

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

November 4, 2017

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
Tobaccoville Facilities
King, NC
Permit #00745-TV-38**

This facility had applied for a significant modification of its Title Air Quality operation permit and has requested a limitation to avoid the applicability of Major New Source Review preconstruction permitting. In addition to this modification, the public may comment on those sections of the permit identified in the statement of basis that are not covered under Forsyth County Air Quality Control Ordinance and Technical Code (FCAQTC) Sec. 3Q-0512(a) Permit Shield. 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 Sec. 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:

<https://www.epa.gov/caa-permitting/north-carolina-proposed-title-v-permits>

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 lloydpb@forsyth.cc on or before December 4, 2017, the close of the public comment period.

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 00745-TV-38	Zzzz XX, 2017	November 27, 2012	February 27, 2012

Facility Name: R.J. Reynolds Tobacco Company - Tobaccoville
Mailing Address: P.O. Box 2959
City, State, ZIP Code: Winston-Salem, NC 27102

Facility Location: RJR Moore Road
City: Tobaccoville, 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 # 00745-TV-38
Zzzz XX, 2017**

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

1.1 Equipment List and Applicable Conditions

Building 851-1 Cigarette Manufacturing

ES#	Emission Source	Applicable Standards						CAM			non-CAM		Visible Emissions		
		PM	PM	PM	SO2	SO2	VOC	Fabric Filter	Fume Incin.	Visual Observ.	Fabric Filter	Wet Scrubber	3.5(A)	3.5(B)	
		3.3(A)	3.3(B)	max.	3.3(B)	3.4(A)	3.4(B)	3.7	3.6(B)	3.6(B)	3.6(B)	3.6(A)	3.6(A)	NSPS	Dc
Applicable Permit Section	(1)	lb/hr	(2)				(1), (4)	(2), (4)	(3), (4)	(1), (3), (4)	(2), (3), (4)				
	Building 851-1 Cigarette Manufacturing														
1	Strip Receiving/Blending		x	45.0	x			102	x		x			9	x
								103	x		x			10	x
								104	x		x			8	x
								70				x		21/21A	x
								82				x		12/12A	x
								84,85,86				x		6/6A	x
								87,88				x		5/5A	x
								89				x		1/1:2A	x
								90				x		5/5A	x
								91				x		4/4:47A	x
								95				x		2/1:2A	x
						105				x		47/4:47A	x		
6	Recovered Tobacco Silo Discharge (Menthol)		x	17.9	x			67			x		24/24E	x	
7	Recovered Tobacco Conveying		x	17.9	x			67			x		24/24E	x	
								77	x		x		24	x	
								79				x		24	x
								71,72,73,74				x		24/24A 24B/24C 24D	x
8	Processed & Recovered Tobacco Input		x	16.5				67			x		24/24E	x	
								80	x		x		24	x	
								92				x		16/16A	x

Applicable Standards						
PM	PM	PM	SO2	SO2	VOC	
3.3(A)	3.3(B)	max.	3.3(B)	3.4(A)	3.4(B)	3.7
	(1)	lb/hr	(2)			

CAM			non-CAM	
Fabric Filter	Fume Incin.	Visual Observ.	Fabric Filter	Wet Scrubber
3.6(B)	3.6(B)	3.6(B)	3.6(A)	3.6(A)
(1), (4)	(2), (4)	(3), (4)	(1), (3), (4)	(2), (3), (4)

Visible Emissions	
3.5(A)	3.5(B)
	NSPS Dc

ES#	Emission Source	CD#	Controls	EP#	Emission Point						
9	Processed Tobacco Conveying		x	27.9		66		x	51/25:51A	x	
						67		x	24/24E	x	
						71,72, 73,74		x	24/24A 24B/24C 24D	x	
10	Expanded Tobacco Conveying		x	28.4	x	63		x	25 25:51A	x	
						71,72, 73,74		x	24/24A 24B/24C 24D	x	
11	Tobacco Strip Conveying/Blending		x	46.3	x	68,70		x	21/21A	x	
						87,88,90		x	5/5A	x	
						89	x	x	1/1:2A	x	
						95		x	1/1:2A	x	
						91		x	4/4:47A	x	
				105		x	47/4:47A	x			
12	Tobacco Strip Conveying/Storage		x	47.4	x	68		x	21/21A	x	
						69	x	x	22/22A	x	
						70	x	x	21/21A	x	
						71,72, 73,74		x	24/24A 24B/24C 24D	x	
				107		x	37	x			
13	Tobacco Strip Conveying to Casing/Drying		x	30.5	x	107		x	37	x	
						112		x	36	x	
14	Tobacco Strip Casing/Drying		x	26.3	x	70		x	21/21A	x	
						107		x	37	x	
						112		x	36	x	
						108	x	x	34	x	
						109	x	x	35	x	
						128			x	43	x
						129			x	40	x
				N/A				38,39,	x		

Applicable Standards					
PM	PM	PM	SO2	SO2	VOC
3.3(A)	3.3(B)	max.	3.3(B)	3.4(A)	3.4(B)
	(1)	lb/hr	(2)		

CAM			non-CAM	
Fabric Filter	Fume Incin.	Visual Observ.	Fabric Filter	Wet Scrubber
3.6(B)	3.6(B)	3.6(B)	3.6(A)	3.6(A)
(1),(4),(5)	(2),(4),(5)	(3),(4),(5)	(1), (3), (4)	(2), (3), (4)

Visible Emissions	
3.5(A)	3.5(B)
	NSPS Dc

Applicable Permit Section

ES#	Emission Source	CD#	Controls	EP#	Emission Point
15	Tobacco Casing/Cutting/Storage	13,19		32/32A	x
		14,20		31/31A	x
		15,16		30/30A	x
		17,18		29/29A	x
		50-53, 55, 57, 59, 61		23	x
		54, 56, 58, 60	x	23	x
		71-74		24/24A 24B/24C 24D	x
		119, 120, 121, 122		20	x
		123, 124, 125, 126		23	x
	N/A	26	x		
16	Cut Tobacco Silo Discharge	13,19		32/32A	x
		14,20		31/31A	x
		15,16		30/30A	x
		18		29/29A	x
18	Filter Making	113		29/29B	x
		114		32/32B	x
		115		30/30B	x
		116		31/31B	x
19	Cigarette Making	1,2		29	x
		21, 22	x	29	x
		3,4		32	x
		23, 24	x	32	x
		5, 6, 7, 10, 30, 131		31	x
		25-27	x	31	x
		8,9,11,12		30	x
28, 29, 31, 32	x	30	x		

Applicable Standards						
PM	PM		PM	SO2	SO2	VOC
3.3(A)	3.3(B)	max.	3.3(B)	3.4(A)	3.4(B)	3.7
	(1)	lb/hr	(2)			

CAM			non-CAM	
Fabric Filter	Fume Incin.	Visual Observ.	Fabric Filter	Wet Scrubber
3.6(B)	3.6(B)	3.6(B)	3.6(A)	3.6(A)
(1), (4)	(2), (4)	(3), (4)	(1), (3), (4)	(2), (3), (4)

Visible Emissions	
3.5(A)	3.5(B) NSPS Dc

Applicable Permit Section	Emission Source							CD#	Controls					EP#	Emission Point	
20	Housekeeping (Industrial Vac)	x	19.2	x				33				x		30	x	
								35				x		31	x	
								38,42				x		29	x	
								40,44,45				x		32	x	
								46				x		33	x	
								48	Note: This control vents through CD-71.			x		24/24A/24B/24C/24D	x	
								64				x		25	x	
								93				x		6	x	
								106				x		4	x	
								111				x		37	x	
21	Tobacco Expansion Process	x	10.2					66				x		51/25:51A	x	
								63				x		25/25:51A	x	
							x	130		x	x			52	x	
								127					x	50	x	
								92				x		16/16A	x	
								67				x		14/24E	x	
F13	Casing Preparation Area							x	All Fugitive							
F16	Packing Equipment							x	All Fugitive							

Building 854-8 Utilities

1	Boiler #5: (87.9 mmBtu/hr, NG)							N/A								
	Combusting #2 fuel oil	x				x								22		x
	Combusting natural gas	x					x								x	
2	Boiler #6: (87.9 mmBtu/hr, NG)							N/A								
	Combusting #2 fuel oil	x				x								23		x
	Combusting natural gas	x					x								x	
3	Boiler #7: (87.9 mmBtu/hr, NG)							N/A								
	Combusting #2 fuel oil	x				x								24		x
	Combusting natural gas	x					x								x	
4	#2 Emergency Gen. 19.92 MMBtu/hr						x		N/A					25	x	

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** [Subchapter 3A 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 Subchapter 3A 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 deviation from 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 Street, 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, .1200 or .1400; or by a permit condition; or that exceeds a **Locally Enforceable Only** emission limit established in a permit issued under Section 3Q .0700. (*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 paragraph 3, below.
3. In addition to any specific NSPS or NESHAP reporting requirements the permittee shall upon becoming aware:

- (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 status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the methods or means designated in 40 CFR 70.6(c)(5)(iii)(B). 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 64 occurred;
- C. whether compliance was continuous or intermittent;
- D. the identification of the method(s) or other means used by the owner and operator for determining the compliance status with each term and condition during the certification period; these methods shall include the methods and means required under 40 CFR Part 70.6(a)(3); and
- E. such other facts as the Director 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 .0501(b)]

When requested by this Office for determining compliance with emission control standards, means shall be provided by the owner to allow periodic sampling and measuring of emission rates, including necessary ports, scaffolding and power to operate sampling equipment; and upon the request of this Office, data on rates of emissions shall be supplied by the permittee.

2.23 General Emissions Testing and Reporting Requirements [Rule 3Q .0508(i)(16)]

When required to conduct emissions testing under the terms of the permit:

- A. The permittee shall submit a sampling protocol to this Office at least 30 days prior to the scheduled test date.
- B. The permittee shall notify this Office of the specific test dates at least 10 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 approved by the Director or his delegate.
- D. The permittee shall submit one copy of the test report to this Office. 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 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 practices, the permittee's 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.

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]

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).

New Source Performance Standards (NSPS) General Provisions - Permit Conditions

Following are conditions found in the 40 CFR Part 60 NSPS General Provisions. The following conditions only apply to sources subject to a relevant standard of a subpart of 40 CFR Part 60 except when otherwise specified in a particular subpart or in a relevant standard.

2.41 NSPS - General Provisions <40 CFR 60 Subpart A> [Rule 3D .0524]

The permittee shall comply with all applicable requirements specified in the general provisions of the New Source Performance Standards (40 CFR 60 Subpart A) including but not limited to requirements concerning notifications, testing, monitoring, recordkeeping, modifications and reconstruction.

2.42 NSPS - Good Air Pollution Control Practice <40 CFR 60.11(d)> [Rule 3D .0524]

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

2.43 NSPS - Circumvention <40 CFR 60.12> [Rule 3D .0524]

Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard under 40 CFR 60. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

2.44 NSPS - Maintain Records - Startup/Shutdown/Malfunction <40 CFR 60.7(b)>
[Rule 3D .0524]

The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

2.45 NSPS - Files Available for Inspection <40 CFR 60.7(f)> [Rule 3D .0524]

The permittee shall maintain a file of all measurements, including, if applicable, performance test measurements and all other information required in 40 CFR 60 . This file shall be kept in a permanent form suitable for inspection and shall be retained at least two years following the date of such measurements, maintenance, reports, and records.

2.46 NSPS - Performance Testing Facilities Provided by Permittee <40 CFR 60.8(e)>
[Rule 3D .0524]

For any performance testing, the permittee shall provide, or cause to be provided, performance testing facilities as follows:

- A. Sampling ports adequate for the applicable test methods. 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) with safe access.
- C. Utilities for sampling and testing equipment.
- D. Unless otherwise specified in the applicable subpart, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For purposes of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply.

**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.

2.47 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.

2.48 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.

2.49 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).

2.50 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.

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.

2.51 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.

2.52 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.

2.53 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. all 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.

2.54 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.

2.55 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.

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

A. Prevention of Significant Deterioration (PSD) [Rule 3D .0530]

1. Best Available Control Technology for Volatile Organic Compounds

The permittee shall not use ethyl alcohol as a vehicle for introducing flavoring agents into tobacco except for limited use (trace amounts) at ES-15 and for use in the production of former Lorillard cigarette brands. This work practice standard has been determined to be Best Available Control Technology for emissions of volatile organic compounds at this facility.

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

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 ethyl alcohol use limitations described above.

Copies of these records shall be retained by the permittee for a period of five 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]

3. Testing [Rule 3D .0501(b)]

If emissions testing is required by this Office or the U.S. EPA, or the permittee submits emissions testing to this Office in support of a permit application, the permittee shall perform such testing in accordance with the appropriate U.S. EPA reference method(s) as approved by this Office. The permittee may request approval from this Office for an alternate test method or procedure in writing.

B. Limitation to Avoid Being Major for Hazardous Air Pollutants [Rule 3D .1111, 3Q .0317(a)(5)]

In order to remain classified as an area source for hazardous air pollutants under Rule 3D .1111 and thereby avoid regulatory requirements of future NESHAP regulations, the facility must comply with the following:

1. Emission Limits -

(a) Total HAP emissions from the facility shall not exceed 25 tons for any 12-month period.

(b) Total vinyl acetate emissions from the facility shall not exceed 10 tons for any 12-month period.

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

Compliance with the limit specified in condition 3.1(B)(1) shall be demonstrated by the following:

- (a) the permittee shall maintain monthly records of all fuel and product throughputs necessary to calculate total HAP and vinyl acetate emissions using the formulas in Sections (b) and (c) below; and,
- (b) total vinyl acetate emissions shall be calculated at the end of each month for the previous 12-month period using the following formula:

$$E = \sum_{i=1}^{12} \sum_{j=1}^n W_j * C_j$$

E = 12-MONTH VINYL ACETATE EMISSIONS (POUNDS).
 W_j = MONTHLY USAGE IN POUNDS FOR GLUE j.
 C_j = VINYL ACETATE WEIGHT CONTENT IN GLUE j.
 i = MONTH 1 THROUGH 12.

- (c) If the vinyl acetate emissions exceed 8 tons/year on any monthly calculation, the 12-month total HAP emissions must be calculated for the same 12-month period using the following formula:

$$E = \sum_{i=1}^{12} 0.021 * P1i + 0.012 * P2i + 0.039 * P14i + 0.040 * P15i + 0.067 * P21i + 0.00184 * PNGi + 0.14 * PFOi + 1660 + Vi$$

E = 12-MONTH TOTAL HAP EMISSIONS (POUNDS).
 P1(i) = MONTHLY PRODUCT THROUGHPUT (TONS) FOR ES-01 IN MONTH i.
 P2(i) = MONTHLY PRODUCT THROUGHPUT (TONS) FOR ES-02 IN MONTH i.
 P14(i) = MONTHLY PRODUCT THROUGHPUT (TONS) FOR ES-14 IN MONTH i.
 P15(i) = MONTHLY PRODUCT THROUGHPUT (TONS) FOR ES-15 IN MONTH i.
 P21(i) = MONTHLY PRODUCT THROUGHPUT (TONS) FOR ES-21 IN MONTH i.
 PNG(i) = MONTHLY NATURAL GAS USAGES (MMBTU) FOR ES-854-8-(1,2,3) IN MONTH i.
 PFO(i) = MONTHLY #2 FUEL OIL USAGES (1000 GALLONS) FOR ES-854-8-(1,2,3) IN MONTH i.
 1660 = THE POTENTIAL HAP EMISSIONS (lbs) FROM ES-854-8-4, ES-(18,19,F17)-851-1 and ES-(1-3, 13)-851-9 (EXCLUDING VINYL ACETATE).
 Vi = MONTHLY VINYL ACETATE EMISSIONS (POUNDS) CALCULATED MONTHLY FOR ES-(18, 19, F16)-851-1 and ES-(5, 11)-851-9 IN SECTION 3.1(B)(2)(b) ABOVE.
 i = MONTHS 1 THROUGH 12.

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

The permittee shall submit a semiannual report to this Office containing the following information:

- (a) total vinyl acetate emissions (tons) emitted each month and for each 12-month period ending on each month using the formula in Section 3.1(B)(2)(b) above; and,
- (b) if the vinyl acetate emissions exceed 8 tons for any 12-month period, the monthly and total 12-month emissions must be reported for the same 12-month period using the formula in Section 3.1(B)(2)(c) above.
- (c) 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.

3.2 Source Specific Emission Limits

A. **ES-1-851-1 - Prevention of Significant Deterioration [Rule 3D .0530 and 3Q .0317]**

1. **Standard/Operation requirements for particulate matter and VOCs for ES-1 (851-1)**

Annual VOC emissions shall not exceed 40 tons and PM annual emissions shall not exceed 25 tons. Compliance with these emission limits are demonstrated by limiting the throughput. Combined throughput rates shall not exceed 216,705 tons of tobacco (dry weight) per monthly rolling 12-month total in order to remain below the significant levels established for exemption from further regulation under Prevention of Significant Deterioration for particulate matter and VOC emissions.

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

The permittee shall maintain monthly and monthly rolling 12-month total records of tobacco throughput rates (dry weight) for ES-01. These records shall be maintained at the facility for a period of five years following the date of such record and shall be made available upon request to this Office.

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

The permittee shall submit a report of the monitoring requirements to this Office by January 30th and July 30th for the preceding six-month period.

B. **Prevention of Significant Deterioration: ES-18-851-1, ES-19-851-1, and F-16-851-1 [Rule 3D .0530 and 3Q .0317]**

1. **Emission limit for volatile organic compounds (VOC)**

The combined emissions of VOC from these sources shall be limited to no more than 100.1 tons in any consecutive 12-month period.

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

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 limit described above. At a minimum these records shall include data sufficient to calculate the combined VOC emission rate from these emission sources on a monthly and monthly rolling 12-month total basis. The permittee shall maintain monthly and monthly rolling 12-month total records of VOC emissions from these emission sources. These records shall be maintained at the facility for a period of five years following the date of such record and shall be made available upon request to this Office.

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

The monthly and monthly 12-month total records described in the paragraph above shall form the basis of a semi-annual report which shall be submitted to this Office by January 30th and July 30th for the preceding six-month period.

3.3 Particulate Emission Limits

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

1. Particulate allowable emission rate [Rule 3D .0503]

(a) Building 854-8 Boilers: ES-854-8-1, ES-854-8-2 and ES-854-8-3 -

Emissions of particulate matter from these emission sources 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-854-8-1	1256 million Btu/hr	0.17 lb/million Btu
ES-854-8-2	1256 million Btu/hr	0.17 lb/million Btu
ES-854-8-3	1256 million Btu/hr	0.17 lb/million Btu

(b) Temporary Boiler(s): ES-TEMP -

Emissions of particulate matter from ES-TEMP 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).

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, No. 2 fuel oil, or diesel fuel with a sulfur content not to exceed 0.05% sulfur by weight 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. Particulates from Industrial Processes

1. 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 with the equation $E = 4.10(P)^{0.67}$ calculated to three significant figures for process rates up to 30 tons/hr, or with the equation $E = 55.0(P)^{0.11} - 40$ calculated to three significant figures for process rates greater than 30 tons/hr; where E equals the maximum allowable PM emission rate in lb/hr, and P equals the process rate in tons/hr. Accordingly, the potential emission rate from this equipment shall at no time exceed the emission rates based on maximum production.

2. **Control of Particulates from Processes Subject to BACT - [Rule 3D .0530]**

Total particulate matter emissions from emission sources designated in Section 1.1 shall be controlled by a properly operated and maintained fabric filters or wet scrubbers where such controls are present. This control strategy has been determined to be Best Available Control Technology.

3.4 Sulfur Dioxide Emission Limits

A. NSPS for Sulfur Dioxide [Rule 3D .0524]

1. **NSPS-Sulfur dioxide allowable emission rate [40 CFR 60.42c(d, i)] [Rule 3D .0524]** - Emissions of sulfur dioxide from emission sources designated in Section 1.1 shall not exceed 0.50 lbs. per million Btu heat input. Compliance with this standard shall be continuously demonstrated by combusting only natural gas or No. 2 fuel oil with a maximum sulfur content of 0.5% by weight, as certified by the fuel supplier for this facility. This standard and the fuel oil sulfur limit apply at all times, including periods of startup, shutdown, and malfunction.
2. **Monitoring [Rule 3Q .0308(a)(1)]** - Approved fuels for the boilers are natural gas and No. 2 fuel oil. Any change in fuel type for the boilers must receive prior approval from the Office of Environmental Assistance and Protection.
3. **Recordkeeping requirement [40 CFR 60.48c(f), (g) and (i)] [Rule 3D .0524]** - The permittee shall maintain the following records for a period of five years following the date of such record.
 - (a) For each shipment of No. 2 fuel oil, the permittee shall obtain and maintain a written statement from the fuel supplier that certifies that all the fuel oil included in the shipment complies with the American Society for Testing and Materials (ASTM) specifications for No. 2 fuel oil. This written statement shall also include the name of the company supplying the fuel.
 - (b) The permittee shall record and maintain records of the amount of No. 2 fuel oil and the amount of natural gas combusted during the reporting period.
4. **Reporting requirement [40 CFR 60.48c(e), (g) and (j)] [Rule 3D .0524]** - The permittee shall submit a semiannual report to this Office no later than January 30th for the period July through December, and no later than July 30th for the period January through June. Each report shall include the following items:
 - (a) The calendar dates covered in the reporting period.
 - (b) The amount of fuel oil and the amount of natural gas combusted during the reporting period. If no fuel oil or natural gas was combusted during the reporting period, a written statement signed by the permittee certifying that fact shall be provided to satisfy this reporting requirement for the given fuel.
 - (c) If fuel oil was combusted during the reporting period, a written statement signed by the permittee certifying that all of the fuel oil combusted during the reporting period is represented by the fuel supplier certifications submitted for the current reporting period or by previously submitted fuel supplier certifications.

B. Sulfur Dioxide Emissions from Combustion Sources [Rule 3D .0516]

1. **Standard [Rule 3D .0516]** - Emissions of sulfur dioxide from emission sources designated in Section 1.1 shall not exceed 2.3 lb/MMBtu input.
2. 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, No. 2 fuel oil, or diesel fuel with a sulfur content not to exceed 0.05% sulfur by weight which inherently meet these standards. 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. Non-NSPS

1. **Standard [Rule 3D .0521(d)]** - Visible emissions from emission sources designated in Section 1.1 shall not exceed 20% opacity when averaged over a six-minute period with the following exceptions:
 - (a) No six-minute period exceeds 87% opacity;
 - (b) No more than one six-minute period exceeds 20% opacity in any hour; and
 - (c) No more than four six-minute periods exceed 20% opacity in any 24-hour period.
2. 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, No. 2 fuel oil, or diesel fuel with a sulfur content not to exceed 0.05% sulfur by weight 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. NSPS Sources

1. **Standard [40 CFR 60.43c(c) (Subpart Dc)] [Rule 3D .0524]** - Visible emissions from emission sources designated in Section 1.1 shall not exceed 20% opacity when averaged over a six-minute period, except for one six-minute period per hour of not more than 27% opacity. This standard shall apply at all times, except during periods of startup, shutdown, or malfunction.
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 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.
3. **Monitoring/Recordkeeping/Reporting requirement [Rule 3Q .0508(f)]** - 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 annual internal inspection of the fabric filters' structural integrity and operation shall be performed.
2. **Periodic monitoring for equipment controlled by wet scrubbers** - Particulate matter emissions from emission sources designated in Section 1.1 shall be controlled during all periods of operation. To ensure that optimum control efficiency is maintained, the permittee shall perform inspections and preventative maintenance in a manner consistent with good practice for minimizing emissions. The inspection and maintenance requirement must include the following:
 - (a) an annual visual internal inspection of the wet scrubbers' structural integrity and operation;
 - (b) the permittee shall maintain and operate low water pressure switches for each wet scrubber and an interlock system that shuts the process down during a low-flow condition.
3. **Recordkeeping requirement** - A log shall be maintained on-site with the dates of inspection and maintenance activities, inspection results, and maintenance performed.
4. **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 annual visual internal inspection of the fabric filters' structural integrity and operation.
 - (b) Upon evidence of 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 shall be defined as failure to perform inspections and preventative maintenance on at least an annual basis or failure to perform repairs to correct abnormal occurrences in a timely manner.

2. **Monitoring-Fume Incinerator [Rule 3D .0614, 40 CFR Part 64]**

To ensure the optimum efficiency of the fume incinerator (CD-130) the permittee shall perform the following monitoring and recordkeeping activities:

- (a) all waste gas and particulate matter emissions resulting from the sublimation loop shall be vented to the fume incinerator at all times the process is in operation. At no time shall this waste stream bypass the incinerator except for periods of malfunction/breakdown; and
- (b) the incinerator combustion chamber shall operate at an air temperature of no less than 650 F and no more than 1750 F; and
- (c) the incinerator shall be equipped with a temperature gauge situated to monitor the air temperature in the combustion chamber. The temperature gauge shall be checked and calibrated as required and in accordance with the manufacturer's written instruction; and
- (d) the temperature shall be monitored continuously while the process is operating and averaged every 15 minutes to ensure proper combustion chamber operation. The temperature data shall be collected by the incinerator operating system and kept in a log (written or electronic form), maintained on site and made available for inspection upon request by this Office; and
- (e) an excursion shall be defined as an incinerator combustion chamber temperature reading below 650 F or above 1750 F. Upon detection, the process shall be shut down and an investigation into the cause of the excursion shall be initiated; and
- (f) the cause of any excursion, results of the investigation and any corrective action taken, as well as other supporting information, shall be documented in a log (written or electronic form), maintained on site and made available for inspection upon request by this Office. The log shall include the date of the investigation, the inspectors name and any corrective actions performed as a result of the investigation.

3. **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 8:00:00 AM and ends at 7:59:59 AM the following calendar day. Visible emissions from each stack 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.
 - (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 visual 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.
4. **Recordkeeping** - Records of the monitoring required under 3.6(B)(1,2,3, and 4) 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) Maintenance of fume incinerator- the cause of any excursion; results of the investigation and any corrective action taken; the date of any investigation; the inspectors name; any corrective actions performed as a result of the investigation.
 - (c) 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-jib training for visual observations.
5. **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(aa)]** - 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. **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.
- C. **Alternative VOC work practice monitoring/recordkeeping requirements for ES-(18, 19, F-13, F-16)-851-1 and ES-(5, 6)-851-9 [Rule 3D .0958(c), 3Q .0508(f), and 3Q .0508(aa)]** - The permittee may perform documented annual employee training as an alternative monitoring/recordkeeping compliance method for the work practice requirements specified in condition 3.7(A). 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.
- D. **Reporting requirements [Rule 3D .0508(f)(2)]** - The permittee shall submit a summary report of the monitoring requirements specified in condition 3.7(B) and (C) 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-854-8-4:

(Emergency Generator, 3,210 HP, Diesel-fired, 19.92 mmBtu/hr)

FCAQTC Rule 3D .1111 "National Emission Standards for Hazardous Air Pollutants" - For **ES-854-8-4**, the permittee shall comply with all applicable provisions, including the maintenance and recordkeeping requirements contained in FCAQTC Rule 3D .1111, as promulgated in 40 CFR 63, Subpart ZZZZ, "National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE)", including Subpart A "General Provisions." The permittee shall comply with the definition of emergency stationary RICE in 40 CFR 63.6675 and the following stationary RICE provisions. **<40 CFR Part 63, Subpart ZZZZ>** [Rule 3D .1111]

- A. **Maintenance and Work Practices** – Pursuant to 40 CFR 63.6603(a), 63.6625(e), (f), and (h) and 63.6640(f) the permittee shall comply with the following:
1. Change the oil and filter every 500 hours of operation or annually, whichever comes first. The permittee has the option to utilize an oil analysis program as provided in 40 CFR 63.6625(i) in order to extend the specified oil change requirement.
 2. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
 3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
 4. Operate and maintain the engine and control device (if any) according to the manufacturer's emission related written instructions or maintenance plan developed by the permittee that minimizes emissions from the engine to the extent practicable.
 5. Install a non-resettable hour meter if one is not already installed.
 6. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
 7. If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedules required in Sections A.1. through 3., above, or if performing the management practice on the required schedules would otherwise pose an unacceptable risk under federal, state or local law, the management practices can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice shall be performed as soon as possible after the emergency has ended or the unacceptable risk has abated. The Permittee shall report any failure to perform the management practice on the schedule required and the federal, state, or local law under which the risk was deemed unacceptable.

8. At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to this Office which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- B. **Operation** – The permittee shall operate the emergency generator in accordance with 40 CFR 63. 6640(f), and the following conditions. 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.
1. There is no time limit on the use of the emergency generator in emergency situations.
 2. The permittee may operate the engine for any combination of the purposes specified in Sections B.1.a. through b. below for a maximum of 100 hours per calendar year.
 - a. The engine may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission authority or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of the engine beyond 100 hours per calendar year.
 - b. The engine may operate for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergency or other authorized entity as determined by the Reliability Coordinator has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP– 002–3.
 - c. The engine may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

3. Pursuant to 40 CFR 63.6640(f)(4), the engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Section B.2. Except as provided in Sections a. and b. below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for the facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
 - a. Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for the facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.
 - b. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if ALL of the following conditions are met:
 - i. The engine is dispatched by the local balancing authority or local transmission or distribution system operator.
 - ii. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - iii. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
 - iv. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - v. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

4. At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to this Office which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

- C. **Fuel Requirements** – Pursuant to 40 CFR 63.6604(b), beginning January 1, 2015, an emergency engine that operates for the purposes specified in Section B.3.b. above or operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in Sections B.2.b. or c. shall use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel. Any existing diesel fuel purchased prior to January 1, 2015 may be used until depleted. The diesel fuel requirements of 40 CFR 80.510(b) are shown below:

Sulfur content	15 ppm maximum.
Cetane index or Aromatic content	A minimum cetane index of 40; or A maximum aromatic content of 35 volume percent.

- D. **Recordkeeping** – Pursuant to 40 CFR 63.6655(d), (e) and (f), the permittee shall keep records for at least five (5) years showing:
1. The engine was operated and maintained according to the manufacturer's emission related operation and maintenance instructions or the permittee's maintenance plan which must provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
 2. If applicable, the parameters that are analyzed as part of the oil analysis program, the results of the analysis, and the oil changes for the engine.
 3. The hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document 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. If the engine is used for purposes specified in Sections B.2.b. or c., or B.3.b. above, then the permittee shall keep records of the notification of the emergency situation, and the date, start time and end time of the engine operation for these purposes.

- E. **Reporting** – Pursuant to 40 CFR 63.6650(h), if the engine operates for the purposes specified in Section B.3.b. above, or operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in Sections B.2.b. or c. above, the permittee shall submit an annual report to this Office. The first annual report shall be submitted no later than March 31, 2016 and cover calendar year 2015. Subsequent annual reports shall be submitted by March 31 of each year and cover the previous calendar year.

The annual report must also be submitted electronically to EPA through the specific NESHAP Subpart ZZZZ reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX). However, if the reporting form specific to NESHAP Subpart ZZZZ is not available in CEDRI at the time that the report is due, the written report shall be submitted to EPA at the appropriate address listed in 40 CFR 63.13.

EPA Region IV
Director, Air, Pesticides and Toxics Management Division
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104

The annual report shall contain the following information:

1. Company name and address where the engine is located.
2. Date of the report and beginning and ending dates of the reporting period.
3. Engine site rating and model year for each engine.
4. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
5. Hours operated for the purposes specified in Sections B.2.b or c. above, including the date, start time, and end time for engine operation.
6. Number of hours the engine is contractually obligated to be available for the purposes specified in Sections B.2.b or c. above.
7. Hours spent for operation for the purpose specified in Section B.3.b. above including the date, start time, and end time for engine operation. The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.
8. If there were no deviations from the fuel requirements in Section C. above that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.
9. If there were deviations from the fuel requirements in Section C. that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.

3.9 Specific emission source permit condition for the following three boilers:

ES-854-8-1: Tobaccoville Boiler #5

ES-854-8-2: Tobaccoville Boiler #6

ES-854-8-3: Tobaccoville Boiler #7

Limitation on the use of No. 2 fuel oil - Except as provided in condition **3.10**, to avoid the applicability of 3D .1111, 40 CFR Part 63, Subpart JJJJJJ, the permittee shall not combust No. 2 fuel oil except during periodic testing not to exceed 48 hours per calendar year per boiler, gas supply emergencies, or periods of gas curtailment pursuant to a contract with the natural gas supplier. For each boiler, the permittee shall maintain records of the dates No. 2 fuel oil is combusted, the amount of No. 2 fuel oil combusted on each date, and the purpose for combusting No. 2 fuel oil on each date. **[Rules 3Q .0308(a)(1) and .0317]**

3.10 National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (Subpart JJJJJJ)

Specific emission source permit conditions for the following three boilers:

- ES-854-8-1: Tobaccoville Boiler #5
- ES-854-8-2: Tobaccoville Boiler #6
- ES-854-8-3: Tobaccoville Boiler #7

Upon start-up for a boiler with No. 2 fuel oil usage beyond the limitations in condition **3.9**, for that boiler the permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart JJJJJJ, National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, including the applicable requirements of 40 CFR Part 63, General Provisions as specified in Table 8 to Subpart JJJJJJ. **<40 CFR 63, Subpart JJJJJJ> [Rule 3D .1111]**

- A. **Notification requirement** - Within 30 days after becoming subject to 40 CFR Part 63 Subpart JJJJJJ, the permittee shall notify this Office of the change. The notification must identify:
1. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
 2. The date upon which the fuel switch, physical change, or permit limit occurred.
- The permittee shall demonstrate compliance with 40 CFR Part 63 Subpart JJJJJJ within 180 days after becoming subject to this rule.
- B. **Tune-up requirements** - As required under 40 CFR 63.11214(b), the permittee shall conduct an initial boiler tune-up according to the requirements in 40 CFR 63.11223(b) no later than March 21, 2014 or 180 days after becoming subject to 40 CFR Part 63 Subpart JJJJJJ, whichever is later. Subsequent biennial tune-ups shall be conducted no more than 25 months after the previous tune-up. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.
- C. **Energy assessment requirement** - As required under 40 CFR 63.11214(c), the permittee shall conduct a one-time energy assessment no later than March 21, 2014 or 180 days after becoming subject to 40 CFR Part 63 Subpart JJJJJJ, whichever is later. The energy assessment must be performed by a qualified energy assessor according to the requirements in Table 2 to Subpart JJJJJJ of Part 63. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this section satisfies the energy assessment requirement.
- D. **Biennial compliance certification report** - The permittee shall prepare a biennial compliance report as required under 40 CFR 63.11225(b). The first report shall be prepared March 1, 2015 or by March 1 of the year following the initial tune-up required in condition **3.10.B**, whichever is later. Subsequent reports shall be prepared March 1st of every other year. The report shall include the following information:

1. Company name and address.
2. Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
3. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

The permittee shall submit the report to this Office if requested by this Office, or no later than March 15 of the reporting year if any deviations from the applicable requirements occurred during the reporting period.

E. Recordkeeping requirements - The permittee shall maintain the following records:

1. Copies of all required notifications and reports submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status as required under 40 CFR 63.10(b)(2)(xiv).
2. Records of tune-ups required in condition **3.10.B** and 40 CFR 63.11214(b) identifying each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned as required under 40 CFR 63.11225(c)(2)(i).
3. A copy of the energy assessment required in condition **3.10.C** and 40 CFR 63.11214(c).
4. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment as required under 40 CFR 63.11225(c)(4).
5. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a) as required under 40 CFR 63.11225(c)(5), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

Records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). As specified in 40 CFR 63.10(b)(1), each record must be kept for 5 years following the date of each recorded action. Records must be kept onsite for at least 2 years after the date of each recorded action and may be kept off site for the remaining 3 years.

F. Reporting requirements - The permittee shall submit the following reports:

1. Initial Notification according to the requirements of 40 CFR 63.9(b) and 40 CFR 63.11225(a)(2) no later than January 20, 2014 or within 120 days after becoming subject to 40 CFR Part 63 Subpart JJJJJJ, whichever is later.

2. Notification of Compliance Status according to the requirements of 40 CFR 63.9(h) and 40 CFR 63.11225(a)(4) for the initial tune-up required in condition **3.10.B** and 40 CFR 63.11214(b) no later than July 19, 2014 or 120 days after the applicable compliance date, whichever is later. The notification must also be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13 and to this Office.
3. Notification of Compliance Status according to the requirements of 40 CFR 63.9(h) and 40 CFR 63.11225(a)(2) for the energy assessment required in condition **3.10.C** and 40 CFR 63.11214(c) no later than July 19, 2014 or 120 days after the applicable compliance date, whichever is later.
4. The Biennial Compliance report required in condition **3.10.D** and 40 CFR 63.11225(b) if any deviations from the applicable requirements occurred during the reporting period no later than March 15 of the reporting year.

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
acetaldehyde (75-07-0)	6.8 lb/hr
benzo(a)pyrene (50-32-8)	2.2 lb/yr
1,3-butadiene (106-99-0)	12 lb/yr
carbon disulfide (75-15-0)	3.9 lb/day
chloroform (67-66-3)	290 lb/yr
cresol (1319-77-3)	0.56 lb/hr
1,4-dioxane (123-91-1)	12 lb/day
ethylene oxide (75-21-8)	1.8 lb/yr
manganese and compounds	0.63 lb/day
mercury, vapor (7439-97-6)	0.013 lb/day

methyl chloroform (71-55-6)	250 lb/day
n-hexane (110-54-3)	23 lb/day
nickel metal (7440-02-0)	0.13 lb/day
methyl ethyl ketone (78-93-3)	78 lb/day and 22.4 lb/hr
phenol (108-95-2)	0.24 lb/hr
soluble chromate compounds, as chromium (VI) equivalent	0.013 lb/day
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 Rule 3Q .0702(a) or (b) at this facility shall not exceed the emission rates listed below. Dispersion modeling, 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 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	AERMOD EPA version	Date of model output file
acetic acid (64-19-7)	490.24 lb/hour	14134	11/19/2014
acrolein (107-02-8)	4.409 lb/hour	15181	10/19/2016
ammonia (7664-41-7)	235.8 lb/hour	15181	10/19/2016
arsenic and inorganic arsenic compounds	37.02 lb/year	15181	10/19/2016
benzene (71-43-2)	4,134 lb/year	15181	10/19/2016
beryllium (7440-41-7)	71.91 lb/year	15181	10/19/2016
cadmium (7440-43-9)	96.47 lb/year	15181	10/19/2016
fluorides	3.473 lb/hour and 83.37 lb/day	15181	10/19/2016
formaldehyde (50-00-0)	13.42 lb/hour	15181	10/19/2016
hydrogen chloride (7647-01-1)	246.41 lb/hr	14134	11/19/2014

4. **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 two 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)

A. Process Modification Project Equipment to Manufacture Former Lorillard Cigarette Brands

Emission Source ID #	Emission Source Description	Control Device Description
Building 851-1		
ES-22-851-1 (TV-33 & TV-35)	New Conveyors for ES-1, ES-10, and ES-21	Fabric Filters: CD-X(3,4,6)-851-1
ES-23-851-1 (TV-33)	Ethanol-Based Top Dressing Materials	Thermal Incinerator: CD-X7-851-1
ES-19-851-1 (TV-33)	Cigarette Making	Fabric Filters: CD-(4,5,8,9,11,12,24,25,28, 29,31,32)-851-1; and CD-(1,2,3,6,7,10,21,22,23,26, 27,30,131)-851-1 (unmodified)
ES-18-851-1 (TV-33)	Filter Making	Fabric Filters: CD-(113-116)-851-1 (unmodified)
F-13-851-1 (TV-33 & TV-35)	Casing Preparation Area	N/A (Fugitive)
F-16-851-1 (TV-33)	Packing Equipment	N/A (Fugitive)
ES-14-851-1 (TV-35)	Ethanol Use in Existing Casing Drums	Wet Scrubbers: CD-(128-129)-851-1
ES-15-851-1 (TV-35)	Propylene Glycol Use in Existing Casing Drums and Hoods	Wet Scrubbers: CD-(119-122)-851-1
ES-15-851-1 (TV-35)	Propylene Glycol Use in Existing Steam Flotation Chambers, Dryers, Pneumatic Separators and Hoods	Wet Scrubbers: CD-(123-126)-851-1

B. DIET Conveying Project (ES-21, Building 851-1)

Emission Source ID #	Emission Source Description	Control Device Description
Building 851-1		
ES-21-851-1 (TV-36)	Tobacco Expansion Process	Fabric Filters: CD-(63, 66)-851-1

C. ES-TEMP Temporary Boiler Project:

Emission Source ID #	Emission Source Description	Emission Point ID No.
ES-TEMP	One or two temporary boilers with low-NOx burners fired with diesel fuel with a sulfur content not to exceed 0.05% sulfur or with natural gas and with a combined maximum firing rate not to exceed 98 mmBtu/hr. Uncontrolled.	EP-T1 (plus EP-T2, if applicable)

D. Make and Pack Modernization Project

Emission Source ID #	Emission Source Description	Control Devices
Building 851-1		
ES-18-851-1	Filter Making	Four Fabric Filters: CD-(113-116)-851-1
ES-19-851-1	Cigarette Making	Twenty-Five Fabric Filters: CD-(1-12)-851-1, CD- (21-32)-851-1, and CD- 131-851-1
F-16-851-1	Packing Equipment	Uncontrolled

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 Part II 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 Part II 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 Part II 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 Part II, Section 1, Condition A 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 Part II, Section 1, Condition A 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 Part II, Section 1, Condition A in accordance with provisions contained in Part I of this permit. If a provision listed in Part II conflicts with a provision of Part I, the permittee shall comply with the provision listed in Part II.
- C. ***Process Modification Project (as described in the application) to manufacture former Lorillard cigarette brands at the Tobaccolville facility.***

ES-22-851-1: New Conveyors for ES-1, ES-10, and ES-21

Fabric Filters: CD-X(3,4,6)-851-1

ES-23-851-1: Ethanol-Based Top Dressing Materials

Thermal Incinerator: CD-X7-851-1

ES-19-851-1: Cigarette Making

Fabric Filters: CD-(4,5,8,9,11,12,24,25,28,29,31,32)-851-1

Fabric Filters: CD-(1,2,3,6,7,10,21,22,23,26,27,30,131)-851-1 (unmodified)

ES-18-851-1: Filter Making

Fabric Filters: CD-(113-116)-851-1 (unmodified)

F-13-851-1: Casing Preparation Area, (Fugitive)

F-16-851-1: Packing Equipment, (Fugitive)

ES-14-851-1: Ethanol Use in Existing Casing Drums

Wet Scrubbers: CD-(128-129)-851-1

ES-15-851-1: Propylene Glycol Use in Existing Casing Drums and Hoods

Wet Scrubbers: CD-(119-122)-851-1

ES-15-851-1: Propylene Glycol Use in Existing Steam Flotation Chambers, Dryers, Pneumatic Separators and Hoods

Wet Scrubbers: CD-(123-126)-851-1

D. Prevention of Significant Deterioration (PSD). Best Available Control Technology (BACT) for Volatile Organic Compounds (VOCs) [Rule 3D .0530]

1. **New Conveyor Systems (Part of ES-22)** - The permittee shall limit the uncontrolled hourly VOC emission rate from the following conveyor systems to no more than:

- 0.60 lb/hr for the new conveyor system serving ES-1,
- 0.20 lb/hr for the new conveyor system serving ES-10, and
- 0.05 lb/hr for the new conveyor system serving ES-21.

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 described above. At a minimum these records shall include data sufficient to calculate the applicable hourly averaged uncontrolled VOC emission rates.

Copies of these records shall be retained by the permittee for a period of five 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]**

2. **Manufacture of former Lorillard products using ethanol-based top dressing materials in the top dressing drums and downstream conveyors (ES-23)** - The permittee shall limit the VOC emission rate from this emission source to no more than 0.54 lb VOC per ton of wet tobacco and at least 98% destruction efficiency of the thermal incinerator. Compliance with these limits shall be based upon the 3-hour block average of the incinerator combustion chamber temperature.

The permittee shall control the VOC emissions by means of a thermal incinerator (CD-X7-851-1). To ensure the optimum efficiency of the thermal incinerator (CD-X7-851-1), the permittee shall perform the following operational, monitoring and recordkeeping activities:

- (a) the incinerator combustion chamber shall operate at an air temperature of no less than 1500 °F unless a revised minimum temperature has been established in accordance with condition 3(D)(3) below;
- (b) the incinerator shall be equipped with a temperature gauge to monitor the air temperature in the combustion chamber. The temperature gauge shall be checked and calibrated in accordance with the manufacturer's written instruction;

- (c) the temperature shall be monitored continuously while any of the associated processes are operating and recorded on a 15-minute block average basis with four 15-minute block averages each hour to ensure proper combustion chamber operation. One-hour and 3-hour block averages of the incinerator combustion chamber temperature shall be calculated and recorded, based on the associated 15-minute block averages. The temperature data shall be collected by the incinerator operating system and kept in a log (written or electronic form), maintained on site and made available for inspection upon request by this Office;
- (d) upon detection of a 1-hour block average combustion chamber temperature below the minimum established in condition 3(D)(2)(a), the process shall be shut down and an investigation into the cause of the low temperature shall be initiated;
- (e) the cause of any low 1-hour block average combustion chamber temperature event, results of the investigation and any corrective action taken, as well as other supporting information, shall be documented in a log (written or electronic form), maintained on site and made available for inspection upon request by this Office. The log shall include the date of the investigation, the inspectors name and any corrective actions performed as a result of the investigation.

Copies of these records shall be retained by the permittee for a period of five 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]**

3. **Initial Performance Testing** - The permittee shall conduct an initial performance test to verify that the VOC emission rate from ES-23 is no more than 0.54 lb VOC per ton of wet tobacco and that the thermal incinerator (CD-X7-851-1) achieves at least 98% destruction efficiency. This initial performance testing shall be performed within 180 days of the start-up of ES-23. This performance testing may be conducted with the thermal incinerator combustion chamber temperature operating at less than 1500 °F in order to demonstrate that the incinerator is capable of achieving the requirements of condition 3(D)(2) at the lower temperature. The testing shall be conducted in accordance with Section 3D .2600 of the FCAQTC. For the performance testing, the following conditions apply: [Rule 3D .0614 and Section 3D .2600]
- (a) **Obligation** – The permittee shall perform any required test at his own expense. [Rule 3D .2602(a)].
 - (b) **Means to allow sampling and measurement** – 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. [Rule 3D .2602(e)]

- (c) Test methods – 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. [Rules 3D .2601, .2602(i) and 3Q .0308(a)(1)]
- (d) Process rate – The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. [Rule 3D .2602(g)]
- (e) Protocol – 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. [Rule 3D .2602(c)]
- (f) Notification – The permittee shall notify this Office at least 15 days before beginning the test so that a representative of this Office may be present to observe the test. [Rule 3D .2602(d)]
- (g) Emissions test report – The final air emission test report shall be submitted 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. Unless otherwise specified in the applicable permit or during the course of the protocol review, the results of the tests shall be expressed in the same units as the emission limits given in the rule for which compliance is being determined. [Rule 3D .2602(f) & (h)]

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 rate described above. At a minimum these records shall include data sufficient to calculate the applicable VOC emission rate and wet tobacco process rate on an hourly basis.

Copies of these records shall be retained by the permittee for a period of five 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]**

4. **Cigarette Production Floor Fugitives (ES-18, ES-19, F-16, ES-23)** - The permittee shall limit the combined uncontrolled VOC emission rate from these emission sources to no more than 271.81 tons per monthly rolling 12-month total.

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 rate described above. At a minimum these records shall include data sufficient to calculate the combined uncontrolled VOC emission rate from these emission sources on a monthly and monthly rolling 12-month total basis.

Copies of these records shall be retained by the permittee for a period of five 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]**

5. **ES-15 Casing Drums: Propylene Glycol-based Casing Materials (Part of ES-22)** - The permittee shall limit the uncontrolled VOC emission rate from the casings drums while manufacturing former Lorillard products to no more than 13.35 lb/hr and 3.7 tons per monthly rolling 12-month total.

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 rate described above. At a minimum these records shall include data sufficient to calculate the applicable hourly averaged uncontrolled VOC emission rate.

Copies of these records shall be retained by the permittee for a period of five 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]**

6. **ES-15 Flotation Chambers, Dryers, and Separators: Propylene Glycol-based Casing Materials (Part of ES-22)** - The permittee shall limit the uncontrolled VOC emission rate from the flotation chambers, dryers, and separators while manufacturing former Lorillard products to no more than 219.2 lb/hr and 97.5 tons per monthly rolling 12-month total.

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 rate described above. At a minimum these records shall include data sufficient to calculate the applicable hourly averaged uncontrolled VOC emission rate.

Copies of these records shall be retained by the permittee for a period of five 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]**

7. **ES-14 Casing Drums: Ethanol-based Casing Materials (Part of ES-23)** - The permittee shall limit the uncontrolled VOC emission rate from the casings drums while manufacturing former Lorillard products to no more than 1.2 lb VOC per ton wet tobacco.

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 rate described above. At a minimum these records shall include data sufficient to calculate the applicable hourly averaged uncontrolled VOC emission rate and wet tobacco process rate.

Copies of these records shall be retained by the permittee for a period of five 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]**

8. **F-13 Casing Preparation Area Mix Tanks and Day Tanks** - The permittee shall limit the uncontrolled VOC emission rate from the casing preparation area mix tanks and day tanks as described below:

Casing preparation area mix tanks (Part of ES-22): No more than 0.0054 tons propylene glycol per monthly rolling 12-month total.

Casing preparation area day tanks (Part of ES--22): No more than 0.0054 tons propylene glycol per monthly rolling 12-month total.

Casing preparation area mix tanks (Part of ES-23): No more than 0.0049 tons ethanol per monthly rolling 12-month total.

Casing preparation area day tanks (part of ES-23): No more than 0.0049 tons ethanol per monthly rolling 12-month total.

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 described above. At a minimum these records shall include data sufficient to calculate the applicable hourly averaged uncontrolled VOC emission rates.

Copies of these records shall be retained by the permittee for a period of five 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]**

E. PM - Monitoring/Recordkeeping/Reporting for Sources Listed in Part II, Section 1.

1. **Monitoring for equipment controlled by fabric filters: ES-18-851-1, ES-19-851-1, ES-22-851-1** - Particulate matter emissions from emission sources designated in Part II, Section 1 shall be controlled during all periods of operation by the applicable fabric filters designated in Part II, Section 1. 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 annual internal inspection of the fabric filters' structural integrity and operation shall be performed.
2. **Monitoring for equipment controlled by wet scrubbers: ES-14-851-1 & ES-15-851-1** - Particulate matter emissions from emission sources designated in Part II, Section 1 shall be controlled during all periods of operation by the applicable wet scrubbers designated in Part II, Section 1. To ensure that optimum control efficiency is maintained, the permittee shall perform inspections and preventative maintenance in a manner consistent with good practice for minimizing emissions. The inspection and maintenance requirement must include the following:
 - (a) an annual visual internal inspection of the wet scrubbers' structural integrity and operation;
 - (b) the permittee shall maintain and operate low water pressure switches for each wet scrubber and an interlock system that shuts the process down during a low-flow condition.
3. Copies of these records shall be retained by the permittee for a period of five years after the date on which the record was made.
4. 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]**

F. Particulate Emissions from Miscellaneous Industrial Processes for Sources Listed in Part II, Section 1 - [Rule 3D .0515]

Emissions for particulate matter from emission sources designated in Part II, Section 1 shall not exceed the allowable emission rate calculated with the equation $E = 4.10(P)^{0.67}$ calculated to three significant figures for process rates up to 30 tons/hr, or with the equation $E = 55.0(P)^{0.11} - 40$ calculated to three significant figures for process rates greater than 30 tons/hr; where E equals the maximum allowable PM emission rate in lb/hr, and P equals the process rate in tons/hr. Accordingly, the potential emission rate from this equipment shall at no time exceed the emission rates based on maximum production.

G. Sulfur Dioxide Emissions for Combustion Sources Listed in Part II, Section 1 - [Rule 3D .0516]

Emissions of sulfur dioxide from the thermal incinerator (CD-X7-851-1) designated in Part II, Section 1 shall not exceed 2.3 lb/MMBtu input. Monitoring and recordkeeping is not required to ensure compliance with this standard.

H. Visible Emissions for Sources Listed in Part II, Section 1 - [Rule 3D .0521(d)]

Visible emissions from emission sources designated in Part II, Section 1 shall not exceed 20% opacity when averaged over a six-minute period with the following exceptions:

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

Monitoring and recordkeeping is not required to ensure compliance with this standard.

I. Work Practices for Sources of Volatile Organic Compounds Listed in Part II, Section 1 - [Rule 3D .0958]

This Rule applies to all facilities that use volatile organic compounds as solvents, carriers, material processing media, or industrial chemical reactants, or in other similar uses or that mix, blend, or manufacture volatile organic compounds, or emit volatile organic compounds as a product of chemical reactions. This Rule does not apply to architectural or maintenance coating, or sources subject to 40 CFR Part 63, Subpart JJ.

1. **Work practice standards - [Rule 3D .0958(c) and 3Q .0508(aa)]** - For equipment listed in Part II, Section 1 the permittee shall:
 - (a) 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,
 - (b) clean up spills as soon as possible following proper safety procedures,
 - (c) store wipe rags in closed containers,
 - (d) not clean sponges, fabric, wood, paper products, and other absorbent materials, unless volatile organic compound emissions are captured and controlled,
 - (e) drain solvents used to clean supply lines and other coating equipment into containers designed for closure, and close containers immediately after each use,
 - (f) 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.

2. **Monitoring/Recordkeeping requirements - [Rule 3Q .0508(f)]** - To ensure compliance with the work practice standards specified in Condition 3(l)(1) above, 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:
 - (a) the date and time of each inspection;
 - (b) the results of each inspection; and
 - (c) all deviations from required work practice standards and the corrective actions taken.

3. **Alternative VOC work practice monitoring/recordkeeping requirements for sources of volatile organic compounds listed in Part II, Section 1 - [Rules 3D .0958(c) and 3Q .0508(aa)]** - The permittee may perform documented annual employee training as an alternative monitoring/recordkeeping compliance method for the work practice requirements specified in Condition 3(l)(1) above. To ensure compliance with this requirement the permittee shall:
 - (a) 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
 - (b) 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:
 - (i) 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,
 - (ii) an outline of the subjects covered in the initial and annual training for each group of personnel.

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

5. 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]**

SECTION 4 SPECIFIC LIMITATIONS AND CONDITIONS

The air emission source(s) and associated air pollution control device(s) listed in Part II, Section 1, Condition B 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 Part II, Section 1, Condition B 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, including Subchapter 3D .0515.
- B. The permittee shall operate the air emission sources and control devices listed in Part II, Section 1, Condition B in accordance with provisions contained in Part I of this permit.
- C. ***DIET Conveying Project (Building 851-1, ES-21, Tobacco Expansion Process):*** *Changes to equipment and routing to PM control for conveyors controlled by two fabric filter baghouses that are part of DIET Conveying.*

Initially permitted in permit #00745-TV-36.

ES-21-851-1: Tobacco Expansion Process

Fabric Filter CD-63-851-1 (Emission Point 25): Net decrease of 3 dust pickup points.

Fabric Filter CD-66-851-1 (Emission Point 51): Net increase of 3 dust pickup points.

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. **[Rule 3A. 0103(a)]**
2. **Commencement of Construction** - If construction/modification of this equipment has not commenced by November 25, 2018 (18 months after the effective date of permit 00745-TV-36), 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)]**

SECTION 5 SPECIFIC LIMITATIONS AND CONDITIONS

The air emission source(s) and associated air pollution control device(s) listed in Part II, Section 1, Condition C 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 Part II, Section 1, Condition C 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, including Subchapter 3D .0515.
- B. The permittee shall operate the air emission sources and control devices listed in Part II, Section 1, Condition C in accordance with provisions contained in Part I of this permit.

C. **ES-TEMP Temporary Boiler Project:**

One or two temporary boilers with low-NO_x burners fired with diesel fuel with a sulfur content not to exceed 0.05% sulfur or with natural gas and with a combined maximum firing rate not to exceed 98 mmBtu/hr. Uncontrolled.

- 1. **Notification requirements - The permittee shall submit to this Office notification as**
 - (a) A written notification, hard-copy or electronic, providing the date that each temporary boiler was ordered and the date and time that each temporary boiler began operation. The notification shall also include information describing make, model, firing rate (mmBtu/hr), and installation location of the boiler(s). This notification shall be submitted so that it is received no later than three business days after the date temporary boiler operation commences.
 - (b) A written notification, hard-copy or electronic, providing the date that each temporary boiler was removed from the facility and the date and time that each boiler last ceased operation prior to removal. This notification shall be submitted so that it is received no later than five business days after the date each boiler is removed from the facility.

[Sec. 3-0103(a)(5) and Rule 3Q .0308(a)]

- 2. **Temporary boiler criteria: 40 CFR 63, Subpart JJJJJJ (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources)** - Each boiler must at all times meet the definition of a temporary boiler as stated in section 63.11237 of 40 CFR, Part 63, Subpart JJJJJJ.

"Temporary boiler" is defined in section 63.11237 as:

Temporary boiler means any gaseous or liquid fuel boiler that is designed to, and is capable of, being carried or moved from one location to another by means of, for example, wheels, skids, carrying handles, dollies, trailers, or platforms. A boiler is not a temporary boiler if any one of the following conditions exists:

- (a) The equipment is attached to a foundation.

- (b) The boiler or a replacement remains at a location within the facility and performs the same or similar function for more than 12 consecutive months, unless the regulatory agency approves an extension. An extension may be granted by the regulating agency upon petition by the owner or operator of a unit specifying the basis for such a request. Any temporary boiler that replaces a temporary boiler at a location within the facility and performs the same or similar function will be included in calculating the consecutive time period unless there is a gap in operation of 12 months or more.
- (c) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least 2 years, and operates at that facility for at least 3 months each year.
- (d) The equipment is moved from one location to another within the facility but continues to perform the same or similar function and serve the same electricity, steam, and/or hot water system in an attempt to circumvent the residence time requirements of this definition.

[Rule 3D .1111, and 40 CFR 63.11237]

3. **Temporary boiler criteria: 40 CFR 60, Subpart Dc** - Each boiler must at all times meet the definition of a temporary boiler as stated in section 60.41c of 40 CFR, Part 60, Subpart Dc.

"Temporary boiler" is defined in section 60.41c as:

Temporary boiler means a steam generating unit that combusts natural gas or distillate oil with a potential SO₂ emissions rate no greater than 26 ng/J (0.060 lb/MMBtu), and the unit is designed to, and is capable of, being carried or moved from one location to another by means of, for example, wheels, skids, carrying handles, dollies, trailers, or platforms. A steam generating unit is not a temporary boiler if any one of the following conditions exists:

- (a) The equipment is attached to a foundation.
- (b) The steam generating unit or a replacement remains at a location for more than 180 consecutive days. Any temporary boiler that replaces a temporary boiler at a location and performs the same or similar function will be included in calculating the consecutive time period.
- (c) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least 2 years, and operates at that facility for at least 3 months each year.
- (d) The equipment is moved from one location to another in an attempt to circumvent the residence time requirements of this definition.

[Rule 3D .0524 and 40 CFR 60.41c]

SECTION 6 SPECIFIC LIMITATIONS AND CONDITIONS

The air emission source(s) and associated air pollution control device(s) listed in Part II, Section 1, Condition D 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 Part II, Section 1, Condition D 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, including Subchapter 3D .0515.
- B. The permittee shall operate the air emission sources and control devices listed in Part II, Section 1, Condition D in accordance with provisions contained in Part I of this permit.
- C. ***Make and Pack Modernization Project (as described in the application)***

ES-18-851-1: Removing existing filter makers and installing new replacement filter makers.

ES-19-851-1 and F-16-851-1: Removing existing cigarette making and packing complexes and installing new replacement cigarette making and packing complexes.

- **ES-18-851-1: Filter Making**

Four Fabric Filter Control Devices (Roll Filters)

<i>Control Device ID</i> CD-()-851-1	Emission Point ID EP-()-851-1
113	29 or 29B
114	32 or 32B
115	30 or 30B
116	31 or 31B

- **ES-19-851-1: Cigarette making**

Twenty-Five Fabric Filter Control Devices (Baghouses)

<i>Control Device ID</i> CD-()-851-1	Emission Point ID EP-()-851-1
1	29
2	29
3	32
4	32
5	31
6	31
7	31
8	30
9	30
10	31
11	30
12	30

21	29
22	29
23	32
24	32
25	31
26	31
27	31
28	30
29	30
30	31
31	30
32	30
131	31

- **F-16-851-1: Packing Equipment**

Fugitive Emissions, Uncontrolled

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. **[Rule 3A. 0103(a)]**
2. **Commencement of Construction** - If construction/modification of this equipment has not commenced by April 30, 2019 (18 months after the effective date of permit 00745-TV-37), 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
for Permit #00745-TV-38**

**R.J. Reynolds Tobacco Company (RJRT)
Tobaccoville facility - Premise # 00745**

Permit Tracking #: **1265**

Make and Pack Modernization Project: Permit to Operate

(This Statement of Basis also includes information related to the construction-only permit for the Make and Pack Modernization Project which was included as part of previously issued permit #00745-TV-37.)

Site Location:
Tobaccoville, NC

Current Permit No
00745-TV-37

New Permit Nos.
00745-TV-38

Technical Contacts:
Max Hopkins

Phone:
(336) 741-6932

Responsible Official:
**Johnny K. Cagigas
Vice President of Manufacturing**

Rob Russ
Agency
Reviewer

Signature

Date

Peter Lloyd
Agency Q/A
Supervisor

Signature

Date

I. Processing

The proposed modification is for a project to modernize cigarette packing and packing equipment and cigarette filter making equipment. The modernization involves replacing existing equipment with similar, but more modern, replacement equipment. Upon completion of the modernization project, the production capacity of the facility will be somewhat reduced. For the modernization project the changes requested in the permit application are being processed in two steps.

Step one was the issuance of a permit to construct under Section 3Q .0300 of the Forsyth County Air Quality Technical Code (FCAQTC). The construction permit allows for the construction (installation) of the new replacement equipment. It also allows for the equipment that will be replaced to be operated under Part I of the permit prior to any equipment replacement. The construction permit does not authorize the operation of any new replacement equipment. The permit issued under step one is permit #00745-TV-37. In Part I of this permit, condition 1.2 lists operating conditions not covered under the Title V permit shield. Since the construction permit is not undergoing EPA review, all of the listed conditions from the previous permit (#00745-TV-36) remain listed as unshielded in the construction permit (#00745-TV-37).

Step two is the issuance of a Title V operating permit under Section 3Q .0500 of the FCAQTC. The changes are being processed as a significant modification in accordance with Rule 3Q .0516 of the FCAQTC. 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 also involves a new Prevention of Significant Deterioration (PSD) avoidance condition in the permit, thereby requiring that it be processed as a significant modification.

The permit to be issued under step two is permit #00745-TV-38. This permit does authorize the operation of the replacement equipment associated with the Make and Pack Modernization Project. Because this permit will have undergone EPA review, all of the operating conditions listed in Part I, condition 1.2 in the construction permit (#00745-TV-37) will be removed from being listed as unshielded in the operating permit (#00745-TV-38). The table below shows the operating conditions that were listed as unshielded in Part I, condition 1.2 in the 00745-TV-37 construction permit.

Operating Conditions Not Covered Under the Permit Shield			
Source ID	Source Description	Unshielded Operating Conditions	Effective Date
ES-15-851-1 (CD-61-851-1)	Tobacco Casing, Cutting and Storage: Added CD-61-851-1 (serving EP-23-851-1) which had been inadvertently omitted from the permit.	Part I: condition 3.5(A) and condition 3.6(A)(1), (3) and (4)	January 9, 2012 (Permit #00745-TV-30)
Facility-wide	Facility-wide	Part I: condition 2.0	January 9, 2012 (Permit #00745-TV-30)
F-13-851-1	Casing Preparation Area: Added F-13-851-1 which had been inadvertently omitted from the permit.	Part I: condition 3.7	January 9, 2012 (Permit #00745-TV-30)
ES-19-851-1 (CD-131-851-1 & CD-31-851-1)	Switched control of three Cigarette Makers from CD-31-851-1 to reinstalled CD-131-851-1.	No Part I conditions changed. (CD-131-851-1 had been inadvertently left on the permit after it had been removed from use in December 2009.)	July 6, 2012 (Permit #00745-TV-31)
ES-854-8-4	Emergency Generator, 3,210 HP, Diesel-fired, 19.92 mmBtu/hr	Part I, conditions 3.8, 2.53 and 2.55	July 18, 2013 (Permit #00745-TV-32)
ES-8-851-1	Processed & Recovered Tobacco Input	No conditions unshielded, just the	July 18, 2013 (Permit #00745-TV-32)

		equipment itself	
ES-9-851-1	Processed Tobacco Conveying	No conditions unshielded, just the equipment itself	July 18, 2013 (Permit #00745-TV-32)
ES-21-851-1	Tobacco Expansion Process	No conditions unshielded, just the equipment itself	July 18, 2013 (Permit #00745-TV-32)
ES-854-8-1, ES-854-8-2, ES-854-8-3	Three boilers	Part I, conditions 3.10, 3.9, 3.3, 3.4, 3.5, 2.51, 2.52, 2.53, 2.54 and 2.55	July 18, 2013 (Permit #00745-TV-32)
Facility-wide	Facility-wide	Part I, conditions 3.1(A)(1) and (2)	May 7, 2015 (Permit #00745-TV-33)
ES-9-851-1	Processed Tobacco Conveying	No conditions unshielded, just the equipment itself	June 26, 2015 (Permit #00745-TV-34)
ES-12-851-1	Tobacco Strip Conveying/Storage	No conditions unshielded, just the equipment itself	June 26, 2015 (Permit #00745-TV-34)
ES-21-851-1	Tobacco Expansion Process - DIET Conveying Project	No conditions unshielded, just the equipment itself	May 25, 2017 (Permit #00745-TV-36)
ES-(1, 7, 8, 11, 12, 14, 15, 19, 21)-851-1	Fabric Filters with CAM VE monitoring requirements	Part I, condition 3.6(B)(3)(a)	May 25, 2017 (Permit #00745-TV-36)
ES-TEMP	Temporary Boiler(s)	Part I, conditions 3.3(A), 3.4(B), and 3.5(A).	October 31 2017 (Permit #00745-TV-37)

In addition to a construction-only permit for the Making and Packing Modernization Project, permit 00745-TV-37 is also a permit to construct and operate for a Title V minor modification project to allow for temporary boilers at the Tobaccoville facility. Because the temporary boiler project is not a significant modification, that modification project did not undergo public notice or EPA review. The temporary boiler project was addressed in a separate Statement of Basis.

The process modification project to manufacture former Lorillard cigarette brands at the Tobaccoville facility that is listed in Part II of permit 0745-TV-38 is not being sent for EPA review at this time. In July 2016, the permittee submitted a timely Title V operating permit application for that project, but the project has not yet been incorporated into Part I of the facility's permit.

II. Modification Overview

The modification and associated PSD avoidance limit involves three emissions sources at the R. J. Reynolds Tobacco Company (RJRT) Tobaccoville facility: Filter Making (ES-18-851-1), Cigarette Making (ES-19-851-1), and Packing Equipment (F-16-851-1). The overall purpose of the modification is to replace old existing equipment with similar, but more modern, equipment. As stated above, the facility's overall cigarette production capacity will be somewhat reduced after the modification.

The new manufacturing equipment requires some changes to utilities and other support equipment, including relocation of feed pipes, glue systems, air systems, and vacuum systems to match the revised equipment footprint. All of the equipment complexes will continue to discharge to the same control devices (all fabric filters for particulate matter control) which will continue to discharge to the same stacks.

However, there may be a need for some process ductwork changes and for small changes to the air flow rates to the control devices.

The planned modernization also includes a change to the tobacco transfer system in cut-filler storage (ES-15-851-1), but the change does not change any emissions and does not require a modification of the permit.

The applicant is requesting a PSD avoidance condition to limit volatile organic compound (VOC) emissions. With the limit the combined emissions of VOC from ES-18-851-1, ES-19-851-1, and F-16-851-1 will be limited to no more than 100.1 tons in any consecutive 12-month period. This new limit is included in permit 00745-TV-38 in condition 3.2(B).

III. Modification Analysis -

A. Emissions

The Packing Equipment source (F-16-851-1) emits only fugitive emissions of VOCs, some federal hazardous air pollutants (HAPs), and some local toxic air pollutants (TAPs). Filter Making (ES-18-851-1) and Cigarette Making (ES-19-851-1) emit VOCs, HAPs, TAPs, and particulate matter (PM) via multiple stacks, all with PM control.

1. ES-18-851-1: Filter Making

Particulate Matter

The emission factors (confidential) are based on past stack testing of similar sources. The emissions determinations conservatively assume that PM = PM10 = PM2.5. The combined uncontrolled PM emissions from the modified ES-18-851-1 equipment is 5.62 lb/hour which converts to 1.40 lb/hour after control by the four fabric filters (75% efficient roll filters). Based on 8760 hours per year, the potential uncontrolled PM emissions are 24.59 tons/year, and the potential controlled PM emissions are 6.15 tons/year. The 6.15 tons/year potential controlled PM emissions do not reflect any production limitations based on PSD avoidance. Meeting the PSD avoidance limitation for VOC emissions will in practice require the facility to limit production on ES-18-851-1. The application includes an estimate of 3.24 tons/year for the controlled PM emissions from ES-18-851-1 based on production levels designed to meet the PSD avoidance limit for VOC emissions.

Volatile Organic Compounds

The emission factors (confidential) are based on past stack testing of similar sources. There is no VOC control. The combined VOC emissions from the modified ES-18-851-1 equipment is 3.38 lb/hr. Based on 8760 hours per year, the potential VOC emissions are 14.79 tons/year. The 14.79 tons/year potential VOC emissions do not reflect any production limitations based on PSD avoidance. Meeting the PSD avoidance limitation for VOC emissions will in practice require the facility to limit production on ES-18-851-1. The application includes an estimate of 7.79 tons/year for the VOC emissions from ES-18-851-1 based on production levels designed to meet the PSD avoidance limit for VOC emissions.

2. ES-19-851-1: Cigarette Making

Particulate Matter

The emission factors (confidential) are based on past stack testing of similar sources. The emissions determinations conservatively assume that PM = PM10 = PM2.5. The combined uncontrolled PM emissions from the modified ES-19-851-1 equipment is 680 lb/hour which converts to 0.680 lb/hour after

control by the twenty-five fabric filters (99.9% efficient baghouses). Based on 8760 hours per year, the potential uncontrolled PM emissions are 2,982 tons/year, and the potential controlled PM emissions are 2.98 tons/year. The 2.98 tons/year potential controlled PM emissions do not reflect any production limitations based on PSD avoidance. Meeting the PSD avoidance limitation for VOC emissions will in practice require the facility to limit cigarette production on ES-19-851-1. The application includes an estimate of 1.57 tons/year for the controlled PM emissions from ES-19-851-1 based on production levels designed to meet the PSD avoidance limit for VOC emissions.

Volatile Organic Compounds

The emission factors (confidential) are based on past stack testing of similar sources plus mass balance for ethanol. There is no VOC control. The combined VOC emissions (not including ethanol) from the modified ES-19-851-1 equipment is 25.77 lb/hr. Based on 8760 hours per year, the potential VOC emissions are 113 tons/year not including ethanol. The 113 tons/year potential VOC emissions do not reflect any ethanol usage and do not reflect any production limitations based on PSD avoidance. In addition to that 113 tons/year, 313 tons/year of fugitive ethanol could potentially be emitted which brings overall potential VOC emissions for ES-19-851-1 to 426 tons/year not taking into account any PSD avoidance limitations. Meeting the PSD avoidance limitation for VOC emissions will in practice require the facility to limit cigarette production on ES-19-851-1. The application includes an estimate of 59.42 tons/year for the VOC emissions (not including fugitive ethanol) plus an estimated 23.00 tons/year of fugitive ethanol emissions from ES-19-851-1 based on production levels designed to meet the PSD avoidance limit for VOC emissions.

3. F-16-851-1: Packing Equipment

Particulate Matter

There are no particulate matter emissions from F-16-851-1. It is a fugitive source with no emissions ducted to the atmosphere.

Volatile Organic Compounds

The emission factors (confidential) are based on past stack testing of similar sources. There is no VOC control. The combined VOC emissions from the modified F-16-851-1 equipment is 4.29 lb/hr. Based on 8760 hours per year, the potential VOC emissions are 18.80 tons/year. The 18.80 tons/year potential VOC emissions do not reflect any production limitations based on PSD avoidance. Meeting the PSD avoidance limitation for VOC emissions will in practice require the facility to limit production on F-16-851-1. The application includes an estimate of 9.90 tons/year for the VOC emissions from F-16-851-1 based on production levels designed to meet the PSD avoidance limit for VOC emissions.

B. PSD Applicability

The only PSD pollutants involved with the modification are VOC, PM10, and PM2.5. The modification conservatively estimates PM10 and PM2.5 emissions as both being equal to PM emissions. All three sources being modified (ES-18-851-1, ES-19-851-1, and F-16-851-1) emit VOC, but PM s only emitted by ES-18-851-1 and ES-19-851-1.

Particulate Matter

After the modification the controlled potential emissions of PM are 6.15 tons/year from ES-18-851-1 and 2.98 tons/year from ES-19-851-1, which total 9.13 tons/year. The 9.13 tons/year is less than the PSD significance levels of 15 tons/year for PM10 and 10 tons/year for PM2.5. Because the significance levels are not exceeded, the modification does not trigger PSD for either PM10 or PM2.5.

Volatile Organic Compounds

After the modification the potential emissions of VOC are 14.79 tons/year from ES-18-851-1, 426 tons/year from ES-19-851-1, and 18.80 tons/year from F-16-851-1 which total 459.59 tons/year. The 459.59 tons/year exceeds the 40 tons/year PSD significance level for VOC.

In order to avoid the applicability of PSD, the applicant is requesting a PSD avoidance condition to limit volatile organic compound (VOC) emissions. With the limit the combined emissions of VOC from ES-18-851-1, ES-19-851-1, and F-16-851-1 will be limited to no more than 100.1 tons in any consecutive 12-month period.

The 100.1 ton/year limit is derived from the baseline emissions of 60.59 tons/year plus 39.51 tons/year – with the 39.51 tons/year being a value that does not exceed the 40 tons/year PSD significance level for VOC.

The applicant selected a 24 month baseline period of October 2015 through September 2017. The average annual VOC emissions during that period for the affected sources are as follows:

ES-18-851-1: 4.76 tons/year

ES-19-851-1: 49.78 tons/year This includes 13.46 tons/year fugitive VOC (ethanol).

F-16-851-1: 6.05 tons/year

$4.76 + 49.78 + 6.05 = 60.59$ tons/year baseline VOC emissions

60.59 ton/year baseline + 39.51 ton/year = 100.1 ton/year PSD Avoidance Limit for VOC

The new 100.1 ton/year PSD avoidance limit for VOC limit was included in the construction permit (permit 00745-TV-37) in Part II, Section 6, condition D.

The new 100.1 ton/year PSD avoidance limit for VOC is included in the operating permit (permit 00745-TV-38) in Part I, Condition 3.2(B).

C. Compliance Assurance Monitoring (CAM) Requirements

CAM applicability is based on a “pollutant specific emission unit” (PSEU) which 40 CFR Part 64 defines as “an emission unit considered separately with respect to each regulated air pollutant.” In order for a PSEU to be subject to CAM it must:

1. Be subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt under 40 CFR 64.2(b)(1).
2. Use a control device to achieve compliance with any such limitation or standard.
3. Have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100% of the amount in tons per year, required for a source to be classified as a major source.

In order to simplify the CAM applicability process, RJRT uses a conservative approach that tends to assign CAM requirements to more control devices than necessary. RJRT assigns CAM applicability to all controlled PSEUs that have potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100% of the emissions (in tons per year) required for a source to be classified as a major source. In the case of this modification project that, means that each PSEU that has

potential pre-control PM10 emissions greater than 100 tons per year (TPY) is considered subject to CAM.

For ES-18-851-1, this modification does not result in any changes to the applicability of CAM for any equipment associated with ES-18-851-1. The four fabric filters were not subject to CAM before the modification, and they remain not subject to CAM after the modification.

For ES-19-851-1, the CAM applicability status of two of the associated 25 fabric filters is changed with the modification. Prior to the modification, all 25 fabric filters were subject to CAM. After the modification only 23 of the 25 are subject to CAM. Two fabric filters (CD-30-851-1 and CD-131-851-1) are no longer subject to CAM because they each have pre-control PM10 emissions less than 100 TPY.

CAM monitoring/recordkeeping/reporting requirements are included in the permit in Condition 3.6(B). Non-CAM monitoring/recordkeeping/reporting requirements are included in the permit in Condition 3.6(A).

D. Compliance with the PM emissions standard in Rule 3D. 0515

ES-18-851-1: Filter Making

Based on the confidential maximum throughput rate for ES-18-851-1 the maximum allowable PM emission rate from the source according to Rule 3D .0515 is 18.7 lb/hr.

The source's combined 1.40 lb/hr controlled PM emissions are less than 8% of that limit.

The source's combined 5.62 lb/hr uncontrolled PM emissions are about 30% of that limit.

Consequently, particulate matter control not required for compliance with Rule 3D .0515.

Permit condition 3.3(B) includes requirements pertaining to Rule 3D .0515.

Nonetheless, the Non-CAM monitoring, recordkeeping and reporting requirements listed in permit condition 3.6(A) are applicable to the four fabric filters controlling ES-18-851-1.

ES-19-851-1: Filter Making

Based on the confidential maximum throughput rate for ES-19-851-1 the maximum allowable PM emission rate from the source according to Rule 3D .0515 is 43.3 lb/hr.

The source's combined 0.680 lb/hr controlled PM emissions are less than 2% of that limit.

The source's combined 680 lb/hr uncontrolled PM emissions are approximately 1,572% of that limit.

Consequently, control by the dust collectors is required for compliance with Rule 3D .0515. The CAM and non-CAM monitoring, recordkeeping and reporting requirements listed in permit conditions 3.6(A) and (B), as applicable, are sufficient to assure compliance with the Rule 3D .0515 PM limit.

E. Compliance with the visible emissions standard in Rule 3D. 0521(d)

Equipment associated with ES-18-851-1 and ES-19-851-1 is subject to the 20% visible emissions standard in Rule 3D .0521(d). Particulate matter control using the 75% efficient roll filters is required at all times while ES-18-851-1 equipment is in operation, and particulate matter control using the 99.9% baghouses is required at all times while ES-19-851-1 equipment is in operation. With the control devices in use and properly operating, compliance with the 20% VE standard is expected for both ES-18-851-1 and ES-19-851-1.

Permit condition 3.5(A) includes requirements pertaining to Rule 3D .0521(d). The monitoring, recordkeeping and reporting requirements listed in permit condition 3.6 are sufficient to assure proper operation of the baghouses and roll filters and compliance with the applicable visible emissions standard.

F. Compliance with the Air Toxics Requirements (Locally Enforceable Only)

Make and Pack Modernization Project

Six local air toxic air pollutants (TAPs) are emitted by ES-18-851-1, ES-19-851-1, and F-16-851-1 combined. ES-18-851-1 emits all six: acetaldehyde, acetic acid, ammonia, dioxane, ethylene oxide, and formaldehyde. ES-19-851-1 emits acetic acid and ammonia. F-16-851-1 does not emit any TAPs.

Of these six TAPs only two have a potential emission increase after the modification: ethylene oxide and dioxane. The other four TAPs have an emission reduction from the modification. Because of the potential emissions increase of ethylene oxide and dioxane, an air toxics review is being done for those two pollutants.

The facility-wide potential emissions of dioxane after the modification are 0.252 lb/day, which is only 2.1% of the 12 lb/day TPER (Toxic Permit Emission Rate) limit for dioxane as listed in Rule 3Q .0711(a) of the FCAQTC. Before the modification, the facility-wide potential emissions of dioxane are 0.168 lb/day, which is only 1.4% of the 12 lb/day TPER limit. The 12 lb/day TPER limit (de minimis limit) for dioxane is in permits 00745-TV-37 and 00745-TV-38 in Part I, condition 4.1(A)(2). In the permits, dioxane is listed as 1,4-dioxane (CAS# 123-91-1)

The facility-wide potential emissions of ethylene oxide after the modification are 92.2 lb/year, which is over 5,100% of the 1.8 lb/year TPER limit for ethylene oxide as listed in Rule 3Q .0711(a) of the FCAQTC. Before the modification, the facility-wide potential emissions of ethylene oxide are 61.3 lb/year which is over 3,400% of the 1.8 lb/year TPER limit. However, ethylene oxide had been previously modeled at the facility. The facility's 00745-TV-36 permit, included a 131.75 lb/yr facility-wide modeling based limit for ethylene oxide in Part I, condition 4.1(A)(3). That limit was kept in the construction permit, #00745-TV-37.

For the new operating permit, #00745-TV-38, the applicant chose not to perform a new modeling demonstration to incorporate changes in potential ethylene oxide emissions and stack parameters. Instead, the applicant analyzed the expected actual emissions of ethylene oxide. Based on current and expected production estimates, the expected actual emissions of ethylene oxide are less than 1.35 lb/year so the emissions are less than 75% of the 1.8 lb/year TPER for ethylene oxide.

The new operating permit, 00745-TV-38, will include a listing of the 1.8 lb/yr TPER limit (de minimis limit) for ethylene oxide (CAS# 75-21-8) in Part I, condition 4.1(A)(2) instead of a listing of any modeling based limit for ethylene oxide in Part I, condition 4.1(A)(3). Because the expected actual emissions of ethylene oxide are less than 75% of the TPER for ethylene oxide and the other TAPs listed in condition 4.1(A)(3) have uncontrolled potential emissions below their respective TPER limits, permit condition 4.1(A)(4) includes this Office's lowest level of monitoring and recordkeeping with no reporting requirements.

Temporary Boiler Project

The 00745-TV-37 permit incorporates information from the air toxics review that was performed for the Temporary Boiler modification project. In Part I, permit condition 4.1(A)(2), the following combustion-derived pollutants were added to the list of de minimis TAPs: manganese and compounds; mercury (vapor); methyl chloroform; n-hexane; nickel metal; and soluble chromate compounds as chromium (VI) equivalent. Acetaldehyde, toluene, and xylene were also de minimis TAPs that were reviewed (but not modeled) as part of the temporary boiler project, but those three TAPs had been listed on the previous permit (#00745-TV-36) so did not need to be added.

Modeling that was performed in October 2016 in association with the temporary boiler project, resulted in updated maximum facility-wide emission rates being listed in Part I, permit condition 4.1(A)(3). The following TAPs were updated based upon the temporary boiler project modeling: acrolein; ammonia; arsenic and inorganic arsenic compounds; benzene; beryllium; cadmium; fluorides; and formaldehyde. Based on that same TAP review, listings for chromium compounds, mercury, and nickel were moved from the modeled pollutant list in condition 4.1(A)(3) to the de minimis pollutant list in 4.1(A)(2). The form of these three metals were adjusted to reflect the current combustion pollutant listings on the North Carolina Department of Air Quality's emissions calculation spreadsheets.

Other

Updated maximum facility-wide emission rates are listed in permit 00745-TV-37 and in permit 00745-TV-38 in Part I, permit condition 4.1(A)(3) for acetic acid and hydrogen chloride based on November 2014 modeling that was performed in conjunction with the process modification project to manufacture former Lorillard cigarette brands at the Tobaccoville facility. For several TAPs, the November 2014 modeling was superseded by the October 2016 modeling associated with the temporary boiler project, but the November 2014 modeling of acetic acid and hydrogen chloride was not superseded by the October 2016 modeling. The locally-enforceable-only air toxics requirements for the modification project to manufacture former Lorillard cigarette brands have been removed from Part II, Section 3, of permits 00745-TV-37 and 00745-TV-38 because EPA review is not applicable to these requirements.

G. Hazardous Air Pollutants (HAPs)

Five federal hazardous air pollutants (HAPs) are emitted by ES-18-851-1, ES-19-851-1, and F-16-851-1 combined. ES-18-851-1 emits all five: acetaldehyde, dioxane, ethylene oxide, formaldehyde, and vinyl acetate. ES-19-851-1 and F-16-851-1 each emit only one HAP: vinyl acetate.

Of these five HAPs, only two have an increase in potential emissions after the modification: ethylene oxide and dioxane. The other three HAPs have a reduction in potential emissions from the modification. The combined potential emissions of all five HAPs has a net reduction of 12.79 tons/year after the modification.

In previous permitting, the Tobaccoville facility chose to take a HAP emission limit in order to avoid being a major source for HAPs. The limitation was in Part I, condition 3.1(B) of the facility's 00745-TV-36 permit, and is in the construction permit (#00745-TV-37), and the proposed operation permit (#00745-TV-38). That permit condition limits the total HAP emissions from the facility to no more than 25 tons per 12-month period, and the vinyl acetate emissions from the facility to no more than 10 tons per 12-month period. Vinyl acetate is the only single HAP with potential emissions greater than 10 tons/year.

The limits in Part I, condition 3.1(B), will not be exceeded by this modification. For the five HAPs affected by the modification, there is a net reduction of 12.79 tons/year in the combined emissions. For vinyl acetate, there is a net reduction of 12.81 tons/year in potential emissions.

The two HAPs that do have an increase in potential emissions from the modification are ethylene oxide with a 0.01546 ton/year increase and dioxane with a 0.01542 ton/year increase. After the modification, the facility-wide potential emission of ethylene oxide is only 0.0461 tons/year, and the facility-wide potential emission of dioxane is only 0.0460 tons/year.

IV. Changes to the Permit

1. Modified the Permit Number to 00745-TV-38 on the permit page with the Forsyth County Seal, on the first page of the permit's Table of Contents, and in the page headers.
2. When the actual effective date of the permit is known, the permit effective date will be added to the permit page with the Forsyth County Seal, the first Table of Contents page, and the page headers.
3. In the Table of Contents for the 00745-TV-38 permit, the listed page numbers were adjusted to reflect the revised permit. Entries were added for Part II, Section 5 and Section 6.
4. In Part I, Condition 1.1 (Equipment List and Applicable Conditions), updated the Rule 3D .0515 PM limits for ES-18-851-1 and ES-19-851-1. Adjusted the control device listings for ES-19-851-1 to indicate that CD-30 and CD-131 are no longer subject to CAM requirements.
5. In Part I, Condition 1.2, Operating Conditions Not Covered Under the Permit Shield, removed all of

the entries listed in the 00745-TV-37 permit because the 00745-TV-38 permit is undergoing EPA review.

6. In Part I, Condition 3.2(B) added a PSD avoidance condition for ES-18-851-1, ES-19-851-1, and F-16-851-1.
7. In Part II, Section 6, removed Condition D, the PSD avoidance condition for ES-18-851-1, ES-19-851-1, and F-16-851-1 because that requirement is now in Part I, Condition 3.2(B).
8. In Part II, Section 6, modified Condition C so that conditions (C)(1) and (C)(2) are the 30-Day Notification from Start-up and Commencement of Construction permit conditions.
9. In Part II, Section 6, removed Condition E, the Commencement of Construction condition for ES-18-851-1, ES-19-851-1, and F-16-851-1 because that requirement is now in Part II, Condition (C)(2).

V. Permit Processing Notes

10/16/2017

A Title V significant permit modification application was received at this Office pertaining to the RJRT Tobaccoville facility. The application A1 form was signed by RJRT Vice President of Manufacturing, Johnny Cagigas, with his signature dated 10-16-2017. The application was for the Make and Pack Modernization Project. The application included payment of the \$929 permit modification application fee was issued tracking number 1265. Because the application was requesting a limit to avoid PSD, it was submitted as a Title V significant modification. The application submitted was the confidential version and included a request for confidential treatment of certain information. RJRT requested expedited processing of the application. This Office agreed to draft a construction-only permit for the project followed, after a 30-day public comment period and 45-day EPA review, by a permit to operate for the project.

10/17/2017

The public version of the application was received at this Office along with a confidential electronic file. In acknowledgement of the application, this Office sent a "Receipt of Permit Application and Application Fee" letter to Max Hopkins, RJRT engineer.

10/24/2017

In response to a request from this Office, Max Hopkins delivered some additional information related to the application. The additional information included both confidential and public versions of the documents and included a request for confidential treatment of certain information.

10/26/2017

This Office decided to include an earlier modification project in with the construction-only permit for the Make and Pack Modernization Project. The earlier project was a minor modification involving temporary emergency boilers. That application had been received about a year ago on 10/10/2016. For the temporary boilers, the permit would allow both construction and operation.

10/27/2017

In response to a request from this Office, Max Hopkins sent via email attachment some additional information related to the application. The submitted information did not contain any confidential information.

10/30/2017

I completed a draft version of the construction-only permit for the Make and Pack Modernization Project, DRAFT Permit 00745-TV-37. This permit also was a construct/operate permit for the temporary emergency boilers. I also completed a draft version of the permit authorizing the operation of the modernization project, DRAFT Permit 00745-TV-38. I also completed drafts of the statement of basis for

each draft permit. I asked Peter Lloyd to review the draft permits and their associated statements of basis. Via email attachment, I sent copies of the two draft permits to Max Hopkins for review by RJRT.

10/31/2017

I received a phone call from Max Hopkins regarding the draft permits. He said that RJRT found the drafts to be acceptable. Later in the day, Peter Lloyd completed his review of the documents. He asked that the Commencement of Construction permit condition be added in Part II, Section 6 of the 00745-TV-37 permit, pertaining to the Make and Pack Modernization Project. I added that permit condition as Part II, Section 6, Condition E. I finalized the 00745-TV-37 permit and statement of basis for Peter Lloyd's signature. Peter signed the documents. I created the cover letter associated with the permit, and made PDF versions of the permit and cover letter. I emailed those PDF files to Max Hopkins, and in the email message stated that the hard-copy originals of the permit and cover letter were ready for him to pick up at our office. Later that day he came and got the documents. Peter Lloyd stated that we would start the public notice period for the 00745-TV-38 permit on November 3, 2017. I completed the public notice announcement based on that date.

11/1/2017

I completed the final version of the draft 00745-TV-38 permit and statement of basis for Peter Lloyd's final review. The 00745-TV-38 permit and statement of basis will be submitted for a 30-day public comment period and 45-day EPA review beginning on 11-3-2017.

11/2/2017

This Office mailed two Confidential Treatment Determination letters to Max Hopkins, one in response to the confidentiality request received on 10/16/2017 and one in response to the confidentiality request received on 10/24/2017.

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 00745-TV-38, which details all the necessary requirements to ensure compliance. This Office recommends approval of this permit modification for the operation of the replacement equipment described as the Make and Pack Modernization Project.