

Air Permit Review

Permit Issue Date: **date, 2007**

Region: Raleigh Regional Office
County: Wilson
NC Facility ID: 9800202
Inspector's Name: Will Wike
Date of Last Inspection: 06/13/2007
Compliance Code: 3/In Compliance - Inspection

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Alliance One International Company, Inc. - Cut Rag Facility</p> <p>Facility Address: Alliance One International Company, Inc. - Cut Rag Facility 605 S. Tarboro Street Annex Wilson, NC 27894</p> <p>SIC: 2141 / Tobacco Stemming And Redrying NAICS: 31221 / Tobacco Stemming and Redrying</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: 15A NCAC 2D .0516 NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 9800202.07A Date Received: 08/14/2007 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08687/T06 Existing Permit Issue Date: 07/19/2005 Existing Permit Expiration Date: 07/31/2008</p>
Jimmy Carpenter Plant Manager (252) 246-0333 605 S. Tarboro Street Annex Wilson NC, 27894-1929	William Lloyd Senior Vice President (252) 753-8000 PO Box 166 Farmville NC, 27828-0166	Terry Koonce Regional Purchasing Manager (252) 753-8000 P.O. Box 166 Farmville NC, 27828-0166	
<p>Review Engineer: Mark Cuilla</p> <p>Review Engineer's Signature: Date: date, 2007</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 08687/T07 Permit Issue Date: date, 2007 Permit Expiration Date: date, 2012</p>	

I. Purpose of Application

The existing Title V permit (**08687T06**) was issued on **July 19, 2005**, and is currently scheduled to expire on **July 31, 2008**. The renewal application was received on **August 14, 2007**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

II. Facility Description

The facility processes tobacco for cigarette manufacturing. Tobacco strips and stems are received for processing and sold to end users for manufacturing cigarette products. The facility consists of a cut rag process line consisting of a series of handling, drying, separating, casing, cutting, topdressing, and packaging equipment. An additional line is also available for the addition of specialty flavorings. The facility has one natural gas and No. 2 fuel oil-fired boiler for process steam.

III. History/Background/Application Chronology

August 20, 2003 – Permit **08687T05** issued as a first time title V permit.

July 19, 2005 – Permit **08687T06** issued as an ownership/name change.

August 14, 2007 – Permit application **9800202.07A** received as a title V renewal application. Application was deemed complete for processing.

September 5, 2007 – DRAFT permit sent to Permittee, Title V Coordinator, and Regional Office for comment prior to the public notice and EPA review periods.

Date, 2007 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

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

Page(s)	Section	Description of Change(s)
Attachment	Insignificant Activities	-updated permit revision number
Cover	-	-updated permit revision numbers and all dates
TOC	-	-updated shell language
All	Header	-updated permit revision number
3-4	Equipment Table	-added NSPS designation -clarified equipment/control device orientation per Permittee comments on DRAFT permit
4-5	2.1 A (table)	-corrected Section 2.2 cross references -corrected avoidance condition citation
5	2.1 A.1.a 2.1 A.1.b 2.1 A.1.c 2.1 A.1.d	-added ID Nos. -updated shell language -added ID Nos. -added monitoring requirements for uncontrolled source
6	2.1 A.2.a 2.1 A.2.c	-added ID Nos. -updated shell language and added ID Nos.
7	2.1 B (table) 2.1 B.1.b	-added sulfur dioxide requirements for natural gas combustion -clarified sulfur dioxide requirements for No. 2 fuel oil combustion -corrected Section 2.2 cross references -updated shell language
8	2.1 B.2 2.1 B.4 2.1 B.4.a	-added 2D .0516 requirement and renumbered subsequent paragraphs -corrected rule citation -added natural gas combustion clarification
9	2.1 B.4.c 2.1 C (table)	-updated shell language -corrected Section 2.2 cross references -corrected avoidance condition citation
10	2.2 A (table)	-corrected avoidance condition citation

Page(s)	Section	Description of Change(s)
11	2.2 A.1.e 2.2 A.2 2.2 A.2.d	-updated shell language -corrected rule citation -modified reporting requirement from quarterly to semiannual
12	2.2 A.4	-corrected rule citation
13-22	General Conditions	-updated shell conditions (v2.19)

It should be noted that all permitted equipment and insignificant activities were reviewed and ESM was modified according to current procedures and naming conventions.

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart Dc)
15A NCAC 2D .0958, Work Practices for Sources of Volatile Organic Compounds
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)
15A NCAC 2Q .0711, Emission Rates Requiring a Permit

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

As part of this permit renewal, the following regulation has been added to the permit:

15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources

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

NSPS – The facility’s one boiler (**ID No. ES-102**) is subject to the sulfur dioxide requirements of the New Source Performance Standards (Subpart Dc) while combusting No. 2 fuel oil only. During those times the maximum sulfur content of the fuel oil shall not exceed 0.5% by weight. Compliance is monitored through the use of fuel supplier certifications and monthly usage recordkeeping. Semiannual reporting of the monitoring requirements is required. There are no changes as a result of this permit renewal.

NESHAPS/MACT – The facility is classified as a Title III minor facility; therefore, MACT does not apply. There are no changes as a result of this permit renewal.

PSD – The facility is currently subject to a PSD avoidance limit for volatile organic compounds of less than 250 tons per year facility-wide. To ensure compliance, the Permittee is required to perform routine monitoring/recordkeeping/reporting activities. As part of this permit renewal, the current quarterly reporting has been replaced with semiannual as follows:

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

- d. 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. The report shall contain the monthly VOC emissions for the previous 17 months. The emissions shall be calculated for each of the 12-month periods over the previous 17 months.

112(r) – The facility is not subject to the 112(r) “Prevention of Accidental Releases” requirements because it does not store any chemicals in amounts greater than the applicability threshold.

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

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-101.1	Cut Rag Process consisting of: -one feeder line No. 1 (15,000 pounds per hour process capacity) including slicing, conditioning, and separating equipment	CD-101 and CD-102*	Two bagfilters (2,260 square feet of filter area, each)
ES-101.2	-one optional feeder line No. 2 (7,000 pounds per hour process capacity) including feeding, conditioning, and separating equipment		

* The facility was issued permit **08687R04** on **March 17, 2003** for the construction of **CD-102**. As of the issuance of this permit, the control equipment has not been installed. A permit condition requiring notification of its start-up has been added to the permit.

The Permittee estimates potential pre-controlled particulate emissions as follows:

PM Uncontrolled Emission Rate = 20 pounds per hour (from Title V permit application dated January 2003 and all subsequent applications and emission inventories)

Potential Uncontrolled PM Emissions

$$(20 \text{ lbs/hr}) \times (8,760 \text{ hrs/yr}) = 175,200 \text{ lbs/yr} = 87.6 \text{ tons/yr}$$

Potential uncontrolled PM emissions are below the 100 tons per year major source threshold; therefore CAM does not apply.

VII. Facility-Wide Air Toxics

The Permittee is currently subject to 15A NCAC 2Q .0711, "Emission Rates Requiring a Permit" for facility-wide emissions of acetic acid and ammonia. The Permittee has made a demonstration that facility-wide emissions do not exceed the toxic permitting exemption rate (TPER). The facility is required to be operated and maintained in such a manner that emissions of acetic acid and ammonia will not exceed this rate. Prior to exceeding this rate, the Permittee is required to submit a permit application to demonstrate compliance with 15A NCAC 2D .1100, "Control of Toxic Air Pollutants." The Permittee is required to maintain records of operation information demonstrating that acetic acid and ammonia does not exceed the TPER. There is no change as a result of this permit renewal.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

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

Pollutant(s)	2006 Actual Emissions (tpy)
CO	0.62
NO _x	0.74
PM ₁₀	0.20
VOC	108.34
Total HAP/TAP	1.21

IX. Stipulation Review

The Raleigh Regional Office did not request any clarifications/modifications of the permit as a result of this renewal application. In his June 13, 2007 inspection report, Mr. Will Wike did not indicate any required permit modifications and stated that "at the time of the inspection, the facility appeared to be in compliance with all permitting requirements."

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected States or Local Programs within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

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

A consistency determination was not required for this renewal.

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

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