



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

Michael F. Easley, Governor

William G. Ross, Jr., Secretary  
B. Keith Overcash, P.E.,  
Director

August 7, 2007

Mr. Ron Walls  
Plant Manager  
Georgia-Pacific Chemicals, LLC  
Post Office Box 268  
Conway, North Carolina 27820

Dear Mr. Walls:

**SUBJECT: Air Quality Permit No. 04243T21  
Facility ID: 05/66/00016  
Georgia-Pacific Chemicals, LLC  
Conway  
Northampton County  
Fee Class: Title V**

In accordance with your completed Air Quality Permit Application 6600016.06C for a 2Q .0515 minor modification of a Title V permit received November 22, 2006, and an application for a name change received November 29, 2006 and consolidated into Permit Application 6600016.06C, we are forwarding herewith Air Quality Permit No. 04243T21 to Georgia-Pacific Chemicals, LLC, 200 Ampac Road, Conway, 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 of Part I. **The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.**

**These emission source(s) and/or control device(s) (ID No(s). ES-B1 and B2) are authorized under a Part II as a minor modification per 15 A NCAC 2Q .0515. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected Part I terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on May 7, 2006. Until this date, the affected Part I permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 2Q .0515(f).**

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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. Ron Walls  
August 7, 2007  
Page 2

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.

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 August 7, 2007 until February 28, 2008, 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. Wallace Pitts at (919) 715-1060

Sincerely yours,

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

Enclosure

c: Raleigh Regional Office  
Central Files, Northampton County

Gregg Worley, EPA Region 4 (permit only)

ATTACHMENT

Insignificant Activities under 2Q .0503(8)

Insignificant Activity Number	Emission Source I.D.	Emission Source Description
I-1		Dowtherm heater
I-2		container filling
I-3		Truck loading resin racks Nos. 1, 2, 3, 5, and 6
I-4		Truck/railcar unloading resin rack No. 7
I-5		Dispenser racks Nos. D1, M1, M3, and 4 including truck fuel diesel oil, distillate No. 2; Truck/railcar unloading of methanol and formaldehyde solution; truck unloading of spray dry material; and railcar unloading of urea raw material.
I-6		Two extended storage silos
I-7		granular area screw conveyor unloading
ICT1, ICT2, ISD1v ISD2		four PF resin tanks , 27,678 gallons each
I-H1		hexamine tank, 12,500 gallons
IP3		phenolic resin tank, 25,075 gallons
IP4		phenolic resin tank, 25,785 gallons
IP14		phenolic resin tank, 22,548 gallons
IP19, IP20, IP21, IP22, IP23, IP25, IP26, and IP27		Eight phenolic resin tanks, 28,748 gallons each
IP24		phenolic resin tank, 22,386 gallons
IU1, IU2, IU3, IU4, IU5, and IU 9		UF resin tanks, 22,347 gallons each
IU6 and IU10		UF resin tanks, 27,678 gallons each
IU7		UF resin tank, 21,039 gallons
IU8		27, 480 gallons
IWW1 and IP28		process water tanks, 27,678 gallons each
IR9		process water tank 29,000gallons

Changes made to Permit 04243T20 and incorporated into Permit 04243T21

Old page	New Page	Part	Section	Change
all	all	all	all	Revised dates, page numbers, etc. to reflect new permit number and issue date.
4	4-5	I	2.1 Equipment Table	Changed ES-11 to ES-11.1 and ES-11.2 for consistency with ESM. Deleted ES-11b and added new bin filters CD-11.1 and CD-11.2. Added footnote to equipment denoting addition of CD-11.1 and CD-11.2 as Part II with associated caveats concerning Permit Shield, etc.
9	9-10	I	2.1 C	Administratively changed control devices for Urea Hoppers from bagfilters to bin filters (prior permit modification: see Table 1 in Part II).
10	11-12	I	2.1 D	Added new section with the extender silos and associated vent filters. Added applicability of 15A NCAC 2D .0515 and 15A NCAC 2D .0521.
27	30	II	1	Added Table 3 with the new bin filters (CD-11.1 and CD-11.2).
28	31	II	2.8	Added section 2.8 to reflect new bin filters for extender storage.

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



## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
4243T21	4243T20	August 7, 2007	February 28, 2008

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 (15A NCAC), 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:** **Georgia-Pacific Chemicals, LLC**  
**Facility ID:** **05/66/00016**

**Facility Site Location:** **200 Ampac Road**  
**City, County, State, Zip:** **Conway, Northampton County, North Carolina 27820**

**Mailing Address:** **Post Office Box 368**  
**City, State, Zip:** **Conway, North Carolina 27820**

**Application Number:** **6600016.06C**  
**Complete Application Date:** **November 6, 2006**  
**Primary SIC Code:** **2821**  
**Division of Air Quality,** **Raleigh Regional Office**  
**Regional Office Address:** **3800 Barrett Drive, Suite 101**  
**Raleigh, North Carolina 27609**

Permit issued this the 7<sup>th</sup> day of August, 2007

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

Table Of Contents

**PART I**

SECTION 1: PERMITTED EMISSION SOURCE(S) AND ASSOCIATED  
AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

SECTION 2: SPECIFIC LIMITATIONS AND CONDITIONS

2.1- Emission Source(s) Specific Limitations and Conditions  
(Including specific requirements, testing, monitoring, recordkeeping, and  
reporting requirements)

2.2- Multiple Emission Source(s) Specific Limitations and Conditions  
(Including specific requirements, testing, monitoring, recordkeeping, and  
reporting requirements)

2.3- Reopen for Cause Condition

SECTION 3: GENERAL PERMIT CONDITIONS

ATTACHMENT

List of Acronyms

**PART II**

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

SECTION 2: SPECIFIC LIMITATIONS AND CONDITIONS

SECTION 3: GENERAL PERMIT CONDITIONS

# PART I

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 Part I of this permit unless otherwise specified.

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

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

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

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES-B1 <sup>6</sup> NSPS, MACT	Natural gas/propane-fired firetube boiler (25.1 million Btu per hour heat input)	NA	NA
ES-B2 <sup>6</sup> NSPS	Natural gas/propane/diesel temporary boiler (less than 25 million Btu per hour heat input)	NA	NA
NESHAP 000 ES4  NESHAP 000 S13 <sup>1</sup>  AOS <sup>2</sup> NESHAP G sv1 ES3M1  ACS <sup>2</sup> NESHAP GSV2 ACS <sup>2</sup> NESHAP GSV1 ES7F1 through ES7F8 <sup>1</sup>  ACS <sup>2</sup> NESHAP G sv1 VS4A.1	Resin manufacturing with seven kettles (ES4.1 through ES4.7), five weigh tanks (ES4.9 through ES4.13), and an acetone scrubber (ES4.14), used only during manufacturing of batches containing acetone for Kettle No. 8 (ES4.8)  Non reactor process vessel; 9,924 gallon capacity  Methanol storage tank M1; 507,852 gallons capacity  up to eight formaldehyde storage tanks (POS; 26,212 gallons each)  up to eight methanol storage tanks (AOS; 26,212 gallons each)  process vent under AOS <sup>3</sup> of combined storage tank and resin manufacture	CD4A	Natural gas/propane-fired thermal oxidizer (2.9 million Btu per hour heat input)

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
PCS <sup>2</sup> NESHAP OOO VS4A.2	process vent under POS <sup>3</sup> of combined reactor and non reactor vessels		
NESHAP ES-2  PCS <sup>2</sup> NESHAP GSV2  PCS <sup>2</sup> NESHAP G sv1 VS2A.1  ACS <sup>2</sup> NESHAP OOO VS2A.2	Formaldehyde production process (vaporizers, super heaters, catalytic converters, cooling systems, after cooler and absorber)  up to eight formaldehyde storage tanks (POS; 26,212 gallons each)  process vent under POS <sup>3</sup> of combined storage tank and formaldehyde production  process vent under AOS <sup>3</sup> of formaldehyde production alone	CD-2A	Natural gas/propane-fired catalytic incinerator (4.5 cubic feet of catalyst, 4.0 million Btu per hour heat input primary burner)
ES-5	Spray dry resin manufacturing (including No. 2 fuel oil/propane/natural gas fired 14.6 million Btu per hour heat input atomizing air heater)	CD-5A and CD-5B	Two bagfilters in series (18,600 and 1,000 square feet of filter area, respectively)
NESHAP ESR1, ESR2, ESR5, and ESR10	Four phenol storage tanks (22,500 gallons capacity each)	NA	NA
NESHAP G sv2 ES-6	Tank ID Nos.: R-5 and R-10, 22,548 gallons each, (ES-6.1 and ES-6.2)	NA	NA
NESHAP ES-8	urea-formaldehyde concentrate (UFC) storage tank (22,500 gallons)	NA	NA
ES-11.1 ES-11.2	Two extender silos	CD-11.1 <sup>7</sup> CD-11.2 <sup>7</sup>	Two bin vent filters (four cartridge filters per bin, 100 square feet each cartridge filter)
ES-GEN1 <sup>4</sup> and ES-GEN23	Two diesel-fired generators (4.87 mmBtu/hr and 4.75 MMBTU/hr, respectively)	NA	NA

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-UH-K3 ES-UH-K8	Two urea hoppers for reactors #3 and #8, respectively	CD-K3-BV1 <sup>5</sup> CD-K3-BV2 <sup>5</sup>	CAMCORP Bin Vent filter (378 square feet of filter area, each)

1. These sources (ID Nos. S13, and ES7F1 through ES7F8 ) are listed as a 502(b)(10) changes per NCAC 2Q .0523. The permit shield described in General Condition R does not apply.
2. PCS=Primary Complinace Scenario, ACS=Alternate Compliance Scenario
3. POS=Primary Operating Scenario, AOS=Alternate Operating Scenario
4. This emission source (ID No. GEN1) marked with asterisks is listed as a significant change per NCAC 2Q .0501(c)(2). The permit shield described in General Condition R does not apply.
5. These emission source(s) and/or control device(s) (ID Nos. K3-BV1 and K3-BV2) are listed as a 502(b)(10) change per NCAC 2Q .0523. The permit shield described in General Condition R does not apply.
6. These emission source(s) and/or control device(s) (ID No(s). ES-XX) are listed as a minor modification per 15 A NCAC 2Q .0515. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected Part I terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on May 8, 2006. Until this date, the affected Part I permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 2Q .0515(f).
7. These emission source(s) and/or control device(s) (ID No(s). CD-11.1 and CD-11.2) are authorized under Part II as a minor modification per 15 A NCAC 2Q .0515. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected Part I terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on July 30, 2007. Until this date, the affected Part I permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 2Q .0515(f).

## SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

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

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

- A. Natural gas/propane-fired boiler (ID No. ES-B1)  
Natural gas/propane/diesel-fired temporary boiler (ID No. ES-B2)**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	E = 0.47 pounds per million Btu heat input	15A NCAC 2D .0503
sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
sulfur dioxide*	fuel oil sulfur content limit of 0.5 percent	2D .0524 (Subpart Dc )
visible emissions	20 percent opacity	15A NCAC 2D .0521
HAP*	180 days of operation	15A NCAC 2D .1111

\*Applies to temporary boiler (ID No. ES-B2) only

**1. 15A NCAC 2D .0524: NSPS 40 CFR PART 60 SUBPART Dc**

- a. 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. (Only applies to ID No. ES-B2)The maximum sulfur content of any fuel oil received and burned in the boiler shall not exceed 0.5 percent by weight.

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

- c. 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). 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)]

- d. 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 each fuel fired during 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)]

- e. 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. a summary report , acceptable to the Regional Air Quality Supervisor, of the sulfur content of the distillate fuel oil fired during the 180 days the temporary boiler is allowed to operate (see 2.1.A. 5) 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.  
ii. All instances of deviations from the requirements of this permit must be clearly identified.

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

- a. Emissions of particulate matter from the combustion of No. 2 fuel oil that are discharged from this source into the atmosphere shall not exceed 0.47 pounds per million Btu heat input. [15A NCAC 2D .0503(a)]

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

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. 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.  
c. No monitoring, recordkeeping, or reporting is required for particulate emissions from the firing of No. 2 fuel oil in these boilers.

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

- a. Emissions of sulfur dioxide from this source 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 found in Section 3. 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/Reporting** [15A NCAC 2Q .0508(f)]

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

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

- a. Visible emissions from this No. 2 fuel oil-fired boiler (**ID No. ES-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 A. 3. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 2D .0521.

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

- c. No monitoring, recordkeeping, or reporting is required for visible emissions from the firing of No. 2 fuel oil in this boiler.

**5. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

- a. For the temporary boiler (ID No. ES-B2), the Permittee shall operate the boiler such that it meets the definition of “temporary boiler” contained in 40 CFR 63.7575. By meeting this definition the facility avoids the applicability of Subpart DDDDD, National Emission Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters as per 63.7491(n).

**Operating Limitations**

- b. The temporary boiler must not remain at a location for more than 180 consecutive days following commencement of operation in order to be considered a temporary boiler. Any temporary boiler that replaces a temporary boiler at a location and is intended to perform the same or similar function will be included in calculating the consecutive time period. Operating at a location for more than 180 consecutive days without first obtaining a permit containing stipulations sufficient to bring the boiler into compliance with Subpart DDDDD will be a violation of 15A NCAC 2D .1111.

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

- c. For compliance purposes, the Permittee shall maintain a record of the days of operation of the temporary boiler in a log (written or electronic format). These records shall be kept onsite and made available to DAQ personnel upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1111 if records of days of operation are not maintained

**B. Two No. 2 fuel oil-fired generators (ID No. ES-GEN1 and ES-GEN2)**

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

<b>Regulated Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
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	less than 40 tons per year ( <b>ID No. GEN1</b> )	15A NCAC 2Q .0317
nitrogen oxides	less than 40 tons per year ( <b>ID No. GEN2</b> )	15A NCAC 2Q .0317

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

- a. Emissions of sulfur dioxide from these generators 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 found in Section 3. 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, or reporting is required for sulfur dioxide emissions from the firing of No. 2 fuel oil in these generators.

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

- a. Visible emissions from these No. 2 fuel oil-fired generators (**ID Nos. ES-GEN1\*\* and ES-GEN2**) 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/Recordkeeping/Reporting** [15A NCAC 2Q .0508(f)]

- c. No monitoring, recordkeeping, or reporting is required for visible emissions from the firing of No. 2 fuel oil in these generators.

**3. 15A NCAC 2Q .0317: AVOIDANCE CONDITIONS for LIMITATION TO AVOID 15A NCAC 2D .0530 "PREVENTION OF SIGNIFICANT DETERIORATION" - To comply with this permit and avoid the applicability of 15A NCAC 2D .0530, "Prevention of Significant Deterioration," as requested by the Permittee, nitrogen oxide emissions from the generator (**ID No. ES-GEN1**) shall be less than forty (40) tons per consecutive twelve (12) month period.**

- a. To ensure enforceability of this limit, the following restrictions shall apply:
- The annual hours of operation shall not exceed 1000 hours.
- b. For compliance purposes, the Permittee shall maintain a monthly record of the hours of operation in a log (written or electronic format). These records shall be kept onsite and made available to DAQ personnel upon request.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if records of hours of operation are not maintained.

**4. 15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS for LIMITATION TO AVOID 15A NCAC 2D .0530 "PREVENTION OF SIGNIFICANT DETERIORATION"** - To comply with this permit and avoid the applicability of 15A NCAC 2D .0530, "Prevention of Significant Deterioration," as requested by the Permittee, nitrogen oxide emissions from the generator (**ID No. ES-GEN2**) shall be less than forty (40) tons per consecutive twelve (12) month period.

- a. To ensure enforceability of this limit, the following restrictions shall apply:
  - i. The annual hours of operation shall not exceed 1000 hours.
- b. For compliance purposes, the Permittee shall maintain a monthly record of the hours of operation in a log (written or electronic format). These records shall be kept onsite and made available to DAQ personnel upon request.

The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0530 if records of hours of operation are not maintained.

**C. Urea Hopper (ID No. ES-UH-K3) for Reactor #3 with associated bin vent filter (ID No. K3-BV1)  
Urea Hopper (ID No. ES-UH-K8) for Reactor #8 with associated bin vent filter (ID No. K8-BV1)**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	E = 35.43 pounds per hour for ES-UH-K3	15A NCAC 2D .0515
visible emissions	20 percent opacity	15A NCAC 2D .0521

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

- a. Emissions of particulate matter from each of these emission 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 be performed 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/Recordkeeping** [15A NCAC 2Q .0508(f)]

- c. Particulate matter emissions from the urea hoppers (ID Nos. ES-UH-K3 and ES-UH-K8) shall be controlled by vent filters. 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. a monthly visual inspection of the system ductwork and material collection unit for leaks; and
  - ii. an annual (for each 12 month period following the initial inspection) internal inspection of the vent filters structural integrity.

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

- d. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. the results of any maintenance performed on the vent filters; and
  - 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 these 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 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 urea hoppers (ID Nos. ES-UH-K3 and ES-UH-K8) 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. 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 Permittee shall establish Anormal≅ for the source in the first 30 days following operation. 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.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 logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook 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. Extender Silos (ID No. ES-11.1 and ES-11.2) with associated bin vent filters (ID No. CD-11.1 and CD-11.2)**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	E = 16.32 pounds per hour for ES-11.1 E = 16.32 pounds per hour for ES-11.2	15A NCAC 2D .0515
visible emissions	20 percent opacity	15A NCAC 2D .0521

\* These emission source(s) and/or control device(s) (ID No(s). CD-11.1, and CD-11.2) are authorized under a Part II as a minor modification per 15 A NCAC 2Q .0515. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected Part I terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on July 30, 2007. Until this date, the affected Part I permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 2Q .0515(f).

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

- a. Emissions of particulate matter from each of these emission 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 be performed 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 .0515.

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

- c. Particulate matter emissions from the extender silos (ES-11.2 and ES-11.2)] shall be controlled by the vent filters. 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. a monthly visual inspection of the system ductwork and material collection unit for leaks; and
  - ii. an annual (for each 12 month period following the initial inspection) internal inspection of the vent filter's structural integrity.
- The Permittee shall be deemed in noncompliance with 15A NCAC 2D .0515 if the ductwork and vent filter's are not inspected and maintained.
- d. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. the date and time of each recorded action;
  - ii. the results of each inspection;
  - iii. the results of any maintenance performed on the vent filter's; and

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 these records are not maintained.

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

- e. The Permittee shall submit the results of any maintenance performed on the vent filters within 30 days 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 extender silos (ID Nos. ES-11.1 and ES-11.2) 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. 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 Permittee shall establish Anormal≅ for the source in the first 30 days following operation of the vent filter. 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.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 logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook 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. PCS-Vent Stream (ID No. VS2A) 98 consisting of :  
 formaldehyde processes (ID No (ES2)-HON group 1 process vent,  
 methanol/formaldehyde storage tanks (ID Nos. ES7F1 through ES7F8)-HON group 1/2 storage tanks, &  
 methanol storage tank (ID No. ES3M1)-HON group 1 storage tank.
- ACS-Vent Stream (ID No. VS2A) 98 consisting of :  
 formaldehyde processes (ID No (ES2)-HON group 1 process vent
- ACS-Vent Stream (ID No. VS4A)95 consisting of :  
 resin manufacturing kettles (ID No. ES4)-MACT OOO reactor vessels  
 mix/blend tank (ID No. S13)- MACT OOO non reactor vessel  
 methanol/formaldehyde storage tanks (ID Nos. ES7F1 through ES7F8)-HON group 1/2 storage tanks  
 methanol storage tank (ID No. ES3M1)-HON group 1 storage tank

The following provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
HAPs	98% reduction organic HAP or reduction to 20 ppmv - for Group 1 process vent under PCS-VS2A and ACS-VS2A	40 CFR 63.113
HAPs	<i>POS- Storage tanks F1 through F8, each solely storing formaldehyde: No limits or standards apply</i>  <i>AOS- Storage tanks F1 through F8, <u>any</u> tank used for methanol storage and combined vent streams with these emission sources Vent to control device capable of achieving 95% organic HAP</i>	40 CFR 63.119
HAPs	Vent via closed vent system to control device achieving 95% organic HAP reduction for group 1 storage vessels under ACS-VS4A	40 CFR 63.119
HAPs - equipment leaks from formaldehyde production process	Implement equipment leak detection and repair program	40 CFR 63 Subpart H
HAPs- formaldehyde loading operations	No limits or standards apply	40 CFR 63.126

### 1. 40 CFR 63.113: CONTROL REQUIREMENTS FOR HAZARDOUS AIR POLLUTANTS FROM PROCESS VENTS

- a. Hazardous air pollutant emissions must be reduced either by 98 weight percent or to 20 parts per million (by volume)

#### Testing

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.2 A. 1. a. above, the Permittee shall be deemed in noncompliance with 40 CFR 63.113.

**Monitoring**

- c. The Permittee shall monitor the temperature upstream and downstream of the catalytic oxidizer catalyst bed in accordance with 63.114(a)(1)(iii). The Permittee shall be deemed in noncompliance with 40 CFR 63.113 if catalyst bed temperatures are not monitored.

**Recordkeeping/Reporting Requirements**

- d. In accordance with 63.118, the following recordkeeping and reporting requirements apply:
  - i. Record upstream and downstream temperatures and temperature difference across the catalyst bed, averaged over the full period of the initial performance test, as reported in the notification of compliance status. The minimum daily averages may be revised to reflect the most recent compliance test.
  - ii. Record the daily average operating temperature and temperature difference across the catalyst bed for each operating day.
  - iii. Report all daily average upstream and daily average temperatures across the catalyst bed that are outside the established temperatures established under Section 2.2.A.1.d.1. above.
  - iv. Report all days when available monitoring data does not meet the requirements of 40 CFR 63.118. The Permittee shall be deemed in noncompliance with 40 CFR 63.113 if the above temperature records are not maintained and reported.

**2. 40 CFR 63.119: CONTROL REQUIREMENTS FOR HAZARDOUS AIR POLLUTANTS FROM FORMALDEHYDE/METHANOL STORAGE TANKS (ID No. ES7F1 through ES7F8)**

**POS: Storage tanks (ID Nos. ES7F1 through ES7F8), any storing formaldehyde:**

- a. No control is required because these tanks are classified Group 2 under the rule.

**POS - Recordkeeping/Reporting Requirements**

- b. Pursuant to HON [40 CFR 63.119], the Permittee shall maintain a list of tanks, recording the tanks dimensions and capacity. The Permittee shall be deemed in noncompliance with 40 CFR 63.119 if records of tank dimensions and capacity are not maintained.

**AOS: Storage tanks (ID No. ES-7(ID Nos. ES7F1 through ES7F8), any storing methanol**

- c. When any of the tanks are used for methanol storage, each of the tanks are classified as Group 1 under the rule and must be routed to the control device capable to achieve organic HAP emission reduction by 95 weight percent.

**AOS - Recordkeeping/Reporting Requirements**

- d. The Permittee shall maintain records indicating any time that the storage tanks (ID No. ES7F1 through ES7F8) are used for methanol storage. When the methanol is stored in these tanks the Permittee shall maintain records indicating any time that vent streams from tanks storage are not being routed to the thermal oxidizer. The Permittee shall be deemed in noncompliance with 40 CFR 63.119 if records are not maintained. No reporting is required.

**3. 40 CFR 63.119: CONTROL REQUIREMENTS FOR HAZARDOUS AIR POLLUTANTS FROM METHANOL STORAGE TANK (ID No. ES3M1)**

- a. The methanol storage tank (ID No. ES3M1) is classified as Group 1 under the rule and must be routed to the control device to achieve organic HAP emission reduction by 95 weight percent.

**Recordkeeping/Reporting Requirements**

- b. The Permittee shall maintain records indicating any time that the vent streams from methanol storage are not being routed to either the formaldehyde process or the thermal oxidizer. The Permittee shall be deemed in noncompliance with 40 CFR 63.119 if records are not maintained. No reporting is required.

**4. 40 CFR SUBPART H: CONTROL REQUIREMENTS FOR HAZARDOUS AIR POLLUTANTS FROM EQUIPMENT LEAKS**

- a. A leak detection and repair program must be established and maintained for all subject equipment components.

**Monitoring**

- b. The Permittee shall monitor in accordance with the leak detection and repair program specified in Subpart H of 40 CFR Part 63.

**Recordkeeping/Reporting Requirements**

- c. The Permittee shall keep records and report in accordance with the leak detection and repair program specified in Subpart H of 40 CFR Part 63. The Permittee shall be deemed in noncompliance with 40 CFR Subpart H if records are not maintained.

**5. 40 CFR 63.126: CONTROL REQUIREMENTS FOR HAZARDOUS AIR POLLUTANTS FROM FORMALDEHYDE LOADING OPERATIONS**

No control is required because formaldehyde loading operations are classified as Group 2 under the rule.

**Recordkeeping/Reporting Requirements**

- b. In accordance with 63.130(f), records must be maintained to prove that total HAP liquid loaded is less than 0.65 million liters per year or that the rack-weighted average vapor pressure is less than 10.3 kilopascals. The Permittee shall be deemed in noncompliance with 40 CFR 63.126 if records are not maintained. No reporting is required.

**B. PCS-Vent Stream (ID No. VS4A) consisting of:**

**resin manufacturing kettles (ID No. ES4)-MACT OOO reactor vessels and mix/blend tank (ID No. S13)- MACT OOO non reactor vessel.**

**Resin storage (ID No. ES6)**

**UFC tank storage (ID No. ES8)**

**Phenol storage tanks and unloading operations (ID Nos. ESR1, ESR2, ESR5, and ESR10)**

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

EMISSION SOURCE	EMISSION LIMIT	REGULATION
Storage vessels	No control requirements	40 CFR 63.1404(a)
Reactor batch process vents and Aggregate batch process vents PCS-VS4A	83 percent by weight HAP reduction or 20 ppmv	40 CFR 63.1406(a)(2) 40 CFR 63.1408(a)(2)
Non-reactor batch process vents	62 percent by weight HAP reduction	40 CFR 63.1407(a)
Equipment leaks	leak detection and repair	40 CFR 63.1410

**1. 40 CFR 63 Subpart OOO - National Emission Standards for Amino/Phenolic Resins Production**

- a. For reactor batch process vents and aggregate batch process vents, the Permittee shall comply with 40 CFR 63.1406 and 63.1408. Pursuant to 40 CFR 63.1408(a)(2)(ii), the Permittee shall either reduce organic HAP emissions for the batch cycle by 83 weight percent or 20 ppmv using a control device from the combined vent stream.
- b. For non reactor batch process vents and aggregate non reactor batch process vents, the Permittee shall comply with 40 CFR 63.1407. Pursuant to 40 CFR 63.1407(a), the Permittee shall reduce non reactor batch organic HAP emissions by 62 weight percent using control device or control technology, or vent all organic HAP emission to a flare if a non reactor batch process vent or combined vent stream can emit 500 pounds or more per year uncontrolled.

**Testing** [40 CFR 63.1413 and 63.1414]

- c. For each emission point, the Permittee shall meet three stages of compliance, with exceptions specified in Subpart OOO. First, the Permittee shall conduct a performance test or design evaluation to demonstrate the performance of the control device or control technology being used. Second, the Permittee shall meet the requirements for demonstrating initial compliance. Third, the Permittee shall meet the requirements for demonstrating continuous compliance through some form of monitoring.
  - i. Performance testing shall be conducted in accordance with the General Provisions at 63.7(a)(1), (a)(3), (d), (e)(1), (e)(2), (e)(4), (g), and (h), with exceptions specified in 63.1413(a)(1). Pursuant to 40 CFR 63.1413(a)(4), the Permittee with a control device that has one or more parameter monitoring level requirement, shall establish a maximum or minimum level, as denoted in Table 4 of Subpart OOO, for each measured parameter using the procedures specified in 63.1413(a)(4)(i) or (ii). Except as otherwise provided in Subpart OOO, the Permittee shall operate control devices such that the daily average, batch cycle daily average, or block average of monitored parameters remains above the minimum level or below the maximum level, as appropriate.
  - ii. When required to conduct a performance test, the Permittee shall use the test methods specified in 63.1414(a)(1) through (6), except where another Section of Subpart OOO requires either the use of a specific test method or the use of requirements in another Subpart.

**Monitoring** [40 CFR 63.1410]

- d. *Equipment leak provisions* - The Permittee of each affected source shall comply with the requirements of 40 CFR 63, Subpart UU (National Emission Standards for Equipment Leaks (control level 2)) for all equipment, as defined under 63.1402, that contains or contacts 5 weight percent HAP or greater and operates 300 hours per year or more. The weight percent HAP is determined for equipment using the organic HAP concentration measurement methods specified in 63.1414(a).
- e. The Permittee of an emission point located at an affected source that uses a control device to comply with the requirements of Subpart OOO and has one or more parameter monitoring level requirement specified under Subpart OOO shall install the monitoring equipment specified in 63.1415(b) in order to demonstrate continuous compliance with Subpart OOO. All monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturer's specifications or other written procedures that provide adequate assurance that the equipment would reasonably be expected to monitor accurately.
  - i. This monitoring equipment shall be in operation at all times when organic HAP emissions that are required to be controlled as part of complying with the emission limits specified in 63.1406, 63.1407, and 63.1408 are vented to the control device.
  - ii. The parameters to be monitored are specified in Table 3 of Subpart OOO. For a catalytic incinerator, the Permittee shall monitor the temperature upstream and downstream of the catalyst bed. For thermal incinerator, the Permittee shall monitor the firebox temperature. The Permittee shall maintain continuous records as specified in 63.1416(d).
- f. Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.
  - i. Where an incinerator other than a catalytic incinerator is used, the temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.
  - ii. Where a catalytic incinerator is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.
- g. As an alternate to 63.1417, the Permittee may install an organic monitoring device equipped with a continuous recorder. Said organic monitoring device shall meet the requirements of Performance Specifications 8 or 9 of 40 CFR 60, Appendix B, and shall be installed, calibrated, and maintained according to 63.6.
- h. The Permittee may request approval to monitor parameters other than those specified in Table 3 of Subpart OOO. The request shall be submitted according to the procedures specified in 63.1417(j).
- i. The Permittee using a vent system that contains bypass lines that could divert emissions away from a control device used to comply with the provisions of Subpart OOO shall comply with either 63.1415(d)(1) or (2). Equipment such as low leg drains, high point bleeds, analyzer vents, open-ended valves or lines, and pressure relief valves needed for safety purposes are not subject to 63.1415(d).

- j. The Permittee may use ASTM Method D6303-98 to monitor formaldehyde in the cooling water of the heat exchange systems subject to the monitoring requirements of 40 CFR 63.1409 as approved by the US EPA in a letter dated November 13, 2003.

**Recordkeeping** [40 CFR 63.1416]

- k. Data retention - Unless otherwise specified in Subpart OOO, the Permittee of an affected source shall keep copies of all applicable records and reports required by Subpart OOO for at least 5 years, as specified in 63.1416(a)(1).
- l. Start-up, Shutdown, and Malfunction - The Permittee of an affected source shall develop and implement a start-up, shutdown, and malfunction plan as specified in 63.1416(b)(1) and (2).
- m. For a batch process vent process, the Permittee shall comply with the recordkeeping requirements specified in 63.1416(d)(1), (2), and (3) as applicable. For aggregate batch vent stream processes, the Permittee shall comply with the recordkeeping requirements specified in 63.1416(e)(1), (2), and (3) as applicable.
- n. Pursuant to 63.1416(h), the Permittee may implement the recordkeeping requirements specified in 63.1416(h)(1) or (2).

The Permittee shall be deemed in noncompliance with NESHAP 40 CFR 63.1400, Subpart OOO if records are not maintained.

**Reporting** [40 CFR 63.1417]

- o. In addition to the reports and notifications required by Subpart A of 40 CFR 63 as specified in Table 1 of Subpart OOO, the Permittee of an affected source shall prepare and submit the reports listed in 63.1417(d) through (i) as applicable. All reports required by Subpart OOO and the schedule for their submittal are listed in Table 5 of Subpart OOO.

**C. Formaldehyde manufacturing (ID No. ES-2) and associated Catalytic incinerator (ID No. CD-2A), Resin manufacturing (ID No. ES-4), Spray dry resin (ID No. ES-5), Resin tank storage (ID No. ES-6), Formaldehyde tank storage (ID No. ES-7), UFC tank storage (ID No. ES-8), Phenol storage tanks and unloading operation (ID Nos. ES-R1, ES-R2, ES-R5, and ES-R10), Generators (ID Nos. ES-GEN1\*\* and ES-GEN2)**

**1. STATE-ONLY REQUIREMENT:**

**TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REPORTING REQUIREMENT -**

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

EMISSION SOURCE(S)	TOXIC AIR POLLUTANT(S)	EMISSION LIMIT(S)
Formaldehyde manufacturing (ID No. ES-2)	Formaldehyde	1.0 pounds per hour
Resin manufacturing (ID No. ES-4)	Phenol Formaldehyde	0.075 pounds per hour 0.312 pounds per hour
Spray dry resin manufacturing (ID No. ES-5)	Phenol Formaldehyde	5.31 pounds per hour 3.76 pounds per hour
Resin tank storage (ID No. ES-6)	Phenol Formaldehyde	0.26 pounds per hour 0.40 pounds per hour
Formaldehyde tank storage (ID No. ES-7)	Formaldehyde	0.28 pounds per hour
UFC tank storage (ID No. ES-8)	Formaldehyde	0.024 pounds per hour
Phenol storage tanks and unloading operation (ID Nos. ES-R1, ES-R2, ES-R5, and ES-R10)	Phenol	0.049 pounds per hour
Generators (ID Nos. ES-GEN1 and ES-GEN2)	Formaldehyde	0.004 pounds per hour

- a. To ensure compliance with the above limits, the following restrictions shall apply:
  - i. Catalytic incinerator (ID No. CD-2A) must be on-line and controlling emissions from formaldehyde manufacturing (ID No. ES-2) any time this manufacturing process is operational. Equipment operating parameters will be monitored by the continuous measuring and recording of catalyst bed temperature as discussed in 2.2.A.1.(c) and (d) above.
  - ii. Except for equipment malfunctions and maintenance, thermal oxidizer (ID No. CD-4A) shall be on-line and controlling emissions from resin manufacturing (ID No. ES-4). The thermal oxidizer will be monitored by the continuous measuring and recording of the combustion chamber temperature (minimum 1250°F). Record each day in a log those periods when emissions from resin manufacturing are discharged directly to atmosphere without being controlled by the thermal oxidizer.
  - iii. Spray dry resin manufacturing (ID No. ES-5) shall be limited to a liquid resin feed rate of 13,000 pound per hour. The Permittee shall record an average daily pounds per hour resin feed rate based on total daily pounds of resin feed processed divided by total daily operating hours.
- b. For compliance purposes, 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 following shall be reported to the Regional Supervisor, DAQ:
  - i. For formaldehyde manufacturing (ID No. ES-2), report the number of three hour periods during which the operating parameters defined in 2.2.D.1.(a)(i) above for the catalytic incinerator (ID No. CD-2A) were exceeded.
  - ii. For spray dry resin manufacturing (ID No. ES-5), report an average daily pounds per hour resin feed rate.
  - iii. For thermal oxidizer (ID No. CD-4A), provide the number of hours per month that the oxidizer was off-line and not controlling emissions from resin manufacturing (ID No. ES-4). Provide also, the total monthly operating hours of resin manufacturing.

### SECTION 3 - GENERAL CONDITIONS

This section describes terms and conditions applicable to this Title V facility. All references to the □permit□ in this section apply only to Part I of the permit.

- A. **General Provisions** [NCGS 143-215 and 15A NCAC 2Q .0508(aa)]
  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(aa)]

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)]

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(c)]

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

E. **Duty to Comply** [15A NCAC 2Q .0508(j)]

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 of Ownership or Operation [15A NCAC 2Q .0524]

The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 2Q .0524.

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. Section 502(b)(10) Changes [15A NCAC 2Q .0523(a)]

a. 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.
  - b. 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.
  - c. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
2. 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.
3. 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)(3)]

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 - any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions, but not including excess emissions as defined above.

##### Excess Emissions

1. If a source is required to report excess emissions under NSPS (15A NCAC 2D .0524), ESHAPS (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:
      - X name and location of the facility;
      - X nature and cause of the malfunction or breakdown;
      - X time when the malfunction or breakdown is first observed;
      - X expected duration; and
      - X estimated rate of emissions;
    - ii. notify the Regional Supervisor or Director immediately when corrected measures have been accomplished; and
    - iii. submit, if requested, to the Regional Supervisor or Director within 15 days after the request a written report as described in 15A NCAC 2D .0535(f)(3).

##### Permit Deviations

3. Pursuant to 15A NCAC 2Q .0508(f)(3), 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 on the next business day after becoming aware of the deviation. A written report shall be submitted within two business days to the Regional

Supervisor and shall include the probable cause of such deviation and any corrective actions or preventative actions taken. All reports of deviations from permit requirements shall be certified by a responsible official.

**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 strt-up and shut-down shall be considered a violation of the appropriate rule if the owner or operatot 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 .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(k)]**

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(n)]**

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)]

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(t)]

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. 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;
3. whether compliance was continuous or intermittent; and
4. the method(s) used for determining the compliance status of the source, currently and over the reporting 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(m)]

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(r) 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(o)]

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(n)]

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)(3)]

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(g)]**

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(h)]**

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(e)]**

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(aa)]**

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, the Permittee shall perform such testing in accordance with the appropriate EPA reference method(s) as approved by the DAQ and follow the procedures outlined below. The Permittee must request **in writing** and receive approval from the DAQ for an alternate test method or procedure.

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 certification of the test results by sampling team leader and facility representative;
  - b. 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);
  - c. 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;
  - d. all field, analytical, and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
  - e. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
  - f. 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. The use of the test results beyond the stated objectives remains subject to the approval of 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(f)]

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.

ATTACHMENT

**List of Acronyms**

<b>AOS</b>	Alternate Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>Btu</b>	British thermal unit
<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>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAPS</b>	National Emission Standards for Hazardous 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>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

## PART II

The Permittee is hereby authorized to construct air emission source(s) and associated air pollution control device(s) and appurtenances listed in Section 1, Part II of this permit, in accordance with the completed air quality permit application 6600016.04A received December 29, 2003, application 6600016.05A received June 28, 2005, and 660016.05B received November 8, 2005, including all plans, specifications, previous applications, and other supporting data, all of which are filed with the DAQ and are incorporated in Part II of this Air Quality Permit.

### SECTION 1: EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

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

Table 1

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-GEN1 <sup>1</sup>	Replace existing No. 2 fuel oil-fired generator (2.5 mmBtu/hr) with a new generator (4.87 mmBtu/hr)	NA	NA
ES-4	Kettle #8	NA	Add packed tower scrubber to kettle #8 to reduce acetone emissions to the thermal oxidizer. <sup>2</sup>
S13 <sup>3</sup>	Blend/mix tank	C4A	thermal oxidizer.
ES-UH-K3 ES-UH-K8	Two urea hoppers for reactors #3 and #8, respectively	K3-BV1 <sup>4</sup> K3-BV2 <sup>4</sup>	CAMCORP Bin Vent filter (378 square feet of filter area)

**1** This emission source (ID No. GEN1) marked with asterisks is listed as a significant change per NCAC 2Q .0501(c)(2). The permit shield described in General Condition R does not apply.

**2** This packed tower scrubber marked with asterisks is listed as an administrative modification.

**3** This is permitted as a 502(b)(10) changes per NCAC 2Q .0523. The permit shield described in General Condition R does not apply.

**4** These emission source(s) and/or control device(s) (ID Nos. ES-UH-K3 and ES-UH-K8) are listed as a 502(b)(10) change per NCAC 2Q .0523. The permit shield described in General Condition R does not apply.

Table 2: The following table contains a summary of all authorized emission sources and associated air pollution control devices and appurtenances **associated with Air Quality Permit Application 660016.05B.**

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-B1* NSPS, MACT	One natural gas/propane-fired boiler (25.1 million Btu per hour heat input)	NA	NA
ES-B2* NSPS	One natural gas/propane/diesel temporary boiler (less than 25 million Btu per hour heat input)	NA	NA

\* These emission source(s) and/or control device(s) (ID No(s). ES-B1 and B2) are authorized under a Part II as a minor modification per 15 A NCAC 2Q .0515. The compliance certification as described in General Condition P is required. Unless

otherwise notified by NC DAQ, the affected Part I terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on May 8, 2006. Until this date, the affected Part I permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 2Q .0515(f).

Table 3: The following table contains a summary of all authorized emission sources and associated air pollution control devices and appurtenances **associated with Air Quality Permit Application 660016.06C**

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES-11.1 ES-11.2	Extender silos	CD-11.1* CD-11.2*	Bin vent filters (four cartridge filters per bin, 100 square feet each cartridge filter)

\* These emission source(s) and/or control device(s) (ID No(s), CD-11.1, and CD-11.2) are authorized under a Part II as a minor modification per 15 A NCAC 2Q .0515. The compliance certification as described in General Condition P is required. Unless otherwise notified by NC DAQ, the affected Part I terms of this permit (excluding the permit shield as described General Condition R) for this source shall become final on July 30, 2007. Until this date, the affected Part I permit terms herein reflect the proposed operating language that the Permittee shall operate this source under pursuant to 15A NCAC 2Q .0515(f).

## SECTION 2: SPECIFIC LIMITATIONS AND CONDITIONS

The air emission source(s) and associated air pollution control device(s) and appurtenances listed in Section 1 are subject to the following specific terms, conditions, and limitations, including the monitoring, recordkeeping, and reporting requirements as specified herein:

- Any air emission sources or control devices authorized to construct in Section 1 must be constructed and maintained in accordance with the provisions contained herein and operated in accordance with provisions contained in Part I of this permit. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A NCAC, Subchapter 2D .0516, .0521, .0530 (avoidance) and Subchapter 2Q .0317.
- APPLICATION REQUIREMENT** - Pursuant to 15A NCAC 2Q .0501(c)(2) and 2Q .0504 the Permittee shall submit a complete Title V Air Quality Permit Application for a significant modification for the operation of the air emission source (**ID No. GEN1**) within twelve (12) months of commencing operation.
- NOTIFICATION REQUIREMENT** - This permit may be revoked unless the emission source(s) and associated air pollution control device(s) listed in Section 1 are constructed in accordance with the approved plans, specifications, and other supporting data. Within 15 days after start up of the new or modified facilities, the Permittee shall provide written notice of the start up to the Regional Supervisor, DAQ.
- The air emission sources or control devices authorized to construct in Section 1 (ID Nos. ES-UH-K3 and ES-UH-K8 ) must be constructed and maintained in accordance with the provisions contained herein and operated in accordance with provisions contained in Part I of this permit. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A NCAC, Subchapter 2D .0515 and 2D .0521.
- NOTIFICATION REQUIREMENT** – (For control devices ID Nos. ES-UH-K3 and ES-UH-K8) In accordance with 15A NCAC 2Q .0523(a)(1)(C), the **Permittee** shall notify the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street, Atlanta, GA 30303) **in writing** at least seven days before the change is made. The written notification shall include:
  - a description of the change at the facility;
  - the date on which the change will occur;
  - any change in emissions; and
  - any permit term or condition that is no longer applicable as a result of the change.

If the proposed operational date of October 1, 2005 is not met, a revised permit is not needed. However, within 15 days after the proposed operational date is not met, the Permittee shall notify in **writing** the Regional Supervisor of the new proposed operational date. Any existing equipment being replaced is permitted to operate in compliance until the replacement equipment is operational

6. **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, submitted on June 28, 2005, is true, accurate, and complete.

7. a. **15A NCAC 2D .0524: NEW SOURCE PERFORMANCE STANDARDS** – For ID Nos. ES-B1 and B2, 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."

b. **NSPS PERFORMANCE TESTING** - As required by 15A NCAC 2D .0524, the following initial performance test for sulfur dioxide from distillate oil combustion shall be conducted for ID No. ES-B2: The initial performance test shall consist of the fuel supplier certification as described in condition 2.1(A)(4)(e)(i) in Part I of this permit as allowed under 40 CFR § 60.44c(h).

c. **NSPS REQUIREMENTS** - In addition to any other 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. the date construction (40 CFR § 60.7) or reconstruction (40 CFR § 60.15) of an affected facility is commenced, postmarked no later than 30 days after such date;

The report (as described in condition 2.1(A)(1)(e)(i) in Part I of this permit) shall be postmarked by the 30th day of the month following the completion of the temporary boiler's (ID No. ES-B2) operation.

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

8. The air emission sources or control devices authorized to construct in Section 1 (ID Nos. CD-11.1 and CD-11.2 ) must be constructed and maintained in accordance with the provisions contained herein and operated in accordance with provisions contained in Part I of this permit. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A NCAC, Subchapter 2D .0515 and 2D .0521.

## **SECTION 3: GENERAL CONDITIONS:**

This section describes terms and conditions applicable to the construction of the air emission source(s) and associated air pollution control device(s) listed in Section 1 and State-only emission sources listed in Part I of the permit. Unless otherwise specified herein all references to the “permit” in this section apply only to Part II of the permit.

### **A. Operating Conditions**

All operating conditions for the air emission source(s) and associated air pollution control device(s) listed in Section 1 are under Part I of this permit.

### **B. General Provisions**

1. This permit is nontransferable by the Permittee. Future owners and operators must obtain a new Air Quality Permit from the DAQ.
2. This issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of state law which have occurred prior to the issuance date of this permit.
3. A violation of any term or condition of Part II of this permit shall subject the Permittee to enforcement pursuant to NCGS 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.

### **C. Submissions (reports, test data, monitoring data, notifications, and requests for renewal)**

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.

### **D. Part II Renewal Request**

The Permittee shall request renewal of the emission source(s) and associated air pollution control device(s) listed in Section 1 at the same time as specified in Part I, Section 3 - General Condition K of this permit.

### **E. Annual Fee Payment**

The Permittee shall pay all fees in accordance with 15A NCAC 2Q .0200 and in conjunction with Part I, Section 3 - General Condition W of this Air Quality Permit.

### **F. 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:

1. changes in the information submitted in the application;
2. changes that modify equipment or processes; or
3. 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.

### **G. Termination, Modification, and Revocation of the Permit**

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; or
4. 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.

H. **Inspection and Entry**

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:

1. 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;
2. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
3. 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
4. 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.

I. **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.