



NORTH CAROLINA
Environmental Quality

JOSH STEIN
Governor

D. REID WILSON
Secretary

MICHAEL ABRACZINSKAS
Director

Month XX, 20XX

Mr. Bernardo Penoro
Director of EH&S
Edwards Wood Products, Inc.
2215 Old Lawyers Rd.
Marshville, NC 28103

Subject: Air Permit No. 10569R04
Edwards Wood Products, Inc. – Laurinburg Saw Mill #2
Laurinburg, Scotland County, North Carolina
Permit Class: Title V
Facility ID# 8300109

Dear Mr. Penoro:

In accordance with your completed application received October 25, 2024, we are forwarding herewith Permit No. 10569R04 to Edwards Wood Products, Inc. – Laurinburg Saw Mill #2, Laurinburg, Scotland County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Additionally, any emissions activities determined from your air permit application as meeting the exemption requirements contained in 15A NCAC 2Q .0102 have been listed for information purposes as an "ATTACHMENT" to the enclosed air permit.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to file a petition for contested case hearing in the North Carolina Office of Administrative Hearings. Information regarding the right, procedure, and time limit for permittees and other persons aggrieved to file such a petition is contained in the attached "Notice Regarding the Right to Contest a Division of Air Quality Permit Decision."

Unless exempted by a condition of this permit or the regulations, construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices described in this permit must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B.

This permit shall be effective from [effective date] until [expiration date], is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.



North Carolina Department of Environmental Quality | Division of Air Quality
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641
919.707.8400

Changes have been made to the permit stipulations. The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. 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. Specific changes and additions are summarized below (note: this list may not include all changes and additions):

- Reclassification of woodworking operations (ES-1) from insignificant/exempt to a permitted source and addition of related requirements.
- Addition of two direct-fired 16.5 million Btu per hour each natural gas burners to emission source ES-3.
- Addition of particulate matter control requirements under 15A NCAC 02D .0515 for five kilns (ES-3, ES-4a, ES-4b, ES-5a, and ES-5b).
- Removal of “Synthetic Minor” operating limitations for avoidance of 15A NCAC 02Q .0501 for five kilns (ES-3, ES-4a, ES-4b, ES-5a, and ES-5b).
- Modification of air toxics-related operating limitations for four steam-heated kilns (ES-4a, ES-4b, ES-5a, and ES-5b) from 97,200 board-feet per load in total to 24,300 board-feet per load each.
- Addition of requirements to accommodate the facility becoming subject to Title V and consequently being reclassified, including requirements for submitting a 2nd step modification application (under 15A NCAC 02Q .0504) and requirements for notifying the Fayetteville Regional Office following construction of new sources (under 15A NCAC 02Q .0308(a)(1)).
- Removal of Synthetic Minor-only requirements in preparation for completion of the Synthetic Minor to Title V modification process.

Should you have any questions concerning this matter, please contact Luke Mayer by phone at (919) 707-8042 or by email at luke.mayer@deq.nc.gov.

Sincerely,

Mark J. Cuilla, EIT, CPM, Chief, Permitting Section
Division of Air Quality, NCDEQ

Enclosures

c:

Laserfiche (8300109)

**NOTICE REGARDING THE RIGHT TO CONTEST A DIVISION OF AIR QUALITY PERMIT
DECISION**

Right of the Permit Applicant or Permittee to File a Contested Case: Pursuant to NCGS 143-215.108(e), a permit applicant or permittee who is dissatisfied with the Division of Air Quality's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 in the Office of Administrative Hearings within 30 days after the Division notifies the applicant or permittee of its decision. If the applicant or permittee does not file a petition within the required time, the Division's decision on the application is final and is not subject to review. The filing of a petition will stay the Division's decision until resolution of the contested case.

Right of Other Persons Aggrieved to File a Contested Case: Pursuant to NCGS 143-215.108(e1), a person other than an applicant or permittee who is a person aggrieved by the Division's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 within 30 days after the Division provides notice of its decision on a permit application, as provided in NCGS 150B-23(f), or by posting the decision on a publicly available Web site. The filing of a petition under this subsection does not stay the Division's decision except as ordered by the administrative law judge under NCGS 150B-33(b).

General Filing Instructions: A petition for contested case hearing must be in the form of a written petition, conforming to NCGS 150B-23, and filed with the Office of Administrative Hearings, 1711 New Hope Church Road, Raleigh NC, 27609, along with a fee in an amount provided in NCGS 150B-23.2. A petition for contested case hearing form may be obtained upon request from the Office of Administrative Hearings or on its website at <https://www.oah.nc.gov/hearings-division/filing/hearing-forms>. Additional specific instructions for filing a petition are set forth at 26 NCAC Chapter 03.

Service Instructions: A party filing a contested case is required to serve a copy of the petition, by any means authorized under 26 NCAC 03 .0102, on the process agent for the Department of Environmental Quality:

Daniel S. Hirschman, General Counsel
North Carolina Department of Environmental Quality
1601 Mail Service Center
Raleigh, North Carolina 27699-1601

If the party filing the petition is a person aggrieved other than the permittee or permit applicant, the party **must also** serve the permittee in accordance with NCGS 150B-23(a).

* * *

Additional information is available at <https://www.oah.nc.gov/hearings-division/hearing-process/filing-contested-case>. Please contact the OAH at 984-236-1850 or oah.postmaster@oah.nc.gov with all questions regarding the filing fee and/or the details of the filing process.



AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
10569R04	10569R03	XXXX*	XXXX**

NOTE: Per General Condition K, a permit application for the renewal of this Title V permit shall be submitted no later than [enter date six months prior to expiration date].

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

Permittee: **Edwards Wood Products, Inc – Laurinburg Saw Mill**
#2

Facility ID: **8300109**
Primary SIC Code: **2421**
NAICS Code: **321113**

Facility Site Location: **13421 North Rocky Ford Rd**
City, County, State, Zip: **Laurinburg, Scotland County, North Carolina 28535**
Mailing Address: **13421 North Rocky Ford Rd**
City, State, Zip: **Laurinburg, North Carolina 28535**

Application Number(s): **8300109.24B**
Complete Application Date(s): **October 25, 2024**

Division of Air Quality,
Regional Office Address: **Fayetteville Regional Office**
225 Green Street, Suite 714
Fayetteville, North Carolina 28301

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List of Acronyms

AOS	Alternative Operating Scenario
BACT	Best Available Control Technology
BAE	Baseline Actual Emissions
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CEDRI	Compliance and Emissions Data Reporting Interface
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
CSAPR	Cross-State Air Pollution Rule
DAQ	Division of Air Quality
DEQ	Department of Environmental Quality
EMC	Environmental Management Commission
EPA	Environmental Protection Agency
FR	Federal Register
GACT	Generally Available Control Technology
GHGs	Greenhouse Gases
HAP	Hazardous Air Pollutant
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NAA	Non-Attainment Area
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NCAC	North Carolina Administrative Code
NCGS	North Carolina General Statutes
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
OAH	Office of Administrative Hearings
PAE	Projected Actual Emissions
PAL	Plantwide Applicability Limitation
PM	Particulate Matter
PM_{2.5}	Particulate Matter with Nominal Aerodynamic Diameter of 2.5 Micrometers or Less
PM₁₀	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
POS	Primary Operating Scenario
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
TAP	Toxic Air Pollutant
tpy	Tons Per Year
VOC	Volatile Organic Compound

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

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

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-1	Woodworking operations	CD-1	Cyclone (12.7 feet diameter)
ES-3	Natural gas direct-fired hardwood/softwood lumber drying kiln (Kiln #1), rated at 152,000 board feet capacity, heated by two direct-fired 16.5 million Btu per hour each natural gas burners	NA	NA
ES-4a	Steam-heated hardwood/softwood lumber drying kiln (Kiln #2), rated at 24,300 board feet capacity	NA	NA
ES-4b	Steam-heated hardwood/softwood lumber drying kiln (Kiln #3), rated at 24,300 board feet capacity	NA	NA
ES-5a	Steam-heated hardwood/softwood lumber drying kiln (Kiln #4), rated at 24,300 board feet capacity	NA	NA
ES-5b	Steam-heated hardwood/softwood lumber drying kiln (Kiln #5), rated at 24,300 board feet capacity	NA	NA
ES-6	Natural gas-fired Boiler (12.6 million Btu per hour maximum heat input capacity) supplying steam for Kiln #2 through Kiln #5 operations	NA	NA

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

2.1 Emission Source(s) and Control Device(s) Specific Limitations and Conditions

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

A. Woodworking Operations (ID No. ES-1) controlled by cyclone (ID No. CD-1)

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

Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	Adequate ductwork/collectors	15A NCAC 02D .0512
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Odorous emissions	State enforceable only Odor management practices See Section 2.2 A.2	15A NCAC 02D .1806
-	See Section 2.2 A.3	15A NCAC 02Q .0207
-	See Section 2.2 A.4	15A NCAC 02Q .0304(d) and (f)
-	See Section 2.2 A.5	15A NCAC 02Q .0504

1. 15A NCAC 02D .0512: PARTICULATES FROM MISCELLANEOUS WOOD PRODUCTS FINISHING PLANTS

- a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring [15A NCAC 02Q .0308(a)]

- b. Particulate matter emissions from this source (**ID No. ES-1**) shall be controlled by a cyclone (**ID Nos. CD-1**) as described above. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer, if any. As a minimum, the inspection and maintenance program shall include:
 - i. monthly external inspection of the ductwork and cyclone, noting the structural integrity; and
 - ii. annual (for each 12-month period following the initial inspection) internal inspection of the ductwork and cyclone noting the structural integrity and the condition of the device.

Recordkeeping [15A NCAC 02Q .0308(a)]

- c. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection; and
 - iii. the results of maintenance performed on any control device.

Reporting [15A NCAC 02Q .0308(a)]

- d. The Permittee shall submit the results of any maintenance performed on any control device within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Section(s) 2.1 A.1.b and c above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-1**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent

opacity.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring [15A NCAC 02Q .0308(a)]

- c. To ensure compliance, once a week the Permittee shall observe the emission points of this source (**ID No. ES-1**) for any visible emissions above normal. The weekly observation must be made for each week of the calendar year period to ensure compliance with this requirement. The Permittee shall establish “normal” for this/these source(s) in the first 30 days following the effective date of the permit. If visible emissions from this source are observed to be above normal, the Permittee shall either:
- i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.2.a above.

Recordkeeping [15A NCAC 02Q .0308(a)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

Reporting [15A NCAC 02Q .0308(a)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities given in Section(s) 2.1 A.2.c and d above postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.

B. Hardwood/Softwood Drying Kiln Operations consisting of

- **One natural gas direct-fired lumber drying kiln (Kiln #1), heated by two direct-fired natural gas burners (ID No. ES-3); and**
- **Four steam-heated lumber drying kilns (Kilns #2 through #5) (ID Nos. ES-4a, ES-4b, ES-5a, and ES-5b)**

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

Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$, for $P \leq 30$ tons per hour $E = 55.0(P)^{0.11}$, for $P > 30$ tons per hour Where E = allowable emission rate in pounds per hour P = process rate in tons per hour	15A NCAC 02D .0515
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity ID No. ES-3 only	15A NCAC 02D .0521
Toxic air pollutants	State enforceable only See Section 2.2 A.1	15A NCAC 02D .1100
Odorous emissions	State enforceable only Odor management practices See Section 2.2 A.2	15A NCAC 02D .1806
	See Section 2.2 A.3	15A NCAC 02Q .0207
-	See Section 2.2 A.4	15A NCAC 02Q .0304(d) and (f)
-	See Section 2.2 A.7 ID Nos. ES-5a and ES-5b only	15A NCAC 02Q .0308(a)(1)
-	See Section 2.2 A.5	15A NCAC 02Q .0504
Toxic air pollutants	See Section 2.2 A.6	15A NCAC 02Q .0711

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from these sources (**ID Nos. ES-3, ES-4a, ES-4b, ES-5a, and ES-5b**) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \quad (\text{for process rates less than or equal to 30 tons per hour), or}$$

$$E = 55.0 \times P^{0.11} - 40 \quad (\text{for process rates greater than 30 tons per hour})$$

Where E = allowable emission rate in pounds per hour
 P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0308(a)]

- c. The Permittee shall maintain production records such that the process rates "P" in tons per hour, as specified by the formulas contained above, can be derived and shall make these records available to a DAQ authorized representative upon request.
- d. No reporting is required for particulate emissions from these sources (**ID Nos. ES-3, ES-4a, ES-4b, ES-5a, and ES-5b**).

2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source (**ID No. ES-3**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in this source (**ID No. ES-3**).

3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources (**ID Nos. ES-3, ES-4a, ES-4b, ES-5a, and ES-5b**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the drying of lumber or the firing of natural gas in these sources.

C. Combustion sources consisting of:

- **One natural gas-fired boiler supplying steam for Kilns #2 through #5 operations (ID No. ES-6)**

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

Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	0.565 pounds per million Btu heat input	15A NCAC 02D .0503
Sulfur dioxide	2.3 million pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity	15A NCAC 02D .0521
Toxic air pollutants	State enforceable only See Section 2.2 A.1	15A NCAC 02D .1100
Odororous emissions	State enforceable only Odor management practices See Section 2.2 A.2	15A NCAC 02D .1806
-	See Section 2.2 A.3	15A NCAC 02Q .0207
-	See Section 2.2 A.4	15A NCAC 02Q .0304(d) and (f)
-	See Section 2.2 A.5	15A NCAC 02Q .0504
Toxic air pollutants	See Section 2.2 A.6	15A NCAC 02Q .0711

1. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from the combustion of natural gas that are discharged from this source (**ID No. ES-6**) into the atmosphere shall not exceed 0.565 pounds per million Btu heat input.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for particulate emissions from the firing of natural gas in this source.

2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source (**ID No. ES-6**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of natural gas in this source (**ID No. ES-6**).

3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from this source (**ID No. ES-6**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0308(a)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition 17.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0308(a)]

- c. No monitoring/recordkeeping/reporting is required for visible emissions from the firing of natural gas in this source.

2.2 Multiple Emission Source(s) Specific Limitations and Conditions

A. Facility-wide emissions sources

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

Pollutant	Limits/Standards	Applicable Regulation
Toxic Air Pollutants	State-enforceable only See Section 2.2 A.1	15A NCAC 02D .1100
Odororous emissions	State-enforceable only Odor management practices See Section 2.2 A.2	15A NCAC 02D .1806
-	See Section 2.2 A.3	15A NCAC 02Q .0207
-	See Section 2.2 A.4	15A NCAC 02Q .0304(d) and (f)
-	See Section 2.2 A.7 ID Nos. ES-5a and ES-5b only	15A NCAC 02Q .0308(a)(1)
-	See Section 2.2 A.5	15A NCAC 02Q .0504
Toxic Air Pollutants	State-enforceable only See Section 2.2 A.6	15A NCAC 02Q .0711

State-enforceable only

1. 15A NCAC 02D .1100: CONTROL OF TOXIC AIR POLLUTANTS

- a. Pursuant to 15A NCAC 02D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limits shall not be exceeded:

Affected Source(s)	Toxic Air Pollutant	Emission Limit (lb/hr)
Natural gas-fired Boiler (12.6 mmBtu/hr maximum heat capacity) supplying steam for Kiln #2 through Kiln #5 operations (ES-6)	Acrolein (107-02-8)	2.22×10^{-7}
Natural gas direct-fired lumber drying kiln (Kiln #1), rated at 152,000 board feet (ES-3) (west side)		3.70×10^{-2}
Natural gas direct-fired lumber drying kiln (Kiln #1), rated at 152,000 board feet (ES-3) (east side)		3.70×10^{-2}
Steam-heated lumber drying kiln (Kiln #2), rated at 24,300 board feet per 17-hr period (ES-4a) AND Steam-heated lumber drying kiln (Kiln #3), rated at 24,300 board feet per 17-hr period (ES-4b)		2.48×10^{-2}
Steam-heated lumber drying kiln (Kiln #4), rated at 24,300 board feet per 17-hr period (ES-5a) AND Steam-heated lumber drying kiln (Kiln #5), rated at 24,300 board feet per 17-hr period (ES-5b)		2.48×10^{-2}
Natural gas-fired Boiler (12.6 mmBtu/hr maximum heat capacity) supplying steam for Kiln #2 through Kiln #5 operations (ES-6)		Formaldehyde (50-00-0)
Natural gas direct-fired lumber drying kiln (Kiln #1), rated at 152,000 board feet (ES-3) (west side)	8.60×10^{-1}	
Natural gas direct-fired lumber drying kiln (Kiln #1), rated at 152,000 board feet (ES-3) (east side)	8.60×10^{-1}	
Steam-heated lumber drying kiln (Kiln #2), rated at 24,300 board feet per 17-hr period (ES-4a) AND Steam-heated lumber drying kiln (Kiln #3), rated at 24,300 board feet per 17-hr period (ES-4b)	6.80×10^{-2}	

Affected Source(s)	Toxic Air Pollutant	Emission Limit (lb/hr)
Steam-heated lumber drying kiln (Kiln #4), rated at 24,300 board feet per 17-hr period (ES-5a) AND Steam-heated lumber drying kiln (Kiln #5), rated at 24,300 board feet per 17-hr period (ES-5b)		6.80×10^{-2}

Operating Restrictions

- b. To ensure compliance with the above limits, the following restrictions shall apply:
 - i. The Permittee shall not exceed 145,000 bd-ft per drying batch load in natural gas direct-fired lumber drying kiln (**ID No. ES-3**) and 24,300 bd-ft per kiln per drying batch load in steam-heated lumber drying kilns (**ID Nos. ES-4a, ES-4b, ES-5a, and ES-5b**).

Recordkeeping Requirements

- c. The Permittee shall maintain the following records:
 - i. For each batch of wood dried in Kiln #1 (**ID No. ES-3**), Kiln #2 (**ID No. ES-4a**), Kiln #3 (**ID No. ES-4b**), Kiln #4 (**ID No. ES-5a**), and Kiln #5 (**ID No. ES-5b**), record the amount of wood in bd-ft.

State-enforceable only

2. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

3. 15A NCAC 02Q .0207: ANNUAL EMISSION INVENTORY REQUIREMENT

As required by 15A NCAC 02Q .0207 "Annual Emissions Reporting", the Permittee shall report by June 30 of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

4. 15A NCAC 02Q .0304(d) and (f): PERMIT RENEWAL REQUIREMENT

The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with application Form A) should be submitted to the Regional Supervisor, DAQ.

5. 15A NCAC 02Q .0504: OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT

- a. The Permittee shall file an initial Title V application following the procedures of Section 15A NCAC 02Q .0500 within one year from the issuance of Air Permit 10569R04.

State-enforceable only

6. 15A NCAC 02Q .0711: EMISSION RATES REQUIRING A PERMIT

- a. The facility shall be operated and maintained in such a manner that any new, existing or increased actual emissions of any Toxic Air Pollutant (TAP) listed in 15A NCAC 02Q .0711 or in this permit from all sources at the facility (excluding those sources exempt under 15A NCAC 02Q .0702 "Exemptions"), including fugitive emissions and emission sources not otherwise required to have a permit, will not exceed its respective TAP permitting emission rates (TPER) listed in 15A NCAC 02Q .0711 without first obtaining an air permit to construct or operate.
- b. PRIOR to exceeding any of the TPERs listed in 15A NCAC 02Q .0711, the Permittee shall be responsible for obtaining an air permit to emit TAPs and for demonstrating compliance with the requirements found in 15A NCAC 02D .1100 "Control of Toxic Air Pollutants."

- c. The Permittee shall maintain at the facility records of operational information sufficient for demonstrating to the Division of Air Quality staff that actual TAPs are less than the rate listed in 15A NCAC 02Q .0711.
- d. The TPER table listed below is provided to assist the Permittee in determining when an air permit is required pursuant to 15A NCAC 02Q .0711 and may not represent all TAPs being emitted from the facility. This table will be updated at such time as the permit is either modified or renewed.

Pollutant	CAS No.	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Acetaldehyde	75-07-0				6.8
Ammonia (as NH3)	7664-41-7				0.68
Benzene	71-43-2	8.1			
Benzo(a)pyrene (Component of 83329/POMTV & 56553/7PAH)	50-32-8	2.2			
Hexane, n-	110-54-3		23		
Phenol	108-95-2			0.24	
Toluene	108-88-3		98		14.4

State-enforceable only

7. 15A NCAC 02Q .0308(a)(1): FINAL ACTION ON PERMIT APPLICATIONS

Notifications [15A NCAC 02Q .0308(a)(1)]

- a. Within 15 days after construction of the new or modified emissions sources (**ID Nos. ES-5a and ES-5b**), the Permittee shall provide written notice of the construction to the Regional Supervisor, DAQ.

SECTION 3 - INSIGNIFICANT ACTIVITIES PER 15A NCAC 02Q .0503(8)

Emission Source ID No.	Emission Source Description ^{1,2}
IES-2	Truck Loadout System controlled by 3.2 ft diameter cyclone (CD-2)
IES-7	One wood chip railcar loadout operation
IES-8 NSPS IIII GAFT ZZZZ	305 HP (227 kW Diesel-fired emergency fire pump)

¹ Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement (Federal or State) or that the Permittee is exempted from demonstrating compliance with any applicable requirement.

² When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."

SECTION 4 - GENERAL PERMIT CONDITIONS

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to the:

Regional Supervisor
North Carolina Division of Air Quality
Fayetteville Regional Office
225 Green Street, Suite 714
Fayetteville, NC 28301
910-433-3300

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 2D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 2Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - In accordance with 15A NCAC 2Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 2Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effectuate an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.

7. CHANGES NOT REQUIRING PERMIT REVISIONS - Pursuant to 15A NCAC 02Q .0318, changes to the facility that are not exempt pursuant to 15A NCAC 02Q .0102 may be allowed without first modifying an applicable air permit if the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5) and the owner or operator notifies the Director in writing, using forms provided by the Division, seven calendar days before the change is made. Within 10 business days of receipt of the notice, the Division shall notify the owner or operator of its determination of whether the change(s) meet(s) the requirements of 15A NCAC 02Q .0318(b)(1) through (b)(5).
8. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
9. In accordance with G.S. 143-215.108(c)(1), 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 effective date of this permit.
10. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
11. In accordance with 15A NCAC 2D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
12. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
13. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
14. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
15. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 2Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
16. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 2D .2100 "Risk Management Program," 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 with the USEPA in accordance with 40 CFR Part 68.
17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow all DAQ procedures including protocol approval,

regional notification, report submittal, and test results approval. Additionally, in accordance with 15A NCAC 2D .0605, the Permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the XX day of XXXXX, XXXX.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

Mark J. Cuilla, EIT, CPM, Chief, Air Permitting Section
Division of Air Quality, NC DEQ
By Authority of the Environmental Management Commission

Air Permit No. 10569R04