

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2006**

Region: Wilmington Regional Office
County: Brunswick
NC Facility ID: 1000067
Inspector's Name: Lynette Bryan
Date of Last Inspection: 08/30/2005
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Primary Energy of North Carolina LLC - Southport Plant Facility Address: Primary Energy of North Carolina LLC - Southport Plant 1281 Power House Dr SE Southport, NC 28461 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: 15A NCAC 2D .0614 NSPS: NA NESHAP: 15A NCAC 2D .1111, Subpart DDDDD PSD: NA PSD Avoidance: NA NC Toxics: NA 112(r): NA Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 1000067.05A; (Note. Applications 1000067.05B and 1000067.06A have been consolidated into this renewal.) Date Received: 07/18/2005; 09/07/05; and 05/03/06 Application Type: Renewal; Ownership change; and Significant Modification (Part II) Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05884/T06 Existing Permit Issue Date: 12/19/2005 Existing Permit Expiration Date: 04/30/2006
Greg Wagoner Compliance Supervisor (910) 457-5056 PO Box 10836 Southport NC, 28461	Gary Hickey Plant Manager (336) 597-4798 P O Box 1153 Roxboro NC, 27573	Greg Wagoner Compliance Supervisor (910) 457-5056 PO Box 10836 Southport NC, 28461	
Review Engineer: Mark Cuilla Review Engineer's Signature: Date:		Comments / Recommendations: Issue 05884/T07 Permit Issue Date: date, 2006 Permit Expiration Date: date, 2011	

I. Purpose of Application

Primary Energy of North Carolina – Southport * is currently operating under permit (**05884T06**) set to expire on April 30, 2006. The renewal application (**1000067.05A**) was received on July 18, 2005, or at least nine months prior to the expiration date. Therefore, the existing permit shall 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 facility is formerly known as Cogentrix of North Carolina, Inc. – Southport. A complete ownership change application including permit fee of \$60 was submitted on September 7, 2005, and entered into IBEAM as application **1000067.05B** and consolidated into this renewal.

This permit renewal action also includes the completion of the two-part permit modification schedule for equipment modifications approved in December 2005 (application **1000067.06A** received May 3, 2006) and consolidated into this renewal.

II. Facility Description

Primary Energy of North Carolina LLC owns and operates a cogeneration facility in Southport, North Carolina. Current permitted equipment includes six solid fuel fired boilers to produce steam. A portion of the steam is sold to a nearby industrial facility for use in their manufacturing process. The remainder of the steam is used to drive a steam turbine connected to an electrical generator to generate electricity for wholesale to the connected utility.

III. History/Background/Application Chronology

May 1, 2001 – Permit **05884T04** issued as first time Title V permit.

June 11, 2004 – Permit **05884T05** issued as 502(b)(10) modification to add acid rain requirements.

July 18, 2005 – Permit application **1000067.05A** received for renewal of existing Title V permit.

September 7, 2005 – Permit application **1000067.05B** received requesting ownership change of facility.

October 20, 2005 – I requested, via email, that the Permittee provide me with a CAM demonstration for all applicable equipment.

November 21, 2005 – I received the completed CAM plans via email.

December 19, 2005 – Permit **05884T06** issued as a 2D .0501(c)(2) Part I modification to allow for combustion of unadulterated wood in the facility's boilers.

February 23, 2006 – I suggested that the Permittee provide me with the second part of his permit application for the combustion of unadulterated wood in the six boilers as required by permit **05884T06**. This second part is required to go to public notice and it made sense to include it in with the permit renewal.

May 3, 2006 – Permit application **1000067.06A** received for significant modification (Part II) and to remove Part II and to extend the permit shield throughout the permit.

May 23, 2006 – I sent via email, a series of questions concerning boiler type for MACT purposes, test results for PSD and PSD Avoidance applicability, and CAM indicator ranges. The response was received **May 31, 2006**. All changes/response were incorporated into the DRAFT permit.

June 15, 2006 – DRAFT renewed permit sent to Permittee, Regional Office, and Title V Coordinator for comment prior to public notice and EPA review.

July 28, 2006 – Received Permittee's comments on DRAFT permit.

October 19, 2006 – DRAFT renewed permit sent to Permittee, Regional Office, and Title V Coordinator for second round of comment prior to public notice and EPA review. Title V Coordinator returned DRAFT permit on **October 26, 2006** with no additional comment. Permittee returned DRAFT permit on **November 8, 2006**. See Section IX of this Document for a complete history of comments and responses.

Date, 2006 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	-amended permit revision number -added equipment per Regional Office inspection report -added equipment ID Nos.
Cover	-	-amended permit revision numbers and all dates -corrected facility name per Permittee request
Table of Contents	-	-amended Section contents
All	Header	-amended permit revision number
3	Equipment table	-added MACT citation -amended boiler descriptions for MACT applicability
4	2.1 A	-amended boiler descriptions for MACT applicability
4-5	2.1 A (table)	-clarified emission limits on a per boiler basis where applicable -added MACT and CAM regulation citations -added clarification asterisks
5	2.1 A.1.a 2.1 A.1.c 2.1 A.1.d	-added equipment ID Nos. -updated shell language -updated shell language
6	2.1 A.2 2.1 A.2.b 2.1 A.2.d 2.1 A.2.1	-corrected rule citations -added equipment ID Nos. -added equipment ID Nos. -added clarification language per Permittee
7	2.1 A.3.g 2.1 A.3.h 2.1 A.3.i 2.1 A.3.k	-added equipment ID Nos. -added equipment ID Nos. -added equipment ID Nos. -added equipment ID Nos.
8	2.1 A.3.m 2.1 A.4.f 2.1 A.4.h	-updated shell language -added equipment ID Nos. -clarified testing requirements
9	2.1 A.5.c	-clarified testing requirements
11	2.1 A.5.i 2.1 A.6.a 2.1 A.6.b 2.1 A.6.e 2.1 A.6.f	-updated shell language -added equipment ID Nos. -added clarification language -added equipment ID Nos. -added fuel types for normal startup -added requirements for combustion of spent demineralizer resin -added requirements for combustion of spent demineralizer resin
12	2.1 A.6.g 2.1 A.6.j 2.1 A.6.k 2.1 A.6.l 2.1 A.6.m	-added requirements for combustion of flyash briquettes -added equipment ID Nos. -added recordkeeping requirements for TDF -added recordkeeping requirements for startup -added recordkeeping requirements for logbooks -added recordkeeping requirements for palletized paper
13	2.1 A.6.n 2.1 A.6.o 2.1 A.6.p 2.1 A.6.q 2.1 A.6.r 2.1 A.6.s 2.1 A.7.a	-added recordkeeping requirements for flyash briquettes -added shell noncompliance language -added reporting requirements -added reporting requirements -added reporting requirements -added reporting requirements -updated language to remove outdated limits
14-16	2.1 A.8	-added CAM requirements
16	2.1 A.9	-added MACT language for boiler MACT

Page(s)	Section	Description of Change(s)
17	2.1 B.1.c 2.1 B.1.d 2.1 B.1.e	-added equipment ID Nos. -updated shell language -updated shell language
18	2.1 B.2.d 2.1 B.2.e 2.1 B.2.g 2.1 B.3.b	-added equipment ID Nos. and updated shell language -updated shell language -updated shell language -updated shell language and corrected a cross reference
19	2.1 B.3.f 2.1 C	-corrected semi-annual reporting date -corrected equipment description
20	2.1 C.1.c 2.1 C.1.d 2.1 C.1.e 2.1 C.2.b 2.1 C.2.d	-added equipment ID Nos. and corrected a cross reference -updated shell language -updated shell language -added equipment ID Nos. -updated shell language
21	2.1 C.2.e 2.1 C.2.f 2.1 D.1.b 2.1 D.1.d	-added equipment ID Nos. -updated shell language -updated shell language and corrected a cross reference -added "no reporting" statement
22	2.1 D.2.b 2.1 D.2.d 2.1 D.2.e	-corrected cross reference -updated shell language -updated shell language
23-31	General Conditions	-updated shell conditions

The following table indicates the modifications to ESM as a result of this permit renewal:

Current Description	Change resulting from permit renewal
One coal/natural gas/No. 2 and No. 4 fuel oil/tire derived fuel/palletized paper fuel/flyash briquette/unadulterated wood-fired steam, electric generating, boilers (223 million Btu per hour heat input capacity, each; ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B, and ES-2-1C)	Six <i>watertube design</i> coal/natural gas/No. 2 and No. 4 fuel oil/tire derived fuel/palletized paper fuel/flyash briquette/unadulterated wood-fired steam, electric generating, boilers (223 million Btu per hour heat input capacity, each; ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B, and ES-2-1C)
Six fuel bunkers (ID Nos. ES-2A through ES-2F)	Six <i>coal</i> bunkers (ID Nos. ES-2A through ES-2F)

V. Regulatory Review

The facility is currently subject to the following regulations:

- 15A NCAC 2D .0501, Compliance with National Ambient Air Quality Standards
- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
- 15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
- 15A NCAC 2D .0521, Control of Visible Emissions
- 15A NCAC 2D .0524, New Source Performance Standards
- 15A NCAC 2D .0530, Prevention of Significant Deterioration
- 15A NCAC 2D .1417, Emission Allocations for Large Combustion Sources
- 15A NCAC 2Q .0317, Avoidance Conditions
- 15A NCAC 2Q .0700, Toxic Air Pollutant Procedures

A regulatory review for these existing requirements will not be included in this document.

As part of this renewal process, the following regulation(s) have been added to the permit:

- 15A NCAC 2D .0614, Compliance Assurance Monitoring
- 15A NCAC 2D .1111, Maximum Achievable Control Technology

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The Permittee is currently subject to the New Source Performance Standards for boilers (40 CFR 60 Subpart Db). Specifically, the Permittee is subject to a particulate matter emission limit of 0.5 pounds per million Btu heat input, a nitrogen oxide emission limit of 0.60 pounds per million Btu heat input while firing coal, a nitrogen oxide emission limit established by the following equation:

$$E_n = (0.1H_{go} + 0.3H_{ro} + 0.6H_c)/(H_{go} + H_{ro} + H_c),$$

while simultaneously burning coal with fuel oil or a mixture of these fuels with natural gas or any other fuel, and a 20 percent opacity. This permit renewal does not affect this status. No modifications to the current permit language are required.

NESHAPS/MACT – As a major hazardous air pollutant emitter, the facility's six boilers (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) will be required to comply with the National Emission Standards for Hazardous Air Pollutants from Industrial, Commercial, Institutional Boilers and Process Heaters" (40 CFR 63, Subpart DDDDD). These existing, watertube design, large solid fuel-fired boilers are required to be in compliance by September 13, 2007. The following language has been included in the renewed permit as Section 2.1 A.9:

9. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

The Permittee shall comply with all applicable provisions contained in Environmental Management Commission Standard 15A NCAC 2D .1111, "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR Part 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters" for its existing, watertube design, large, solid fuel fired boilers (ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C) by September 13, 2007.

However, it should be noted that these same boilers will be subject to the proposed mercury rules for electric generators (CAMR; 15A NCAC 2D .2500). These rules are (as of the date of this document) in the proposal stage. These boilers are cogeneration emission units because they combust coal, tire-derived fuel and wood to produce useful thermal energy for the facility's industrial host and generate electricity for sale to Progress Energy. The boilers serve an electrical generator with a nameplate capacity greater than 25 megawatts of electrical output and sell greater than one-third of their potential electric output capacity to the electrical grid. Although the boilers do not technically meet the definition of an electrical utility steam generating unit because their individual design capacity is not more than 25 megawatts, the boilers serve a similar purpose as they collectively supply more than 25 megawatts to the grid. Based on the boilers status as cogeneration units supplying a certain amount of electricity to the grid, they are regulated by, among other CAA programs, the new source performance standards, CAMR and the Clean Air Act Interstate Rule (CAIR).

In proposed modifications to the boiler MACT (70FR62264-62275, October 31, 2005), EPA writes:

*"On March 29, 2005, EPA revised the regulatory finding that it issued in December 2000, removing electric utility steam generating units from the CAA Section 112 source category list. EPA instead established standards of performance for mercury from new and existing electric utility steam generating units under the authority of Section 111 of the CAA. These standards of performance (Subparts Da and HHHH of 40 CFR Part 60) regulating mercury from electric utility steam generating units were promulgated on May 18, 2005 in the Clean Air Mercury Rule....Thus to clarify applicability of the final rule, we are proposing to modify 40 CFR 63.7491(c) to **EXCLUDE** 'an electric utility steam generating unit (including a unit covered by 40 CFR Part 60, Subpart Da) and a Mercury (Hg) Budget unit covered by 40 CFR Part 60, Subpart HHHH.' The term 'electric utility steam generating unit' is defined in 40 CFR 63.7575 of Subpart DDDDD in accordance with the statutory definition in Section 112(a)(8) of the CAA."*

This permit should be reviewed for future boiler MACT and CAMR rule consideration as the proposed rules are promulgated. If EPA promulgates the proposed modifications to exclude the CAMR subject sources from the requirements of the Boiler MACT prior to the compliance date of the MACT, this permit should be administratively amended to remove this language as a “non-applicable requirement”.

PSD – The Permittee is subject to both PSD and PSD Avoidance conditions for its six boilers (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**). Specifically, the Permittee is subject to particulate matter, sulfur dioxide, nitrogen oxide, carbon monoxide, sulfuric acid, and maximum coal sulfur content emission limits for PSD and nitrogen oxide, sulfur dioxide, and carbon monoxide emission limits for PSD avoidance. This permit renewal does not affect this status. However, as part of this renewal, the testing requirements for PSD have been amended to require that a particulate matter test be completed for each stack once per permit cycle. This requirement mirrors the requirement currently in the PSD avoidance language.

112(r) – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect this status.

CAM – 40 CFR 64 requires that a continuous assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The facility currently operates the following equipment:

- six boilers (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B, and ES-2-1C**) with associated bagfilters (**ID Nos. CD-1-1A through CD-1-1C and CD-2-1A through CD-2-1C**) respectively;
- six fuel bunkers (**ID Nos. ES-2A through ES-2F**) with associated bagfilters (**ID Nos. CD-2A through CD-2F**);
- two flyash silos (**ID Nos. ES-3A and ES-3B**) with associated binvents (**ID Nos. CD-3A and CD-3B**);
- four ash vacuum transport pumps (**ID Nos. ES-4A through ES-4D**) with associated filters (**ID Nos. CD-4A through CD-4D**), two cyclones (**ID Nos. CD-4G and CD-4H**), and two bagfilters (**ID Nos. CD-4E and CD-4F**); and
- coal unloading/storage and transfer operations (**ID No. ES-5**) with associated wet suppression system (**ID No. Wetsup**).

The following table illustrates the applicable regulations and CAM applicability for each piece of equipment:

Regulated Pollutant	Applicable Regulation	CAM Demonstration Needed
Boilers (ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B, and ES-2-1C)		
SO ₂	15A NCAC 2D .0516	No; control devices not for SO ₂
PM₁₀ NO _x (coal firing) NO _x (coal w/other fuels) Opacity	15A NCAC 2D .0524 (Subpart Db)	Yes No; control devices not for NO _x No; control devices not for NO _x No; opacity is not a criteria pollutant
PM₁₀ SO ₂ NO _x CO	15A NCAC 2D .0501(e)	Yes No; control devices not for SO ₂ No; control devices not for NO _x No; control devices not for CO
PM₁₀ SO ₂ NO _x CO Sulfuric acid mist	15A NCAC 2D .0530	Yes No; control devices not for SO ₂ No; control devices not for NO _x No; control devices not for CO No; acid mist not a criteria pollutant
NO _x	15A NCAC 2D .1417	No; control device not for NO _x
NO _x SO ₂ CO	15A NCAC 2Q .0317 (PSD Avoidance)	No; control device not for NO _x No; control device not for SO ₂ No; control device not for CO
Toxics	15A NCAC 2Q .0700 (State only requirement)	No; control device not for toxics

Regulated Pollutant	Applicable Regulation	CAM Demonstration Needed
	Fuel Bunkers (ID Nos. ES-2A through ES-2F)* Flyash Silos (ID Nos. ES-3A and ES-3B)* Ash Vacuum Transport Pumps (ID Nos. ES-4A through ES-4D)* Coal Unloading/Storage and Transfer Operations (ID No. ES-5)*	
Opacity	15A NCAC 2D .0521	No; opacity is not a criteria pollutant
PM ₁₀	15A NCAC 2D .0530	No; PSEUs < major source threshold*

* Renewal application included estimated potential emission calculations that indicate that these sources are below the major source threshold for particulate therefore; CAM is not applicable.

The bagfilters for each boiler are installed for particulate matter control. A check against the DAQ spreadsheets for PM₁₀ indicates that potential precontrolled PM₁₀ emissions exceed the threshold quantity for CAM applicability. The following language has been included as Section 2.1 A.8 in the renewed permit.

8. 15A NCAC 2D .0614: COMPLIANCE ASSURANCE MONITORING

- a. Per 40 CFR 64 and 15A NCAC 2D .0614, the Permittee shall comply with the following.
- b. **Background**
 - i. Emission Unit(s).
 - (A) Description. Six watertube design coal/natural gas/No. 2 and No. 4 fuel oil/tire derived fuel/palletized paper fuel/flyash briquette/unadulterated wood-fired boilers
 - (B) Identification. ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C
 - ii. Applicable Regulation, Emission Limit, and Monitoring Requirements.
 - (A) Regulations. 15A NCAC 2D .0524 (Subpart Db)
15A NCAC 2D .0501(e)
15A NCAC 2D .0530
 - (B) Emission limits
 - 1. 0.05 pounds per million Btu heat input (40 CFR 60.43b(a)(1)) – [particulate matter]
20 percent opacity [40 CFR 60.43b(f)]
 - 2. 6.02 pounds per hour per boiler [PM₁₀]
 - 3. 0.027 pounds per million Btu heat input per boiler [PM₁₀]
 - (C) Control Technology. Six bagfilters (ID Nos. CD-1-1A, CD-1-1B, CD-1-1C, CD-2-1A, CD-2-1B and CD-2-1C)
- c. **Monitoring Approach.** The key elements of the monitoring approach for particulate matter, including parameters to be monitored, parameter ranges and performance criteria are presented in the following table.

	1	2
I. Indicator	Visible emissions	Pressure drop
Measurement Approach	Visible emissions from the fabric filter will be monitored continuously using COM system on each common stack	Pressure drop across the fabric filter is measured with a differential pressure gauge
II. Indicator Range	An excursion is defined as visible emissions in amounts greater than or equal to 15% (six-minute average). Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a pressure drop greater than 9.5 inches of water. Excursions trigger an inspection, corrective action, and a reporting requirement.
QIP Threshold	The QIP threshold is six excursions in a 6-month reporting period.	None selected

	1	2
<i>III. Performance Criteria</i>		
<i>A. Data Representativeness</i>	<i>Measurements are being made at the emission point (fabric filter outlet) of each common stack</i>	<i>Pressure taps are located at the fabric filter inlet and outlet. The gauge has a minimum accuracy of 0.5 inches of water.</i>
<i>B. Verification of Operational Status</i>	NA	NA
<i>C. QA/QC Practices</i>	<i>The COM systems shall be calibrated, maintained and operated according to 40 CFR 60, Appendix B, PSI.</i>	<i>The pressure gauge is checked daily for operation.</i>
<i>D. Monitoring Frequency</i>	<i>Data is collected continuously with COM systems.</i>	<i>Pressure drop is monitored daily.</i>
<i>Data Collection Procedures</i>	<i>Data from the COM systems is collected electronically and maintained on the Data Acquisition and Handling System computer along with information on the operating status of the boilers.</i>	<i>Pressure gauge readings are manually recorded daily.</i>
<i>Averaging Periods</i>	NA	NA

d. Justification

- i. Background. *The pollutant-specific emission units are the six identical stoker boilers used to produce steam (a portion of which is sold to a nearby industrial facility for use in their process). The remainder of the steam is used to drive a steam turbine connected to an electrical generator to generate electricity for wholesale to the connected utility. The particulate matter emissions from each boiler are controlled by fabric filters with approximately 16,800 square feet of filter area, each.*
- ii. Rationale for Selection of Performance Indicators. *Visible emissions was selected as the performance indicator because it is a good indicator of the proper operation and maintenance of the filter units. When the filter units are operating properly, there will not be any visible emissions in the exhaust outlet. Any increase in visible emissions indicates reduced performance of the filter units, therefore, the presence of visible emissions in levels exceeding or equal to 15% (six-minute average) is used as a performance indicator.*

In general, filters are designed to operate at a relatively constant pressure drop. Monitoring pressure drop provides a means of detecting a change in operation that could lead to an increase in emissions. An increase in pressure drop can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged/broken, the bags are becoming blinded, or the airflow has increased. A decrease in pressure drop may indicate broken or loose bags, but this is also indicated by the presence of visible emissions, indicator No. 1. A pressure drop across the filter unit also serves to indicate that there is airflow through the control device.

- iii. Rationale for Section of Indicator Ranges. *Per operating knowledge of the systems, the facility has selected an indicator range of greater than or equal to 15% opacity (six-minute average). When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a COMs is a well established monitoring technique for these sources.*

The selected QIP threshold for fabric filter visible emissions is six excursions in a 6-month reporting period. This level is 19 percent of the total visible emissions observations. If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented.

The indicator range chosen for the fabric filter pressure drop is greater than 9.5 inches water. An excursion triggers an inspection, corrective action, and a reporting requirement. The pressure drop is recorded daily. As the pressure drop approaches 10 inches water the bags are scheduled for replacement.

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

- e. The Permittee shall submit a summary report of all monitoring 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 for the requirements of this permit must be clearly identified.

VII. Facility Wide Air Toxics

The Permittee is currently required to comply with the toxics limitations by restricting its combustion activities. This permit renewal does not change this status. However, as part of this renewal the following (italicized) language has been added to the permit for clarification and to provide DAQ additional monitoring/recordkeeping/reporting requirements:

State-enforceable only

6. 15A NCAC 2Q .0700: TOXIC AIR POLLUTANT PROCEDURES

- a. The Permittee is allowed to burn the following as supplemental fuels in these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) provided that the wastes are generated at this plant-site and are combusted under conditions of high fire producing high steam demand:
 - i. waste water basin/evaporation pit sludge of a maximum feed rate of 1% by weight not to exceed 20 tons per year,
 - ii. spent demineralizer resin;
 - iii. activated carbon filters from the water treatment process not to exceed 10 tons per year, and
 - iv. EDTA boiler cleaning solution with a maximum injection rate of 10 gallons per minute of the solution per 100,000 pounds of steam flow not to exceed 35,000 gallons per year.
- b. The Permittee may use the following for normal start-up of these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) provided that the oil is generated at this plant-site:
 - i. unadulterated oil soaked rags,
 - ii. wood scraps,
 - iii. used oil absorbents,
 - iv. used/fuel oil soaked rags, and
 - v. used oil soaked wood chips.
- c. The tire derived fuel feed rate shall not exceed 35% of the heat input of each source (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**).
- d. Other than allowed per Section 2.1 A.6.b above, the wood combusted in these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) shall meet the definition of "unadulterated wood" as defined per 15A NCAC 2Q .0703(23).
- e. The Permittee may burn "regenerated" spent cation/anion resins [spent demineralizer resin] in these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) once the following conditions have been met:
 - i. testing adequate to determine the quantity and type of any toxic materials listed in 15A NCAC 2Q .0711 shall be performed. The results shall be forwarded to the Wilmington Regional Office Supervisor, Division of Air Quality.
 - ii. the Permittee shall request and obtain written permission from the Wilmington Regional Office Supervisor, Division of Air Quality, prior to burning the resins.
 - iii. Combustion of these plant wastes will occur with the following limitations:
 - A. wastes are generated from this plant-site,

- B. wastes are combusted in these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) operating under conditions of high fire producing high steam demand,
- f. Combustion of these plant wastes will occur with the following limitations that the maximum amount of “regenerated” spent cation/anion resins [spent demineralizer resin] shall not exceed 40 tons per year.
- g. To comply with this permit and avoid the applicability of 15A NCAC 2Q .0706, “Modifications” as requested by the Permittee, toxic pollutant emissions from the firing of the alternative fuel flyash briquettes in these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) shall be less than the emissions from the firing of coal in these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**). To ensure enforceability of this limit, flyash briquettes will be fired only during low steam demand conditions defined to be:
 - i. when the plant is dispatched off-line (no electrical generation produced for the utility), and
 - ii. steam production limit of 80,000 pounds steam per hour.

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

- h. Prior to using any used oil absorbents the Permittee shall submit an analysis of the oil for an unadulterated equivalency determination. This equivalency determination need only be submitted and approved once for each oil type. The Permittee shall maintain records on site of DAQ approved equivalent oils.
- i. The Permittee shall maintain a wastewater sludge combustion logbook onsite with the following information:
 - i. date of wastewater sludge combustion;
 - ii. feed rate of wastewater sludge to these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**); and
 - iii. feed rate of coal to these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**).
- j. The Permittee shall maintain a tire derived fuel (TDF) combustion logbook onsite with the following information:
 - i. date of TDF combustion,
 - ii. quantity of TDF combusted,
 - iii. feed rate of TDF to these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) and heat input from TDF combustion,
 - iv. feed rate of coal and/or other fuels to these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**) and associated heat input, and
 - v. documentation of any feed rate limitation, if applicable.
- k. The Permittee shall maintain a plant waste fuel start-up logbook onsite with the following information:
 - i. date of start-up,
 - ii. hours of start-up, and
 - iii. quantity and type of materials used when plant wastes are used to start-up these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**).
- l. The Permittee shall maintain a plant waste combustion logbook onsite with the following information:
 - i. date of plant waste combustion,
 - ii. type of plant waste combusted,
 - iii. quantity of waste materials combusted,
 - iv. feed rate of plant waste to these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**),
 - v. feed rate of coal to these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**), and
 - vi. documentation of any feed rate limitation, if applicable.
- m. The Permittee shall maintain a palletized paper fuel (PPF) combustion logbook onsite with the following information:
 - i. date of PPF combustion,
 - ii. description of PPF combusted,
 - iii. quantity of PPF combusted,
 - iv. feed rate of PPF to these sources (**ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C**),

- v. *feed rate of coal to these sources (ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C), and*
- vi. *documentation of any feed rate limitation, if applicable.*
- n. *The Permittee shall maintain a flyash briquette combustion logbook onsite with the following information:*
 - i. *daily quantity of flyash briquettes combusted,*
 - ii. *maximum hourly steam demand during the hours of flyash briquettes combustion for that day, and*
 - iii. *daily recordkeeping is only required on days in which briquettes are burned.*
- o. *The Permittee shall be deemed in noncompliance with 15A NCAC 2Q .0700 if the monitoring and recordkeeping requirements of Section 2.1 A.6.a through 2.1 A.6.n above, are not maintained.*

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

- p. *Within 30 days after each calendar year, the following shall be reported:*
 - i. *the total amount of the flyash briquettes burned, and*
 - ii. *the chemical composition datasheet and/or MSDS for each shipment of flyash briquettes received during that calendar year.*
- q. *Prior to combustion for the first time, the Permittee shall submit an analysis of the used oil and unadulterated oil equivalency determination for approval.*
- r. *Within 30 days after the end of each calendar year, the Permittee shall submit a report of the number of gallons of used oil combusted and an analysis of the used oil.*
- s. *Within 30 days after the initial use of each of these permitted alternative fuels and plant wastes, the Permittee shall submit in writing the type of fuel or plant waste and the date in which the material was first used in these sources (ID Nos. ES-1-1A, ES-1-1B, ES-1-1C, ES-2-1A, ES-2-1B and ES-2-1C).*

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2004 Actual Emissions (tpy)
CO	149.67
NO _x	1,292.94
PM ₁₀	23.66
SO ₂	3,244.66
VOC	2.90
Total HAP/TAP	192.81

IX. Stipulation Review

The Regional Office does not note any necessary stipulation modifications with this permit renewal.

The Permittee has provided the following comments on the DRAFT renewed permit prior to the notice period (Note. There were two rounds of DRAFT renewal comments submitted to the Permittee prior to public notice. Each set of comments are included below:

1. We note that the agency has proposed to modify the renewal application date from the current requirement of six months prior to expiration to nine month prior to the expiration of the due date. We request the prior six months. *No change; 15A NCAC 2Q .0513(b) requires submittal at least nine months prior to expiration.* Thank you – we were not aware of the time change from six to nine months change per the regulation you cited.

2. In both the equipment table and in Section 2.1 A, we request that the permit reflect that each boiler is designed and operates with an overfired air system. *No change; this request is under investigation by the regional office and central office compliance section.* The Overfire Air (OFA) systems were part of the original boiler design and construction. The OFA systems have been in operation since the boiler start-up in 1987. The intent of adding the OFA system to the boiler descriptions was to provide a more complete description of the boiler as originally constructed, permitted and operated. *No change. The ongoing testing requirement for Roxboro (letter dated September 27, 2006) is in effect. Once this testing is completed and the results submitted, the description of the boilers will either:*
 1. *be modified through a required permit modification; OR*
 2. *via a Permittee requested administrative amendment.*
3. We note that the agency has clarified that emission limits are based on a per boiler basis. It should be noted that while the heat input for each boiler is measured directly, emissions from the boilers are measured in a common stack. *Agree; the renewed permit will be clarified to make this clarification.* Thank you.
4. We note that the permit is not precise as to the averaging time for all the pounds per million Btu based emission limits. To ensure that all proper records are maintained consistent with the agency's view of the proper averaging period for all applicable limits, we ask that averaging times be explicitly included in the permit. *No change; averaging times are listed in the permit condition where necessary.* Thank you. We will abide by permit condition 2.1 A.2.h which specifies 1-hour NO_x reading averaged on a 30-day rolling average basis per 2.1 A.2.c.iii.
5. We question the appropriate method to reflect the fact that the agency has determined that the Boiler MACT does not apply to the facility because the State's implementing regulations for the Clean Air Mercury Rule has been determined to apply. *In a June 9, 2006 response to Mr. Thor Ketzback concerning the applicability of CAMR and the boiler MACT, DAQ states that:*

“Based on the fact that both Primary Energy facilities will be subject to the regulations for CAMR and on the fact that EPA, with its clarification of the Boiler MACT, does intend to clarify that CAMR subject sources are excluded from having to comply with the modified Boiler MACT, NC DAQ does confirm that the Boiler MACT does not apply to the electric steam generating units at both the Roxboro and Southport Primary Energy facilities. HOWEVER, it should be noted that this determination is being made on the basis of a proposed modification. If the modification to the Boiler MACT specifically excluding CAMR affected sources is not promulgated as written, NC DAQ reserves the right to change its decision.”

Based on this response, it has been determined that placeholder language for the MACT should be placed in the renewed permit. The underlying rules which would exclude these sources from the Boiler MACT have not been promulgated as of yet. Until that time, these sources ARE subject and therefore as existing sources would be required to comply by September 13, 2007. If prior to that date, EPA promulgates the modified rule, the permit can either be administratively amended to remove a “non-applicable” requirement OR the language can remain as unnecessary. We spoke with Jim Eddinger at EPA RTP who said that the clarification on the boiler MACT has cleared OMB, gone to the EPA Administrator for signature and should have been out by the end of October 2006. If the clarification is not unduly delayed, it may be worth either waiting for the issuance of the clarification or contacting EPA prior to issuing the permit, as the clarification is close to final issuance. This would enable NCDENR to remove the ICI Boiler MACT “placeholder language” from the permit. No change to the DRAFT permit. If during the public notice period and/or the EPA review period, EPA does finalize these changes, then the permit can be issued without the MACT language. However, if not, then the permit will be issued as drafted and the Permittee can request an administrative amendment to remove any unnecessary language once EPA does act.
6. Request that a clarification be added to the recordkeeping/reporting requirements for quarterly reporting of nitrogen content of any residual oil combusted in the sources per the New Source Performance Standards in Section 2.1 A.2.1. *Agree; the renewed permit will be modified to include the statement “(if burned)”.* Thank you.

7. With regard to compliance with the national ambient air quality standards, we believe that the agency's intent is to ensure that sustained elevated differential pressures across the bagfilters shall be avoided and appropriate records be maintained. Normal operating practice would be to monitor the differential pressure across the bagfilters on a 5-minute average basis. We suggest that Section 2.1 A.3.h be modified to reflect this 5-minute average. *No change; the permit condition establishes a maximum pressure drop reading to reflect proper operation of the control device.* Your clarification is requested. Our understanding of the term "normal operating range" in your response excludes conditions that are not generated as part of the baghouse PM removal operation. For example, on-line bag air pulse cleaning can cause pressure spikes when pressurized air is purposely injected into the bags to remove ash accumulation from the filterbag surface. Differential pressure spikes caused by air pulse cleaning are not indicative of excessive PM loading. *The specific monitoring required by this permit condition allows the Permittee to establish "when" the monitoring is to be completed. Section 2.1 A.3.i.ii requires that the pressure differential be monitored and recorded once weekly. The allowance for spikes during cleaning are built into this requirement. It is expected that the Permittee will, while taking this weekly reading, record such conditions that may have been present that would have caused an exceedance of the permit requirement and any actions to correct those conditions. The official weekly reading can then be properly recorded. These records reflect "normal operation."*
8. We wish to be sure that DAQ agrees with the interpretation that the qualifying test condition in Section 2.1 A.4.h allows Southport to determine and set what the level of maximum feasible feed rates for testing should be. We also interpret maximum feasible feed rate as a fuel input rate that is representative of typical operating conditions and allows Southport to operate reliably and within permit emission limits. *DAQ agrees with this interpretation. The testing requirement establishes testing conditions that are clarified that "if physical design limitations exist" the Permittee shall conduct test using maximum feasible rates. Maximum feasible as it is used for this permit condition should at a minimum represent worst case operating conditions in order to assure compliance with the established emission standards.* Thank you.
9. Correct typo in Section 2.1 A.4.h. "tern" should be "term". *Agree; change will be made.*
10. Consistent with the requirements of Section 2.1 A.4.h, Section 2.1 A.5.c should similarly require a test on only **one** source stack per permit **term**. *Not agree; testing for each stack once per term is the minimum testing requirement to ensure compliance with the established emission limits. Therefore; the renewed permit will require that both Sections 2.1 A.4.h and Section 2.1.A.5.c indicate that source testing should be on **each** source stack per permit **term**.* Based on our reading of the cited regulation [NCGS 143-215.108], there is no specific language requiring assignment of stack testing of both of Southport's power unit stacks. 108.c.1 indicates that authority to grant and renew a permit with any conditions attached that the Commissions believes necessary to achieve the purposes of the Clean Air Act. Our basis for requesting the one stack test per permit term (versus a stack test for each power unit stack per permit term) is that all six boilers at Southport are physically and operationally identical. The boilers are all of the same design and size using the same installed equipment, ranging from the boiler FD and ID air systems, fuel feed systems, overfire air/ash re-injection systems and boiler management control systems. When the plant is "bunkered" with fuel, all six boiler bunkers are filled with and deliver the dame fuel blend. All six boilers are operated at the same steam pressure and temperature ranges for low and high load conditions. Both power units have identical ash and baghouse control systems, and emission stacks. It is our position, based on the physical and operational equivalency of the power units, stack testing on either unit would be representative and applicable to the other unit. A suggested approach could be to specify compliance stack testing be alternated between power units. This would ensure testing of both power units over time. *No change; the requirement for source testing for PSD compliance on a source stack basis once per permit term is meant to align this condition with that already required by the PSD avoidance condition for the same sources (e.g., Section 2.1 A.4.h is NOW the same frequency as 2.1 A.5.c).*

11. We note that the previous permit conditions have required the summary report required by Section 2.1 A.5.i to require monthly emission totals and average emission rates for the previous 14 months, instead of the proposed 17 months, which would be consistent with the reporting periods for our other NC facility. *No change. The 17 months are necessary to adequately represent the correct number of months in a semiannual report (14 months is necessary for quarterly reporting). See the following example. Thank you.*

Semi-annual reporting (6 consecutive 12-month periods)	Quarterly reporting (3 consecutive 12-month periods)
<p><i>July 30, 2007 report (for previous 6 months January 2007 – June 2007)</i></p> <p>February 2006 March 2006 April 2006 May 2006 June 2006 July 2006 August 2006 September 2006 October 2006 November 2006 December 2006 January 2007 ← 6th February 2007 ← 5th March 2007 ← 4th April 2007 ← 3rd May 2007 ← 2nd June 2007 ← 1st</p> <p>Total Months – 17 (February '06 - June '07)</p>	<p><i>July 30, 2007 report (for previous 3 months April 2007 – June 2007)</i></p> <p>May 2006 June 2006 July 2006 August 2006 September 2006 October 2006 November 2006 December 2006 January 2007 February 2007 March 2007 April 2007 ← 3rd May 2007 ← 2nd June 2007 ← 1st</p> <p>Total Months – 14 (May '06 – June '07)</p>

12. We note with regard to Section 2.1 A.6.e.i that the spent cation/anion media is used for the treatment of either city supplied potable water or for the non-contaminated groundwater. There is no source of potential organic contamination, hence no basis for monitoring of a broad slate of organics. We agree that there could be some metals accumulation based on the treatment of groundwater with various dissolved solids including metals. With the nature of influent water quality being highly consistent, we believe that initial testing should meet test requirement, unless there is evidence of a change in water quality that would indicate retesting. Therefore we suggest that this condition be modified. *No change; permit language is identical to sister facility in Roxboro, NC.* Thank you. We will coordinate with the NCDENR Wilmington, NC office regarding required testing for the subject plant waste streams and conduct testing adequate to determine the type of any toxic material testing per 15A NCAC 2Q .0711 that is required.
13. With regard to the monitoring and recordkeeping requirements of Section 2.1 A.6.n, we believe that it is the intent of the agency to only require daily recordkeeping requirements related to flyash briquettes only on days when that fuel is combusted, similar to the requirements for other alternative fuels. As such, we request that the permit condition be modified to reflect this. *No change; permit condition 2.1 A.6.n.iii, as drafted, is identical to the suggested language.* Thank you.
14. We suggest the allowance of a short time period (5 minutes) in the compliance assurance monitoring requirements to allow for instantaneous opacity spikes and short excursions of the visible emissions indicator that typically return to normal quickly with only minor or in many cases no operational adjustments. *Not agree with Permittee's suggestion. However, the DRAFT renewed permit has been modified to reflect that the opacity excursion is based on a six-minute average level. This modification brings the level in line with the opacity emission limit of the NSPS.* Thank you. The six-minute period provides the clarification needed to address the instantaneous opacity spikes.

15. We request that Section 2.1 A.8.d.ii be modified allow a short time period (5 minutes) to allow for typical operating differential pressure ranges that are a function of demand for output and changes in blends of fuels. *No change; the pressure drop indicator is measured daily. The excursion level is accurately identified to all for fluctuations within a normal operating range not to exceed the excursion level.* Your clarification is requested. Our understanding of the term “normal operating range” in your response excludes conditions that are not generated as part of the baghouse PM removal operation. For example, on-line bag air pulse cleaning can cause pressure spikes when pressurized air is purposely injected into the bags to remove ash accumulation from the filterbag surface. Differential pressure spikes caused by air pulse cleaning are not indicative of excessive PM loading. *The specific monitoring required by this permit condition allows the Permittee to establish “when” the monitoring is to be completed. Section 2.1 A.8 requires that the pressure differential be monitored and recorded once daily. The allowance for spikes during cleaning are built into this requirement. It is expected that the Permittee will, while taking this weekly reading, record such conditions that may have been present that would have caused an exceedance of the permit requirement and any actions to correct those conditions. The official daily reading can then be properly recorded. These records reflect “normal operation.”*
16. We believe that the purpose of the CAM plan is to establish a primary and secondary indicator, and then use the secondary indicator IF the primary goes outside the monitoring range to determine that the unit is still operating properly; thus providing a reasonable assurance of compliance. We request that the recordkeeping requirement (Section 2.1 A.8.e) be modified to reflect that reporting be only required for all instances of deviations involving excursions above both of the identified CAM plan indicators. *No change; CAM is not written to include a primary and secondary indicator as suggested. Each parameter is required to be monitored and recorded separately. In the case where only one indicator is required, the Permittee has adequately correlated the indicator range to the emission standard. In this case, opacity and pressure drop are good performance indicators of a properly operating control device. However, a direct correlation has not been established. Any excursions recorded are not considered deviations or violations of any standard. Excessive excursions (those that fall outside the levels set in the CAM plan) will require that the Permittee revisit what is “normal” for the proper operation of the control equipment. A QIP would be required to be submitted at that point. The QIP allows the Permittee to adjust the CAM plan requirements to assure that the control equipment is operating in a manner that provides reasonable assurance that the respective emission limit is not being exceeded prior to an actual violation of the standard.* Thank you.
17. Based on the permit language in the General Condition of Excess Emissions (I.A), it is our understanding that because the Southport facility is covered under an NSPS for NO_x, SO₂, and PM emissions, we are required to report its excess emissions via our quarterly reports only. Southport is NOT subject to the verbal next day notifications and written reports within 2 and 15 days as required for facilities NOT covered by NSPS. *Yes, the NSPS is specific concerning what is “reportable” in the quarterly reports. However, for any standard that is NOT NSPS (even if the pollutant is the same) and for excess emissions not occurring during start-up and shut-down these events reported as per the prompt reporting requirements under 2D .0535 (not waiting until the quarterly report and addressing them at that time).* Thank you.

18. Under excess emissions reporting, it has been our practice to report the excess emissions in our quarterly report but classify those excess emissions events that were the result of an unavoidable condition during start-up and shut-down as unavoidable per the conditions of 15A NCAC 2D .0535(g). The quarterly reports submitted would state no excess emissions, but reveal those conditions where excess emissions occurred but were not classified as a deviation based on unavoidable conditions. If we make a determination of unavoidable, because there are no specified agency reporting requirements for written justification of this determination, we plan to generate the excess emissions documentation internally and provide the information upon request. *It should be noted that the General Condition language has been modified to read “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.” Furthermore, it would appear with the current federal and state enforceable language that applicants would seek to obtain formal, prompt, Director concurrence that emissions were unavoidable as excess emissions that do not occur during start-up or shut-down are considered violations. DAQ would discourage the use of a quarterly report with the applicant making a determination that the emissions are unavoidable but work with the regional office to set up a more formal approach for making these determinations.* Thank you. In our request we were looking to minimize and streamline the reporting requirement for us and the NCDENR Division of Air Quality. Your point regarding concurrence with the Director is important to properly classify the compliance status of “unavoidable” emissions should such emissions occur during start-up and shut-down conditions.
19. We believe that General Condition K should be modified to six months, consistent with the change requested earlier. *No change; 15A NCAC 2Q .0513(b) requires that permit renewal applications be submitted no later than nine months prior to expiration.* Thank you – we were not aware of the time change from six to nine months change per the regulation you cited.
20. Review of 15A NCAC 2Q .0508(f) does not appear to parallel what it stated in General Condition LL. It says that the Permittee is to submit reports of any required monitoring at least every six months. It goes on to discuss reporting malfunction/upset conditions. Please clarify what the Agency is requesting. Do you mean this to apply to equipment that is shutdown for an extended period of time; not everyday non-operating time? *This condition was designed to handle instances when an applicant did not have a record because the equipment was not operating. The DAQ could not ascertain if the applicant did not monitor or keep records because the equipment was not operating or if the applicant simply did not conduct required monitoring and recordkeeping during the monitoring period. The Permittee provided specific sources such as boilers and ancillary sources that may require these kinds of records. The applicant was concerned that DAQ required “start and stop” records for each piece of equipment. This is not the case as the applicant should simply, during the monitoring period as specified in the permit, conduct monitoring at sometime during the monitoring period or do not conduct the monitoring and note the equipment is not operating as required by General Condition LL.* Thank you.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina is a state/program within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WIRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WIRO's recommendation to issue the renewed air permit.