

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: **date, 2009**

Region: Washington Regional Office
County: Hertford
NC Facility ID: 4600082
Inspector's Name: Betsy Huddleston
Date of Last Inspection: 11/08/2007
Compliance Code: C / In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)		
Applicant (Facility's Name): Perdue Grain and Oilseed, LLC - Cofield Facility Address: Perdue Grain and Oilseed, LLC - Cofield 242 Perdue Road Cofield, NC 27922 SIC: 2048 / Prepared Feeds Nec NAICS: 311222 / Soybean Processing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:		
Contact Data			Application Data		
Facility Contact	Authorized Contact	Technical Contact	Application Number: 4600082.09A Date Received: 05/27/2009 Application Type: Renewal/Modification Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02875/T24 Existing Permit Issue Date: 10/21/2008 Existing Permit Expiration Date: 03/31/2010		
Wayne Black Senior Environmental Engineer (252) 348-4326 P O Box 460 Lewiston, NC 27849	Wayne Black Senior Environmental Engineer (252) 348-4326 P O Box 460 Lewiston, NC 27849	Wayne Black Senior Environmental Engineer (252) 348-4326 P O Box 460 Lewiston, NC 27849			
Review Engineer: Mark Cuilla Review Engineer's Signature: Date: date, 2009			Comments / Recommendations: Issue 02875/T25 Permit Issue Date: date, 2009 Permit Expiration Date: date, 2014		

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**02875T25**) was issued on **October 21, 2008**, and is currently scheduled to expire on **March 31, 2010**. The renewal application was received on **May 27, 2009** and amended on **June 5, 2009**, 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.

In addition to renewal of the existing permit, the Permittee is also requesting:

1. that the second step of a two-step significant permit process to construct and operate a natural gas-fired rental boiler (**ID No. ESB4**) be completed extending the permit shield to this previously un-shielded source;

2. that one of the existing PSD avoidance conditions for sulfur dioxide be removed from the permit. The application indicates that the avoidance conditions were for boilers (**ID Nos. ES-1 and ESB2**) initially and later commuted to boilers (**ID Nos. ESB2 and ESB3**) after modification to replace boiler (**ID No. ES-1**). The application also indicates by removing one of the two conditions the modified permit should consolidate the two remaining sources previously covered under the remaining single avoidance condition. (See Section VI of this Document for a more complete discussion). As a result of this change, the facility will no longer be considered a major stationary source for NSR purposes;

II. Facility Description

The facility is a feedmill (producing pelletized grain chicken feed) and soybean oil extraction facility.

III. History/Background/Application Chronology

June 2, 2004 – Permit **02875T21** issued as a first step of a two-step significant modification process for the addition of boiler (**ID No. ESB3**).

April 22, 2005 – Permit **02875T22** issued as a renewal of the existing title V air permit.

April 15, 2008 – Permit **02875T23** issued as a first step of a two-step significant modification process for the addition of boiler (**ID No. ESB4**).

October 21, 2008 – Permit **02875T24** issued as an ownership change.

May 27, 2009 – Permit application **4600082.09A** received for renewal of the current Title V air permit. Application was deemed complete for processing.

June 5, 2009 – Application **4600082.09A** was amended to add the information pertaining to the second step of the two-step significant modification process to add boiler (**ID No. ESB4**).

July 13, 2009 – Received, via email from the Permittee, the CAM applicability for each particulate control device as an addendum to the permit renewal application.

July 20, 2009 – DRAFT permit sent to Permittee for comment prior to public notice and EPA review periods.

date, 2009 – 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	Section	Description of Change
Cover	-	-amended all dates and permit revision numbers
TOC	-	-removed references to Part I and Part II (here and throughout the permit)
All	Header	-amended permit revision number
3-4	Equipment table	-removed reference to boiler ES I -added NSPS/MACT Subpart designations

Page	Section	Description of Change
5	2.1 A 2.1 A (table) 2.1 A.1.a 2.1 A.1.b 2.1 A.1.c	-removed reference to boiler ES1 -added ID number references to applicable standards -corrected avoidance condition rule citations -removed reference to boiler ES1 -corrected testing rule citation -removed reference to boiler ES1
6	2.1 A.2.a 2.1 A.2.b 2.1 A.2.c 2.1 A.2.d 2.1 A.2.e 2.1 A.2.f 2.1 A.3.a	-removed reference to boiler ES1 -corrected testing rule citation -removed reference to boiler ES1 -removed reference to boiler ES1 and added reference to No. 4 fuel oil -added reference to No. 4 fuel oil -added "no reporting" language for natural gas/No. 2 fuel oil firing -removed reference to boiler ES1
7	2.1 A.3.c 2.1 A.3.d 2.1 A.3.e 2.1 A.3.g 2.1 A.4	-corrected testing rule citation -added "no monitoring/recordkeeping" language for natural gas/No. 2 fuel oil firing -removed reference to boiler ES1 and testing rule citation correction -added "no reporting" language for natural gas/No. 2 fuel oil firing -corrected rule citation
8	2.1 A.4.c 2.1 A.4.e	-corrected NSPS monitoring language -corrected NSPS reporting language
9	2.1 B 2.1 B (table)	-clarified applicable equipment/control device descriptions -corrected avoidance conditions rule citations
10	2.1 B.1.a 2.1 B.1.b 2.1 B.1.c 2.1 B.1.d	-added ID numbers -corrected testing rule citation -added ID numbers -added monitoring language for uncontrolled sources
11	2.1 B.1.f 2.1 B.2.b 2.1 B.3.a 2.1 B.3.b 2.1 B.3.c	-added "no reporting" language for uncontrolled sources -added shell testing language -added ID numbers -corrected testing rule citation -added "no monitoring/recordkeeping" language for natural gas/propane firing
12	2.1 B.3.d 2.1 B.3.f 2.1 C (table)	-added ID numbers and updated shell language -added "no reporting" language for natural gas/propane firing -corrected avoidance condition rule citation
13	2.1 C.1.a 2.1 C.1.b 2.1 C.1.c	-added ID numbers -corrected testing rule citation -added ID numbers and updated shell language
14	2.1 D (table) 2.1 D.1.a 2.1 D.1.b 2.1 D.1.c 2.1 D.2	-corrected cross reference -added ID numbers -corrected testing rule citation -added ID numbers -added 2D .0516 language (renumbered subsequent sections)
15	2.1 D.3.b 2.1 D.4 2.2 A 2.2 A (table)	-corrected testing rule citation -corrected rule citation -clarified applicable equipment/control device descriptions -clarified avoidance condition citation

Page	Section	Description of Change
16	2.2 A.1.a 2.2 A.1.b 2.2 A.1.c 2.2 A.1.d	-added ESB3 with combination of avoidance conditions -corrected testing rule citation -updated shell language -added No. 2 fuel oil component to equation
17	2.2 B 2.2 B (table) 2.2 B.1.a 2.2 B.1.b 2.2 B.1.c	-clarified applicable equipment/control device descriptions -clarified applicable emission limits -added ID numbers -added shell testing language -updated shell language
18	2.2 C (table)	-added table of applicable regulations
19	2.2 C.3	-added 2D .1100 language
20	2.2 C.4 2.2 D (old) 2.2 D (new) 2.2 D.1.b 2.2 D.1.d	-added 2Q .0705 language -removed PSD avoidance condition per Permittee request -renumbered Section (formerly 2.2 E) -corrected testing rule citation -cross reference correction
21	2.2 E 2.2 E (table)	-renumbered section (formerly 2.2 F) -added table of applicable regulations
36-46	General Conditions	-updated shell conditions (v2.22.1)

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

Current Description	Modified Description
One natural gas, No. 4 and No. 6 fuel oil-fired boiler (12.5 million Btu per hour maximum heat input rate; ID No. ES1)	End-dated per Permittee request

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 .0516, Sulfur Dioxide Emissions from Combustion Sources
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 Practice Standards for Sources of Volatile Organic Compounds
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart GGGG)
15A NCAC 2D .1806, Control of Odorous Emissions
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

Except for 15A NCAC 2D .0503, a regulatory review for the existing sources will not be included in this document. As indicated above, the facility has been modified a number of times to add and remove boilers. As such, the allowable particulate emission rate has been calculated as follows:

Particulate emission rate is calculated using the following equation:

$$E = 1.090 \times Q^{-.2594}$$

Where Q is the total heat input at the facility in million Btu per hour and E is the allowable emission rate in pounds per million Btu.

1. Original permitting (ES1 only) – Q = 12.5 million Btu per hour; therefore, E = 0.567 pounds per million Btu for ES1
2. First modification (add ESB2) – Q = (12.5 + 70) million Btu per hour; therefore, E = 0.347 pounds per million Btu for ESB2
3. Second modification (add ESB3 to replace ES1) – Q = (70 + 16.7) million Btu per hour; therefore, E = 0.343 pounds per million Btu for ESB3
4. Third modification (add ESB4) – Q = (70 + 16.7 + 95) million Btu per hour; therefore, E = 0.283 pounds per million Btu for ESB4

Note: Per 15A NCAC 2D .0503 *“Fuel burning indirect heat exchangers constructed or permitted after February 1, 1983, shall not change the allowable emission limit of any fuel burning indirect heat exchanger whose allowable emission limit has been previously set. The removal of a fuel burning indirect heat exchanger shall not change the allowable emission limit of any fuel burning indirect heat exchanger whose allowable emission limit has previously been established. However, for any fuel burning indirect heat exchanger constructed after, or in conjunction with, the removal of another fuel burning indirect heat exchanger at the plant site, the maximum heat input of the removed fuel burning indirect heat exchanger shall no longer be considered in the determination of the allowable emission limit of any fuel burning indirect heat exchanger constructed after or in conjunction with the removal.”*

As part of this permit renewal the following regulations have been added to the permit (See discussions for each below):

15A NCAC 2D .1100, Control of Toxic Air Pollutants

15A NCAC 2Q .0705, Existing Sources and SIC Calls

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

NSPS – The Permittee is subject to the following NSPS requirements:

1. Subpart Dc for the natural gas/No. 4/No. 2/No. 6 fuel oil-fired boiler (**ID No. ESB3**). This boiler is Subject to 40 CFR 60, Subpart Dc because it was constructed after **June 9, 1989** and has a maximum heat input capacity equal to or greater than 10 million Btu per hour. Because the boiler is allowed to combust multiple fuels including natural gas and multiple fuel oil grades, it is required to comply with the SO₂ standard limiting the maximum sulfur content of any fuel oil received and burned to less than 0.5 percent by weight. Specific monitoring, recordkeeping, and reporting are all specified in the current permit. However, Betsy Huddleston of the WARO has pointed out in her latest inspection report that *“there is a permit requirement to sample the storage tank for sulfur after each residual oil shipment. 60.42c(h)(2) specifically allows for residual oil boilers between 10 and 30 million Btu per hour in size to use fuel supplier certifications for demonstrating compliance.”* Her comment is correct. Therefore, the renewed permit condition has been modified to allow fuel supplier certifications as the accepted monitoring requirement for residual oil. In addition, the reporting requirements for residual oil has also been modified to match the requirements of 60.48c(f)(2)(i-iv).

2. Subpart Dc for the natural gas-fired rental boiler (**ID No. ESB4**). This boiler is subject to 40 CFR 60, Subpart Dc because it was constructed after **June 9, 1989** and has a maximum heat input capacity equal to or greater than 10 million Btu per hour. Because the boiler's size is greater than 90 million Btu per hour and its fuel type is natural gas, the Permittee is only required to maintain monthly fuel consumption records. No other reporting is required. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is currently classified as a Title III major facility. Sources (**ID Nos. ES17 and ES17A**) are currently subject to 40 CFR 63 Subpart GGGG, “National Emission Standards for Hazardous Air Pollutants for Solvent Extraction and Vegetable Oil Production.” The permit includes specific detailed monitoring, recordkeeping, and reporting requirements. This permit renewal does not affect this status (except to renumber the Section due to a previous permit condition being removed).

PSD – The facility is currently a PSD major stationary source. It currently operates under the following PSD avoidance conditions:

1. Section 2.2 A.1 limits emissions of sulfur dioxide from these sources (**ID Nos. ESB2, ES23 and ES24**) to less than 250 tons total per consecutive 12-month period. To ensure compliance, the Permittee is required to track fuel consumption and calculate sulfur dioxide emissions monthly per established formula (taking into account amount of fuel combusted and percent sulfur by weight of the fuel). This permit renewal does not affect this status (except to include an emission source from a second avoidance condition being removed per the Permittee's request – see below).
2. Section 2.2 B.1 limits emissions of VOCs from these sources (**ID Nos. ESB2, ESB3, ES23, ES24, ES32A, ES32B, ES17, and ES17A**) to less than 250 tons per year total per consecutive 12-month period respectively. The condition also contains a separate 250 ton per year avoidance limitation for VOCs from this source (**ID No. ES12**). To ensure compliance with these two limitations, the Permittee shall limit the soybean meal processed over any 12-month consecutive period to less than 300,800 tons. In addition, the Permittee shall calculate the record daily the weight of soybean meal processed every day and the VOC emissions from the facility. This permit renewal does not affect this status.
3. Section 2.2 D.1 limits emissions of sulfur dioxide from this source (**ID No. ESB3**) to less than 250 tons per consecutive 12-month period. To ensure compliance, the Permittee is required to track fuel consumption and calculate sulfur dioxide emissions monthly per established formula (taking into account amount of fuel combusted and percent sulfur by weight of the fuel). This permit renewal does not affect this status. However, as part of this permit renewal, the Permittee has requested that the second SO₂ avoidance condition be removed from the permit and that the applicable emission source's requirements be included under the remaining avoidance condition. Therefore, this source (**ID No. ESB3**) has been moved to Section 2.2 A.1 and its natural gas component has been added to the specific formula for calculating SO₂ emissions.
4. Section 2.2 E.1 limits emissions of nitrogen oxides from this source (**ID No. ESB4**) to less than 40 tons per consecutive 12-month period while combusting natural gas. To ensure compliance, the Permittee shall record monthly hours of operation for this source and calculate emissions monthly per the established formula. This permit renewal does not affect this status (except to renumber the Section due to the previous permit condition being removed).

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

CAM – 40 CFR 64 requires that a continuous 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 following table identifies all emission equipment/control device relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
Feed Mill			
ES2	Receiving truck dump pit	CD2	One bagfilter (1,300 square feet of filter area)
ES3	Receiving rail dump pit	CD2	One bagfilter (1,300 square feet of filter area)
ES4	Receiving elevator and turn head (for feed additives)	CD4	One bagfilter (209 square feet of filter area)
ES5	Two hammermills	CD5	One bagfilter (651 square feet of filter area)
ES6	No. 1 pellet system	CD6A CD6B	Two cyclones (47 inches in diameter each)
ES7	No. 2 pellet system	CD7A CD7B	Two cyclones (47 inches in diameter each)
Grain Receiving			
ES22	Grain receiving (dump hopper), truck loadout and railcar loadout	CD22	One bagfilter (2,185.4 square feet of filter area)
ES23	84 tons per hour propane/natural gas-fired grain dryer (22 million Btu per hour maximum heat input capacity)	CD23A CD23B	Two screens One cyclone (60 inches in diameter)
ES32A	Scalper		
ES24	84 tons per hour propane/natural gas-fired grain dryer (22 million Btu per hour maximum heat input capacity)	CD24A CD24B	Two screens One cyclone (60 inches in diameter)
ES32B	Scalper		
Soybean Plant			
ES12	Soybean meal cooler/dryer unit	CD12A CD12B CD12C	Three cyclones (78 inches in diameter each)

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES14	Soybean preparation process	CD14A CD14B CD14C	Two cyclones (75 inches in diameter each) One bagfilter (2960 square feet of filter area)
ES15	Meal grinding and screening process	CD15	One bagfilter (2474 square feet of filter area)
ES16	Hull grinding process	CD16	One bagfilter (610 square feet of filter area)
ES18	Flaking rolls aspiration system	CD18	One cyclone (62 inches in diameter)
ES20	Soybean meal storage tank with four loadouts	CD20A	One bagfilter (4,000 square feet of filter area)
ES21	Whole soybean storage tank	CD21	One bagfilter (45 square feet of filter area)

The following table indicates the regulations applicable to each emission source/control device relationship:

Emission Source ID No.	Control Device ID No. (exit to atmosphere)	Applicable Regulations	Pollutant/CAM Required?
ES2	CD2	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES3	CD2	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES4	CD4	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES5	CD5	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES6	CD6B	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES7	CD7B	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES22	CD22	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES23 ES32A	CD23B	2D .0515 2D .0516 2D .0521 2Q .0317 2Q .0317	Particulates. No, PM ₁₀ portion less than 100 tpy Sulfur dioxide. No, control device for particulates Visible emissions. No, not criteria pollutant Sulfur dioxide. No, control device for particulates Volatile organic compounds. No, control device for particulates

Emission Source ID No.	Control Device ID No. (exit to atmosphere)	Applicable Regulations	Pollutant/CAM Required?
ES24 ES32B	CD24B	2D .0515 2D .0516 2D .0521 2Q .0317 2Q .0317	Particulates. No, PM ₁₀ portion less than 100 tpy Sulfur dioxide. No, control device for particulates Visible emissions. No, not criteria pollutant Sulfur dioxide. No, control device for particulates Volatile organic compounds. No, control device for particulates
ES12	CD12A CD12B CD12C	2D .0515 2D .0521 2Q .0317	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant Volatile organic compounds. No, control device for particulates
ES14	CD14C	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES15	CD15	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES16	CD16	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES18	CD18	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES20	CD20A	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant
ES21	CD21	2D .0515 2D .0521	Particulates. No, PM ₁₀ portion less than 100 tpy Visible emissions. No, not criteria pollutant

Particulates discussion – The Permittee provided spreadsheets in defense of the conclusion that CAM does not apply to any particulate source being controlled by either cyclone or bagfilter as shown above (spreadsheets will be included in final permit record). Specific assumptions are as follows:

Feedmill processing:

- Potential calculations are based on 84 tons per hour and 8760 hours per year potential Hammermill for corn is rated at 51 tons per hour and 8760 hours per year
- Emission factors from AP42 (Chapter 9.9.1 Grain Elevators and Processes)

Grain processing:

- Potential calculations are based on 1.2 times the actual 2009 tonnage received (458,713 tons)
- Truck receiving factor is prorated equally between general and hopper bottom type trucks
- Emission factors from AP42 (Chapter 9.9.1 Grain Elevators and Processes)

Soybean processing:

- Potential calculations for TSP based on 300,800 tons per year permit limit on meal produced
- Raw tonnage of beans is estimated at 70% of bean tonnage being meal
- Emission factors* from AP42 (Chapter 9.11.1 Vegetable Oil Processing). Emission factors are listed for TSP only. However, it is reasonable to assume that PM₁₀ is only a portion of TSP. If 100% of TSP were PM₁₀ for CAM purposes, no individual control device would be subject; therefore, CAM is not required.

VII. Facility Wide Air Toxics

The current permit does not contain any modeled emission rates per 15A NCAC 2D .1100 or toxic pollutant emission rates (TPERs) per 15A NCAC 2Q .0711. However, Section 2.2 F does require that the Permittee perform a facility-wide air toxics demonstration in accordance with 2Q .0705 prior to recommencing operation of the soybean extraction process and related operations. According to Betsy Huddleston's latest inspection report, "*MACT GGGG is the last and only MACT for this facility. Therefore, they were required to have demonstrated compliance with air toxics before starting up the soybean oil plant. They submitted facility-wide hexane modeling (the other toxics are due to fuel combustion) on September 21, 2007. Mark Yoder reviewed and approved the model. Perdue applied worst-case emissions from a volume source. The modeled concentration was 99% of the AAL. Perdue is limited to 48.5 pounds per hour of hexane. This can be tracked through daily measurements and calculations that they do for the MACT.*" Therefore, the renewed permit has been modified to replace the modeling requirement of Section 2.2 F with both 15A NCAC 2D .1100 and 2Q .0705 language which include the modeled emission rate for hexane, the date of the modeling demonstration, and MRR requirements linking compliance with this regulation to compliance with the MACT.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years' emission inventories from the facility as compared to the potential emissions for the same pollutant:

Pollutant(s)	2006 Actual Emissions (tpy)	2007 Actual Emissions (tpy)
CO	1.23	4.56
NO _x	8.53	6.89
PM ₁₀	21.9	19.05
SO ₂	47.58	2.31
VOC	0.06	71.51
Total HAPs/TAPs	0.03	0.08

IX. Stipulation Review

The facility was last inspected by Betsy Huddleston of the WaRO on **November 8, 2007** and again on **July 9, 2009**. She notes "with the exception of one delayed monthly external observation of a bagfilter on a soybean storage tank, the facility appeared to be in compliance with the conditions of the permit at the time of the inspection."

In addition, she noted the following issues:

1. The NSPS requirements for fuel oil are not correct (Section 2.1 A.4.d). The permit condition requires that the Permittee sample the storage tank for sulfur after each residual oil shipment. The NSPS specifically allows to residual oil boilers between 10 and 30 million Btu per hour in size to use fuel supplier certifications for demonstrating compliance. *Agree, option has been confirmed and condition modified to match NSPS.*
2. Section 2.1 B.3 does not include the soybean oil sources as being applicable to the visible emissions requirements. The permit condition should be modified. *Agree, the permit condition has been modified to include all applicable sources (with the use of ID numbers rather than descriptions of processes).*

3. Bagfilter **CD14A** is incorrectly identified in the permit as **CD14C**. *Disagree; the Permittee has confirmed that the current permit equipment description and control device orientation is correct.*
4. The grain dryers cyclones (**ID Nos. CD23A, B and CD24A, B**) have no inspection and maintenance requirements in the permit because the cyclones are near impossible to internally inspect. They are visually inspected weekly. *Agree, ID numbers have been added to the permit to specifically identify which pieces of control equipment are required to perform annual internal inspections.*

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. Virginia is an affected State 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.

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

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