

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Person
NC Facility ID: 7300056
Inspector's Name: Steven Carr
Date of Last Inspection: 01/21/2010
Compliance Code: 3 / Compliance - inspection

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): CPI USA North Carolina - Roxboro Plant Facility Address: CPI USA North Carolina - Roxboro Plant 331 Allie Clay Road Roxboro, NC 27573 SIC: 4911 / Electric Services NAICS: 221112 / Fossil Fuel Electric Power Generation Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: 2D .2400 (CAIR) NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 7300056.11A Date Received: 02/16/2011 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05856/T12 Existing Permit Issue Date: 06/02/2010 Existing Permit Expiration Date: 12/31/2011
Elton Gibbs General Manager (336) 597-4798 P. O. Box 1153 Roxboro, NC 27573	Elton Gibbs General Manager (336) 597-4798 P. O. Box 1153 Roxboro, NC 27573	Matthew Speer Environmental Engineer (630) 427-6430 3250 Lacey Road Downers Grove, IL 60515	
Review Engineer: Ed Martin Review Engineer's Signature: _____ Date: _____ DRAFT FOR PUBLIC NOTICE		Comments / Recommendations: Issue 05856/T13 Permit Issue Date: Permit Expiration Date:	

I. Purpose of Application:

This permit revision is to renew the existing Title V permit pursuant to 2Q .0513 and to add the Clean Air Interstate Rules (CAIR) to the permit. The renewal application (7300056.11A) was received on February 16, 2011, or at least nine months prior to the expiration date. Therefore, the existing permit will not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied. The CAIR application (7300056.09A, which was consolidated into the renewal application) was required to be submitted in accordance with the schedule in 40 CFR Part 96 for each NOx source, each SO₂ source and each NOx Ozone Season source. The CAIR application was originally received July 2, 2007, and entered into I-Beam as an applicability determination, then re-entered as an application on December 23, 2008. A revised application was received March 13, 2009 in response to a request from DAQ. Public notice of the draft permit is required.

II. Permit Revisions Since Last Title V Permit Renewal

<u>Permit No.</u>	<u>Date Issued</u>	<u>Type of Change</u>
05856T12	6-2-10	Significant modification to add 112(j) MACT requirements.
05856T11	5-27-09	Administrative amendment for minor changes.
05856T10	3-31-09	2Q .0501(c)(2) significant modification to increase the feed rate of tired-derived fuel (TDF), to install: a SO ₂ sorbent injection system, alkaline silo and associated bin vent fabric filter, rotating opposed overfire air system (ROFA) for reducing NO _x emissions, and selective non-catalytic reduction (SNCR) technology for reducing NO _x emissions.
05856T09	10-15-07	State-only modification to burn engineered wood in the boilers.
05856T08	1-22-07	Last permit renewal.

III. Permit Changes:

The following changes were made to the CPI USA North Carolina – Roxboro Plant Air Quality Permit No. 05856T12:

Page No.	Section	Changes
TOC	--	Added sections: 2.2 - Multiple Emissions Source(s) 2.3 - Clean Air Interstate Rules (CAIR) Permit Requirements
		Added Clean Air Interstate Rules (CAIR) Application as an attachment.
throughout	--	Revised all testing conditions to delete reference to 15A NCAC 2D .2601 and reference 2Q .0508(f) as the citation.
3	--	Removed the two paragraphs prior to Section 1.
3	Section 1, table of emission sources	Removed asterisks and footnote for equipment requiring submittal of a Title V Air Quality Permit Application.
4	Section 2.1 A regulation table	Added 15A NCAC 2D .2404 Clean Air Interstate Rule (CAIR) permit requirements as an applicable regulation for sulfur dioxide and 15A NCAC 2D .2403 and .2405 CAIR permit requirements as applicable regulations for nitrogen oxides.
33-35	Section 2.3	Added CAIR permit requirements.
35-44	Section 3	Updated general conditions to version 3.4.

IV. Facility Description

CPI USA North Carolina - Roxboro Plant was formerly EPCOR USA Ventures LLC, Primary Energy and Cogentrix (going back to the last permit renewal in 2007). The facility was originally designed as a cogeneration facility producing steam for Collins & Aikman and selling electricity to Progress Energy. However, the Collins & Aikman plant shut down in 2006, and since that time the facility has been strictly selling electricity to Progress Energy. The facility operates three boilers, each with a maximum rated heat input of 220 million Btu per hour. Under its contract with Progress Energy, to supply additional power to meet peak demand, the facility's maximum power output is limited to 56 megawatts (net).

V. Actual Facility Emissions

The following are the actual facility emissions from most recent emission inventory (2009)

Pollutant	Actual Emissions (TPY)
CO	12.38
NO _x	68.94
PM (TSP)	9.04
PM-10	9.03
PM-2.5	6.09
SO ₂	244.16
VOC	1.93

VI. Summary of Changes to Emission Sources and Control Devices

There are no changes to emission sources or control devices.

VII. Emission and Regulatory Evaluation

15A NCAC 2D .2400 “Clean Air Interstate Rule”

North Carolina’s CAIR rules were approved into the SIP by EPA on November 17, 2009 and published in the Federal Register on November 30, 2009.

The applicable CAIR rules, as specified in the CAIR Permit Application attached to the permit, includes the emission and monitoring requirements shown below for the following affected CAIR sources:

CAIR ID No.
ES-1-1A
ES-1-1B
ES-1-1C

This rule implements the federal Clean Air Interstate Rule under 40 CFR Part 96. The following 2D .2400 sections apply:

15A NCAC 2D .2403 “Nitrogen Oxide Emissions”

This section specifies the total annual NO_x allocations and includes the compliance, emissions measurements recording and reporting, excess emissions and liability requirements.

15A NCAC 2D .2404 “Sulfur Dioxide Emissions”

This section specifies the annual SO₂ allocations and includes the compliance, emissions measurements recording and reporting, excess emissions and liability requirements.

15A NCAC 2D .2405 “Nitrogen Oxide Emissions During Ozone Season”

This section specifies the NO_x allocations during the ozone season and includes the compliance, emissions measurements recording and reporting, excess emissions and liability requirements.

The owners and operators of each affected source must hold, in the source’s compliance account, allowances in an amount not less than the total tons of NO_x, SO₂ and NO_x Ozone Season emissions for each control period.

VIII. Public Notice and EPA Review

Pursuant to 15A NCAC 2Q .0521, a notice of the draft Title V Operating Permit will be published on on the DAQ website, to provide for a 30-day comment period with an opportunity for a public hearing. Copies of the draft (proposed) permit, review and public notice will be sent to EPA for their 45-day review, to persons on the Title V mailing list, to the Raleigh Regional Office, and to the Permittee for review.

IX. Other Requirements

PE Seal

A professional engineer's seal was not required for this renewal since there are no new control devices or changes to any existing control devices.

Zoning

A consistency determination was not required for this renewal since the facility is not being expanded.

Fee Classification

The facility fee classification before and after this modification will remain as "Title V".

X. Recommendations

To be determined after public notice.