter area 3,463 ft <sup>2</sup>
TP-30-01	Row R dust transfer	BH-48-01	One bagfilter-filter area 3,463 ft <sup>2</sup>
TP-32-01	Row S dust transfer	BH-50-01	One bagfilter-filter area 3,463 ft <sup>2</sup>
TP-34-01	Row P dust transfer	BH-52-01	One bagfilter-filter area 3,463 ft <sup>2</sup>
TP-36-01	Row M dust transfer	BH-39-01	One bagfilter-filter area 3,996 ft <sup>2</sup>
CY-29-01, CY-31-01, CY-31-02, CY-05-01, CY-52-01, CY-53-01, CY-54-01, CY-55-01	Reject cigarette ripping system (Line 1)	BH-03-01 BH-03-02 BH-03-03	Three bagfilters with a filter surface area of 646, 646, and 600 square feet, respectively
	<u>Cut Filler Recovery System (Line 1)</u>		
DC-01-01, SM-02-01, SM-03-01	Dumper Feeder Main VT Separator Secondary VT Separator	BH-04-01 BH-05-01 BH-06-01	One bagfilter-filter area 646 ft <sup>2</sup> One bagfilter-filter area 646 ft <sup>2</sup> One bagfilter-filter area 646 ft <sup>2</sup>

\* TBD = To be determined

- a. Emissions of particulate matter from these expanded tobacco sources shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

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

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

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

**Testing** [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall perform in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 E.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. For the cigarette manufacturing process, all particulate sources are controlled by bagfilters. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- i. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters for fabric and component integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the bagfilters are not inspected and maintained.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of inspections and maintenance on the bagfilters shall be maintained in a log (written or electronic form) kept on site, and made available to DAQ personnel upon request. The log shall record the following:

- i. the date of actions;  
ii. the results of any inspections and maintenance performed;  
iii. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the above records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of receipt of a written request by the DAQ.  
f. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from the cigarette manufacturing sources 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. [15A NCAC 2D .0521(d)]

**Testing** [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 E.2.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from this source 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 2D .0501(c)(8) is below the limit given in Section 2.1 E.2. 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 2D .0521.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log 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 2D .0521 if these records are not maintained.

**Reporting** [15A NCAC 2Q .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.

**F. Support Facilities - Charcoal filter manufacturing/transport**

The following table provides a summary of limits and standards for the emission source(s) describe above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10P^{0.67}$ where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 2D .0515
Visible emissions	20 % opacity	15A NCAC 2D .0521

**1. 15A NCAC 2D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from charcoal filter manufacturing/transport shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 2D .0515(a)]

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

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

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

**Testing** [15A NCAC 2D .0501(c)(3)]

- b. If emissions testing is required, the testing shall perform in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 F.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. For charcoal filter manufacturing/transport, all particulate sources are controlled by bagfilters. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer’s inspection and maintenance recommendations, or if there is no manufacturer’s inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
  - i. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters for fabric and component integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the bagfilters are not inspected and maintained.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of inspections and maintenance on the bagfilters shall be maintained in a log (written or electronic form) kept on site, and made available to DAQ personnel upon request. The log shall record the following:
- i. the date of actions;
  - ii. the results of any inspections and maintenance performed;
  - iii. any variance from manufacturer's recommendations, if any, and corrections made.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the above records are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of receipt of a written request by the DAQ.
- f. The Permittee shall submit a summary report 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. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from charcoal filter manufacturing/transport 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. [15A NCAC 2D .0521(d)]

**Testing** [15A NCAC 2D .0501(c)(8)]

- b. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ. If the results of this test are above the limit given in Section 2.1 F.2.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

**Monitoring** [15A NCAC 2Q .0508(f)]

- c. To assure compliance, once a month the Permittee shall observe the emission points of this source for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from this source 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 2D .0501(c)(8) is below the limit given in Section 2.1 F.2. 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 2D .0521.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

- d. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log 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 2D .0521 if these records are not maintained.

**Reporting** [15A NCAC 2Q .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.

## 2.2 Multiple Emission Source(s) Specific Limitations and Conditions

### A. 15A NCAC 2D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

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

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>Process Line 1</b>			
FC-01-01 FC-02-01	Two spray cylinders	NA	NA
CC-01-01 CC-02-01	Two top casing cylinders	NA	NA
FC-03-01 & FC-03-02, FC-04-01 & FC-04-02 FC-05-01 & FC-05-02, FC-06-01 & FC-06-02, FC-07-01 & FC-07-02	Ten after cut flavor cylinders	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 million Btu per hr. each)
PF-01-01	45 flavor preparation tanks	NA	NA
BS-01-01	Nine spray tanks	NA	NA
<b>Process Line 2</b>			
FC-08-01 FC-09-01	Two spray cylinders	NA	NA
CC-04-01 CC-05-01	Two top casing cylinders	NA	NA
FC-10-01, FC-10-02, FC-11-01, FC-11-02, FC-12-01, & FC-12-02	Six aftercut flavor cylinders	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 million Btu per hr, each)
PF-02-01	45 flavor preparation tanks	NA	NA
BS-02-01	Nine spray tanks	NA	NA
<b>Expanded Tobacco</b>			
AT-01-01	One ET casing/steam cylinder	SR-02-01	One rotoclone (wet centrifugal fan)
<b>Cigarette Manufacturing</b>			

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
IJ-01-01 IJ-02-01	110 pack printers 110 carton printers	NA	NA

1. Pursuant to 15A NCAC 2D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions, and whose emissions of VOC are greater than 15 pounds per day; the Permittee shall:
  - a. store all material, including waste material, containing volatile organic compounds in tanks or 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 of volatile organic compounds as soon as possible following proper safety procedures,
  - c. store wipe rags containing volatile organic compounds in closed containers,
  - d. not clean sponges, fabric, wood, paper products, and other absorbent materials with volatile organic compounds,
  - e. transfer solvents containing volatile organic compounds used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act,
  - f. clean mixing, blending, and manufacturing vats and containers containing volatile organic compounds by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act. [15A NCAC 2D .0958(c)]
2. When cleaning parts with a solvent containing a volatile organic compound, the Permittee 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. [15A NCAC 2D .0958(d)]

**Monitoring** [15A NCAC 2Q .0508(f)]

3. To assure compliance with paragraphs (a) and (b) above, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing volatile organic compounds. The inspections shall be conducted during normal operations. If the required inspections are not conducted the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

4. The results of the inspections shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
  - a. the date and time of each inspection; and
  - b. the results of each inspection noting whether or not noncompliant conditions were observed.
If the required records are not maintained the Permittee shall be deemed to be in noncompliance with 15A NCAC 2D .0958.

**Reporting** [15A NCAC 2Q .0508(f)]

5. The Permittee shall submit a summary report of the observations by 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. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS  
for 15A NCAC 2D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

The following emission sources are subject to these multiple emission source limits:

Regulated Pollutants	Limits/Standards	Applicable Regulation
	Emission limit (tons per 12 month period) for <b>Process Lines 1 and 2, Expanded Tobacco, and Cigarette Manufacturing:</b>	15A NCAC 2Q .0317 (PSD Avoidance)
Total suspended particulate	37.7	
PM <sub>10</sub>	18.1	
Sulfur dioxide	40.0	
Nitrogen oxide	48.8	
Volatile organic compounds	1029.2	
Carbon monoxide	104.3	

- In order to avoid applicability of 15A NCAC 2D .0530(g), **Process Lines 1 and 2, Expanded Tobacco, and Cigarette Manufacturing** shall discharge into the atmosphere less than 37.7 tons of particulate matter, 18.1 tons of PM<sub>10</sub>, 40.0 tons of sulfur dioxide, 48.8 tons of nitrogen oxide, 1029.2 tons of volatile organic compounds, and 104.3 tons of carbon monoxide per consecutive 12-month period.

**Testing** [15A NCAC 2D .0501(c)(3)]

- If emissions testing is required, the Permittee shall perform such testing in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.2 B.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530.

**Monitoring** [15A NCAC 2Q .0508(f)]

- The Permittee shall measure and keep monthly records in a log (written or electronic format) of the dry weight of tobacco processed by each emission source, quantity of ethanol used, and amount of fuel by type burned in the two furnaces (**ID Nos. FU-02-01 and FU-03-01**) and two thermal oxidizers (**ID Nos. IN-01-01 and IN-01-02**). The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the above measurements and records are not maintained.
- The monthly emissions of total suspended particulate (TSP), PM<sub>10</sub>, sulfur dioxide, carbon monoxide, nitrogen oxide, and VOCs shall be calculated and recorded as follows:
  - For process sources, emission factors established from source testing and tobacco throughput measurements [pounds of pollutant per pound (dry weight) of tobacco processed] shall be used to calculate TSP, PM<sub>10</sub>, and VOC emissions, applying as appropriate, the control efficiency of the thermal oxidizers. **The thermal oxidizers may be operated on an as needed basis to stay below the 12 month VOC emission limit.** Once a calendar year, conduct an audit of the emission factors used to calculate emissions for each source in the tracking system to ensure they are current and accurate. Record the results of this audit.
  - Ethanol emissions will be reported on a mass balance basis<sup>1</sup>.
  - For the thermal oxidizers, current AP-42 emission factors shall be applied to calculate emissions of SO<sub>2</sub>, NO<sub>x</sub>, and CO.
  - For the process furnaces, current AP-42 emission factors shall be applied to calculate SO<sub>2</sub> emissions. TSP, PM<sub>10</sub>, NO<sub>x</sub> and CO shall be calculated from emission factors established from source testing and tobacco throughput measurements.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the above emission calculation records are not kept or if 12 month consecutive emissions exceed the limits in Section 2.2 B.a.
- To ensure that control device efficiency is maintained, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and

<sup>1</sup> VOC emissions occur from ethanol added with flavorant and also is given off naturally from the tobacco. For predominately propylene glycol emission points, VOC emission results will be based on Method 25A testing (as carbon) times a conversion factor of 2.93 to reflect the PG. The remaining emission points not identified as PG-dominated, VOC emissions will be based on Method 25A testing (as carbon) times a conversion factor of 1.4.

maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:

- a. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters for fabric and component integrity; and
- b. an annual (for each 12 month period following the initial inspection) internal inspection of the rotoclones for clogging, corrosion, and component integrity, plus clean and calibrate instrumentation.
- c. an annual (for each 12 month period following the initial inspection) internal inspection of the tray scrubber for clogging, corrosion, and component integrity. Once weekly, check the water flow rate to the scrubber. The water flow rate shall be maintained at a minimum of 40 gallons per minute.
- d. Thermal oxidizer -
  - (1) Primary Monitoring Scenario: Operating, but no credit taken when estimating emissions. The incinerator controls are not needed to maintain compliance with the permitted emission limits for VOC emissions, but the incinerators are operated anyway to ensure minimum VOC emissions. **Therefore, no monitoring, recordkeeping or reporting is required.**
  - (2) Alternate Monitoring Scenario: Operating, taking credit for removal efficiency when estimating emissions. The incinerator controls are needed to maintain compliance with the permitted emissions limits for VOC emissions. A computer will monitor and record operational parameters (temperature and damper settings) plus will record any time that process exhausts are being emitted directly to atmosphere. In addition, the control system will alarm whenever the combustion chamber temperature drops below 1400 degrees F.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the bagfilters, rotoclones, tray scrubber and thermal oxidizer are not inspected and maintained.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

6. The results of inspections and maintenance on the bagfilters, rotoclones, tray scrubber and thermal oxidizer shall be maintained in a log (written or electronic form) kept on site, and made available to DAQ personnel upon request. The log shall record the following:
  - a. the date and time of each recorded action;
  - b. the results of any inspections and maintenance performed;
  - c. for the rotoclones, record actions taken in response to low water flow alarms;
  - d. for the tray scrubber, record weekly the water flow rate;
  - e. for the thermal oxidizer -
    - (1) record the monitoring scenario being used and actions taken when making a change from one monitoring scenario to another, and
    - (2) record actions taken as a result of an alarm condition; and
  - f. any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if the above records for the bagfilters, rotoclones, tray scrubber, and thermal oxidizer are not maintained.

**Reporting** [15A NCAC 2Q .0508(f)]

7. The Permittee shall submit a semi-annual summary report, acceptable to the Mooresville 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:
  - a. The monthly emissions for the pollutants identified above for the previous 17 months. The emissions must be calculated for each of the three 12-month periods over the previous 17 months.
  - b. Total hours during the semi-annual period when the thermal oxidizers are not on-line and not controlling process VOC emissions.
8. The Permittee shall submit a summary report, to the Mooresville 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:
  - a. A summary of monitoring and inspections conducted on the control devices.
  - b. Summary results of annual emission factor audit.
9. The Permittee shall submit a summary report of any maintenance performed on the bagfilters, tray scrubber, rotoclones, and thermal oxidizer within 30 days of receipt of a written request by the DAQ.

**C. 15A NCAC 2D .0951 MISCELLANEOUS VOLATILE ORGANIC COMPOUND EMISSIONS**

The following emission sources and associated control devices are subject to 15A NCAC 2D .0951:

<b>Emission Source I.D. No.</b>	<b>Emission Source Description</b>	<b>Control Device I.D. No.</b>	<b>Control Device Description</b>
<b>Process Line 1</b>			
FC-01-01 & FC-02-01 <sup>3</sup>	Two spray cylinders	NA	NA
DA-01-01 & DA-02-01 <sup>3</sup>	Two steam dryers	NA	NA
CC-01-01& CC-02-01 <sup>3</sup>	Two top casing cylinders	NA	NA
CS-08-01 <sup>3</sup>	One total blend (cutter) steam cylinder	NA	NA
DR-01-01 through DR-01-06 <sup>4</sup>  FC-03-01 & FC-03-02, FC-04-01 & FC-04-02 FC-05-01& FC-05-02, FC-06-01 & FC-06-02, FC-07-01 & FC-07-02 <sup>4</sup>	Six after-cut steam dryers  Ten after-cut flavor cylinders	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 million Btu per hour heat input each)
<b>Process Line 2</b>			
SP-07-01 through SP-07-04, SP-08-01 through SP-08-04, SP-09-01 through SP-09-04 <sup>3</sup>	12 separators	BH-37-01	One bagfilter 6,397 square feet of filter surface area)
SE-01-01 through SE-03-01 <sup>3</sup> , SP-10-01 through SP-12-01 <sup>3</sup> , OD-01-01, OD-01-02, OD-02-01, OD-02-02, OD-03-01, & OD-03-02 <sup>3</sup>	Three slicers, three reject air leg separators, and six optical detectors	BH-38-01	One bagfilter (3,934 square feet of filter surface area)
FC-08-01 FC-09-01 <sup>3</sup>	Two spray cylinders	NA	NA

<b>Emission Source I.D. No.</b>	<b>Emission Source Description</b>	<b>Control Device I.D. No.</b>	<b>Control Device Description</b>
DA-03-01 DA-04-01 <sup>3</sup>	Two steam dryers	NA	NA
CC-04-01 CC-05-01 <sup>3</sup>	Two top casing cylinders	NA	NA
CS-14-01 <sup>3</sup>	One total blend steam cylinder	NA	NA
DR-03-01 DR-04-01 <sup>4</sup>  FC-10-01, FC-10-02, FC-11-01, FC-11-02, FC-12-01, & FC-12-02 <sup>4</sup>	Two after-cut dryers  Six after-cut flavor cylinders	IN-01-01 or IN-01-02	Two natural gas/No. 2 fuel oil fired thermal recuperative oxidizers (16.0 million Btu per hr, each)
<b>Expanded Tobacco</b>			
SP-05-01 through SP-05-04 <sup>3</sup> ,  TP-22-01 <sup>3</sup>	Four ET separators  One conveyor discharge hood	BH-36-01	One bagfilter (2,152 square feet of filter surface area)
<u>ET Line 1</u> SM-01-01 & SM-01-02 <sup>3</sup> <u>ET Line 2</u> SM-05-01 & SM-05-02 <sup>3</sup>	Two VT separators  Two VT separators	BH-01-01  BH-35-01	One bagfilter (1,847 square feet of filter surface area)  One bagfilter (2,500 square feet of filter surface area)
<b>Cigarette Manufacturing</b>			
MF-01-01 <sup>5</sup>	Menthol on Foil	NA	NA
J-01-01 <sup>5</sup> J-02-01 <sup>5</sup>	110 pack printers 110 carton printers	NA	NA

1. This Rule applies to all facilities that use volatile organic compounds as solvents, carriers, material processing media, or industrial chemical reactants, or in other similar uses, or that mix, blend, or manufacture volatile organic compounds for which there is no other applicable emissions control rule in 15A NCAC 2D .0900 except 15A NCAC 2D .0958 [15A NCAC 2D .0951(a)].
  - i. The owner or operator of any facility to which 15A NCAC 2D .0951 applies shall install and operate reasonably available control technology.
2. For the Footnote 3 designated sources above (and in Section 1), add on VOC RACT equipment not economically reasonable due to high cost of equipment annualized over short period of use. Before any production begins and operation of the designated sources (inactive or brought back on site) a permit application for permit modification and a permit shall be required. The Permittee shall submit an application 60 days before beginning production and operation documenting compliance with VOC RACT and the DAQ issues a modification to this Title V permit.
3. For the Footnote 4 designated sources above (and in Section 1), the owner operator has successfully demonstrated RACT is no additional control. The existing thermal oxidizers (**ID Nos. IN-01-01 or IN-01-02**) shall be operated as of the compliance date of April 1, 2009 whenever the affected sources are operating and emitting VOCs.

4. For the Footnote 5 designated sources above (and in Section 1), the owner operator has successfully demonstrated RACT is no additional control. Add on VOC RACT equipment not economically reasonable due to high cost of equipment installed on fugitive sources.

**Testing** [15A NCAC 2D .0501(c)(8)]

5. If emissions testing is required, the testing shall be performed in accordance with 15A NCAC 2D .0501(c)(8) and General Condition JJ.

**Monitoring** [15A NCAC 2Q .0508(f)]

6. For the thermal oxidizers, the Permittee shall monitor and record the temperature plus will record any time that process exhausts are being emitted directly to atmosphere. In addition, the control system will alarm whenever the combustion chamber temperature drops below 1400 degrees F.

**Recordkeeping** [15A NCAC 2Q .0508(f)]

7. For the thermal oxidizers, the Permittee shall maintain records of actions taken as a result of an alarm condition; and maintain records of the daily temperature readings on site and available to the DAQ for inspection.

**Reporting** [15A NCAC 2Q .0508(f)]

8. The Permittee shall submit a summary report of the monitoring conducted on the thermal oxidizers 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.

**State-Enforceable Only**

**D. 15A NCAC 2D .1100: CONTROL OF TOXIC AIR POLLUTANTS**

Pursuant to 15A NCAC 2D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limit shall not be exceeded:

<b>Emission Source(s)</b>	<b>Toxic Air Pollutant(s)</b>	<b>Emission Limit(s)</b>
Process Lines 1 and 2, Expanded Tobacco, and Cigarette Manufacturing	Ammonia	9.1 pounds per hour

**Monitoring/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

No monitoring, recordkeeping, or reporting is required.

**E. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT), 40 CFR PART 63 SUBPART ZZZZ**

1. For the existing emergency generators constructed on site prior to June 12, 2006 (**ID No. EG-01-01**), the Permittee shall maintain applicability determination on site for five years [40 CFR 63.10(b)(3)].

### SECTION 3 - GENERAL CONDITIONS (version 3.1)

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

- A. **General Provisions** [NCGS 143-215 and 15A NCAC 2Q .0508(i)(16)]
1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 2D and 2Q.
  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 2Q .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 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 Environment and Natural Resources upon request.

- C. **Severability Clause** [15A NCAC 2Q .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 2Q .0507(e) and 2Q .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 2Q .0508(i)(2)]
- 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. **Permit Modifications**

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

H. **Changes Not Requiring Permit Modifications**

1. Reporting Requirements  
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 2Q .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 2Q .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 2Q .0523(c)]  
To the extent that emissions trading is allowed under 15A NCAC 2D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 2Q .0523(c).

**I.A. Reporting Requirements for Excess Emissions and Permit Deviations**

[15A NCAC 2D .0535(f) and 2Q .0508(f)(2)]

“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 2D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 2Q .0700. (*Note: Definitions of excess emissions under 2D .1110 and 2D .1111 shall apply where defined by rule.*)

“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.

Excess Emissions

1. If a source is required to report excess emissions under NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
2. If the source is not subject to NSPS (15A NCAC 2D .0524), NESHAPS (15A NCAC 2D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 2D .0535 as follows:
  - a. Pursuant to 15A NCAC 2D .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 2D .0535(f)(3).

Permit Deviations

3. Pursuant to 15A NCAC 2Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
  - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 2D .0535 quarterly. 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.B. Other Requirements under 15A NCAC 2D .0535**

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 2D .0535, including 15A NCAC 2D .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 2D .0535(c)(1) through (7).

2. 15A NCAC 2D .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 2Q .0508(e) and 2Q .0513(b)]

This permit is issued for a fixed term of five years for facilities subject to Title IV requirements and for a term not to exceed five years in the case of all other facilities. This permit shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete renewal application is submitted at least nine months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 2Q .0512(b)(1), this permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.

L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 2Q .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 2Q .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 2Q .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 2Q .0508(f) and 2Q .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 2Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street, Atlanta, GA 30303) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions limitations, standards, or work practices. 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; and
4. the method(s) used for determining the compliance status of the source during the certification period.

Q. **Certification by Responsible Official** [15A NCAC 2Q .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 2Q .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 2Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 2Q .0515.

S. **Termination, Modification, and Revocation of the Permit** [15A NCAC 2Q .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 2Q .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 2Q .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 2Q .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 2Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 2Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environment and Natural Resources. 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 2Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 2Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 2Q .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 2Q .0107 and 2Q. 0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 2Q .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 2Q .0107.

Z. **Construction and Operation Permits** [15A NCAC 2Q .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 2Q .0100 and .0300.

**AA. Standard Application Form and Required Information** [15A NCAC 2Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 2Q .0505 and .0507.

**BB. Financial Responsibility and Compliance History** [15A NCAC 2Q .0507(d)(4)]

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 2Q .0501(e)]

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 2Q .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. Prevention of Accidental Releases General Duty Clause - Section 112(r)(1) -**  
**FEDERALLY-ENFORCEABLE ONLY**

Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

**FF. Title IV Allowances** [15A NCAC 2Q .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 2D .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 2D .0300.

**HH. Registration of Air Pollution Sources** [15A NCAC 2D .0200]

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 2D .0202(b).

**II. Ambient Air Quality Standards** [15A NCAC 2D .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 2D .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 2Q .0508(i)(16)]

If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow the procedures outlined below:

1. The Permittee shall submit a completed Protocol Submittal Form to the DAQ Regional Supervisor at least 45 days prior to the scheduled test date. A copy of the Protocol Submittal Form may be obtained from the Regional Supervisor.
2. The Permittee shall notify the Regional Supervisor of the specific test dates at least 15 days prior to testing in order to afford the DAQ the opportunity to have an observer on-site during the sampling program.
3. During all sampling periods, the Permittee shall operate the emission source(s) under maximum normal operating conditions or alternative operating conditions as deemed appropriate by the Regional Supervisor or his delegate.
4. The Permittee shall submit **two** copies of the test report to the DAQ. The test report shall contain at a minimum the following information:
  - a. a description of the training and air testing experience of the person directing the test;
  - b. a certification of the test results by sampling team leader and facility representative;
  - c. a summary of emissions results and text detailing the objectives of the testing program, the applicable state and federal regulations, and conclusions about the testing and compliance status of the emission source(s);
  - d. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics should be included as necessary;
  - e. all field, analytical, and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
  - f. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
  - g. documentation of facility operating conditions during all testing periods and an explanation relating these operating conditions to maximum normal operation. If necessary, provide historical process data to verify maximum normal operation.
5. The testing requirement(s) shall be considered satisfied only upon written approval of the test results by the DAQ.
6. The DAQ will review emission test results with respect exclusively to the specified testing objectives as proposed by the Permittee and approved by the DAQ.

**KK. Reopening for Cause** [15A NCAC 2Q .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 2Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 2Q .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 2Q .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 2Q .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. During operation the monitoring recordkeeping and reporting requirements as prescribed by the permit shall be implemented within the monitoring period.

**MM. Fugitive Dust Control Requirement** [15A NCAC 2D .0540] - STATE ENFORCEABLE ONLY

As required by 15A NCAC 2D .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 2D .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 2Q.0501 and .0523]

1. For modifications made pursuant to 15A NCAC 2Q .0501(c)(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 2Q .0501(d)(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 2Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA - Air Planning Branch, 61 Forsyth St., Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:
  - a. a description of the change at the facility;
  - b. the date on which the change will occur;
  - c. any change in emissions; and
  - d. any permit term or condition that is no longer applicable as a result of the change.

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. Mandatory Greenhouse Gas Reporting Requirements** [15A NCAC 2Q .0508]  
**FEDERAL-ENFORCEABLE ONLY**

If the Permittee is subject to requirements of 40 CFR 98.2(a), the Permittee shall submit all required reports to the EPA Administrator in accordance with 40 CFR 98.

## ATTACHMENT

### List of Acronyms

<b>AOS</b>	Alternate Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>Btu</b>	British thermal unit
<b>CAA</b>	Clean Air Act
<b>CAIR</b>	Clean Air Interstate Rule
<b>CEM</b>	Continuous Emission Monitor
<b>CFR</b>	Code of Federal Regulations
<b>CAA</b>	Clean Air Act
<b>DAQ</b>	Division of Air Quality
<b>DENR</b>	Department of Environment and Natural Resources
<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>HAP</b>	Hazardous Air Pollutant
<b>MACT</b>	Maximum Achievable Control Technology
<b>NAA</b>	Non-Attainment Area
<b>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAPS</b>	National Emission Standards for Hazardous Air Pollutants
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NSPS</b>	New Source Performance Standard
<b>OAH</b>	Office of Administrative Hearings
<b>PM</b>	Particulate Matter
<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>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>tpy</b>	Tons Per Year
<b>VOC</b>	Volatile Organic Compound