

County of Forsyth



PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR QUALITY PERMIT

FORSYTH COUNTY
OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION
WINSTON-SALEM, NORTH CAROLINA

September 16, 2015

Notice is hereby given by the Forsyth County Office of Environmental Assistance and Protection (EAP) of an opportunity for the public to review and comment on a draft Title V air quality permit for:

**R.J. Reynolds Tobacco Company, Whitaker Park Facilities
Winston-Salem, NC
Permit #00339-TV-31**

This facility had applied for a significant modification of its Title Air Quality operation permit requesting an emission limit to avoid the applicability of Prevention of Significant Deterioration preconstruction permitting requirements for the addition of the R&D Facility Ethanol use Project. This modification will not cause a significant increase of regulated air pollutant emissions. The draft permit meets the Title V requirements as specified in FCAQTC Section 3Q .0500.

EPA will process this draft permit as a proposed permit and perform its 45-day review provided by Rule 3Q .0522 *Review by EPA and Affected States* concurrently with the public notice period. If public comments are received that result in a change to the permit, EPA's 45-day review period will cease to be performed concurrently with the public notice period. The deadline for citizen's petitions to the EPA Administrator will be determined based on EPA's 45-day review period beginning after the public comment period has ended. The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address:

<http://www.epa.gov/region4/air/permits/northcarolina.htm>

The EAP will issue a final Air Quality Permit, in accordance with the conditions of the draft/proposed Air Quality Permit, unless there are public comments which result in a different decision or significant change in the permit.

A copy of the draft permit and statement of basis is available at the EAP's website:

http://www.forsyth.cc/EAP/public_notices.aspx

Additional information regarding the draft permit may be obtained from the Office of Environmental Assistance and Protection, Forsyth County Government Center, 201 N. Chestnut Street, Winston-Salem, NC 27101-4120; telephone (336) 703-2440. The public may submit written comments on these proceedings to the address above or by e-mail to loydpb@forsyth.cc on or before October 16, 2015, the close of the public comment period.

A handwritten signature in black ink, appearing to read "Peter B. Lloyd".

Peter B. Lloyd, Ph.D., P.E., Manager
Compliance Assistance & Permitting Division

OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION

FORSYTH COUNTY GOVERNMENT CENTER
201 NORTH CHESTNUT STREET
WINSTON-SALEM, NC 27101-4120

PERMIT TO OPERATE
AIR QUALITY CONTROL
CLASS: Title V

PERMIT NUMBER	EFFECTIVE DATE	EXPIRATION DATE	RENEWAL DUE
DRAFT 00339-TV-31	TBD	December 11, 2013	March 11, 2013

Facility Name: R.J. Reynolds Tobacco Company

Mailing Address: P.O. Box 2959
City, State, ZIP Code: Winston-Salem, NC 27102

Facility Location: Whitaker Park Facilities
City: Winston-Salem, NC

In accordance with the provisions set forth in the Forsyth County Air Quality Technical Code and Chapter 3 of the Forsyth County Code, "Air Quality Control", the facility identified above is authorized to operate, as outlined in Part I, "Air Quality Title V Operation Permit", the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations contained within this permit.

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 Forsyth County Office of Environmental Assistance and Protection and received an Air Quality Permit, except as provided in this permit or in accordance with applicable provisions of the Forsyth County Air Quality Technical Code.

This permit supersedes all previous permits issued to the permittee by the Forsyth County Environmental Affairs Department or Forsyth County Office of Environmental Assistance and Protection.

Peter B. Lloyd, Ph.D., P.E., Manager
Compliance Assistance & Permitting Division

DATE:

R. J. Reynolds Tobacco Company

Air Quality Permit # 00339-TV-31

Zzzz XX, 2015

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SECTION 1 PERMITTED EQUIPMENT AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)

1.1 Equipment List and Applicable Conditions

ES#	Emission Source	Applicable Standards						CAM		non-CAM	Visible Emissions		Source Specific Limit			
		PM	PM	SO2	VOC	MACT	Fabric Filter	Visual Observ.	Fabric Filter	40%	20%					
		3.3(A)	3.3(B)	max. lb/hr	3.4(A)	3.4(B)	3.7	3.8	3.6(B) (1,3,4)	3.6(B) (2,3,4)	3.6(A)	3.5(A)		3.5(B)	3.2	
Building 603-1 Processing																
1	Tobacco Scrap Feed Broke Recovery System		x	15.8					1	x	x		14		x	
2	Tobacco Stem Feed		x	15.8					1			x	14		x	
									2	x	x		15		x	
3	Dust Infeed & Extraction		x	7.6					1			x	14		x	
4,5	Dryers #6 & #7		x	15.8					None				1, 6, 7, 16-18		x	C, D
Shed 181																
1	Reconstituted Tobacco		x	1.54					None				1, 2, 3		x	

ES#	Emission Source	Applicable Standards						CAM		non-CAM	Visible Emissions		Source Specific Limit				
		PM	PM	SO2	VOC	MACT	Fabric Filter	Visual Observ.	Fabric Filter	40%	20%						
		3.3(A)	3.3(B)	max. lb/hr	3.4(A)	3.4(B)	3.7	3.8	3.6(B) (1,3,4)	3.6(B) (2,3,4)	3.6(A)	3.5(A)		3.5(B)	3.2		
Building 2-1 Recovery																	
200	Waste Paper Removal		x	34.5					31 (2-2)	x	x		31 (2-2)		x	E	
201	Waste Filter/Paper Removal Mill Lines 1, 2, 3		x	34.5					30 (2-2)	x	x		30 (2-2)		x	E	
202	WT Shorts Line A		x	12.1					9			x	9		x		
									14			x	14		x		
									34			x	34		x		
									35			x	35		x		
									None					32, 38, 45, 47		x	
203	WT Shorts Line B		x	12.1					9			x	9		x		
									14			x	14		x		
									33			x	33		x		
									36			x	36		x		
									None					31, 37, 44, 46		x	
Building 2-2 Recovery																	
200	Tobacco Reclaim		x	25.6					24A	x	x		24		x		
201	Waste Paper Removal TPO Infeed Tower		x	25.6					24B	x	x		24		x		
Building 611-2																	
5	Cigarette Making						x		<i>Fugitive</i>								
Building 611-3																	
3	Casing & Cutting		x	8.2					1			x	10		x		
									2			x	9 (611-4)		x		
									None					7-9, 11		x	
									None					1 (611-4)		x	

ES#	Emission Source	Applicable Standards						CAM		non-CAM	Visible Emissions		Source Specific Limit				
		PM	PM	SO2	VOC	MACT	Fabric Filter	Visual Observ.	Fabric Filter	40%	20%						
		3.3(A)	3.3(B)	max. lb/hr	3.4(A)	3.4(B)	3.7	3.8	3.6(B) (1,3,4)	3.6(B) (2,3,4)	3.6(A)	3.5(A)		3.5(B)	3.2		
Building 611-4																	
1	Blending & Conditioning		x	3.82					None				6		x		
2	Casing & Drying		x	5.38					4	x	x		5		x		
									None				2, 3, 4		x		
3	Tobacco Milling		x	3.07					10	x	x		10		x		
Building 611-16																	
2	Smokeless Processing		x	0.59					None				1		x		
Building 602-1 Utilities																	
1	Union Ironworks								N/A								
	135 MMBtu/hr-#2 fuel oil	x												1	x		
	140 MMBtu/hr-Natural Gas	x															
2	Union Ironworks								N/A								
	135 MMBtu/hr-#2 fuel oil	x												2	x		
	140 MMBtu/hr-Natural Gas	x															
5	Erie City								N/A								
	120.8 MMBtu/hr-#2 fuel oil	x												5	x		
	125.5 MMBtu/hr-Natural Gas	x															
6	Erie City								N/A								
	124.1 MMBtu/hr-#2 fuel oil	x				x								6		x	
	129 MMBtu/hr-Natural Gas	x				x											
11	Caterpillar Emergency Gen. 14 MMBtu/hr #2 fuel oil				x			x	N/A				11		x		

Note: The "x" denotes the applicable conditions in Sections 3.3 - 3.7.

1.2 Operating Conditions Not Covered Under the Permit Shield

The following specific conditions have been revised or added to this permit following procedures other than the Significant Modification procedures in Section 3Q .0500 of the Forsyth County Air Quality Control Ordinance and Technical Code. As required under Rule 3Q .0512 Permit Shield and Application Shield, a permit shield is not provided for these new or revised permit requirements. During the next Significant Modification as defined in Rule 3Q .0516 or renewal of this permit, the Title V permit applications for the new and revised permit requirements listed below will also be processed according to the Significant Modification procedures and then a permit shield will be extended at that time.

Source ID	Source Description	Unshielded Operating Conditions	Effective Date

SECTION 2 FACILITY GENERAL ADMINISTRATIVE CONDITIONS

2.1 General Provisions [Sections 3-0100, 3-0200 and 3-0400 and Rule 3Q .0508(i)(16)]

- A. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in Subchapters 3D and 3Q of the Forsyth County Air Quality Technical Code (FCAQTC).
- B. The terms, conditions, requirements, limitations and restrictions set forth in this permit are binding and enforceable pursuant to Sections 3-0100, 3-0200 and 3-0400 of the Forsyth County Air Quality Ordinance (FCAQO), including assessment of civil and/or criminal penalties. This permit is valid only for the specific processes and operations applied for and indicated in the air quality permit application. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and enforcement action by this Office.
- C. This permit is not a waiver of or approval of any other permits that may be required for other aspects of the facility which are not addressed in this permit.
- D. 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. This permit does not allow the permittee to cause pollution in contravention of local laws or rules, unless specifically authorized by an order from the Director, or to cause pollution in contravention of state laws or rules.
- E. Terms and conditions contained herein shall be enforceable by this Office, the U.S. EPA and citizens of the United States as defined in the federal Clean Air Act, except those identified as Locally Enforceable Only requirements which are enforceable by this Office.
- F. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained or modified without the appropriate and valid permits issued by this Office, unless the source is exempted by rule. This Office may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the applicable requirements.
- G. In addition to the authority found in Rules 3D. 0501 and 3Q .0508(i)(16), any exceedance of the monitoring provisions of this permit may result in a request by this Office to submit data on rates of emissions in order to demonstrate compliance with any applicable regulation.

2.2 Permit Availability [Rules 3Q .0507(k), .0508(i)(16), .0508(i)(9) and .0110]

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 this Office or the U.S. EPA upon request.

2.3 Submissions [Rules 3Q .0507(c), .0508(i)(16) and .0104]

All documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required to be sent to this Office by this permit shall be submitted to the Forsyth County Office of Environmental Assistance and Protection, Forsyth County Government Center, 201 N. Chestnut St., Winston-Salem, NC 27101-4120.

2.4 Severability Clause [Rule 3Q .0508(i)(2)]

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any specific circumstance, is challenged, the application of the provision in question to other circumstances, as well as the remainder of this permit's provisions, shall not be affected.

2.5 Duty to Comply [Rule 3Q .0508(i)(3)]

The permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. 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.

2.6 Need to Halt or Reduce Activity Not a Defense [Rule 3Q .0508(i)(4)]

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.

2.7 Permit Shield [Rule 3Q .0512(a)]

- A. 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.
- B. A permit shield shall not alter or affect:
 1. the power of the Forsyth County Board of Commissioners, Director, or Governor under NCGS 143-215.3(a)(12) or the U.S. EPA under Section 303 of the federal Clean Air Act;
 2. 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;
 3. the applicable requirements under Title IV of the Clean Air Act; or

4. the ability of the Director or the U.S. EPA under Section 114 of the federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
- C. A permit shield shall not apply to any change made at a facility that does not require a permit or to any permit revision made under Rule 3Q .0523.
- D. A permit shield shall not extend to minor permit modifications made under Rule 3Q .0515.

2.8 **Circumvention [Rules 3D .0502 and 3Q .0508(i)(16)]**

No person shall circumvent any permitted air pollution control device, or allow the emissions of regulated air pollutants without the applicable air pollution control device operating properly. Unless otherwise specified by this permit, no permitted emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

2.9 **Good Air Pollution Control Practice [Rules 3D .0502 and 3Q .0508(i)(16)]**

At all times, the equipment listed in Section 1 shall be operated and maintained in a manner consistent with the design and emissions control as applied for in the application.

2.10 **Reporting Requirements for Excess Emissions and Permit Deviations [Rules 3D .0535(f) and 3Q .0508(f)(2), 3Q .0508(i)(16) and 3Q .0508(g)]**

"Excess Emissions" - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections 3D .0500, .0900 or .1200; or by a permit condition; or that exceeds an emission limit established in a permit issued under Rule 3H .0610. (Note: This definition applies where the NSPS does not further define excess emissions for an affected NSPS emissions source.)

"Deviation" - means any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions.

- A. Sources subject to Rules 3D .0524, .1110 or .1111

Excess Emissions and Permit Deviations

1. If the source specific NSPS (3D .0524) or NESHAP (3D .1110 or .1111) defines "excess emissions", these shall be reported as prescribed in 3D .0524, .1110 or .1111.
2. If the source specific NSPS (3D .0524) or NESHAP (3D .1110 or .1111) does NOT define "excess emissions", the permittee shall report excess emissions as deviations from permit requirements as prescribed in subparagraph 3.
3. In addition to any specific NSPS or NESHAP reporting requirements the permittee shall:
 - (a) report to this Office any deviations from permit requirements by the next business day, unless an alternative reporting schedule is specifically provided in the permit, and

- (b) report in writing to this Office all deviations from permit requirements or any excess emissions within two business days, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such deviations and any corrective actions or preventative actions taken. Reports of all deviations from permit requirements shall be certified by a responsible official.

B. Sources NOT subject to Rules 3D .0524, 1110 or .1111

1. Excess Emissions Greater than Four Hours in Duration [3D .0535(f)]

The permittee shall report excess emissions greater than four hours in duration as prescribed in Rule 3D .0535(f) including, but not limited to the following:

- (a) Notify this Office of any such occurrence by 9:00 a.m. Eastern time of this Office's next business day of becoming aware of the occurrence as described in Rule 3D .0535(f)(1);
- (b) Notify this Office immediately when corrective measures have been accomplished; and
- (c) Submit, if requested, to this Office within 15 days after the request, a written report as described in Rule 3D .0535(f)(3).

2. Excess Emissions Less than Four Hours in Duration and Deviations [3Q .0508(f)]

The permittee shall report excess emissions less than four hours in duration and deviations from permit requirements as follows:

- (a) Report to this Office any excess emissions less than four hours in duration and any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit; and
- (b) Report in writing to this Office any excess emission less than four hours in duration or any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such excess emissions and deviations and any corrective actions or preventative actions taken. All reports of excess emissions and deviations from permit requirements shall be certified by a responsible official.

- C. Other Requirements under Rule 3D .0535 (Rule 3D .0535(g) is Locally Enforceable Only).

The permittee shall comply with all other requirements contained in Rule 3D .0535.

2.11 Emergency Provisions <40 CFR 70.6(g)>

The permittee shall be subject to the following provision with regard to emergencies:

- A. 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.
- B. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in paragraph C below are met.
- C. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
1. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 2. the permitted facility was at the time being properly operated;
 3. 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
 4. the permittee submitted notice of the emergency to this Office 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, and steps taken to mitigate emissions, and corrective actions taken.
- D. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- E. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

2.12 Permit Fees [Rules 3Q .0206(b), .0508(i)(10) and .0519(a)(4)]

If, within 30 days after being billed, the permittee fails to pay an annual permit fee required under Subchapter 3Q .0200 of the FCAQTC, the Director may initiate action to terminate this permit under Rule 3Q .0519 of the FCAQTC.

2.13 Annual Emission Inventory Requirements [Rule 3Q .0207]

The permittee shall report to the Director by June 30th of each year the actual emissions of each air pollutant listed in Rule 3Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form(s) as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

2.14 Compliance Certification <40 CFR 70.6(c)> [Rules 3Q .0508(n) and .0508(i)(16)]

By March 1st unless another date is established by the Director, the permittee shall submit to this Office and the U.S. EPA (U.S. EPA Region 4, Air Enforcement Section, Mail Code: 4APT-AEEB, 61 Forsyth Street S. W., Atlanta, GA 30303) a compliance certification by a responsible official with all 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 include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

- A. the identification of each term or condition of the permit that is the basis of the certification;
- B. the identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include at a minimum, the methods and means required under 40 CFR 70.6(a)(3). If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- C. the status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph B above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- D. such other facts as the permitting authority may require to determine the compliance status of the source.

2.15 Retention of Records [Rule 3Q .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.

2.16 NESHAP - Recordkeeping Requirement for Applicability Determinations <40 CFR 63.10(b)(3)> [Rule 3D .1111]

If the permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR Part 63, the permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source. This record shall include all of the information required under 40 CFR 63.10(b)(3).

2.17 Duty to Provide Information [Rule 3Q .0508(i)(9)]

- A. The permittee shall furnish to this Office, 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.
- B. The permittee shall furnish this Office copies of records required to be kept by the permit when such copies are requested by the Director.

2.18 Duty to Supplement or Correct Application [Rule 3Q .0507(f)]

The permittee, upon becoming aware that any relevant facts were omitted from the application or that incorrect information was submitted with the application, shall promptly submit such supplementary facts or corrected information to this Office. The permittee shall also provide additional information necessary to address any requirements that become applicable to the source after the date a complete application was submitted but prior to release of the draft permit.

2.19 Certification by Responsible Official [Rule 3Q .0520]

A responsible official (as defined in 40 CFR 70.2) 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 statement and information in the document are true, accurate, and complete.

2.20 Inspection and Entry [Rule 3Q .0508(l)]

- A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of this Office to perform the following:
 - 1. enter upon 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 must be kept under 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, at reasonable times and using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements.

Nothing in this condition shall limit the ability of the U.S. EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

- B. No person shall obstruct, hamper or interfere with any such authorized representative while in the process of carrying out his official duties.

2.21 **Averaging Times <40 CFR 70.6(a)(3)> [Rule 3Q .0508(f)]**

Unless otherwise specified in Section 3 of this permit for a specific emission standard or limitation, the applicable averaging period for determining compliance with an emission standard or limitation during compliance testing shall be based on the applicable U.S. EPA reference test method.

2.22 **Compliance Testing [Rule 3D .2602(e)]**

When requested by this Office for determining compliance with emission control standards, the permittee shall provide sampling ports, pipes, lines, or appurtenances for the collection of samples and data required by the test procedure; scaffolding and safe access to the sample and data collection locations; and light, electricity, and other utilities required for sample and data collection.

2.23 **General Emissions Testing and Reporting Requirements [Rules 3D .2602 and 3Q .0508(i)(16)]**

Testing shall be conducted in accordance with FCAQTC Section 3D .2600 except as may be otherwise required in FCAQTC Rules 3D .0524, 3D .0912, 3D .1110, 3D .1111, 3D .1415 or a permit condition specific to the emissions source. Requests to use an alternative test method or procedure must be made in writing at least 45 days prior to the test and approved by this Office. Alternatives to test methods or procedures specified for emissions sources subject to test requirements under 40 CFR 60, 40 CFR 61 or 40 CFR 63, may require approval by the U.S. EPA. When required to conduct emissions testing under the terms of the permit:

- A. The permittee shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved prior to air pollution testing. Emission testing protocols must be submitted at least 45 days before conducting the test for pre-approval prior to testing if requested by the permittee.
- B. The permittee shall notify this Office of the specific test dates at least 15 days prior to the scheduled test date in order to afford this Office the opportunity to have an observer on-site during the sampling program.

- C. During all sampling periods, the permittee shall operate the emission source(s) under operating conditions that best fulfill the purpose of the test and are approved by the Director or his delegate.
- D. The permittee shall submit one copy of the test report to this Office not later than 30 days after sample collection. The permittee may request an extension to submit the final test report if the extension request is a result of actions beyond the control of the permittee. The test report shall contain at a minimum the following information:
 - 1. a certification of the test results by sampling team leader and facility representative;
 - 2. a summary of emissions results expressed in the same units as the emission limits given in the rule for which compliance is being determined 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) as appropriate;
 - 3. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics as necessary;
 - 4. all field, analytical and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
 - 5. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
 - 6. 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.
- E. This Office will review emission test results with respect to the specified testing objectives as proposed by the permittee and approved by this Office.

2.24 **Termination, Modification, and Revocation of the Permit [Rule 3Q .0519]**

The Director may terminate, modify, or revoke and reissue this permit if:

- A. the information contained in the application or presented in support thereof is determined to be incorrect;
- B. the conditions under which the permit or permit renewal was granted have changed;
- C. violations of conditions contained in the permit have occurred;
- D. the permit holder fails to pay fees required under Section 3Q .0200 within 30 days after being billed;

- E. the permittee refuses to allow the Director or his authorized representative upon presentation of credentials:
 - 1. to enter, at reasonable times and using reasonable safety premises in which a source of emissions is located or in which any records are required to be kept under terms and conditions of the permit;
 - 2. to have access, at reasonable times, to any copy or records required to be kept under terms and conditions of the permit;
 - 3. to inspect, at reasonable times and using reasonable safety practices, any source of emissions, control equipment, and any monitoring equipment or method required in the permit; or
 - 4. to sample, at reasonable times and using reasonable safety practices, any emission sources at the facility;
- F. the U.S. EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
- G. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of Chapter 3 of the Forsyth County Code.

2.25 Permit Reopenings, Modifications, Revocations and Reissuances, or Terminations [Rule 3Q .0508(i)(5)]

The Director may reopen, modify, revoke and reissue, or terminate this permit for reasons specified in Rule 3Q .0517 or .0519. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition in this permit.

2.26 Permit Renewal [Rule 3Q .0508(e) and Rule 3Q .0513]

This permit is issued for a term not to exceed five years. Permits issued under Title IV of the Clean Air Act shall be issued for a fixed period of five years. 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 Rule 3Q .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.

2.27 Reopening for Cause [Rules 3Q .0517 and .0508(g)]

This permit shall be reopened and revised in accordance with Rule 3Q .0517 prior to its expiration date, for any of the following reasons:

- A. Additional applicable requirements become applicable to the facility with remaining permit term of three or more years.

- B. Additional requirements, including excess emissions requirements, become applicable to this source under Title IV of the Clean Air Act. Excess emissions offset plans for this source shall become part of this permit upon approval by the U.S. EPA.
- C. The Director or the U.S. EPA finds that a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- D. The Director or the U.S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

2.28 Construction and Operation Permits [Sections 3Q .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 Sections 3Q .0100 and .0300.

2.29 Permit Modifications [Rules 3Q .0514, .0515, .0516, .0517, .0523 and .0524]

- A. Permit modifications may be subject to the requirements of Rules 3Q .0514, .0515, .0516 and .0524.
- B. Changes made pursuant to Rules 3Q .0523(a) and (b) do not require a permit modification.
- C. The permittee shall submit an application for reopening for cause in accordance with Rule 3Q .0517 if notified by this Office.
- D. To the extent that emissions trading is allowed under FCAQTC Subchapter 3D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to Rule 3Q .0523(c).

2.30 Insignificant Activities [Rules 3Q .0503 and .0508(i)(15)]

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 of this Office upon request, documentation, including calculations if necessary, to demonstrate that an emission source or activity is insignificant.

2.31 Standard Application Form and Required Information [Rules 3Q .0505 and .0507]

The permittee shall submit applications and required information in accordance with the provision of Rules 3Q .0505 and .0507.

2.32 Property Rights [Rule 3Q .0508(i)(8)]

This permit does not convey any property rights of any sort, or any exclusive privileges.

2.33 Refrigerant Requirements (Stratospheric Ozone and Climate Protection) [Rule 3Q .0508(b)]

- A. 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 82 Subpart A, Appendices A and B, the permittee shall service, repair, and maintain such equipment according to the work practices and personnel certification requirements, and the permittee shall use certified recycling and recovery equipment specified in 40 CFR 82 Subpart F.
- B. 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 82 Subpart F.
- C. The permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the U.S. EPA or its designee as required. Records required under 40 CFR 82 shall be made available to the U.S. EPA or its designee upon request. These records are not required to be maintained on site.

2.34 Prevention of Accidental Releases - Section 112(r) [Rule 3Q .0508(h)]

If the permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the federal Clean Air Act, then the permittee is required to register this plan in accordance with 40 CFR Part 68.

2.35 Title IV Allowances [Rule 3Q .0508(i)(1)]

The facility's emissions are prohibited from exceeding any allowances that the facility lawfully holds under Title IV of the Clean Air Act. This permit shall not limit the number of allowances held by the permittee, but the permittee may not use allowances as a defense to noncompliance with any other applicable requirement.

2.36 Air Pollution Alert, Warning or Emergency [Section 3D .0300]

Should the Director of this Office declare an Air Pollution Alert, Warning or Emergency, 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 Section 3D .0300.

2.37 Registration of Air Pollution Sources [Rule 3D .0202]

The Director of this Office 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 shall be in accordance with Rule 3D .0202(b).

2.38 Ambient Air Quality Standards [Rule 3D .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 Rule 3D .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.

2.39 Odor [Rule 3D .0522] Locally Enforceable Only

The permittee shall not cause or permit the emission of odors beyond the facility's property lines which are harmful, irritating or which unreasonably interfere with the use and enjoyment of any person's properties or living conditions, or any public properties or facilities. Such odors are prohibited by Rule 3D .0522. No violation shall be cited, provided that the best practical treatment, maintenance, and control of odor(s) currently available is used. This requirement does not apply to normal agricultural practices, nor to accidental emissions of odors which are not normally produced during routine operations and activities as determined by the Director.

2.40 Fugitive dust control requirement [Rule 3D .0540] Locally Enforceable Only

The permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR 60, Appendix A), the owner or operator may be required to submit and implement a fugitive dust control plan as described in 3D .0540(f).

National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) General Conditions - [Rule 3D .1111]

Following are conditions found in the 40 CFR Part 63 NESHAP General Provisions. The following conditions only apply to sources subject to a relevant standard of a subpart of 40 CFR Part 63 except when otherwise specified in a particular subpart or in a relevant standard.

2.41 NESHAP - General Provisions <40 CFR 63 Subpart A> [Rule 3D .1111]

The permittee shall comply with all applicable requirements specified in the general provisions of the National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR 63 Subpart A) including but not limited to requirements concerning notifications, testing, monitoring, recordkeeping, modifications, construction, and reconstruction.

2.42 NESHAP - Startup Shutdown and Malfunction Plan <40 CFR 63.6(e)(3)> [Rule 3D

The permittee shall develop and implement a written startup, shutdown and malfunction plan in accordance with the requirements in 40 CFR 63.6(e)(3).

2.43 NESHAP - Good Air Pollution Control Practice <40 CFR 63.6(e) and 63.8(c)> [Rule 3D .1111]

At all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions at least to the levels required by all relevant standards. The permittee also shall maintain and operate each continuous monitoring system (CMS) as specified in 40 CFR 63.8, or in a relevant standard, and in a manner consistent with good air pollution control practices. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required by 40 CFR 63.6(e)(3). Operation and maintenance requirements established pursuant to Section 112 of the Clean Air Act are enforceable independent of emissions limitations or other requirements in relevant standards.

2.44 NESHAP - Circumvention <40 CFR 63.4(b)> [Rule 3D .1111]

The permittee shall not build, erect, install, or use any article, machine, equipment or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere, the use of diluents to achieve compliance with a relevant standard for visible emissions, and the fragmentation of an operation such that the operation avoids regulation by a relevant standard.

2.45 NESHAP - Maintain Records <40 CFR 63.10(b)(2)> [Rule 3D .1111]

For affected sources, the permittee shall maintain relevant records of:

- A. the occurrence and duration of each startup, shutdown, or malfunction of operation;
- B. the occurrence and duration of each malfunction of the air pollution control equipment;
- C. maintenance performed on the air pollution control equipment;
- D. actions taken during periods of startup, shutdown, and malfunction;
- E. all information necessary to demonstrate compliance with the affected source's startup, shutdown, and malfunction plan when all actions taken are consistent with the procedures specified in the plan;
- F. each period during which a CMS is malfunctioning or inoperative;
- G. all required measurement needed to demonstrate compliance with a relevant standard;
- H. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;
- I. all measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
- J. all CMS calibration checks;
- K. all adjustments and maintenance performed on CMS;

- L. any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements if the source has been granted a waiver under 40 CFR 63.10(f);
- M. all emission levels relative to the criterion for obtaining permission to use an alternative to the relative accuracy test if the source has been granted such permission under 40 CFR 63.8(f)(6); and,
- N. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.

2.46 NESHAP - Files Available for Inspection <40 CFR 63.10(b)(1)> [Rule 3D .1111]

The permittee shall maintain files of all information required by 40 CFR Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

2.47 NESHAP - Performance Testing Facilities Provided by Permittee <40 CFR 63.7(d)> [Rule 3D .1111]

For any performance testing for each new source and, at the request of the Director, for each existing source, the permittee shall provide performance testing facilities as follows:

- A. Sampling ports adequate for test methods applicable to the affected source. This includes:
 - 1. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures; and
 - 2. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.
- B. Safe sampling platform(s).
- C. Safe access to sampling platform(s).
- D. Utilities for sampling and testing equipment.
- E. Any other facilities that the Director deems necessary for safe and adequate testing of a source.
- F. Unless otherwise specified in the applicable subpart, each performance test shall be conducted according to the requirements in 40 CFR 63.7.

Compliance Assurance Monitoring for Major Stationary Sources (CAM) - General Conditions - [40 CFR Part 64]

Following are conditions based on the requirements found in 40 CFR Part 64. These conditions only apply to sources subject to the CAM requirements.

2.48 CAM - Proper Maintenance <40 CFR 64.7(b)> [Rule 3D .0614]

At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

2.49 CAM - Continued Operation <40 CFR 64.7(c)> [Rule 3D .0614]

Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

2.50 CAM - Response to Excursions or Exceedances <40 CFR 64.7(d)> [Rule 3D .0614]

Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designed condition, or below the applicable emissions limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. Based on the results of this determination, this Office may require the permittee to develop and implement a Quality Improvement Plan (QIP). The elements of a QIP are identified in 40 CFR 64.8(b).

2.51 **CAM - Documentation of Need for Improved Monitoring <40 CFR 64.7(e)> [Rule 3D .0614]**

After approval of the CAM plan, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify this Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conduction monitoring and collecting data, or the monitoring of additional parameters.

SECTION 3

SPECIFIC LIMITATIONS AND CONDITIONS

The emission source(s) and associated air pollution control device(s) listed below are subject to the following specific terms, conditions, and limitations, including the monitoring recordkeeping, and reporting requirements to which those requirements apply:

3.1 Facility-Wide Emission Source Conditions

NONE AT THIS TIME: RESERVED FOR FUTURE USE

3.2 Source Specific Emission Limits/Conditions

A. ES-603-1-(4, 5) - Prevention of Significant Deterioration [Rule 3D .0530 and 3Q .0317(b)]

1. Emission limit

Emissions of VOC from processing GTC products at dryers #6 and #7 (ES-603-1-(4,5)) shall be limited to less than 40 tons in any consecutive 12-month period. Emissions shall be calculated using the following formula:

$$V = (A \times 2.324) / 2000$$

where:

V = monthly VOC emission in tons

A = Monthly G7-48/56/63 production in tons at Plant 603

The non-integer constant in the equation is an emission factor in lb-VOC per ton of production, as determined by the most recent stack tests.

2. Monitoring/Recordkeeping requirement [Rule 3Q .0508(f)]

The permittee shall monitor and maintain monthly records of production of G7-48/56/63 processed through dryers #6 and #7 (ES-603-1-(4, 5)). At the end of each month, the total VOC emissions shall be calculated and recorded for each 12-month period.

3. Reporting requirement [Rule 3Q .0508(f)]

The records in 3.2(A)(2) shall form the basis of a semi-annual report which shall be submitted to this Office by January 30th and July 30th for the proceeding six-month period. This reporting requirement is an alternative excess emission report as described in condition 2.10(B)(2)(b).

B. ES-603-1-(4, 5) - Prevention of Significant Deterioration [Rule 3D .0530 and 3Q .0317(b)]

1. Emission limit

- (a) Combined emissions of VOC from processing G7 products shall be limited to less than 62.66 tons in any consecutive 12-month period.
- (b) No more than 20,000,000 lbs. of the "E" family of reconstituted sheet shall be processed in any consecutive 12-month period.
- (c) No more than 12,000,000 lbs. of the "F" family of reconstituted sheet shall be processed in any consecutive 12-month period.

2. **Monitoring/Recordkeeping requirement [Rule 3Q .0508(f)]**

The permittee shall monitor and maintain monthly records of the amounts of all G7 products processed. The records shall classify the G7 products according to the VOC emission factor (lbs. VOC/ton of G7) as follows:

G7 "family"	Factor greater than:	Factor less than or equal to:
A		1.54
B	1.78	2.32
C	1.54	1.78
D	2.32	2.56
E	equal to 2.32	
F	2.56	4.82
G	4.82	6.27

$$V = [(A \times 1.54) + (B \times 2.32) + (C \times 1.78) + (D \times 2.56) + (E \times 2.32) + (F \times 4.82) + (G \times 6.27)] / 2000$$

where:

V = monthly VOC emission in tons

A = Monthly production in tons of A family

B = Monthly production in tons of B family

C = Monthly production in tons of C family

D = Monthly production in tons of D family

E = Monthly production in tons of E (GTC) family

F = Monthly production in tons of F family

G = Monthly production in tons of G family

The non-integer constants in the equation are emission factors in lb-VOC per ton production, as determined by the most recent stack tests.

At the end of each month the permittee shall calculate and record the total VOC emissions for that 12-month period.

At the end of each month the permittee shall calculate and record the amount of "E" family of reconstituted sheet processed for that 12-month period.

At the end of each month the permittee shall calculate and record the amount of "F" family of reconstituted sheet processed for that 12-month period.

3. **Reporting requirement [Rule 3Q .0508(f)]**

The records in 3.2(B)(2) shall form the basis of a semi-annual report which shall be submitted to this Office by January 30th and July 30th for the proceeding six-month period. This reporting requirement is an alternative excess emission report as described in condition 2.10(B)(2)(b).

C. **ES-200-2-1, ES-201-2-1 - Prevention of Significant Deterioration [Rule 3D .0530 and 3Q .0317(b)]**

1. **Emission limit**

The combined emissions of PM10 shall not exceed 15 tons per year. Compliance is demonstrated by limiting production to 138,704.3 tons in any consecutive 12-month period.

2. **Monitoring/Recordkeeping requirement [Rule 3Q .0508(f)]**

The permittee shall monitor and maintain records of the monthly production throughput. At the end of each month the total throughput for each 12-month period shall be calculated and recorded.

3. **Reporting requirement [Rule 3Q .0508(f)]**

A summary report of all recordkeeping requirements in 3.2(C)(2) shall be submitted semi-annually and shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. This reporting requirement is an alternative excess emission report as described in condition 2.10(B)(2)(b).

D. **Building Group 611 - Research and Development Activities [Rule 3Q .0317]**

The permittee shall maintain a log on-site of R&D activities documenting that the activity results in no changes to the applicable requirements. There are no reporting requirements associated with this monitoring requirement.

E. **MACT-Organic HAP limit - 40 CFR 63, Subpart JJJJ [Rule 3D .0111]**

1. **HAP emission limit for ES-5-611-2**

- (a) Limit emissions to no more than 5% of the mass of organic HAP applied each month; or,
- (b) Limit the total mass of organic HAP in coating materials, or the total mass of organic HAP emitted, to no more than 4 mass percent of the total mass of coating materials applied to the web substrate each month; or,
- (c) Limit the total mass of organic HAP in coatings, or the total mass of organic HAP emitted, to no more than 20 mass percent of the total mass of coating solids applied to the web substrates each month.

2. **Monitoring/Recordkeeping requirement [Rule 3Q .0508(f)]**

The permittee shall monitor and maintain records sufficient to determine if the facility is operating in compliance with the standard.

3. **Reporting requirement [Rule 3Q .0508(f)]**

A report shall be submitted semi-annually and shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December. This reporting requirement is an alternative excess emission report as described in condition 2.10(B)(2)(b). The report shall contain the following:

- (a) Company name and address.
- (b) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
- (c) Date of report and beginning and ending dates of the reporting period.
- (d) If there are no deviations from any emission limitations (emission limit or operating limit), a statement that there were no deviations from the emission limitations during the reporting period.
- (e) If there were deviations from the emission limit, a summary of the violation including cause, duration, and corrective action taken.

F. **611-3-ES-3, 611-4-ES-2, and 611-2-ES-5 - Prevention of Significant Deterioration [Rule 3D .0530 and 3Q .0317(b)]**

In order for the 00339-TV-31 modification to avoid PSD review the facility must comply with the following:

1. **Emission limit**

The combined emissions of VOC from Casing & Cutting (611-3-ES-3), Casing & Drying (611-4-ES-2), and Cigarette Making (611-2-ES-5) shall be limited to less than 40 tons in any consecutive 12-month period.

2. **Monitoring/Recordkeeping - [Rule 3Q .0508(f)]**

Compliance with the limit specified in condition 3.2(F)(1) shall be demonstrated by the following:

- (a) The permittee shall maintain monthly records of all product throughputs necessary to calculate VOC emissions using the following formula:

$$(A*W + B*X + C*Y + D*Z + E) / 2000 = \text{monthly VOC emissions (tons)}$$

where:

A = monthly tons of tobacco processed in Casing & Cutting (611-3-ES-3);

B = monthly millions of cigarettes made in Cigarette Making (611-2-ES-5);

- C = monthly tons of tobacco processed in Casing & Drying (611-4-ES-2);
- D = monthly pounds of menthol applied in Cigarette Making (611-2-ES-5);
- E = monthly combined pounds of ethanol applied in Casing & Cutting (611-3-ES-3) and Casing & Drying (611-4-ES-2);
- W = VOC emission factor (lb VOC/ton tobacco) for tobacco processed in Casing & Cutting (611-3-ES-3), from the permit application for the 00339-TV-31 permit;
- X = VOC emission factor (lb VOC/million cigarettes) for cigarettes made in Cigarette Making (611-2-ES-5), from the permit application for the 00339-TV-31 permit;
- Y = VOC emission factor (lb VOC/ton tobacco) for tobacco processed in Casing & Drying (611-4-ES-4), from the permit application for the 00339-TV-31 permit; and
- Z = VOC emission factor (lb VOC/lb menthol applied) for menthol applied in Cigarette Making (611-2-ES-5), from the permit application for the 00339-TV-31 permit.

- (b) Each month the permittee shall calculate the monthly VOC total and the 12-month VOC total.
- (c) Each 12-month VOC total shall not exceed 40 tons of VOC.
- (d) The permittee shall keep a log of the cigarette makers in Cigarette Making (611-2-ES-5), documenting the make/model and maximum production rate of each cigarette maker.

3. **Reporting - [Rule 3Q .0508(f)]**

- (a) The permittee shall submit a semiannual report to this Office which includes the total VOC emissions (tons) emitted each month and the total VOC emissions (tons) emitted each 12-month period.
- (b) The report shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December.

3.3 Particulate Emission Limits

A. Particulates from Fuel Burning Indirect Heat Exchangers [Rule 3D .0503]

1. **Particulate allowable emission rate [Rule 3D .0503]** - Emissions of particulate matter from emission sources designated in Section 1.1 shall not exceed the allowable emission rate calculated by the equation $E=1.09 * Q^{-0.2594}$; where E = allowable emission limit for particulate matter in lb/million Btu, and Q =maximum heat input in million Btu/hr of all fuel burning indirect heat exchangers, determined according to Rule 3D .0503(c,e).

Emission Source ID	Value of Q	Particulate emission limit (E)
ES-602-1-1	792.5 MMBtu/hr	0.19 lb/million Btu
ES-602-1-2	792.5 MMBtu/hr	0.19 lb/million Btu
ES-602-1-5	792.5 MMBtu/hr	0.19 lb/million Btu
ES-602-1-6	792.5 MMBtu/hr	0.19 lb/million Btu

2. **Monitoring/Recordkeeping/Reporting requirement [Rule 3Q .0508(f)]** - No monitoring/recordkeeping/reporting is required for the specific purpose of demonstrating compliance with the above standard because the fuels being combusted are natural gas and No. 2 fuel oil which inherently meet this standard. However, the permittee shall maintain the appropriate records for raw material usage and/or production rates in order to calculate the emissions data needed to fulfill the requirements for condition 2.13 entitled Annual Emission Inventory Requirements.

B. Control of Particulates from Miscellaneous Industrial Processes - [Rule 3D .0515]

Emissions for particulate matter from emission sources designated in Section 1.1 shall not exceed the allowable emission rate calculated by the equation, $E = 4.10 * P^{0.67}$, for process weight rates up to 30 tons/hr or by the equation, $(55.0 * P^{0.11})-40$, for process weight rates greater than 30 tons/hr; where E = allowable PM emission rate in lb/hr, and P = process weight in tons/hr. Accordingly, the potential emission rate from this equipment shall at no time exceed the emission rates based on maximum production.

3.4 Sulfur Dioxide Emission Limits

- A. **Sulfur Dioxide Emission from Combustion Sources [Rule 3D .0516]**
Emissions of sulfur dioxide from ES-602-1-11 (generator) shall not exceed 2.3 lb/MMBtu input.
- B. **Sulfur Dioxide Emission from Combustion Sources [Rule 3D .0501(e)]**
Emissions of sulfur dioxide from ES-602-(1,2,5,6)-11 (boilers) shall not exceed 1.6 pounds per million Btu input which is a source specific SIP limit established in 1983.
- C. **Monitoring/Recordkeeping/Reporting requirement [Rule 3Q .0508(f)]**
No monitoring/recordkeeping/reporting is required for the specific purpose of demonstrating compliance with the above standard because the fuel being combusted is No. 2 fuel oil or natural gas. The maximum sulfur content of No. 2 fuel oil is 0.5 % by weight which ensures compliance with the sulfur dioxide standard. However, the permittee shall maintain the appropriate records for raw material usage and/or production rates in order to calculate the emissions data needed to fulfill the requirements for condition 2.13 entitled Annual Emission Inventory Requirements.

3.5 Control of Visible Emissions

A. Control of Visible Emissions [Rule 3D .0521(c)]

Standard - Visible emissions from emission sources designated in Section 1.1 (boilers) shall not exceed 40% opacity when averaged over a six-minute period. However, the six-minute averaging periods may exceed 40% opacity if:

1. no six-minute average exceeds 90%;
2. no more than one six-minute period exceeds 40% in any hour; and
3. no more than four six-minute periods exceed 40% in any 24 hours.

This standard shall apply at all times, except during periods of startup, shutdown, or malfunction.

B. Control of Visible Emissions [Rule 3D .0521(d)]

Standard - Visible emissions from emission sources designated in Section 1.1 (manufacturing sources) shall not exceed 20% opacity when averaged over a six-minute period. However, the six-minute averaging periods may exceed 20% opacity if:

1. no six-minute average exceeds 87%;
2. no more than one six-minute period exceeds 20% in any hour; and
3. no more than four six-minute periods exceed 20% in any 24 hours.

This standard shall apply at all times, except during periods of startup, shutdown, or malfunction.

C. Monitoring/Recordkeeping/Reporting requirement [Rule 3Q .0508(f)]

No monitoring/recordkeeping/reporting is required for the specific purpose of demonstrating compliance with the above standard for all fuel combustion sources because the fuels being combusted are natural gas and No. 2 fuel oil which inherently meet this standard. However, the permittee shall maintain the appropriate records for raw material usage and/or production rates in order to calculate the emissions data needed to fulfill the requirements for condition 2.13 entitled Annual Emission Inventory Requirements.

For all non-fuel burners, Section 3.6 satisfies this requirement.

3.6 PM - Periodic Monitoring/Recordkeeping/Reporting

A. Non-CAM [Rule 3Q .0508(f)]

1. **Periodic monitoring for equipment controlled by fabric filters** - Particulate matter emissions from emission sources designated in Section 1.1 shall be controlled during all periods of operation. To ensure the optimum efficiency of the control devices, the permittee shall perform inspections and maintenance in a manner and frequency consistent with good practice for minimizing emissions. At a minimum, an internal inspection shall be performed annually.
2. **Recordkeeping requirement** - A log shall be maintained on-site with the dates of inspection and maintenance activities, inspection results, and maintenance performed.
3. **Reporting requirement** - The permittee shall submit a summary report of the monitoring requirements to this Office by January 30th and July 30th for each preceding six-month period.

B. Compliance Assurance Monitoring (CAM) [Rule 3D .0614, 40 CFR Part 64]

1. **Monitoring-Fabric Filter Inspection & Maintenance** - To ensure the optimum efficiency of the control devices as designated in Section 1.1, the permittee shall perform inspections and maintenance in a manner and frequency consistent with good practice for minimizing emissions. Inspection and maintenance must include the following:
 - (a) An internal inspection shall be performed of each control device at least on an annual basis.
 - (b) When an inspection reveals a problem, an investigation shall be initiated and maintenance activities, required to correct the problem, shall be scheduled and performed. The investigation and corrective action shall be conducted as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions.
 - (c) Only trained maintenance personnel will perform inspection and maintenance.
 - (d) An excursion is when improper maintenance results in the improper operation of the control device.
2. **Monitoring-Visual Stack Observations** - - In order to demonstrate compliance with the CAM plan for control devices identified in Section 1.1, the permittee shall perform visual stack observations. As a minimum, the visual stack observation program shall include the following:
 - (a) With respect to the CAM plan visual stack observations, an "operational day" begins at 7:00:00 AM and ends at 6:59:59 AM the following calendar day.

- (i) Visible emissions from each stack (except stack EP-5-611-4, serving emission source ES-2-611-4) shall be monitored for the presence of visible emissions, once per operational day for each plant operational day. The visible emissions observation data for each stack must be available for at least 90 percent of the facility's operating days during the six-month reporting period to ensure compliance with this requirement. If an emission source is not operating, a record of this fact along with the corresponding date and time shall substitute for the daily check.
 - (ii) Visible emissions from stack EP-5-611-4, serving emission source ES-2-611-4, shall be monitored for the presence of visible emissions, once per operational day for each plant operational day during which the ES-2-611-4 equipment runs for four continuous hours.
- (b) The presence of any visible emissions shall trigger an investigation to determine the cause and, if applicable, corrective action. The investigation and corrective action shall be conducted as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions. The visual observation shall be repeated as soon as practicable after the investigation and completion of any corrective action to verify that the visible emissions are no longer present. If the visible emissions are present after the investigation and corrective action has been taken, the emissions shall be considered an excursion.
- (c) Observers shall receive on-the-job training pertaining to visual observations and what constitutes an excursion.
3. **Recordkeeping** - Records of the monitoring required under 3.6(B)(1, 2) shall be maintained on-site, made available to Office personnel, that include the following:
- (a) Maintenance of fabric filters - dates of inspections and maintenance activities; results of investigations and corrective actions taken; names of persons conducting activities; records of employee on-the-job training for inspection and maintenance.
 - (b) Visual observations - date/time of each observation; person performing observation; results of observation (visible emissions present or absent); results of investigation and corrective action if visible emissions are present; records of employee on-the-job training for visual observations.
4. **Reporting requirement** - The permittee shall submit a summary report of all monitoring requirements in this section to this Office by January 30th and July 30th for each preceding six-month period.

3.7 Work Practices for Sources of Volatile Organic Compounds [Rule 3D .0958]

- A. **Work practice standards [Rule 3D .0958(c) and 3Q .0508(i)(16)]** - For equipment designated in Section 1.1 the permittee shall:
1. store all material, including waste material, containing volatile organic compounds in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
 2. clean up spills as soon as possible following proper safety procedures,
 3. store wipe rags in closed containers,
 4. not clean sponges, fabric, wood, paper products, and other absorbent materials, unless volatile organic compound emissions are captured and controlled,
 5. drain solvents used to clean supply lines and other coating equipment into containers designed for closure, and close containers immediately after each use,
 6. clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent, closing the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be poured into a closed container.
- B. **Work practice standards [Rule 3D .0958(d) and 3Q .0508(i)(16)]** - For all parts washing the permittee shall:
1. flush parts in the freeboard area,
 2. take precautions to reduce the pooling of solvent on and in the parts,
 3. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
 4. not clean filling machines above the fill line,
 5. not agitate solvent to the point of causing splashing, unless volatile organic compound emissions are captured and controlled.
- C. **Monitoring/Recordkeeping requirements [Rule 3Q .0508(f)]** - To ensure compliance with the work practice standards specified in condition 3.7(A) the permittee shall perform weekly inspections at each affected emissions source to verify compliance with the work practices and identify any deviations. The results of the inspections and any deviations shall be recorded in a log (written or electronic form), maintained on site and made readily available upon request by a representative of this Office. The log shall contain the following:
1. the date and time of each inspection;
 2. the results of each inspection; and
 3. all deviations from required work practice standards and the corrective actions taken.

- D. **Alternative VOC work practice monitoring/recordkeeping requirements - [Rule 3D .0958(c) and 3Q .0508(i)(16)]** - To ensure compliance with the work practice standards the permittee shall train all personnel involved in the operation of the affected equipment, at least annually, on the reasons, procedures and importance of VOC work practice methods. The training shall be conducted prior to being responsible for the operation. Records must be maintained on-site of the training activities. Quarterly inspections shall be conducted to assure that the training is adequate. To ensure compliance with this requirement the permittee shall:
1. train all personnel involved in operation of the above equipment, at least annually, in accordance with the reasons, procedures and importance of VOC work practice methods. All personnel shall be trained prior to being involved in the operation; and
 2. maintain records on site demonstrating that the annual training program is in place. These records shall be made available for inspection upon request by this Office and shall include, but not be limited to:
 - (a) an up-to-date list of personnel involved in operation of the above equipment and documentation of successful completion of both initial and annual training including dates of the training sessions; and,
 - (b) an outline of the subjects covered in the initial and annual training for each group of personnel,
 - (c) inspection dates, person conducting inspection, and results.
- E. **Reporting requirements [Rule 3D .0508(f)(2)]** - The permittee shall submit a summary report of the monitoring requirements specified in condition 3.7(C) and (D) to this Office by January 30th and July 30th for each preceding six-month period. This report shall contain the total number of weeks in which the work practice standards weekly inspection was not made during the reporting period. The report shall also include which monitoring/recordkeeping method was selected during the reporting period to demonstrate compliance with condition 3.7(A) and the date of a switch being made from one compliance method to the other.

3.8 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ)

Specific emission source permit conditions for ES-602-1-11 (Emergency Generator, 1,610 HP, Diesel-fired, 14 mmBtu/hr), effective beginning no later than May 3, 2013.

- A. **National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines** (Subpart ZZZZ) – The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ including the applicable requirements of 40 CFR Part 63 Subpart A, General Provisions as specified in Table 8 to Subpart ZZZZ. **<40 CFR Part 63, Subpart ZZZZ> [Rule 3D .1111]**
- B. **Operation** – The permittee shall operate the emergency generator in accordance with paragraphs (f)(1)(i) through (iii) of 40 CFR 63. 6640, and the following conditions:
1. There is no time limit on the use of the emergency generator in emergency situations.
 2. The emergency generator may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of the emergency generator is limited to 100 hours per year.
 3. If additional hours are needed for maintenance checks and readiness testing, the permittee shall petition this Office for approval of additional hours, unless the permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the emergency generator beyond 100 hours per year.
 4. The emergency generator may be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing.
 - (a) non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity;
 - (b) the permittee may operate the emergency generator for a maximum of 15 hours per year as part of a demand response program in accordance with 63.6640(f)(1)(iii). The 15 hours per year of demand response operation shall be counted as part of the 50 hours of operation per year provided for non-emergency situations;
 - (c) The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by (ii) above, as long as the power provided by the financial arrangement is limited to emergency power.
 5. If the permittee fails to operate the emergency generator according to these requirements, the emergency generator will not be considered an emergency engine and must meet all requirements for non-emergency engines.

<40 CFR 63.6640(f)> [Rule 3D .1111]

- C. **Maintenance** - The permittee shall maintain the emergency generator in accordance with 40 CFR 60.6603 and Table 2d.
1. The permittee shall change the oil and filter of the emergency generator every 500 hours of operation or annually, whichever comes first.
 2. The permittee shall inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first.
 3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
 4. The permittee may, at its option, utilize an oil analysis program as provided in 40 CFR 63.6625(i) in order to extend the specified oil change requirement of (1), above.
- <40 CFR 63.6603(a) and 63.6640> [Rule 3D .1111]**
- D. **Monitoring requirements** – The emergency generator shall be equipped with a non-resettable hour meter.
- <40 CFR 63.6625(f)> [Rules 3D .1111 and 3Q .0308(a)(1)]**
- E. **Recordkeeping requirements** – The permittee shall maintain records in accordance with 40 CFR 63.6655, including the following:
1. Records of maintenance conducted on the emergency generator sufficient to demonstrate that it is being operated and maintained according to the permittee's maintenance plan. [§63.6655(e)]
 2. Records of the hours of operation of the emergency generator recorded by the non-resettable hour meter.
 3. Records of the total annual hours of operation due to maintenance checks and readiness testing.
 4. Records of how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.
 5. If the emergency generator is used for demand response operation, records of the notification of the emergency situation, and the time the engine was operated as part of demand response.
 6. If the permittee utilizes an oil analysis program pursuant to 3.6.(c)(4) and 40 CFR 63.6625(i), records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

SECTION 4 CONTROL OF TOXIC AIR POLLUTANTS - LOCALLY ENFORCEABLE ONLY

The entire facility is subject to Subchapter 3D .1100 of the FCAQTC for the toxic air pollutants listed. This section is locally enforceable only. All the emission sources and their associated air pollution control device(s) are subject to the following specific terms, conditions, and limitations, including the monitoring recordkeeping, and reporting requirements to which those requirements apply.

4.1. Facility-Wide Toxic Air Pollutant Conditions

A. Permit Requirements for Toxic Air Pollutants and Control of Toxic Air Pollutants [Section 3D .1100]

1. **Other and Future air toxic requirements** - Specification of a listed toxic air pollutant (TAP) in this permit does not excuse the permittee from complying with the requirements of Sections 3D .1100 and 3Q .0700 of the FCAQTC with regard to any other listed TAP emitted from the regulated facility, nor does this permit exempt the permittee from compliance with any future air toxic regulations promulgated pursuant to the requirements of the Clean Air Act. [Sections 3D. 1100 and 3Q. 0700]
2. **De minimis limits** - Total facility-wide emissions of the following pollutants shall not exceed their respective de minimis emissions limits as shown in Rule 3Q .0711 unless a modeling demonstration is first approved by this Office which shows that the emissions of the subject TAPs from the facility will not adversely affect human health. This demonstration shall be in accordance with the requirements set forth in Section 3D .1100 and 3Q. 0700 of the FCAQTC. This demonstration must be made with an up-to-date version of a U.S. EPA approved computer model or, upon approval by this Office, calculated using the results of a previous modeling analysis showing compliance with the acceptable ambient levels for the pollutants listed below. [Section 3Q .0700]

Pollutant (CAS Number)	De minimis level
chloroform (67-66-3)	290 lb/yr
cresol (1319-77-3)	0.56 lb/hr
hydrogen chloride (7647-01-0)	0.18 lb/hr
methyl ethyl ketone (78-93-3)	78 lb/day and 22.4 lb/hr
phenol (108-95-2)	0.24 lb/hr
styrene (100-42-5)	2.7 lb/hr
toluene (108-88-3)	98 lb/day and 14.4 lb/hr
trichlorofluoromethane (75-69-4)	140 lb/hr
xylene (1330-20-7)	57 lb/day and 16.4 lb/hr

3. **Dispersion modeling emission limits** - Combined emissions of the following TAPs from all sources not exempted by 3Q .0702(a) and (b) at this facility shall not exceed the emission rates listed below. Dispersion modeling (using AERMOD - version 07026), performed in July, 2007 and approved by this Office, demonstrated that the permitted emissions of the TAPs listed in the table below from this facility impacted the surrounding ambient air at levels below the acceptable ambient levels (AALs) specified in Rule 3D .1104 of the FCAQTC. The emission rates (calculated as potential emissions) listed below shall be used as a basis for certifying that any future modifications or changes in the methods of operation will result in ambient impacts below these AALs. In no case shall actual emissions resulting from changes or modifications exceed any of the following emission rates without first applying for and receiving a permit. [Section 3D .1100]

Pollutant (CAS Number)	Maximum facility-wide emission rate
acetaldehyde (75-07-0)	0.38 lb/hr
acetic acid (64-19-7)	26.0 lb/hr
acrolein (107-02-8)	0.20 lb/hr
carbon disulfide (75-15-0)	24.06 lb/day
ammonia (7664-41-7)	29.54 lb/hr
benzene (71-43-2)	147.4 lb/yr
formaldehyde (50-00-0)	0.22 lb/hr
phosphine (7803-51-2)	1.68 lb/hr

4. **Modifications** - In accordance with Rule 3Q .0701(c), for the 5 year period ending on July 26, 2012, modifications which increase the facility-wide emissions of, or which relocate an existing emission source of any TAPs listed in the table in permit condition 4.1(A)(3) are allowed without further modeling analysis by the permittee except that actual emissions may not increase above those emissions rates listed in that table without first applying for and obtaining a permit. This does not prevent this Office from conducting a modeling analysis of the facility and, furthermore, does not affect the ability of the Director to require the permittee to conduct another modeling analysis pursuant to Rule 3Q .0712. This permit condition does not exempt the permittee from the requirement to apply for a permit to comply with any future National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63).[Rule 3Q .0701(c)]

5. **Monitoring/recordkeeping/reporting requirement** -The permittee shall maintain updated records of production rates, throughputs, material usage, and other process operational information as is necessary to determine compliance with the emission rates specified in permit conditions 4.1(A)(2) and (3). At a minimum these records shall include data sufficient to calculate monthly averaged emission rates (in pounds per hour of emission source operation) for TAPs with 1-hour or 24-hour emission limits and yearly emission rates (in pounds per calendar year) for TAPs with annual emission limits.

Copies of these records shall be retained by the permittee for a period of three years after the date on which the record was made.

If requested by an agent of this Office, the permittee shall readily supply copies of these records at the time of inspection. Likewise, the permittee shall submit copies of the records upon request by this Office. [Rules 3D .0605 and 3D .1105]

PART II

AIR QUALITY CONSTRUCTION PERMIT

The permittee is hereby authorized to construct air emission source(s) and associated air pollution control device(s) listed in Part II, Section 1 of this permit, in accordance with the associated air quality permit application(s) received, including all plans, specifications, previous applications, and other supporting data, all of which are filed with this Office and are incorporated in Part II of this Air Quality Permit.

SECTION 1

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

Emission Source ID #	Emission Source Description	Control Device Description
611-3-ES-3	Casing & Cutting	Fabric filters: CD-1-611-3 and CD-2-611-4 (No Control Devices for VOC)
611-4-ES-2	Casing & Drying	Fabric filter: CD-4-611-4 (No Control Devices for VOC)
611-2-ES-5	Cigarette Making	Uncontrolled, fugitive emissions

SECTION 2

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. Unless otherwise specified herein all references to the "permit" in this section apply only to Part II of the permit.

A. General Provisions

1. This permit is nontransferable by the permittee. Future owners and operators must obtain a new air quality permit from this Office.
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 Forsyth County Air Quality Control Ordinance and Technical Code, including assessment of civil and/or criminal penalties.

B. Submissions**(REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, AND REQUESTS FOR RENEWAL)**

Unless otherwise approved by this Office, 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 this Office.

C. 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, condition 2.26 of this permit.

D. Annual Fee Payment

The permittee shall pay all fees in accordance with Forsyth County Air Quality Control Ordinance and Technical Code Subchapter 3Q .0200 and in conjunction with Part I, condition 2.12 of this permit.

E. 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 Director:

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 this Office 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.

F. 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 Forsyth County Air Quality control Ordinance and Technical Code.

G. Inspection and Entry

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow this Office, 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.

SECTION 3 SPECIFIC LIMITATIONS AND CONDITIONS

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

- A. 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. The permittee shall comply with applicable Forsyth County Air Quality Control Ordinance and Technical Code Regulations.
- B. The permittee shall operate the air emission sources and control devices listed in Section 1 in accordance with provisions contained in Part I of this permit.
- C. **R&D Facility Ethanol Use Project:**

Emission Source 611-3-ES-3, Casing & Cutting top dressing drum. Change in top dressing applied (allow ethanol use). Existing top dressing drum replaced by Hauni top dressing drum. (Emission Point EP-11)

Emission Source 611-4-ES-2, Casing & Drying, burley casing drum. Change in casing applied (allow ethanol use). (Emission Point EP-4)

Emission Source 611-2-ES-5, Cigarette Making. Change in tobacco top dressing (allow for ethanol use). (Fugitive emissions)

 1. **30-Day Notification From Start-up** - The permittee shall notify this Office of the actual start-up date of the completed project within 30 days after such date. This notification is to enable this Office to plan an inspection to verify compliance with any applicable standards. **[Sec. 3-0103(a)(5) and Rule 3Q .0308(a)]**
 2. **Commencement of Construction** - If construction/modification of this equipment has not commenced by **Zzzz XX, 2017** (18 months after the effective date of permit **00339-TV-31**), or construction activities lapse for a period of 18 months after construction has commenced, the permittee shall reapply to this Office and obtain a permit to construct before commencing or resuming construction. **[Rule 3Q .0308(a)]**

**FORSYTH COUNTY
OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION**

SIGNIFICANT MODIFICATION – STATEMENT OF BASIS

R.J. Reynolds, Whitaker Park facility - Premise # 00339

Permit Tracking #: **1149**

Site Location:
Winston-Salem, NC

Current Permit No
00339-TV-30

New Permit No.
00339-TV-31

Technical Contacts:
Max Hopkins
Mike Hastings

Phone:
(336) 741-6932
(336) 741-4785

Responsible Official:
Daniel J. Herko
Executive Vice President of R&D

Rob Russ
Agency
Reviewer

Signature

Date

Peter Lloyd
Agency Q/A
Supervisor

Signature

Date

I. Processing

The changes requested in the permit application will be processed as a significant modification in accordance with Rule 3Q .0516 of the Forsyth County Air Quality Technical Code. This draft permit will go through a 30 day public comment period and a concurrent 45 day review by the U.S. EPA prior to final approval. This dual process is known as parallel processing. The proposed modification involves a change in the method of operation and the replacement of a top dressing drum to allow ethanol-based top dressing to be applied in the facility's Research and Development (R&D) department. The proposed modification also involves a new Prevention of Significant Deterioration (PSD) avoidance condition in the permit, thereby requiring that it be processed as a significant modification.

II. Modification Analysis

Summary

The modification and associated PSD avoidance limit involves three emissions sources in the Whitaker Park R&D department: Casing & Cutting (611-3-ES-3), Burley Casing & Drying (611-4-ES-2), and Cigarette Making (611-2-ES-5). The overall purpose of the modification project is to allow the use of ethanol-based top-dressings in the R&D equipment. The project does not result in any debottlenecking. The maximum throughput capacity of the equipment is not affected by the modification. In Casing and Cutting an existing top dressing drum will be replaced by a Hauni top dressing drum with the same maximum throughput capacity.

In Casing & Cutting, the ethanol may be introduced in the top dressing drum (TPDD-14101). This will increase VOC emissions (ethanol) in Casing & Cutting as well as in the cigarette makers downstream. Based on past engineering assessments, 1% of the ethanol is expected to be emitted in the cigarette makers and 99% in Casing & Cutting.

In Burley Casing & Cutting, ethanol may also be applied in the burley casing drum (TPSD-1201).

The applicant is requesting that a VOC limit of <40 tons per 12-month period be placed in the permit in order to avoid PSD for the proposed modification project. This new limit is included in the permit in condition 3.2(F).

III. Modification Analysis -

VOC, PM and some tobacco related HAP/TAP pollutants are emitted by the three emission sources involved with the modification. The only pollutant with emissions affected by the modification is VOC.

Compliance Assurance Monitoring (CAM) Requirements

CAM requirements are not affected by this modification since the involved emissions sources have no VOC control and VOC is the only pollutant affected by the modification.

PSD Applicability

The potential emission of VOC after the modification will exceed the VOC PSD threshold of 40 tons per 12-month period. Based on the proposed ethanol application rates and the maximum throughput capacities of the equipment, the total potential of ethanol alone is over 335 TPY. The ethanol application rates and maximum throughput rates are considered confidential information. They are listed in the confidential version of the permit application.

Cigarette Makers No Longer Considered to Be Insignificant Sources

Because cigarette making is involved in the PSD avoidance limit, cigarette making must be included in the permit. Previously, each cigarette maker machine had been established as an insignificant activity in accordance with Rule 3Q .0503(8). Cigarette Making is included in the permit as emission source 611-2-ES-5. This source could have been removed from the permit in the past after all the cigarette makers had been demonstrated to be insignificant, but it had inadvertently been left in the equipment list in permit condition 1.1. With the modified permit, permit 00339-TV-31, emission source 611-2-ES-5 must remain in the equipment list. The cigarette makers are not exhausted to ambient air so the only emissions from these sources is VOC and trace amounts of HAP/TAP. The facility currently has eight R&D cigarette maker machines, but the number of R&D cigarette makers is of no consequence with respect to any permit limits. The combined number of cigarettes collectively made on the R&D cigarette makers, however, is important because it is involved with the new PSD avoidance condition. Consequently, the permit does not restrict the number of R&D cigarette makers or their addition or removal. The PSD avoidance condition requires that the number of cigarettes made in R&D be recorded and reported. For informational purposes,

there is also a requirement to keep a log of the R&D cigarette making machines, documenting the make/model and maximum production rate of each cigarette maker (permit condition 3.2(F)(2)(d)).

PSD Avoidance Limit for VOC

The PSD avoidance limit for VOC is included in the permit in condition 3.2(F) as follows:

F. **611-3-ES-3, 611-4-ES-2, and 611-2-ES-5 - Prevention of Significant Deterioration [Rule 3D .0530 and 3Q .0317(b)]**

In order for the 00339-TV-31 modification to avoid PSD review the facility must comply with the following:

1. **Emission limit**

The combined emissions of VOC from Casing & Cutting (611-3-ES-3), Casing & Drying (611-4-ES-2), and Cigarette Making (611-2-ES-5) shall be limited to less than 40 tons in any consecutive 12-month period.

2. **Monitoring/Recordkeeping - [Rule 3Q .0508(f)]**

Compliance with the limit specified in condition 3.2(F)(1) shall be demonstrated by the following:

- (a) The permittee shall maintain monthly records of all product throughputs necessary to calculate VOC emissions using the following formula:

$$(A*W + B*X + C*Y + D*Z + E) / 2000 = \text{monthly VOC emissions (tons)}$$

where:

A = monthly tons of tobacco processed in Casing & Cutting (611-3-ES-3);

B = monthly millions of cigarettes made in Cigarette Making (611-2-ES-5);

C = monthly tons of tobacco processed in Casing & Drying (611-4-ES-2);

D = monthly pounds of menthol applied in Cigarette Making (611-2-ES-5);

E = monthly combined pounds of ethanol applied in Casing & Cutting (611-3-ES-3) and Casing & Drying (611-4-ES-2);

W = VOC emission factor (lb VOC/ton tobacco) for tobacco processed in Casing & Cutting (611-3-ES-3), from the permit application for the 00339-TV-31 permit;

X = VOC emission factor (lb VOC/million cigarettes) for cigarettes made in Cigarette Making (611-2-ES-5), from the permit application for the 00339-TV-31 permit;

Y = VOC emission factor (lb VOC/ton tobacco) for tobacco processed in Casing & Drying (611-4-ES-4), from the permit application for the 00339-TV-31 permit; and

Z = VOC emission factor (lb VOC/lb menthol applied) for menthol applied in Cigarette Making (611-2-ES-5), from the permit application for the 00339-TV-31 permit.

- (b) Each month the permittee shall calculate the monthly VOC total and the 12-month VOC total.
 - (c) Each 12-month VOC total shall not exceed 40 tons of VOC.
 - (d) The permittee shall keep a log of the cigarette makers in Cigarette Making (611-2-ES-5), documenting the make/model and maximum production rate of each cigarette maker.
3. **Reporting - [Rule 3Q .0508(f)]**
- (a) The permittee shall submit a semiannual report to this Office which includes the total VOC emissions (tons) emitted each month and the total VOC emissions (tons) emitted each 12-month period.
 - (b) The report shall be received by this Office by July 30th for the previous months of January through June, and by January 30th for the previous months of July through December.

The actual emission factors represented by the variables W, X, Y, and Z have been granted confidential status so are not included in the permit or in the public version of the permit application. They are included in the confidential version of the permit application. The emission factors are based on accepted non-ethanol tobacco related VOC emission factors, menthol application and release rates plus the new ethanol application rates.

IV. Changes to the Permit -

- A.** Modified the Permit Number to 00339-TV-31 on the permit page with the Forsyth County Seal and on the first page of the permit's Table of Contents.
- B.** Updated the permit effective date to and added the new effective date to the page headers along with the permit number.
- C.** In the Table of Contents for the 00339-TV-31 permit, the listed page numbers were adjusted to reflect the revised permit.
- D.** In Part I, Condition 1.1 (Equipment List and Applicable Conditions), revised the description for emission source 611-2-ES-5 from "Making & Packing" to Cigarette Making" to address the fact that the only permitted equipment pieces included in 611-2-ES-5 are the R&D cigarette makers. Also removed the listing of emission source 603-1-ES-6 because all of the equipment associated with that source had previously demonstrated to qualify as an insignificant activities in accordance with Rule 3Q .0503(8).
- E.** In Part I, Condition 1.2, Operating Conditions Not Covered Under the Permit Shield, all of the entries from the previous permit (00339-TV-30) were removed because the new permit (00339-TV-

31) went through EPA review.

- F. In Part I, added new permit condition 3.2(F) to address the new PSD avoidance limit for VOC.
- G. In Part II (Air Quality Construction Permit) deleted the listing for the Tobacco Milling Project which had been included in permit 00339-TV-30. The start-up of that completed project occurred on September 3, 2014. Added the listing for the new R&D facility Ethanol Use Project.

V. Permit Processing Notes

4/7/2015

A Title V minor permit modification application (dated 4/7/2015) was received pertaining to the RJR Whitaker Park facility. The application was for the use of ethanol in the top dressings for tobacco processed in the R&D department at the facility. The application included payment of the \$918 permit modification application fee for a Title V minor modification. The application was issued tracking #1149. The application included a request for confidential treatment for some of the information in the application.

In reviewing the application, it was determined that the application needed to be for a Title V significant modification because the application was requesting a limit to avoid PSD. This information was relayed to Mike Hastings with RJR.

4/30/2015

A revised permit application (this time for a Title V significant modification application) was received from RJR. The application included payment of \$8,524 which was the difference between the full fee for a Title V significant application fee (\$9,442) and the \$918 payment received on 4/7/2015. The revised application did not involve the submittal of any confidential information.

5/4/2015

This Office sent RJR a confidential treatment determination letter indicating that this Office had determined that the requested information (from the 4/7/2015 application) was entitled to confidential treatment as provided in Rule 3Q .0107 of the FCAQTC.

6/26/2015

An amended version of the Title V significant modification application was received from RJR. The amended application addressed VOC emissions relating to ethanol being applied in the burley casing drum in the R&D Casing & Cutting line. The need for the addition of ethanol in the burley casing drum had not been realized by RJR at the time of the April 2015 applications. The amended application included a request for confidential treatment for some of the information.

7/1/2015

A revised D3-1 application form was received from Mike Hastings of RJR for the R&D facility ethanol use project. The email message accompanying the revised form stated: "I have made some corrections to the D3-1 forms (attached) for the recent R&D submittal for using ethanol in the pilot plant. There was only a correction to the TAP emissions and do not affect the rest of the application package."

8/21/2015

This Office sent RJR a confidential treatment determination letter indicating that this Office had determined that the requested information (from the amended application) was entitled to confidential treatment as provided in Rule 3Q .0107 of the FCAQTC.

9/9/2015

A revised D4 application form was received via email attachment from Mike Hastings of RJR for the R&D

facility ethanol use project. The email message accompanying the revised form stated: "For fire safety reasons the CFM of the stack on the new top dressing drum will have to be increased. Attached is an updated D4 form with the change, to be included with the application package. This has no effect on the emissions."

9/11/2015

I completed the draft permit, statement of basis, and draft public notice documents. I sent an email to Peter Lloyd asking him to review the documents.

9/14/2015

Peter Lloyd completed his review having suggested several edits.

9/15/2015

I incorporated Peter Lloyd's edits into the documents.

VI. Statement of Basis Conclusions

This Office, upon completion of its review of this modification, has concluded that the facility will be in compliance with all applicable regulations and has drafted permit number 00339-TV-31, which details all the necessary requirements to ensure compliance. This Office recommends approval of this TV permit modification.