

**PERMIT APPLICATION FOR
MODIFICATION OF THE
BUCK COMBINED CYCLE FACILITY
SALISBURY, NORTH CAROLINA
Revision I**

Prepared for:

DUKE ENERGY CAROLINAS, LLC
Salisbury, North Carolina

Prepared by:

ECT *Environmental Consulting
& Technology of
North Carolina, PLLC*

*7208 Falls of Neuse Road, Suite 102
Raleigh, North Carolina 27615-3244*

ECT No. 170140-0100

November 2017

TABLE OF CONTENTS

<u>Section</u>		<u>Page</u>
1.0	INTRODUCTION	1-1
1.1	<u>GENERAL APPLICATION INFORMATION</u>	1-2
1.2	<u>PROJECT LOCATION</u>	1-2
1.3	<u>PROJECT OVERVIEW</u>	1-2
1.4	<u>CONTENTS OF THE MODIFICATION PERMIT APPLICATION</u>	1-4
2.0	PROCESS DESCRIPTION	2-1
2.1	<u>PRE-REACTOR MATERIAL HANDLING EQUIPMENT</u>	2-1
2.2	<u>STAR® TECHNOLOGY</u>	2-3
2.3	<u>POST-REACTOR MATERIAL HANDLING EQUIPMENT</u>	2-5
3.0	EMISSIONS CALCULATIONS	3-1
3.1	<u>NSR REVIEW APPLICABILITY DETERMINATION SUMMARY</u>	3-2
3.2	<u>PROJECT EMISSIONS</u>	3-2
3.2.1	STAR® SYSTEM	3-2
3.2.2	MATERIAL HANDLING	3-4
3.2.3	FUGITIVE EMISSIONS	3-4
3.2.4	FACILITYWIDE EMISSIONS	3-4
3.3	<u>CONTEMPORANEOUS PROJECT EMISSIONS</u>	3-6
3.4	<u>PSD NETTING ANALYSIS</u>	3-8
3.5	<u>TOXIC EMISSIONS</u>	3-10
4.0	REGULATORY ANALYSIS	4-1
4.1	<u>PSD (40 CFR 52.21)/ 15A NCAC 02D .0530</u>	4-1
4.2	<u>NORTH CAROLINA AMBIENT AIR QUALITY STANDARDS</u>	4-4
4.2.1	15A NCAC 2Q .0101 - REQUIRED AIR QUALITY PERMITS	4-4
4.2.2	15A NCAC 2D .0400. AMBIENT AIR QUALITY STANDARDS	4-4
4.2.3	15A NCAC 2D .0515 – PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES	4-5
4.2.4	15A NCAC 02D .0516 – SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES	4-7
4.2.5	15A NCAC 2D .0521 – CONTROL OF VISIBLE EMISSIONS	4-7

4.2.6	15A NCAC 02D .0530 PREVENTION OF SIGNIFICANT DETERIORATION	4-8
4.2.7	15A NCAC 2D .0535 - EXCESS EMISSIONS REPORTING AND MALFUNCTIONS	4-8
4.2.8	15A NCAC 02D .0540 - PARTICULATES FROM FUGITIVE DUST EMISSION SOURCES	4-9
4.2.9	15A NCAC 02D .0544 - PREVENTION OF SIGNIFICANT DETERIORATION REQUIREMENTS FOR GREENHOUSE GASES	4-9
4.2.10	15A NCAC 02D .1100 - CONTROL OF TOXIC AIR POLLUTANTS	4-9
4.2.11	15A NCAC 02D .1200 - CONTROL OF EMISSIONS FROM INCINERATORS	4-9
4.2.12	15A NCAC 02D .1400 – NITROGEN OXIDES	4-10
4.3	<u>FEDERAL REGULATIONS</u>	4-11
4.3.1	NEW SOURCE PERFORMANCE STANDARDS (NSPS)	4-11
4.3.1.1	NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR 60, Subpart CCCC)	4-11
4.3.1.2	NSPS for Large Municipal Waste Combustors (40 CFR 60, Subpart Eb)	4-11
4.3.1.3	NSPS Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	4-12
4.3.2	NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANT (NESHAP)	4-12
4.3.2.1	National Emission Standard for Hazardous Air Pollutant (NESHAP)	4-13
4.3.2.2	NESHAP for Industrial, Commercial and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD)	4-13
4.3.2.3	NESHAP for Industrial, Commercial and Institutional Boilers Area Sources (40 CFR 63, Subpart JJJJJ)	4-13
5.0	AIR QUALITY IMPACT ASSESSMENT	5-1
5.1	<u>MODEL SELECTION</u>	5-1
5.1.1	PHYSICAL SOURCE GEOMETRY/GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS	5-1
5.1.2	LOCAL TOPOGRAPHY	5-4
5.2	<u>AERMOD MODEL APPLICATION</u>	5-4
5.2.1	METEOROLOGICAL DATA	5-4

5.2.2	RECEPTORS AND TOPOGRAPHY FOR AERMOD	5-4
5.2.3	PHYSICAL SOURCE AND EMISSIONS DATA	5-5
5.3	<u>MODELING RESULTS</u>	5-11

APPENDICES

APPENDIX A—AIR PERMIT APPLICATION FORMS
APPENDIX B—SUPPORTING EMISSION CALCULATIONS
APPENDIX C—PSD NETTING CALCULATIONS AND SUPPORT DOCUMENTATION
APPENDIX D—FACILITY DRAWINGS
APPENDIX E—ELECTRONIC AIR DISPERSION MODELING
APPENDIX F—NHSM DETERMINATION
APPENDIX G—RACT ANALYSIS
APPENDIX H—CAM PLAN
APPENDIX I—ZONING COMMISSION DOCUMENTATION

LIST OF TABLES

<u>Table</u>		<u>Page</u>
3-1	Proposed Project Emissions	3-5
3-2	Contemporaneous Project Emissions	3-7
3-3	PSD Netting Analysis	3-9
3-4	Net Emission Increases – Proposed STAR [®] Project	3-11
3-5	Summary of Actual TAP Emissions from the Buck STAR [®] facility and Comparison the TPERs	3-12
4-1	Ambient Air Quality Standards	4-2
4-2	Attainment Status for Rowan County, North Carolina	4-3
4-3	15A NCAC 2D .0515 Allowable Emissions	4-6
5-1	Source Parameters—Point Sources	5-6
5-2	Source Parameters—Volume Sources	5-7
5-3	Source Parameters—Area Sources	5-8
5-4	Modeled Emissions Rates—Point Sources	5-9
5-5	Modeled Emissions Rates—Volume and Area Sources	5-10
5-6	Results for AERMOD Dispersion Modeling—	5-12

LIST OF FIGURES

<u>Figure</u>		<u>Page</u>
1-1	Site Location Map	1-3
1-2	Process Flow Diagram	1-6
5-1	Facility Layout—Sources and Building Locations in AERMOD	5-3

1.0 INTRODUCTION

Duke Energy Carolinas, LLC (Duke Energy) is currently permitted (Air Permit No. 03786T34) to operate the Buck Steam Station located in Rowan County, North Carolina, which is currently attainment for all regulated pollutants. Duke Energy expanded this facility in 2011 by adding two (2) combustion turbine generators (CTGs) with supplemental duct firing operating in a 2x1 combined cycle mode with a nominal capacity of 620 MW. The combined cycle turbines are equipped with selective catalytic reduction (SCR) to minimize oxides of nitrogen (NO_x) emissions and an oxidation catalyst to minimize carbon monoxide (CO) and volatile organic compounds (VOC) emissions. Three of the five coal-fired boilers were retired prior to initial operation of the new CTGs, and three existing simple cycle combustion turbines were retired in October 2012. The facility currently consists of the 2x1 combined cycle power island and ancillary equipment.

Duke Energy is proposing to install and operate a fly ash processing facility consisting of a Staged Turbulent Air Reactor (STAR[®]) plant and associated ancillary activities. To support this project, Duke Energy is submitting this application for a minor source construction permit.

North Carolina Department of Environmental Quality (NC DEQ) application forms and tables are located in Appendix A. Supporting emission calculations are presented in Appendix B. Supporting documents for the Prevention of Significant Deterioration (PSD) netting calculation are presented in Appendix C. A site plan, plot plan and process flow diagrams for the proposed project can be found in Appendix D. The toxic air dispersion modeling files are presented in Appendix E. The non-hazardous secondary material (NHSM) determination is provided in Appendix F. Reasonably Available Control Technology (RACT) analysis is presented in Appendix G. Compliance Assurance Monitoring (CAM) Plan is provided in Appendix H and Appendix I contains Zoning Commission documentation.

1.1 GENERAL APPLICATION INFORMATION

Following is the applicant's primary point of contact and the address and telephone number where he can be reached:

Duke Energy Contact

Dan Markley
Duke Energy Carolinas, LLC
526 South Church St.
Charlotte, North Carolina 28202
(704) 382-0696 (Office)
(704) 816-9164 (Mobile)

ECT Contact

Thomas O. Pritcher, P.E.
Environmental Consulting & Technology, Inc.
7208 Falls of Neuse Road, Suite 102
Raleigh, North Carolina 27615
(919) 861-8888 (Office)
(919) 631-1537 (Mobile)

1.2 PROJECT LOCATION

The Buck STAR[®] facility will be located on the property associated with Duke Energy's Buck Combined Cycle facility, which is located at 1385 Dukeville Road, Salisbury, NC 28146. Figure 1-1 provides a regional topographic map showing the site location.

1.3 PROJECT OVERVIEW

The STAR[®] system is a patented technology developed by The SEFA Group Inc. (SEFA) to process feedstock (of any carbon content) like fly ash (wet or dry) along with other ingredient materials into a variety of commercial products. These products are used, not only for application as a partial cement replacement, but for many other commercial and industrial applications. For example, there are several products that SEFA is currently capable of producing because of the flexibility embodied in the STAR[®] process, including STAR[®] RP, Ultrix[®], Spherix[®], Fortimix[®], and Permanix[™].

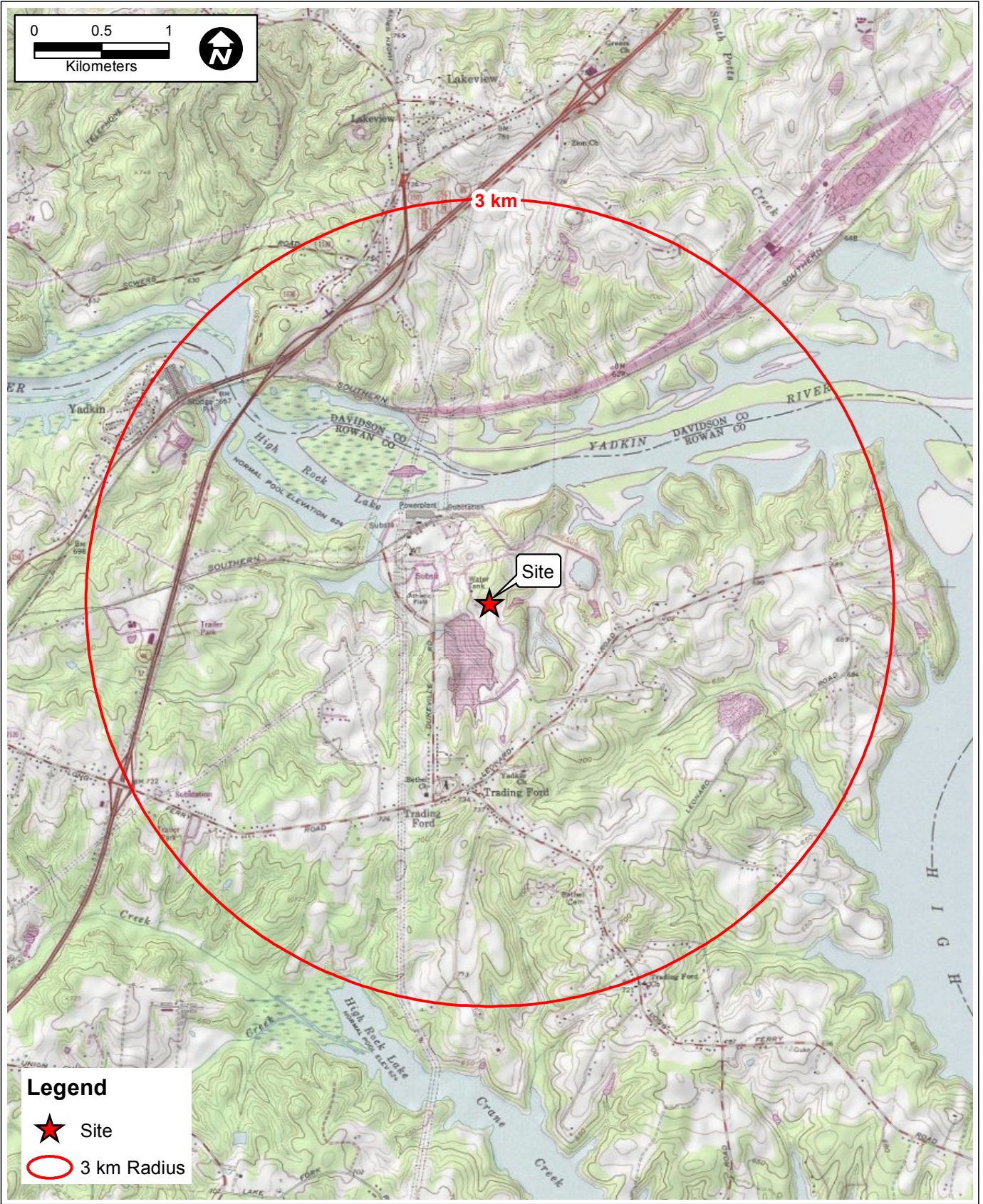


FIGURE 1-1.
SITE LOCATION TOPOGRAPHIC MAP



Sources: Esri Basemap USGS Topographic Quadrangle, ECT 2017.

The associated sources of air emissions proposed to support the STAR[®] system includes the following:

- Ash Basin excavation.
- Ash Handling/Processing.
- Haul Roads.
- Screener.
- Crusher.
- Two diesel engines associated with a Screener and a Crusher.
- Wet ash receiving area and storage shed.
- Wet ash feed hopper.
- Wet ash unloading pile
- Two External heat exchangers (EHE) (with baghouses).
- Transfer silo filling and unloading (with bin vent product capture device).
- Feed silo filling and unloading (with bin vent product capture device).
- Storage dome filling and unloading (with bin vent product capture device).
- Loadout silo (with bin vent product capture device).
- Loadout silo chute 1A (with bin vent product capture device).
- Loadout silo chute 1B (with bin vent product capture device).
- FGD Byproduct Silo (with bin vent product capture device).
- FGD Absorbent Silo (with bin vent product capture device).

The facility will be designed to produce up to 400,000 tons of fly ash product annually. Figure 1-2 illustrates a general process flow diagram for proposed facility.

1.4 CONTENTS OF THE MODIFICATION PERMIT APPLICATION

Section 2.0 of this document provides a source description of the facility. Section 3.0 presents the projected air emissions. Section 4.0 discusses the regulatory applicability, and Section 5.0 presents the air toxic dispersion modeling methodology and results. The appendices are organized as follows:

- Appendix A—Air Permit Application Forms.
- Appendix B—Supporting Emissions Calculations.
- Appendix C—PSD Netting Calculations and Support Documentation.
- Appendix D—Facility Drawings.
- Appendix E—Electronic Air Dispersion Modeling.
- Appendix F—NHSM Determination.
- Appendix G—RACT Analysis.
- Appendix H—CAM Plan.
- Appendix I—Zoning Commission Documentation.

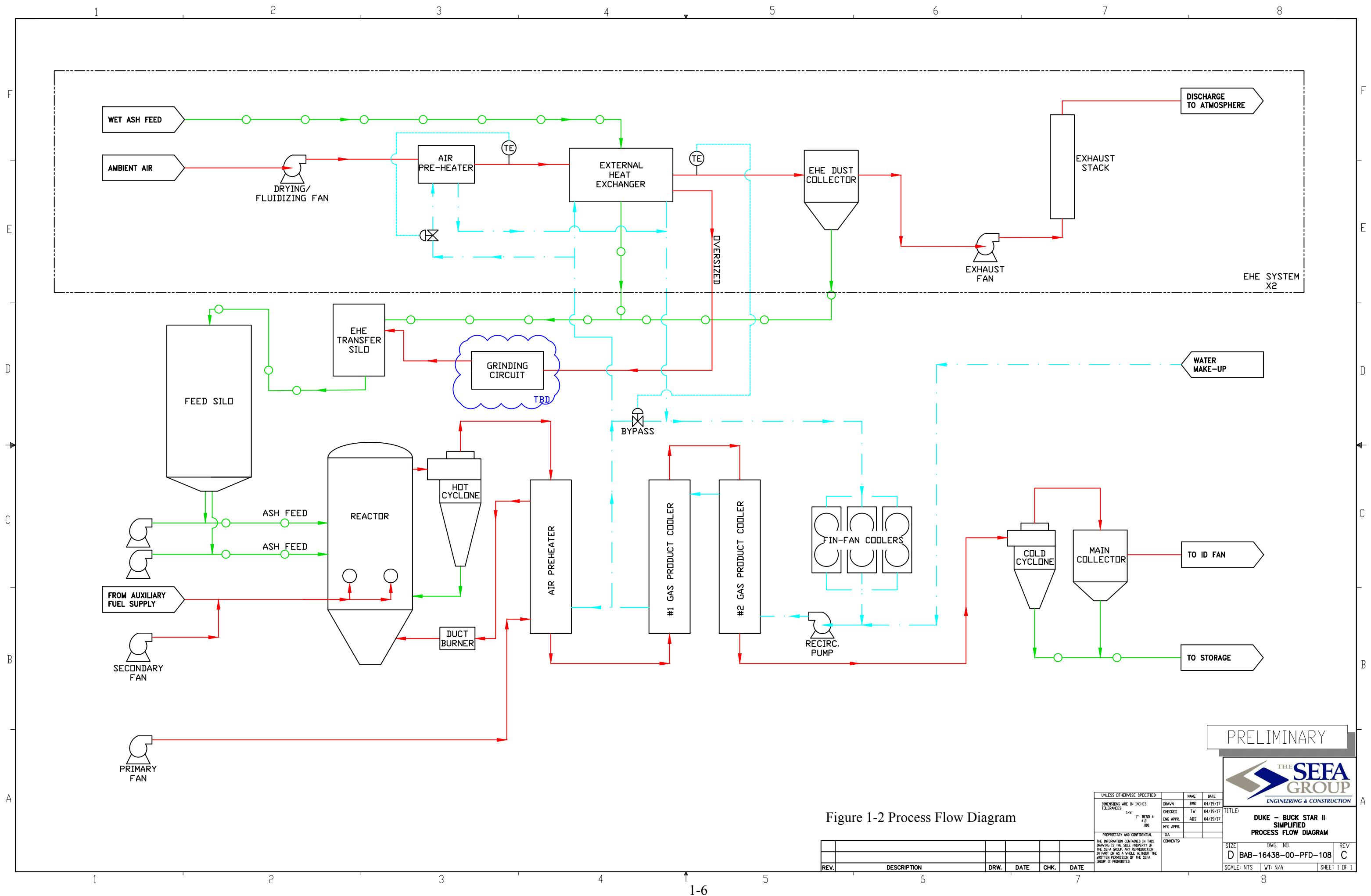


Figure 1-2 Process Flow Diagram

PRELIMINARY



UNLESS OTHERWISE SPECIFIED:	NAME	DATE
DIMENSIONS ARE IN INCHES	DRAWN	04/19/17
TOLERANCES:	CHECKED	04/19/17
1/8"	ENG. APPR.	04/19/17
± .01	MFG APPR.	
± .001	SA:	
PROPRIETARY AND CONFIDENTIAL	COMMENTS:	
THE INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF THE SEFA GROUP. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF THE SEFA GROUP IS PROHIBITED.		

TITLE: DUKE - BUCK STAR II SIMPLIFIED PROCESS FLOW DIAGRAM

SIZE: D	DWG. NO: BAB-16438-00-PFD-108	REV: C
SCALE: NTS	WT: N/A	SHEET 1 OF 1

REV.	DESCRIPTION	DRW.	DATE	CHK.	DATE

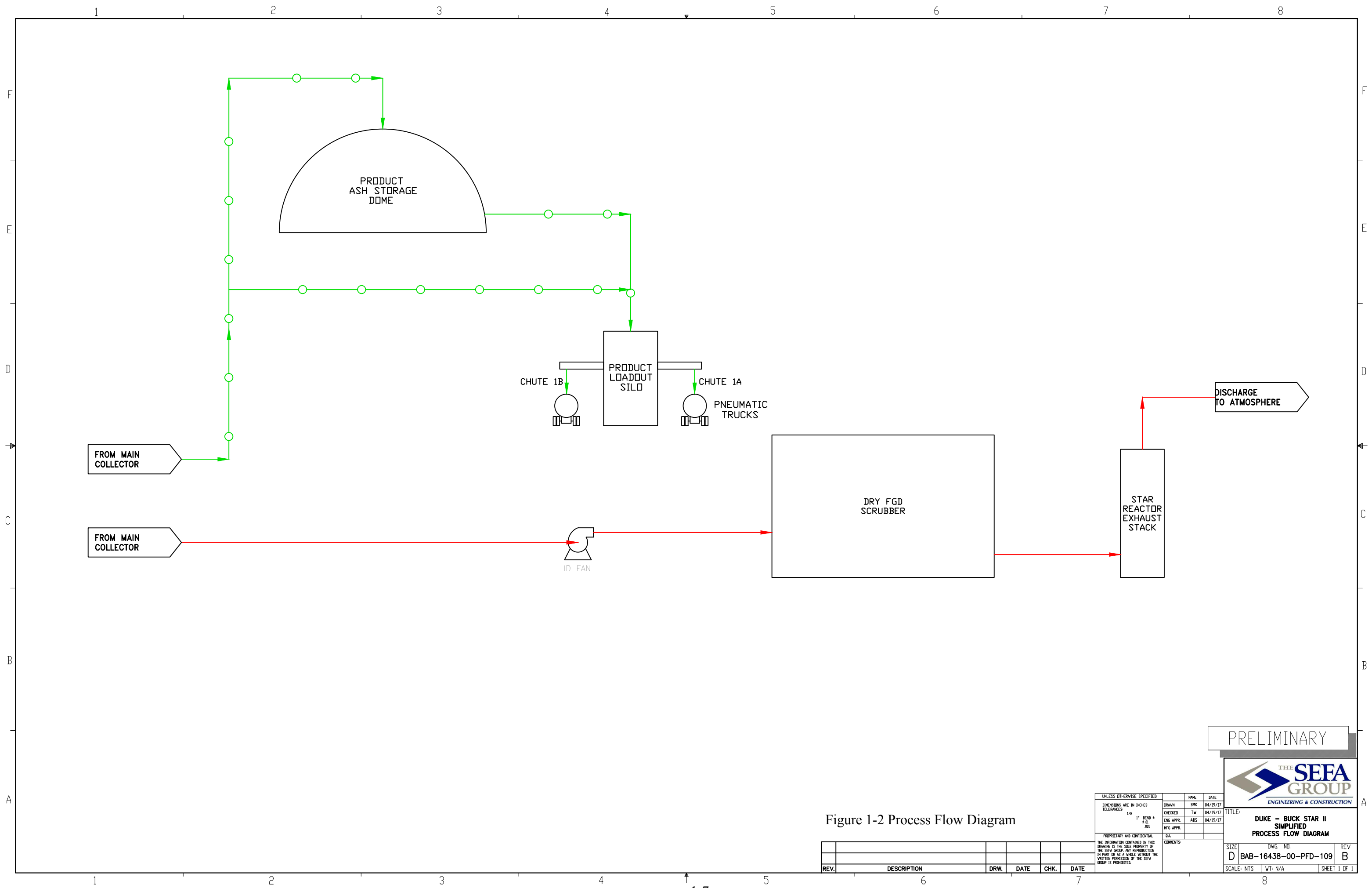


Figure 1-2 Process Flow Diagram

PRELIMINARY



UNLESS OTHERWISE SPECIFIED:	NAME	DATE
DIMENSIONS ARE IN INCHES	DRAWN	04/19/17
TOLERANCES	CHECKED	04/19/17
1/8"	ENG. APPR.	04/19/17
± .01	MFG APPR.	
± .001	SA	
PROPRIETARY AND CONFIDENTIAL	COMMENTS	
THE INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF THE SEEA GROUP. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF THE SEEA GROUP IS PROHIBITED.		

TITLE: DUKE - BUCK STAR II SIMPLIFIED PROCESS FLOW DIAGRAM

REV.	DESCRIPTION	DRW.	DATE	CHK.	DATE

SIZE: D	DWG. NO: BAB-16438-00-PFD-109	REV: B
SCALE: NTS	WT: N/A	SHEET 1 OF 1

2.0 PROCESS DESCRIPTION

2.1 PRE-REACTOR MATERIAL HANDLING EQUIPMENT

Excavation and processing of materials from the ash ponds to meet the STAR[®] system fly ash (ingredient) specifications will be under the control of the Duke Energy. All fly ash reclaimed from an ash pond delivered for use as an ingredient in the STAR[®] system must first undergo processing by the owner to be:

- A. Free of all, but minimal contaminants (e.g., organic debris, slag);
- B. Finely-divided and free-flowing,
- C. Have consistent moisture content of $\leq 25\%$; and
- D. Have a consistent chemical composition, including organic content a measured by loss on ignition.

The processing sequence of events will include fly ash being excavated and staged to allow for dewatering (ensures moisture content of $\leq 25\%$). Dewatered fly ash will then be screened to remove contaminants (organic debris, slag, etc.), to produce a consistent chemical composition and a finely divided free-flowing ingredient.

Wet fly ash nominal 15 percent by weight moisture (water) is delivered via trucks. The wet fly ash can be unloaded from the trucks into the storage shed, unloaded from the trucks to a pile that is then transferred to a storage shed by a front-end loader, or unloaded from the trucks directly into the feed hopper. The wet fly ash in the shed is transferred via front-end loader to a hopper at up to 70 wet “short” tons per hour (tph) (one “short” ton = 2,000 lb), which then conveys the wet fly ash to the mechanical conveyance equipment. The material is discharged from the mechanical conveyance equipment into a material delumper unit to reduce the “overs” material. The material discharged from the delumper unit is then introduced into the EHE by gravity, where it is continually fluidized using preheated air.

The fluidized material is dried by two heat transfer means: (1) intimate contact of the wet, fluidized material with the heated fluidizing air and (2) direct contact of the wet material

with hot water heat exchangers located in the EHE. By contact of the material with the outer surfaces of the heat exchanger tube, heating energy is transferred from the tube-side hot water (hot water that is a part of the facility's cooling loop at approximately 350 degrees Fahrenheit [°F] at 250 pounds per square inch gauge [psig]) to the material such that the material heats and, consequently, dries, while the supplied hot water temperature is reduced.

The material is discharged from the EHE units via two means. The primary method of material discharge from the unit is via the fixed-height overflow weir located at the discharge end of the unit. This overflow stream (comprising the majority of the material discharged from the unit) enters the integrally-constructed discharge box/chute of the unit. The second method of material discharge from the unit is via an integrally-constructed underflow discharge screw or rotary valve. The purpose of this underflow discharge stream is to discharge large or oversized material from the unit that, due to these particles' size, may not sufficiently fluidize to the point that they would reach the normal overflow weir height. The material is discharged from the unit at less than 2.0 percent by weight moisture and at a temperature range of 150 to 300°F to downstream material-handling equipment (transfer silos).

The exhaust air is discharged from each EHE through interconnecting ductwork to a high-efficiency bag filter unit operation for feedstock recovery/exhaust air treatment. The moisture- and dust-laden exhaust air enters the unit, and, as the air passes through the filter media, dust is separated from the exhaust air stream with high fractional removal efficiency. The high-efficiency filter media used will be able to achieve a particulate matter (PM) exhaust rate of 0.025 grain per dry standard cubic foot (gr/dscf) of exhaust air (or less).

After the bag filter unit, the cleaned exhaust air stream passes through interconnecting ductwork to the exhaust air fan. The exhaust air volumetric rate is estimated at approximately 41,550 actual cubic feet per minute (acfm) at 10 inches in the water column (water

gauge) static pressure (atmospheric pressure) and at approximately between 150-300°F (and at or below the dust loading rate of 0.025 gr/dscf).

2.2 STAR® TECHNOLOGY

As discussed previously, the STAR® process is a patented technology developed by SEFA to process feedstock (of any carbon content) like fly ash (wet or dry) along with other ingredient materials into a variety of commercial products. These products are used not only for application as a partial cement replacement but also as an ingredient in many other commercial and industrial applications.

The STAR® process is inherently flexible in that operating parameters can be varied and different ingredients can be added to produce a desired product. The primary component of the STAR® is a cylindrical refractory-lined vessel in which the majority of the process reactions take place. These reactions can include a range of both chemical and physical reactions. Air required for pneumatic uplift of the solids and for the process reactions enters through the floor of the STAR® system as well as through the walls at multiple locations. The raw feedstock and any other ingredients are introduced through the walls of the STAR®. All of the solids and gases exit together at the top of the reactor. The gas/solids mixture enters a hot cyclone, where the majority of solids are separated from the gas and recycled back to the STAR® system. The high rate of hot recycle solids increases the operating flexibility of the process. The process reactions can occur through this reactor/hot cyclone loop. Due to the high gas velocity, multiple injection points, and recycle solids, there is a significant amount of turbulence created that enhances the mixing of the ingredients and optimizes the reactions. The gas and remaining solids not collected by the hot cyclone are passed over a heat exchanger, which can be designed to preheat the process air, used in heat recovery or to simply cool the gas/solids mixture. Once cooled, the solids are separated from the gas in a fabric filter recovery device. The STAR® system's integral design allows for solids to be removed from the bottom of the reactor or from the recycle loop ultimately to be combined with the solids/gas stream before the heat recovery equipment. By design the STAR® operates under a wide range of process parameters to produce

a high-quality class F fly ash for beneficial use in ready mix concrete or other specialty products.

During startup, the process air is heated with a startup burner firing auxiliary fuel (i.e., natural gas or propane) until reactor temperatures reach auto-ignition. At this point, the residual carbon in the fly ash reacts and becomes the heat source for the self-sustaining process. Under certain conditions, auxiliary fuel may be co-fired with the residual carbon in the fly ash. Process controls meter additional raw fly ash through a feeder into the reactor as necessary. As additional material is added to the reactor, processed fly ash is entrained in the exhaust and exits the top of the reactor.

After exiting the reactor, the fly ash entrained in the flue gas passes through a hot cyclone where solids are returned to the reactor for temperature control. The fly ash and flue gas leaving the hot cyclone is conveyed to the air preheater then passes through a gas cooler. The cooled flue gas and fly ash passes through a fabric filter baghouse, which is an integral part of the process for product capture, and then exhausts to a Dry Flue Gas Desulfurization (FGD) system (using hydrated lime as a reagent and an additional fabric filter control device) to reduce SO₂ emissions. The FGD exhaust is vented to the atmosphere through a stand-alone stack.

The Dry FGD system consist of a Circulating Dry Scrubbing System (CDS) and a Fabric Filter baghouse (FF). Flue gas, reagent (hydrated lime) and water are mixed homogenously in the CDS to absorb the acid gas, sulfur oxides, and is collected in the FF baghouse. The clean gas will then flow from the CDS-FF system to an Induced Draft (ID) fan which forces the clean exhaust gas up the stack where it discharges to atmosphere. The byproduct solids are discharged from the FF baghouse into a byproduct storage silo. The system is comprised of a three (3) day storage silo with vent filter, fluidizing air stones and dry unloading chutes. Dry dust unloading chutes are telescoping chutes equipped with small ventilation fans that recirculate displaced air back to the top of the byproduct storage silo.

2.3 POST-REACTOR MATERIAL HANDLING EQUIPMENT

Once the fly ash leaves the reactor, it is collected in the product recovery baghouse and pneumatically transferred to either the storage dome or the loadout silo, each equipped with a bin vent. The truck loadout station uses telescoping chutes and a negative pressure ventilation system to reduce fugitive emissions.

3.0 EMISSIONS CALCULATIONS

This section contains the New Source Review (NSR) applicability determination for the proposed Project and discusses the basis and methodology for the calculation of air pollutant emission rates for the proposed sources. Per 40 CFR 51.166, the proposed project is subject to the provisions of PSD if the project will result in significant emissions increase and significant net emissions increase exceeding specified thresholds for each pollutant. Emissions increase analysis was prepared for each NSR pollutant to summarize the emissions increases and decreases associated with the proposed project. The results of this analysis were used to determine whether any pollutants are potentially subject to NSR applicability.

This section is organized to follow the steps in the project emissions increase analysis. A summary of the NSR applicability determination is provided first, with supporting documentation provided in the subsequent subsections. The NSR applicability determination was prepared in accordance with the provisions of 40 CFR 51.166, 15 NCAC 2D.0530 and 2D.0544.

For the emission sources to be added for the proposed Project, emission rates are based on process information developed and provided by SEFA, Duke Energy, manufacturers' data, and/or published emission factors such as those contained in the U.S. Environmental Protection Agency's (USEPA) Compilation of Air Pollutant Emission Factors, AP-42. Unit design parameters and operational practices have been incorporated into the analysis to make the emission estimates conservative and representative of on-site conditions. Emission estimates are provided for criteria pollutants, hazardous air pollutants (HAP) and toxic air pollutants (TAP).

The emissions impact of project-related sources is based on the potential emissions for all new sources that will be included in the project. Detailed emission calculation methodolo-

gies and throughput data for the emission sources specified in the PSD applicability analysis are presented in Appendix B. A summary of the results of the PSD applicability determination and project emissions increase analysis are provided in Appendix C.

3.1 NSR REVIEW APPLICABILITY DETERMINATION SUMMARY

A NSR applicability determination was prepared for each applicable NSR pollutant specified in 40 CFR 51.166. These pollutants include NO_x, SO₂, PM, particulate matter with diameter less than 10 microns in diameter (PM₁₀), particulate matter with diameter less than 2.5 microns in diameter (PM_{2.5}), CO, ozone (as VOC), lead (Pb), sulfuric acid mist (H₂SO₄) and greenhouse gases (GHGs). The proposed project is deemed to be subject to PSD, if the sum of the increases and decreases associated with the project exceeds the pollutant-specific thresholds defined as a “significant emissions increase” in 40 CFR 51.165 and 40 CFR 51.166. A summary of the individual steps in preparing the NSR emissions increase analysis is as follows:

- Emissions increase associated with the project: The emissions increase equals the difference between the projected actual or potential emissions and the baseline actual emissions for each existing unit. If the modified units are new and therefore do not have 24 consecutive months of operating data, then the baseline actual emissions will equal the potential to emit.
- Emissions increase (or decrease) due to other permitted changes which occurred during the contemporaneous period for the proposed project.
- The project emissions increase equals the sum of the emissions increases (or decreases) for all new and existing sources associated with the project.

3.2 PROJECT EMISSIONS

3.2.1 STAR® SYSTEM

Emissions from the STAR® system, include PM/PM₁₀/PM_{2.5}, SO₂, NO_x, CO, VOCs, and GHGs from the auxiliary fuels and residual carbon in the fly ash. Emissions from the auxiliary fuels were estimated using the most recent emissions factors for natural gas- and propane-fired boilers contained in the U.S. Environmental Protection Agency’s (EPA’s)

Compilation of Air Pollutant Emissions Factors (AP-42). The auxiliary fuel burners are a low-NO_x design intended to comply with North Carolina NO_x control regulations.

Emissions of NO_x and CO from the processing of the residual carbon in the fly ash were estimated based on emissions estimates from other existing STAR[®] units. Particulate emissions for the STAR[®] are based on the baghouse manufacturer's data of 0.01 grain per actual cubic foot (gr/acf). The induced draft fan providing the motive force for the product transfer is rated at 56,846 acfm, at the expected process conditions of 350°F and nominal atmospheric pressure.

SO₂ emissions are a function of the amount of fly ash processed through the reactor, the sulfur content of the fly ash, the amount of sulfur remaining in the product ash exiting the STAR[®] reactor, and the SO₂ air pollution control equipment removal efficiency, in this case the dry scrubber. Assuming ash sulfur content of 0.15 percent and 100-percent oxidation of the sulfur. The dry scrubber will be designed to provide 100-percent capture and can be operated with an SO₂ control efficiency of 95 percent.

Fly ash generated from the combustion of coal may contain trace quantities of heavy metals. Duke Energy provided metals emission factors based on averages, ash analysis was used to calculate the emission rates for each metal.

The STAR[®] system will normally fire auxiliary fuels during system startup and will cut back on auxiliary fuel feed as the reactor reaches self-sustaining conditions. However, emissions have been estimated conservatively by combining the total emissions associated with firing the worst-case auxiliary fuel at full capacity with the total emissions from fly ash processing.

GHG emissions were also calculated from the STAR[®] reactor. GHG emissions were based on the annual natural gas and propane usages and emissions factors from Table C-1 of Chapter 40, Part 98, Code of Federal Regulations (CFR), Subpart C, along with the loss of

ignition of the fly ash. Appendix B provides detailed spreadsheets and example calculations.

3.2.2 MATERIAL HANDLING

The material handling system includes one wet ash raw feed unloading pile, one wet ash storage shed, one wet ash EHE feed hopper, two EHE's, raw feed silos, one loadout silo, two loadout chutes, transfer silos, a product storage dome, FGD byproduct silo, FGD absorbent silo, screener, crusher, ash basin and handling and haul roads. The silos are each equipped with a bin vent product capture device to minimize product losses associated with the pneumatic transfer process. The truck loadout station uses telescoping chutes and a negative pressure ventilation system to reduce fugitive emissions.

Particulate emissions from the silos were estimated using the maximum short- and long-term transfer rates and appropriate emissions factors from previous STAR[®] facilities.

Trace metal concentration data discussed previously for the STAR[®] system were used in conjunction with the calculated PM emissions rates to estimate emissions of trace metal from the material handling activities. Appendix B contains detailed spreadsheets and example calculations.

3.2.3 FUGITIVE EMISSIONS

Additional particulate emissions were also calculated for the wet ash receiving process, ash handling process (including screening and crushing activities) and haul roads. Windblown fugitive dust emissions were also calculated from the unloading pile. The emissions were calculated using the appropriate emissions factors from AP-42. Appendix B contains detailed spreadsheets and example calculations.

3.2.4 FACILITYWIDE EMISSIONS

Table 3-1 presents a summary of the proposed project emissions and comparison to the respective Significant Emission Rate (SER).

Table 3-1. Proposed Project Emissions and Comparison to the SER

Pollutant	Proposed Project Emissions		SER (tpy)	Netting Required
	lb/hr	tpy		
PM	12.05	49.14	25	Yes
PM ₁₀	10.75	43.59	15	Yes
PM _{2.5}	6.42	24.64	10	Yes
SO ₂	41.03	163.98	40	Yes
NO _x *	30.34	117.66	40	Yes
CO	25.01	92.26	100	No
VOC	3.21	9.54	40	No
Lead	1.41E-03	6.17E-03	0.6	No
GHG (mass basis)	--	116,599		
GHG (CO ₂ e basis)	--	116,604	75,000	Yes
Sulfuric acid mist	0.10	0.44	7	No

* NO_x emissions from STAR[®] unit is based on NO_x at 0.12 lb/MMBtu.

Note: lb/hr = pound per hour.

PM₁₀ = particulate matter less than or equal to 10 micrometers.

PM_{2.5} = particulate matter less than or equal to 2.5 micrometers.

CO₂e = carbon dioxide equivalent.

Source: ECT, 2017.

3.3 CONTEMPORANEOUS PROJECT EMISSIONS

Table 3-2 summarizes the contemporaneous increases and decreases based on data provided by Duke Energy and the existing air permit for the pollutants which have proposed project emissions above the SER. Contemporaneous project emissions include the creditable emissions increases and decreases which have occurred at the facility, which include the following:

- Shut down of coal boilers and associated coal handling equipment (contemporaneous decrease) – Per Duke Energy, for the emission decreases, the facility emission for the calendar years 2010 and 2011 represent the emission sources that have been removed from service. Therefore, emissions for these two years were averaged in order to represent the contemporaneous decrease. (See Appendix C)
- Combined cycle project (contemporaneous increase) - The contemporaneous increase associated with the combined cycle project does take into account the PSD avoidance conditions with the existing permit. The emissions for the combine cycle project were taken from the current permit (03786T34), the Duct Burner Modification Application (Feb 2013), the BK Hot Gas Path Modification Application (May 2014), the BK ES-17EmGen Application (May 2016), and from the letter to NC DEQ for the addition of ash basin water pump (Feb 2017).

This information is provided in more detail in Appendix C.

Table 3-2. Contemporaneous Project Emissions

Description of Emission	NO _x (TPY)	SO ₂ (TPY)	PM (TPY)	PM ₁₀ (TPY)	PM _{2.5} (TPY)	CO _{2e} (TPY)
PSD Avoidance CAP for ES11 and ES12 (Increases)	599.8	108.52	198.90	160.8	160.8	2,669,078
Non-Turbine Emissions, Ancillary Equipment (Increases)	5.71	0.23	8.05	8.04	8.04	0
Contemporaneous Decreases	(781.70)	(4724.45)	(290.26)	(257.94)	(220.84)	(0)

Note:

SO₂=sulfur dioxide

PM = particulate matter

PM₁₀ =particulate matter less than or equal to 10 micrometers.

PM_{2.5} =particulate matter less than or equal to 2.5 micrometers.

CO = carbon monoxide

H₂SO₄ – sulfuric acid mist

CO_{2e} =carbon dioxide equivalent.

Source: ECT, 2017.

3.4 **PREVENTION OF SIGNIFICANT DETERIORATION NETTING ANALYSIS**

Duke Energy is applying to the NC DEQ for a revision to PSD avoidance conditions in Section 2.1.A.6.a and Section 2.1.A.7.a of Air Permit No. 03786T34 for sulfuric acid mist and VOCs. Specifically, Duke Energy is requesting the removal of VOC and sulfuric acid mist from these conditions, and the creation of a new PSD avoidance condition that addresses VOCs and sulfuric acid mist from the turbines (ES-11 and ES-12), the STAR[®] unit (proposed ES-74) and two proposed diesel engines associated with ash screening/crushing without change to the respective avoidance limits indicated in Section 2.1.A.6.a and Section 2.1.A.7.a of Air Permit No. 03786T34. As result of this request, VOCs and sulfuric acid mist are not subject to PSD review because no increase in these pollutants is requested.

As shown in Table 3-3 and considering the PSD avoidance condition requested in the previous paragraph, the project does not result in a significant increase in emissions of any PSD pollutant except for GHGs. Please note that GHG emissions are expected to increase by a value more than the Significant Emission Rate (SER) for GHG emissions. GHG emissions have been categorized as an “anyway” pollutant and require another PSD pollutant to be subject to PSD review before PSD review applies to GHG emissions. Therefore, GHG are not subject to PSD review for the proposed project. The emission calculation methodologies used to prepare the values are provided in Appendix B.

Table 3-3. PSD Netting Analysis

Description of Emission	NO _x	SO ₂	PM	PM ₁₀	PM _{2.5}	CO ₂ e
	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)
Proposed Project Emission (Increases)	117.66	163.98	49.14	43.59	24.64	116,604
PSD Avoidance CAP for ES11 and ES12 (Increases)	599.8	108.52	198.90	160.8	160.8	2,669,078
ES13 – 10 cell cooling tower (Increases)			7.00	7.00	7.00	
ES14 – Auxiliary Boiler (Increases)	1.80	0.22	0.40	0.40	0.40	
ES15 – Fuel oil fired emergency generator (Increases)	0.80	0.0009	0.028	0.023	0.023	
ES16 – Fuel oil fired fire water pump (Increases)	0.10	0.0001	0.004	0.004	0.004	
ES72 – Chiller cooling tower (Increases)			0.60	0.60	0.60	
Ash basin water management pump (Increases)	2.50	0.004	0.016	0.016	0.016	
ES17 – Fuel oil fired emergency generator, 762 hp (Increases)	0.513	0.0005	0.003	0.002	0.002	
Total Increases	723.17	272.73	256.09	212.43	193.48	2,785,682
Contemporaneous Decreases	(781.70)	(4724.45)	(290.26)	(257.94)	(220.84)	(0)
Difference	-58.53	-4451.72	-34.17	-45.50	-27.35	2,785,682
PSD SERS	40	40	25	15	10	75,000
Significant Modification	No	No	No	No	No	Yes

Source: ECT, 2017.

3.5 TOXIC EMISSIONS

The toxic permitting emission rate (TPER) analysis was performed using the procedures outlined in 15A NCAC 2Q.0706.

The first step of the TPER analysis is to determine if the modification results in “a net increase in emissions of any toxic air pollutant that the facility was emitting before the modification” or if the modification results in “emissions of any toxic air pollutant that the facility was not emitting before the modification if such emissions exceed the levels contained in Rule .0711.” The proposed modification is the installation of the STAR[®] unit and associated equipment. Table 3-4 presents the potential emissions of the toxic air pollutants (TAPs) from the proposed modification at the Buck STAR[®] facility. Please note that the diesel engines (ES-82B and ES-83B) were not included in the TPER analysis per 15A NCAC 2Q.0702 (a)(27). Additional calculation information is provided in Appendix B.

Using the list of TAPs determined from the first step of the TPER analysis, the emissions from the Buck STAR[®] facility, including the proposed modifications (Table 3-4) and the existing equipment, were compared to the TPERs, presented in Table 3-5, to identify the compounds exceeding their respective TPERs. The emissions for the existing turbines and auxiliary boiler were taken from the current permit (03786T34) limits and the Duct Burner Modification Application (February 15, 2013). Additional information is provided in Appendix B.

Once the compounds exceeding the TPERs were identified, an air dispersion modeling analysis was completed for the whole Buck STAR[®] facility including the existing combined cycle turbines and auxiliary boiler.

Table 3-4. Net Emission Increases – Proposed STAR[®] Project

Compound	Total Emissions		
	lb/hr	lb/day	lb/yr
Sulfuric acid	1.00E-01	2.4	-
Benzene	-	-	3.34
Formaldehyde	7.64E-03	-	-
n-Hexane	-	2.54	-
Toluene	1.32E-03	3.17E-02	-
Arsenic	-	-	11.37
Beryllium	-	-	2.34
Cadmium	-	-	2.58
Chromium VI (Soluble Chromate)	-	4.14E-03	
Manganese	-	6.70E-02	-
Mercury	-	5.66E-04	-
Nickel	-	4.06E-02	-

Table 3-5. Summary of Potential TAP Emissions from the Buck Combined Cycle Facility and Comparison the TPERs

Compound	Total Emissions			TPER			Exceed TPER		
	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr
Sulfuric acid	3.50	84.00		0.025	0.25		YES	YES	
Benzene			444.93			8.1			YES
Formaldehyde	0.91			0.04			YES		
n-Hexane		12.54			23.0			NO	
Toluene	0.26	62.15		14.4	98.0		NO	NO	
Arsenic			20.34			0.053			YES
Beryllium			2.89			0.28			YES
Cadmium			51.89			0.37			YES
Chromium VI (Sol- uble Chromate)		0.012			0.013			NO	
Manganese		0.117			0.630			NO	
Mercury		0.022			0.013			YES	
Nickel		0.302			0.013			YES	

Note: Chromium VI total emission is less than TPER, but to be conservative it is still modeled because the emissions are very close to the threshold.

4.0 REGULATORY ANALYSIS

Federal and state regulations were reviewed to determine their applicability to and implications for the various emissions sources at the Buck STAR[®] facility. The regulations that may apply only to the proposed emissions sources as a result of modification at the facility are discussed in the following subsections.

USEPA promulgated regulations that set NAAQS for seven criteria compounds: SO₂, CO, NO_x, PM₁₀, PM_{2.5}, Pb, and ozone (O₃). Two classes of ambient air quality standards have been established: (1) primary standards defining levels of air quality that the USEPA has judged as necessary to protect public health; and (2) secondary standards defining levels for protecting soils, vegetation, wildlife, and other aspects of public welfare. Table 4-1 lists the national primary and secondary and state ambient air quality standards in micrograms per cubic meter (µg/m³). The NC DEQ ambient air quality standards are also included in Table 4-1.

According to 40 CFR §81.334, the current attainment status for the project area Rowan County for each of the criteria pollutants is provided in Table 4-2. The proposed facility is located in an area that is in attainment of the national ambient air quality standards (NAAQS).

4.1 PSD (40 CFR 52.21)/ 15A NCAC 02D .0530

The proposed modification (addition of STAR[®] unit) to the operating limits in the Buck Combined Cycle facility air permit does not result in a significant increase of emissions for any PSD pollutant and is therefore not subject to PSD review.

Table 4-1. Ambient Air Quality Standards

Pollutant	Averaging Period*	NAAQS ($\mu\text{g}/\text{m}^3$ †)		NC DEQ Regulation Standards ($\mu\text{g}/\text{m}^3$ †)	
		Primary	Secondary	Primary	Secondary
SO ₂	Annual‡	80	—§	80	—§
	24-hour‡	365	—§	365	—§
	1-hour	196	—§	196	—§
	3-hour	—§	1,300	—§	1,300
PM ₁₀	24-hour	150	150	150	150
PM _{2.5}	Annual	12	15	12	15
	24-hour	35	35	35	35
CO	8-hour	10,000	—§	10,000	—§
	1-hour	40,000	—§	40,000	—§
Ozone	8-hour	0.070 ppm	0.070 ppm	0.075 ppm	0.075 ppm
NO ₂	Annual	100	100	100	100
	1-hour	188	—§	188	—§
Lead	3-month£	0.15	0.15	0.15	0.15

Note: ppm = part per million.
ppb = part per billion. NO₂ = nitrogen dioxide.

*National short-term ambient standards may be exceeded once per year; annual standards may never be exceeded. North Carolina short-term standards may be exceeded once per year, annual standards may never be exceeded. Ozone standard is attained when the expected number of days of an exceedance is equal to or less than one.

†Standards expressed in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) unless otherwise noted.

‡Final rule signed June 2, 2010. The 1971 annual and 24-hour SO₂ standards were revoked in this rulemaking. However, these standards remain in effect until one year after an area is designated for the 2010 standard, except in areas designated nonattainment for the 1971 standards, where the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standard are approved.

§No ambient standard for this pollutant and/or averaging period.

£The rule signed October 15, 2008, finalized a new lead standard. The 1978 lead standard of 1.5 $\mu\text{g}/\text{m}^3$ as a quarterly average remains in effect until one year after an area is designated for the 2008 standard, except in areas designated nonattainment for the 1978 standard, where, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Sources: 40 CFR 50.
15A NCAC 2D .0400.

Table 4-2. Attainment Status for Rowan County, North Carolina

Pollutant	Attainment Status
CO	Unclassifiable/attainment
SO ₂	Attainment
NO ₂	Unclassifiable/attainment
PM ₁₀	Unclassifiable/attainment
PM _{2.5}	Unclassifiable/attainment
Ozone (8-hour)	Attainment
Lead	Unclassifiable/attainment

Source: 40 CFR 81.334.

Duke Energy is applying to the NC DEQ for a revision to PSD avoidance conditions in Section 2.1.A.6.a and Section 2.1.A.7.a of Air Permit No. 03786T34 for sulfuric acid mist and VOCs. Specifically, Duke Energy is requesting the removal of VOC and sulfuric acid mist from these conditions, and the creation of a new PSD avoidance condition that addresses VOCs and sulfuric acid mist from the turbines (ES-11 and ES-12), the STAR[®] unit (proposed ES-74) and two proposed diesel engines associated with ash screening/crushing without change to the respective avoidance limits indicated in Section 2.1.A.6.a and Section 2.1.A.7.a of Air Permit No. 03786T34. Detailed explanation is provided in Section 3.4 earlier.

4.2 NORTH CAROLINA AMBIENT AIR QUALITY STANDARDS

4.2.1 15A NCAC 2Q .0101 - REQUIRED AIR QUALITY PERMITS

This regulation requires the owner or operator of all sources for which there is an ambient air quality or emission control standard, which is not exempted from permit requirements, to apply for an air quality permit. The owner or operator of a source required to have a permit shall not begin construction or operation of the source without first obtaining a permit. The STAR[®] unit and the material handling equipment's listed in Section 1.3 are not categorically exempt from permitting. Thus, Duke Energy is submitting this air permit application to obtain a permit prior to any construction or change in method of operation of these sources. Duke Energy will submit a separate Title V permit application within 12 months after the initial start-up of the proposed project.

4.2.2 15A NCAC 2D .0400. AMBIENT AIR QUALITY STANDARDS

The purpose of the ambient air quality standards is to establish certain maximum limits on parameters of air quality considered desirable for the preservation and enhancement of the quality of the State's air resources. The ambient air quality standards for North Carolina are the same as those promulgated by the EPA. All standards promulgated by the EPA as of June 22, 1988, have been adopted and incorporated by reference as the official ambient air quality standards of the State of North Carolina. Duke Energy expects that the proposed project will be in compliance with the applicable air quality standards.

4.2.3 15A NCAC 2D .0515 – PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

Allowable emissions of particulate matter from any industrial process for which no other emission control standards are applicable shall not exceed the amounts calculated by the following equation:

$$E = 4.10 \times P^{0.67} \text{ for } P \leq 30 \text{ tons per hour}$$

or

$$E = 55.0 \times P^{0.11} - 40 \text{ for } P > 30 \text{ tons per hour}$$

where: E = allowable emission rate in pounds per hour

P = process weight in tons per hour

Solid fuels charged are considered as part of the process weight, liquid and gaseous fuels and combustion air are not.

Table 4-3 presents the process weight rates and associated allowable emissions for the equipment onsite. Compliance with this requirement is expected and appropriate monitoring and recordkeeping will be performed to verify this expectation.

Table 4-3. 15A NCAC 2D .0515 Allowable Emissions

Emissions Source	Process Rate (tph)	Allowable PM (lb/hr)
EHE (Units1 and 2)	70	47.8
Feed silo filling	125	53.5
Feed silo unloading	75	48.4
FGD Byproduct Silo	TBD	TBD
FGD Absorbent Silo	TBD	TBD
STAR [®] Reactor	75	48.4
Storage dome filling	75	48.4
Storage dome unloading	275	62.02
Transfer silo filling	125	53.5
Transfer silo unloading	75	48.4
Loadout	75	48.4
Loadout chute 1A	100	51.3
Loadout chute 1B	100	51.3
Screener	165	56.4
Crusher	7	15.1

Note: lb/hr = pound per hour.

Source: 15A NCAC 2D .0515.

4.2.4 15A NCAC 02D .0516 – SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

Emission of sulfur dioxide from any source of combustion that is discharged from any vent, stack, or chimney shall not exceed 2.3 pounds of sulfur dioxide per million BTU 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. Sulfur dioxide formed or reduced as a result of treating flue gases with sulfur trioxide or other materials shall also be accounted for when determining compliance with this standard.

A source subject to an emission standard for sulfur dioxide in Rules 2D .0524, .0527, .1110, .1111, .1205, .1206, .1210, or .1211 of 15A NCAC shall meet the standard in that particular rule instead of the standard in the above paragraph.

The STAR[®] unit is not subject to any sulfur dioxide standards; therefore, it is subject to the requirements in 2D .0516. Compliance with the emission standard of 2.3 lb/million Btu is expected based on the conceptual design of the SO₂ device. Appropriate monitoring and recordkeeping will be performed to verify this expectation.

4.2.5 15A NCAC 2D .0521 – CONTROL OF VISIBLE EMISSIONS

The intent of this Rule is to prevent, abate and control emissions generated from fuel burning operations and industrial processes where visible emissions can be reasonably expected to occur, except during startup, shutdowns, and malfunctions approved as such according to procedures approved under 15A NCAC 2D .0535.

This Rule shall apply to all fuel burning sources and to other processes that may have a visible emission. However, sources subject to a visible emission standard in Rules .0506, .0508, .0524, .0543, .0544, .1110, .1111, .1205, .1206, .1210, .1211, or .1212 of this Subchapter shall meet that standard instead of the standard contained in this Rule.

For sources manufactured after July 1, 1971, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period. However, except for sources required to install, operate, and maintain continuous opacity monitoring systems (COMS), compliance with the 20 percent opacity limit shall be determined as follows:

- i. No six-minute period exceeds 87 percent opacity;
- ii. No more than one six-minute period exceeds 20 percent opacity in any hour;
and
- iii. No more than four six-minute periods exceed 20 percent opacity in any 24-hour period.

Duke Energy assumes all proposed sources will be subject to this rule. Compliance will be achieved through the use of the proposed emission control equipment.

4.2.6 15A NCAC 02D .0530 PREVENTION OF SIGNIFICANT DETERIORATION

The Project will not result in a significant increase in emissions, and therefore the PSD review provisions of this rule do not apply, subject to the specific provisions in 15A NCAC 2D.0544 for GHG sources.

4.2.7 15A NCAC 2D .0535 - EXCESS EMISSIONS REPORTING AND MALFUNCTIONS

This regulation applies to all permitted facilities and outlines the procedures of reporting excess emissions as a result of malfunctions or operational upsets. The facility owner/operator must notify the appropriate regional office of any excess emissions that last for greater than four hours. This report must be made by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence. Notify the Director or his designee immediately when the corrective measures have been accomplished. Submit a written report to the Director within 15 days after the request.

4.2.8 15A NCAC 02D .0540 - PARTICULATES FROM FUGITIVE DUST EMISSION SOURCES

This rule requires that fugitive dust emissions not cause or contribute to substantive complaints, excessive fugitive dust emissions at the property boundary, or NAAQS violations. Dust emissions from the Ash handling and Loading/Unloading sources are expected to be in compliance. Appropriate monitoring and recordkeeping will be performed to verify this expectation.

4.2.9 15A NCAC 02D .0544 - PREVENTION OF SIGNIFICANT DETERIORATION REQUIREMENTS FOR GREENHOUSE GASES

This rule indicates that a major stationary source or major modification shall not be required to obtain a PSD permit on the sole basis of its greenhouse gases emissions. All other new source review pollutants are below the PSD major source thresholds. Thus, PSD review for GHGs does not apply.

4.2.10 15A NCAC 02D .1100 - CONTROL OF TOXIC AIR POLLUTANTS

This rule applies to all facilities that emit a toxic air pollutant that are required to have a permit under 15A NCAC 2Q .0700. NC DEQ requires any facility that emits a regulated Toxic Air Pollutant (TAP) at a rate greater than the TAP Permitting Emission Rate (TPER), as listed in the 15A NCAC 2Q .0711, demonstrate through air dispersion modeling that emissions from the facility are not resulting in the exceedance of the Acceptable Ambient Level (AAL) for that pollutant, as listed in 15A NCAC 2D .1104. Per 2Q.0700, the Duke Buck Combined Cycle facility has the potential to emit TAPs in excess of de minimis thresholds. Detailed explanation of toxic modeling analyses is presented in Section 5 of this application.

4.2.11 15A NCAC 02D .1200 - CONTROL OF EMISSIONS FROM INCINERATORS

Fly ash is not a waste material; instead, it is a feedstock (or an ingredient) for the Buck STAR[®] facility. The coal fly ash is a raw material for the proposed Buck STAR[®] facility. It is required to produce beneficiated product as per the standard of the American Society for Testing and Materials (ASTM) Standard C618, and American Association of State

Highway and Transportation Officials (AASHTO) Standard M 295 for pozzolan-grade fly ash.

Based on the determination that fly ash as proposed to be used is not a waste material, the Buck STAR[®] facility is not subject to this requirement. NC DEQ's concurrence with this conclusion is supported by the documentation included in Appendix F.

4.2.12 15A NCAC 02D .1400 – NITROGEN OXIDES

This rule applies to facilities with potential emissions of NO_x equal to or greater than 100 tons per year or 560 pounds per calendar day beginning May 1 through September 30 of any year in the following areas: (1) Cabarrus County; (2) Gaston County; (3) Lincoln County; (4) Mecklenburg County; (5) Rowan County; (6) Union County; and (7) Davidson Township and Coddle Creek Township in Iredell County.

Buck STAR[®] facility is located in Rowan county, but according to Rule .1402 (h), regardless of any statement of applicability, this rule is not applicable to incinerator or thermal or catalytic oxidizer used primarily for the control of air pollution. The STAR[®] process does not meet the definition of a fuel-burning operation. The combustion of natural gas or propane during startup is direct-fired with all of the STAR[®] ingredients, including fly ash. The proposed emission unit is subject to the NO_x RACT requirements listed in 15A 02D.1413 – Sources Not Otherwise Listed in this Section. Detailed RACT analysis is presented in Appendix G.

4.3 FEDERAL REGULATIONS

Federal regulations were reviewed to determine their applicability to the proposed Buck STAR[®] facility. The federal regulations that were found to be potentially applicable only to the proposed STAR[®] are discussed as follows:

4.3.1 NEW SOURCE PERFORMANCE STANDARDS (NSPS)

4.3.1.1 NSPS for Commercial and Industrial Solid Waste Incineration Units (40 CFR 60, Subpart CCCC)

Unless exempt, combustion of a NHSM as defined in 40 C.F.R. Part 241 would subject an emissions unit to 40 CFR 60 Subpart CCCC-Standards Of Performance For Commercial And Industrial Solid Waste Incineration Units (CISWI). In accordance with 40 CFR 241.3(b)(3), “non-hazardous secondary materials used as an ingredient in a combustion unit that meet the legitimacy criteria...” are not solid wastes. Additionally, in accordance with 40 CFR 241.3(b)(4), “...ingredient products that are used in a combustion unit and are produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria” are not solid wastes. Based on this it is determined that use of fly ash is not a waste but an ingredient therefore; the Buck STAR[®] unit is not subject to CISWI.

4.3.1.2 NSPS for Large Municipal Waste Combustors (40 CFR 60, Subpart Eb)

These standards apply to large municipal waste combustor units with a combustion capacity greater than 250 tons per day of municipal solid waste that initiated construction after September 20, 1994. According to 40 CFR 60.51b, a municipal waste combustor means “any equipment that combusts solid, liquid, or gasified municipal solid waste.” Municipal solid waste means household, commercial, retail, or institutional waste and specifically excludes “industrial process or manufacturing wastes.” Even if the raw fly ash were considered a solid waste, it does not meet the definition of municipal solid waste. The proposed Buck STAR[®] unit, therefore, is not subject to the NSPS codified under 40 CFR 60, Subpart Eb.

4.3.1.3 NSPS Subpart III—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

Per 40 CFR 60.4200(a)(2), the provisions of this subpart are applicable to, “Owners and operators of stationary compression ignition internal combustion engines that commence construction after July 11, 2005, where the stationary compression ignition internal combustion engines are:

- (i) Manufactured after April 1, 2006, and are not fire pump engines, or
- (ii) Manufactured as a certified National Fire Protection Association fire pump engine after July 1, 2006.”

The diesel-fired engines will commence construction (be ordered) after July 11, 2005, and be manufactured after April 1, 2006; therefore, are subject to 40 CFR 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. Per 40 CFR 60.4201(a), Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later non-emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 kilowatt (KW) (3,000 horsepower (HP)) and a displacement of less than 10 liters per cylinder to the certification emission standards for new nonroad CI engines in 40 CFR 89.112, 40 CFR 89.113, 40 CFR 1039.101, 40 CFR 1039.102, 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, and 40 CFR 1039.115, as applicable, for all pollutants, for the same model year and maximum engine power. Proposed diesel engines (ES-39B and ES-40B) have displacement less than 10 liters per cylinder and engine power is less than 3000 HP, the emissions standards under this rule are applicable. Duke Energy will comply with all applicable Subpart III emissions limitation, monitoring, recordkeeping, and reporting requirements.

4.3.2 NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANT (NESHAP)

NESHAP are standards for HAPs from stationary sources. The Buck Combined Cycle facility has potential emissions of an individual HAP below 10 tpy or more and potential emissions of total HAPs below 25 tpy or more. Therefore, the Buck Combined Cycle facility is a minor source of HAP emissions. The applicability of relevant NESHAP is discussed in the following subsections.

4.3.2.1 NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ)

The engines associated with the screening and crushing are subject to Subpart ZZZZ, because this standard is applicable to area sources of HAPs as well. Since the engines are new and located at an area source, the requirements of 40 CFR 60, Subpart IIII, must be met to meet the requirements of Subpart ZZZZ. The engines will meet applicable NSPS requirements.

4.3.2.2 NESHAP for Industrial, Commercial and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD)

40 CFR 63 Subpart DDDDD, establishes national emission limitations and work practice standards for HAP emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP. The Buck Combined Cycle facility is an area source of HAPs. Therefore, the STAR[®] system is not subject to the NESHAP codified under 40 CFR 63, Subpart DDDDD.

4.3.2.3 NESHAP for Industrial, Commercial and Institutional Boilers Area Sources (40 CFR 63, Subpart JJJJJ)

These standards apply to industrial, commercial, and institutional boilers at an area source of HAP. The Buck Combined Cycle facility is an area source of HAPs. However, no proposed units at the facility meet the definition of a boiler under 40 CFR 63.11237. Therefore, the STAR[®] system is not subject to the NESHAP codified under 40 CFR 63, Subpart JJJJJ.

4.3.3 40 CFR 64 - COMPLIANCE ASSURANCE MONITORING REGULATIONS

On October 27, 1997, EPA promulgated the CAM Rule, 40 CFR Part 64, which addresses monitoring for certain emission units at major sources, thereby assuring that facility owners and operators conduct effective monitoring of their air pollution control equipment. In order to be subject to CAM, the following criteria must be met:

- The unit is subject to an emissions limitation or standard for the pollutant of concern;
- An “active” control device is used to achieve compliance with the emission limit; and
- The emission unit’s pre-control potential-to-emit is greater than the applicable major source threshold.

For emissions of SO₂ from the STAR® system (ES-74), Duke Energy is subject to CAM requirements for the state SO₂ standard, i.e., 2.3 lb/MMBtu per 15A NCAC 02D .0516. A preliminary draft of a CAM plan is included in Appendix H for the agency’s review.

5.0 AIR QUALITY IMPACT ASSESSMENT

5.1 MODEL SELECTION

For this modeling analysis, the American Meteorological Society (AMS)/EPA Regulatory Model Improvement Committee (AERMIC) model (AERMOD) system components were used. These include the existing regulatory components (AERMOD, AERMOD meteorological preprocessor program [AERMET], AERMOD terrain preprocessor program [AERMAP], and Building Profile Input Program [BPIP] for Plume Rise Model Enhancement [PRIME] [BPIP/PRM]), AERSURFACE and AERMINUTE. AERMOD (Version 16216r) was used in the refined modeling analyses for flat, elevated, and complex terrain.

The procedures used in conducting the air quality modeling analyses followed the requirements outlined in the 40 CFR 51, Appendix W, Guidelines on Air Quality Models; NC DEQ Air Toxic Quality Modeling Guidelines, February 2014; and direction received from the NC DEQ Modeling Section. Supporting information for the air quality modeling study included building downwash analyses, meteorological data, and terrain data.

5.1.1 PHYSICAL SOURCE GEOMETRY/GOOD ENGINEERING PRACTICE STACK HEIGHT ANALYSIS

A good engineering practice (GEP) stack height/building wake effect analysis was conducted to identify which building structures influence plume dispersion from each emissions source. Based on the formula, GEP stack height and region of influence, the Building Profile Input Program (BPIP) PRIME program was run for the point source emissions points and related building structures. Figure 5-1 shows the Buck Combined Cycle facility layout (including the modeled sources) and property lines. The BPIP PRIME (Version 04274 dated September 30, 2004) program was used to calculate the GEP height and wind direction-specific building dimensions for input to the air dispersion model.

The GEP analysis was used to identify critical buildings and to determine wind direction-specific building dimensions for use in the modeling analysis. GEP was also used to

demonstrate compliance with applicable state and federal stack height regulations. Following the Guideline for Determination of GEP Stack Height (Technical Document for the Stack Height Regulation), GEP height was calculated using the following equation:

$$H_g = H + 1.5 L$$

where: H_g = good engineering practice stack height.

H = height of the structure or nearby structure.

L = lesser dimension (height or projected width of the structure or nearby building).

In a situation where a nearby structure consists of multiple tiers or there are several structures nearby, the GEP height was calculated for each tier or structure, and the one resulting in the greatest calculated GEP height determined both the GEP height and the wind direction-specific building dimension used when modeling a stack that is lower than the GEP height.

The direction-specific building dimensions obtained from the BPIP PRIME analysis were put into the air dispersion model to simulate the effects of building-induced downwash. The BPIP files are included with the air dispersion modeling files on the DVD included in Appendix E.

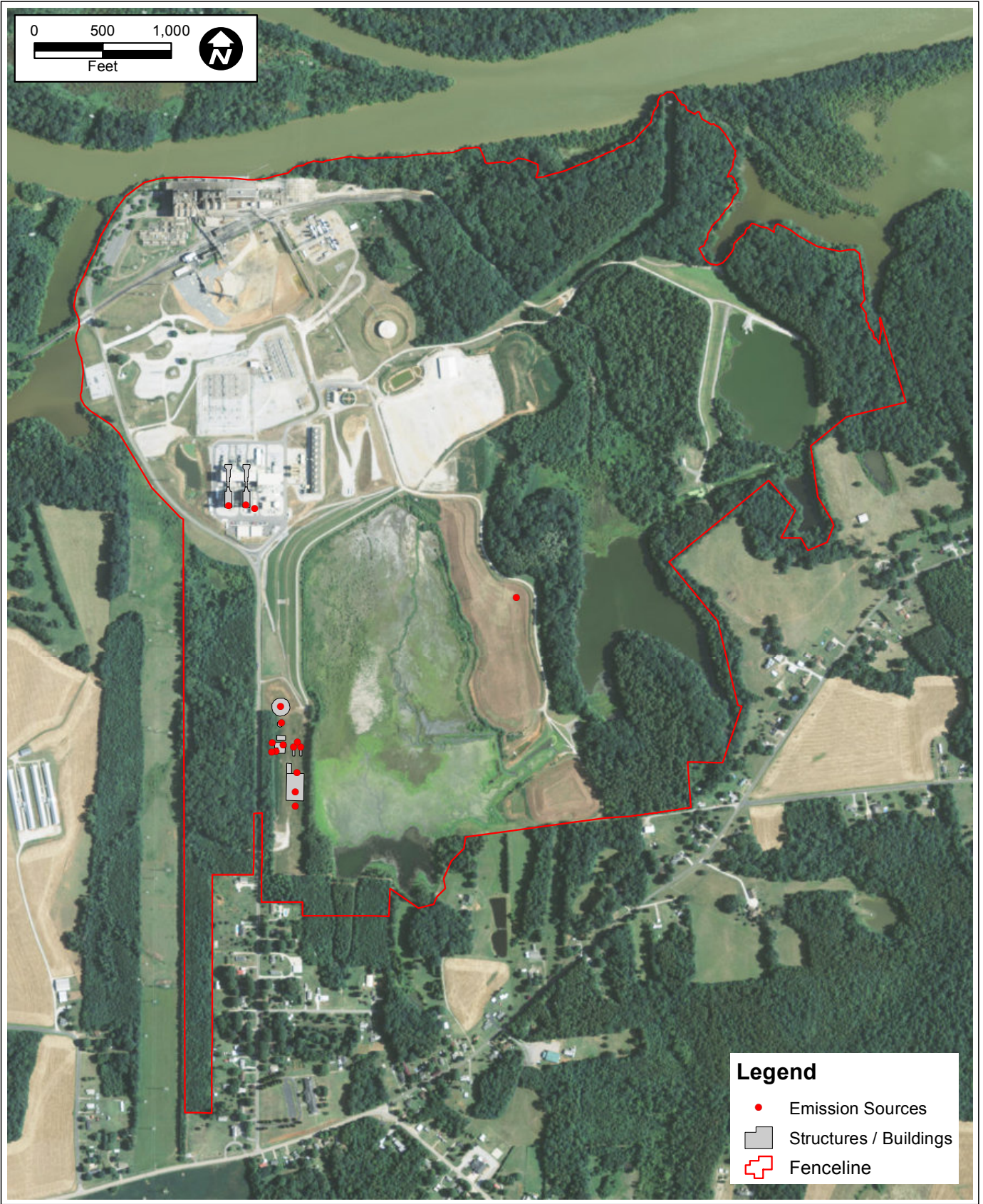


FIGURE 5-1.
FACILITY LAYOUT - SOURCE AND BUILDING LOCATIONS
IN AERMOD

Sources: Esri Basemap Imagery, ECT 2017.



5.1.2 LOCAL TOPOGRAPHY

Local topography played an important role in the selection of the appropriate dispersion model. Available dispersion models can be divided into two general categories: those applicable to terrain that is below stack top (simple terrain) and above stack top (complex terrain). The terrain near the Buck Combined Cycle facility can be described as generally flat terrain. A model that simulated both simple and complex terrain was used.

5.2 AERMOD MODEL APPLICATION

The AERMOD modeling system consists of two preprocessors and the dispersion model. AERMET is the meteorological preprocessor component, and AERMAP is the terrain preprocessor component that characterizes the terrain and generates receptor elevations along with critical hill heights for those receptors.

AERMOD has the following capabilities applicable to this study:

- Handles all terrain features.
- Simulates PRIME aerodynamic building downwash.
- Simulates both short- and long-term averaging periods.
- Handles large numbers of receptors.
- Calculates concentrations within the building cavity and within 5L of the stack.

5.2.1 METEOROLOGICAL DATA

For this project, refined modeling analyses were conducted using a data set downloaded from the NC DEQ Website that consisted of 5 years (2011 through 2015) of hourly meteorological data from Charlotte, North Carolina (surface), and Greensboro, North Carolina (upper air). This data set was processed by NC DEQ.

5.2.2 RECEPTORS AND TOPOGRAPHY FOR AERMOD

A single nested Cartesian receptor grid was generated for use in the AERMOD refined modeling. Receptors were spaced 100 meters apart along the property boundary, except where a source was within 100 meters, receptors were spaced 25 meters apart. Receptors

were spaced 100 meters apart extending from the property boundary out to 1,000 meters. Receptors were spaced 500 meters apart extending from 1,000 meters out to 10,000 meters. The receptor grid used in the modeling analysis was based on North American Datum of 1983 (NAD 83) and in Zone 17. The AERMAP (Version 11103) processor program was used to calculate terrain elevations and critical hill heights for the receptor grid (NAD 83 and Zone 17) using National Elevation Data (NED). The NED dataset was downloaded from the Multi-Resolution Land Characteristics Consortium (MRLC) website.

The base elevation for the buildings and emissions sources was also obtained from the NED. The base elevation for each building and emission source was then manually adjusted to be the lowest elevation for the buildings and sources in a particular area.

5.2.3 PHYSICAL SOURCE AND EMISSIONS DATA

The air dispersion modeling analysis was conducted with emissions rates and exhaust characteristics (flow rate and temperature) that are expected to represent the worst-case parameters for this project.

Tables 5-1 through 5-3 provide summaries of the exhaust data. Tables 5-4 through 5-5 present summaries of emissions rates for the air pollutants addressed in this modeling analysis.

Table 5-1. Source Parameters—Point Sources

Source ID and Description	Stack Height (ft)	Stack Diameter (ft)	Temperature (°F)	Exit Velocity (fps)
ES-11 – Existing CT 1	160	19	200	52.79
ES-12 – Existing CT 2	160	19	200	52.79
ES-14 – Existing Auxiliary Boiler	40	4	325	60.00
ES-73 – Feed Silo (1500 ton)	111	1.5	70	0.003281
ES-74 – STAR [®] Reactor (Exhaust Stack)	140	4	155	43.02
ES-77 – EHE – 1 (Dust Collector)	65	4	187	55.11
ES-78 – EHE – 2 (Dust Collector)	65	4	187	55.11
ES-79 – Transfer Silo (300 Ton)	100	0.667	70	0.003281
ES-80 – Storage Dome (Ash)	125	1.5	70	0.003281
ES-81 – Loadout Silo (1500 Ton)	111	1.5	70	0.003281
ES-81A – Loadout Silo Chute 1A	111	1.5	70	0.003281
ES-81B – Loadout Silo Chute 1B	111	1.5	70	0.003281

Note: °F = degree Fahrenheit.
fps = foot per second.
ft = foot.

*Horizontal exhaust orientation is represented as 0.003281 fps.

Source: ECT, 2017.

Table 5-2. Source Parameters—Volume Sources

Source ID and Description	Release Height (ft)	Initial Horizontal Dimension (ft)	Initial Vertical (ft)
F-1 - wet ash receiving, transfer to storage shed	5	29.76	13.94
F-2 wet ash receiving, transfer to hopper	10	6.98	6.98

Note: ft = foot.

Source: ECT, 2017.

Table 5-3. Source Parameters—Area Sources

Source ID and Description	Release Height (ft)	Easterly Length (ft)	Northerly Length (ft)	Angle from North (degree)
F-3 – Unloading Pile (secondary off-loading zone)	4	35.00	Default	Default
F-4 – Ash Basin/Ash Handling	10	660.0	Default	Default

Note: ft = foot.

Source: ECT, 2017.

Table 5-4. Modeled Emissions Rates—Point Sources

Pollutant	Averaging Period	Emissions Rates (lb/hr)											
		ES-11	ES-12	ES-14	ES-73	ES-74	ES-77	ES-78	ES-79	ES-80	ES-81	ES-81A	ES-81B
Sulfuric Acid Mist	1-HR	1.70	1.70			0.10							
Sulfuric Acid Mist	24-HR	1.70	1.70			0.10							
Benzene	Annual	2.51E-02	2.51E-02	2.35E-05		1.24E-04							
Formaldehyde	1-HR	4.46E-01	4.46E-01	3.68E-03		4.41E-03							
Arsenic	Annual	5.10E-04	5.10E-04	2.24E-06	5.27E-07	5.89E-04	6.35E-04	6.35E-04	5.27E-07	5.27E-07	2.63E-07	1.32E-07	1.32E-07
Beryllium	Annual	3.08E-05	3.08E-05	1.35E-07	1.09E-07	1.20E-04	1.32E-04	1.32E-04	1.09E-07	1.09E-07	5.46E-08	2.74E-08	2.74E-08
Cadmium	Annual	2.81E-03	2.81E-03	1.23E-05	9.41E-08	1.68E-04	1.13E-04	1.13E-04	9.41E-08	9.41E-08	4.70E-08	2.35E-08	2.35E-08
Chromium VI (Soluble Chromate)	24-HR	1.43E-04	1.43E-04	6.27E-07	1.54E-07	7.71E-05	8.48E-05	8.48E-05	1.54E-07	2.70E-07	5.78E-08	7.71E-08	7.71E-08
Mercury	24-HR	4.11E-04	4.11E-04	1.27E-05	7.40E-09	1.90E-05	4.07E-06	4.07E-06	7.40E-09	1.30E-08	2.78E-09	3.70E-09	3.70E-09
Nickel	24-HR	5.38E-03	5.38E-03	1.03E-04	1.40E-06	8.25E-04	7.71E-04	7.71E-04	1.40E-06	2.45E-06	5.26E-07	7.01E-07	7.01E-07

Source: ECT, 2017.

Table 5-5. Modeled Emissions Rates—Volume and Area Sources

Pollutant	Averaging Period	Emissions Rates (lb/hr)			
		F-1	F-2	F-3	F-4
Sulfuric Acid Mist	1-HR				
Sulfuric Acid Mist	24-HR				
Benzene	Annual				
Formaldehyde	1-HR				
Arsenic	Annual	1.96E-07	3.93E-07	5.81E-07	7.08E-05
Beryllium	Annual	4.06E-08	8.13E-08	1.20E-07	1.47E-05
Cadmium	Annual	3.52E-08	7.01E-08	1.04E-07	1.26E-05
Chromium VI (Soluble Chromate)	24-HR	4.02E-08	8.04E-08	7.76E-08	9.76E-06
Mercury	24-HR	1.94E-09	3.86E-09	3.73E-09	4.68E-07
Nickel	24-HR	3.66E-07	7.31E-07	7.06E-07	8.87E-05

Source: ECT, 2017.

5.3 MODELING RESULTS

This section presents the results of the air quality impact analyses performed for Buck STAR[®] facility. The air quality analyses were conducted using the inputs and methodologies described previously. Methodologies and protocols adhere to the EPA and NC DEQ Guidelines. In accordance with NC DEQ requirements, Appendix E contains a DVD containing the modeling input and output files.

The emissions from the equipment were modeled with AERMOD to estimate the maximum concentrations for the pollutants and corresponding averaging period for each year of meteorological data. Table 5-6 provides a summary of the AERMOD modeling results for each pollutant and averaging period for the Cartesian grid and fenceline receptors discussed in Section 5.2.2.

Based on the results, the Buck STAR[®] facility demonstrates compliance with 15A NCAC 02Q .0700.

Table 5-6. Results for AERMOD Dispersion Modeling—

Chemical	Averaging Period	Rank	Modeled Impact ($\mu\text{g}/\text{m}^3$)					Maximum Impact ($\mu\text{g}/\text{m}^3$)	Maximum Allowable Concentration ($\mu\text{g}/\text{m}^3$)	Complies (Yes/No)
			2012	2013	2014	2015	2016			
Sulfuric Acid Mist	1-HR	H	0.66	0.65	0.68	0.92	0.71	0.92	100.00	Yes
Sulfuric Acid Mist	24-HR	H	0.17	0.18	0.19	0.47	0.20	0.47	12.00	Yes
Benzene	Annual	H	2.50E-04	1.70E-04	2.20E-04	1.70E-04	2.50E-04	2.50E-04	1.20E-01	Yes
Formaldehyde	1-HR	H	0.17	0.17	0.18	0.25	0.19	0.25	150.00	Yes
Arsenic	Annual	H	3.80E-04	3.70E-04	4.00E-04	4.50E-04	3.70E-04	4.50E-04	2.10E-03	Yes
Beryllium	Annual	H	8.00E-05	8.00E-05	8.00E-05	9.00E-05	8.00E-05	9.00E-05	4.10E-03	Yes
Cadmium	Annual	H	9.00E-05	8.00E-05	9.00E-05	1.00E-04	9.00E-05	1.00E-04	5.50E-03	Yes
Chromium VI (Soluble Chromate)	24-HR	H	5.30E-04	4.90E-04	5.60E-04	5.80E-04	5.60E-04	5.80E-04	6.20E-04	Yes
Mercury	24-HR	H	5.00E-05	5.00E-05	5.00E-05	1.30E-04	5.00E-05	1.30E-04	0.60	Yes
Nickel	24-HR	H	4.92E-03	4.53E-03	5.17E-03	5.51E-03	5.14E-03	5.51E-03	0.60	Yes

Note: $\mu\text{g}/\text{m}^3$ = microgram per cubic meter.

H = highest.

Source: ECT, 2017.

APPENDIX A
AIR PERMIT APPLICATION FORMS

FORM A

GENERAL FACILITY INFORMATION

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

A

NOTE- APPLICATION WILL NOT BE PROCESSED WITHOUT THE FOLLOWING:

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Local Zoning Consistency Determination (new or modification only) | <input checked="" type="checkbox"/> Appropriate Number of Copies of Application | <input checked="" type="checkbox"/> Application Fee (if required) |
| <input checked="" type="checkbox"/> Responsible Official/Authorized Contact Signature | <input checked="" type="checkbox"/> P.E. Seal (if required) | |

GENERAL INFORMATION

Legal Corporate/Owner Name: Duke Energy Carolinas LLC	
Site Name: Buck Combined Cycle Facility	
Site Address (911 Address) Line 1: 1385 Dukeville Road	
Site Address Line 2:	
City: Salisbury	State: NC
Zip Code: 28146-8613	County: Rowan

CONTACT INFORMATION

Responsible Official/Authorized Contact:		Invoice Contact:	
Name/Title: Henry Botkins Jr. / General Manager, Buck Combined Cycle Facility		Name/Title: Cynthia Winston/ Manager, Permitting & Compliance, Carolinas	
Mailing Address Line 1: 1385 Dukeville Road		Mailing Address Line 1: 410 S. Wilmington Street	
Mailing Address Line 2:		Mailing Address Line 2:	
City: Salisbury	State: NC	City: Raleigh	State: NC
Zip Code: 28146		Zip Code: 27601	
Primary Phone No.: (704)-630-3019	Fax No.: (704)-630-3021	Primary Phone No.: (919)-546-5538	Fax No.:
Secondary Phone No.:		Secondary Phone No.:	
Email Address: henry.botkins@duke-energy.com		Email Address: Cynthia.Winston@duke-energy.com	

Facility/Inspection Contact:		Permit/Technical Contact:	
Name/Title: Dale Wooten/ Environmental Coordinator		Name/Title: Dan Markley/ Lead Environmental Specialist	
Mailing Address Line 1: 1385 Dukeville Road		Mailing Address Line 1: 526 South Church St.	
Mailing Address Line 2:		Mailing Address Line 2:	
City: Salisbury	State: NC	City: Charlotte	State: NC
Zip Code: 28146		Zip Code: 28202	
Primary Phone No.: (704)-630-3086	Fax No.: (704)-630-3021	Primary Phone No.: (704)-382-0696	Fax No.: (704)-382-0249
Secondary Phone No.:		Secondary Phone No.:	
Email Address: dale.wooten@duke-energy.com		Email Address: dan.markley@duke-energy.com	

APPLICATION IS BEING MADE FOR

- | | | | |
|--|--|---|--|
| <input type="checkbox"/> New Non-permitted Facility/Greenfield | <input checked="" type="checkbox"/> Modification of Facility (permitted) | <input type="checkbox"/> Renewal Title V | <input type="checkbox"/> Renewal Non-Title V |
| <input type="checkbox"/> Name Change | <input type="checkbox"/> Ownership Change | <input type="checkbox"/> Administrative Amendment | <input type="checkbox"/> Renewal with Modification |

FACILITY CLASSIFICATION AFTER APPLICATION (Check Only One)

- | | | | | |
|----------------------------------|--------------------------------|--|--|---|
| <input type="checkbox"/> General | <input type="checkbox"/> Small | <input type="checkbox"/> Prohibitory Small | <input type="checkbox"/> Synthetic Minor | <input checked="" type="checkbox"/> Title V |
|----------------------------------|--------------------------------|--|--|---|

FACILITY (Plant Site) INFORMATION

Describe nature of (plant site) operation(s): Buck Combined Cycle Facility- Generation of electricity for sale.	
Facility ID No. 8000004	
Primary SIC/NAICS Code: 4911	Current/Previous Air Permit No. 03786T31 Expiration Date: 1/31/2020
Facility Coordinates:	Latitude: 35° 12' 55" Longitude: 81° 45' 46"

Does this application contain confidential data? YES NO *****If yes, please contact the DAQ Regional Office prior to submitting this application.*** (See Instructions)**

PERSON OR FIRM THAT PREPARED APPLICATION

Person Name: Thomas O. Pritcher		Firm Name: Environmental Consulting & Technology, Inc.	
Mailing Address Line 1: 7208 Falls of Neuse Road, Suite 102		Mailing Address Line 2:	
City: Raleigh	State: NC	Zip Code: 27615	County: Wake
Phone No.: (919) 861-8888	Fax No.:	Email Address: tpritcher@ectinc.com	

SIGNATURE OF RESPONSIBLE OFFICIAL/AUTHORIZED CONTACT

Name (typed): Henry Botkins Jr.	Title: General Manager, Buck Combined Cycle Facility
X Signature(Blue Ink):	Date:

FORM A (continued, page 2 of 2)
GENERAL FACILITY INFORMATION

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

A

SECTION AA1 - APPLICATION FOR NON-TITLE V PERMIT RENEWAL

_____ (Company Name) hereby formally requests renewal of Air Permit No. _____

There have been no modifications to the originally permitted facility or the operations therein that would require an air permit since the last permit was issued.

Is your facility subject to 40 CFR Part 68 "Prevention of Accidental Releases" - Section 112(r) of the Clean Air Act? YES NO

If yes, have you already submitted a Risk Management Plan (RMP) to EPA? YES NO Date Submitted: _____

Did you attach a current emissions inventory? YES NO

If no, did you submit the inventory via AERO or by mail? Via AERO Mailed Date Mailed: _____

SECTION AA2- APPLICATION FOR TITLE V PERMIT RENEWAL

In accordance with the provisions of Title 15A 2Q .0513, the responsible official of _____ (Company Name) hereby formally requests renewal of Air Permit No. _____ (Air Permit No.) and further certifies that:

- (1) The current air quality permit identifies and describes all emissions units at the above subject facility, except where such units are exempted under the North Carolina Title V regulations at 15A NCAC 2Q .0500;
- (2) The current air quality permit cites all applicable requirements and provides the method or methods for determining compliance with the applicable requirements;
- (3) The facility is currently in compliance, and shall continue to comply, with all applicable requirements. (Note: As provided under 15A NCAC 2Q .0512 compliance with the conditions of the permit shall be deemed compliance with the applicable requirements specifically identified in the permit);
- (4) For applicable requirements that become effective during the term of the renewed permit that the facility shall comply on a timely basis;
- (5) The facility shall fulfill applicable enhanced monitoring requirements and submit a compliance certification as required by 40 CFR Part 64.

The responsible official (signature on page 1) certifies under the penalty of law that all information and statements provided above, based on information and belief formed after reasonable inquiry, are true, accurate, and complete.

SECTION AA3- APPLICATION FOR NAME CHANGE

New Facility Name: _____

Former Facility Name: _____

An official facility name change is requested as described above for the air permit mentioned on page 1 of this form. Complete the other sections if there have been modifications to the originally permitted facility that would require an air quality permit since the last permit was issued and if there has been an ownership change associated with this name change.

SECTION AA4- APPLICATION FOR AN OWNERSHIP CHANGE

By this application we hereby request transfer of Air Quality Permit No. _____ from the former owner to the new owner as described below.

The transfer of permit responsibility, coverage and liability shall be effective _____ (immediately or insert date.) The legal ownership of the facility described on page 1 of this form has been or will be transferred on _____ (date). There have been no modifications to the originally permitted facility that would require an air quality permit since the last permit was issued.

Signature of New (Buyer) Responsible Official/Authorized Contact (as typed on page 1):

X Signature (Blue Ink): _____

Date: _____

New Facility Name: _____

Former Facility Name: _____

Signature of Former (Seller) Responsible Official/Authorized Contact:

Name (typed or print): _____

Title: _____

X Signature (Blue Ink): _____

Date: _____

Former Legal Corporate/Owner Name: _____

In lieu of the seller's signature on this form, a letter may be submitted with the seller's signature indicating the ownership change

SECTION AA5- APPLICATION FOR ADMINISTRATIVE AMENDMENT

Describe the requested administrative amendment here (attach additional documents as necessary):

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Feed Silo Filling	EMISSION SOURCE ID NO: ES-73A
	CONTROL DEVICE ID NO(S): CD-73
OPERATING SCENARIO <u>1</u> OF <u>1</u>	EMISSION POINT (STACK) ID NO(S): EP-73

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Ash feed silo filled pneumatically at the filling rate of 125 ton/hr and equipped with bin vent product capture device.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):		
<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD DATE MANUFACTURED: TBD

MANUFACTURER / MODEL NO.: TBD EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	6.09E-03	9.74E-03	N/A	N/A	6.09E-03	9.74E-03
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	2.88E-03	4.60E-03	N/A	N/A	2.88E-03	4.60E-03
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	2.88E-03	4.60E-03	N/A	N/A	2.88E-03	4.60E-03
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	7.73E-07	1.24E-06	N/A	N/A	7.73E-07	1.24E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	7.21E-07	1.15E-06	N/A	N/A	7.21E-07	1.15E-06
Beryllium	7440-41-7	Ash Analysis	1.49E-07	2.39E-07	N/A	N/A	1.49E-07	2.39E-07
Cadmium	7440-43-9	Ash Analysis	1.29E-07	2.06E-07	N/A	N/A	1.29E-07	2.06E-07
Chromium	7440-47-3	Ash Analysis	8.76E-07	1.40E-06	N/A	N/A	8.76E-07	1.40E-06
Chromium VI	18540-29-9	Ash Analysis	9.64E-08	1.54E-07	N/A	N/A	9.64E-08	1.54E-07
Cobalt	7440-48-4	Ash Analysis	3.50E-07	5.61E-07	N/A	N/A	3.50E-07	5.61E-07
Manganese	7439-96-5	Ash Analysis	1.55E-06	2.47E-06	N/A	N/A	1.55E-06	2.47E-06
Mercury	7439-97-6	Ash Analysis	4.63E-09	7.40E-09	N/A	N/A	4.63E-09	7.40E-09
Nickel	7440-02-0	Ash Analysis	8.76E-07	1.40E-06	N/A	N/A	8.76E-07	1.40E-06
Selenium	7782-49-2	Ash Analysis	2.37E-07	3.79E-07	N/A	N/A	2.37E-07	3.79E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	7.21E-07	1.73E-05	2.31E-03
Beryllium	7440-41-7	Ash Analysis	1.49E-07	3.59E-06	4.78E-04
Cadmium	7440-43-9	Ash Analysis	1.29E-07	3.09E-06	4.12E-04
Chromium VI	18540-29-9	Ash Analysis	9.64E-08	2.31E-06	3.08E-04
Manganese	7439-96-5	Ash Analysis	1.55E-06	3.71E-05	4.95E-03
Mercury	7439-97-6	Ash Analysis	4.63E-09	1.11E-07	1.48E-05
Nickel	7440-02-0	Ash Analysis	8.76E-07	2.10E-05	2.80E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Feed Silo Filling	EMISSION SOURCE ID NO: ES-73A
OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): CD-73
DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Ash feed silo filled pneumatically at the filling rate of 125 ton/hr and equipped with bin vent product capture device.	EMISSION POINT(STACK) ID NO(S): EP-73

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
Ash feed silo filled pneumatically at the filling rate of 125 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT ³): 60 bulk, 90 structural
--------------------------	---

CAPACITY	CUBIC FEET: 76,000	TONS:
-----------------	--------------------	-------

DIMENSIONS (FEET)	HEIGHT: 97	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	------------	--------------	------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 400,000	MAXIMUM DESIGN CAPACITY: 400,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input checked="" type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: 3	
MAXIMUM ACFM: 6600	

MATERIAL IS UNLOADED TO:
N/A

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): 125

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): N/A

COMMENTS:
This form is for Feed Silo Filling. Unloading data is provided in Form B6 for ES-73B.

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Feed Silo Unloading	EMISSION SOURCE ID NO: ES-73B
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): CD-73
	EMISSION POINT (STACK) ID NO(S): EP-73

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Ash feed silo unloaded at the rate of 75 ton/hr and equipped with bin vent product capture device.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	3.65E-03	9.74E-03	N/A	N/A	3.65E-03	9.74E-03
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	1.73E-03	4.60E-03	N/A	N/A	1.73E-03	4.60E-03
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	1.73E-03	4.60E-03	N/A	N/A	1.73E-03	4.60E-03
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	4.64E-07	1.24E-06	N/A	N/A	4.64E-07	1.24E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.15E-06	N/A	N/A	4.33E-07	1.15E-06
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.39E-07	N/A	N/A	8.97E-08	2.39E-07
Cadmium	7440-43-9	Ash Analysis	7.73E-08	2.06E-07	N/A	N/A	7.73E-08	2.06E-07
Chromium	7440-47-3	Ash Analysis	5.26E-07	1.40E-06	N/A	N/A	5.26E-07	1.40E-06
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.54E-07	N/A	N/A	5.78E-08	1.54E-07
Cobalt	7440-48-4	Ash Analysis	2.10E-07	5.61E-07	N/A	N/A	2.10E-07	5.61E-07
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.47E-06	N/A	N/A	9.28E-07	2.47E-06
Mercury	7439-97-6	Ash Analysis	2.78E-09	7.40E-09	N/A	N/A	2.78E-09	7.40E-09
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.40E-06	N/A	N/A	5.26E-07	1.40E-06
Selenium	7782-49-2	Ash Analysis	1.42E-07	3.79E-07	N/A	N/A	1.42E-07	3.79E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.04E-05	2.31E-03
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.15E-06	4.78E-04
Cadmium	7440-43-9	Ash Analysis	7.73E-08	1.85E-06	4.12E-04
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.39E-06	3.08E-04
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.23E-05	4.95E-03
Mercury	7439-97-6	Ash Analysis	2.78E-09	6.66E-08	1.48E-05
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.26E-05	2.80E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Feed Silo Unloading	EMISSION SOURCE ID NO: ES-73B
	CONTROL DEVICE ID NO(S): CD-73

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-73
--	---------------------------------------

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Ash feed silo unloaded at the rate of 75 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT ³): 60 bulk, 90 structural
--------------------------	---

CAPACITY	CUBIC FEET: 76,000	TONS:
-----------------	--------------------	-------

DIMENSIONS (FEET)	HEIGHT: 97	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	------------	--------------	------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 400,000	MAXIMUM DESIGN CAPACITY: 400,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: N/A	
---------------------	--

MAXIMUM ACFM: 6600	
--------------------	--

MATERIAL IS UNLOADED TO:
 STAR® Reactor

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): N/A
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): 75

COMMENTS:
 This form is for Feed Silo Unloading. Filling data is provided in Form B6 for ES-73A.

Attach Additional Sheets As Necessary

FORM C1 CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-73	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-73A & ES-73B		
EMISSION POINT (STACK) ID NO(S): EP-73	POSITION IN SERIES OF CONTROLS	NO. 1 OF	1 UNITS

OPERATING SCENARIO:			
1 OF 1	P.E. SEAL REQUIRED (PER 2q.0112)?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO

DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the feed silo.

POLLUTANTS COLLECTED:	PM (Filling)	PM10/PM2.5 (Filling)	PM (Unloading)	PM10/PM2.5 (Unloading)
BEFORE CONTROL EMISSION RATE (LB/HR):	0.0061	0.00287	0.00365	0.00173
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %	N/A %	N/A %
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %	N/A %	N/A %
EFFICIENCY DETERMINATION CODE:	2	2	2	2
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.0061	0.00287	0.00365	0.00173

PRESSURE DROP (IN H₂O): MIN: MAX: Avg: 10-15 wg GAUGE? YES NO

BULK PARTICLE DENSITY (LB/FT³): 25 INLET TEMPERATURE (°F): Contract MIN MAX

POLLUTANT LOADING RATE: N/A LB/HR GR/FT³ OUTLET TEMPERATURE (°F) Contract MIN MAX

INLET AIR FLOW RATE (ACFM): 1300 FILTER OPERATING TEMP (°F): Contract

NO. OF COMPARTMENTS: 1 NO. OF BAGS PER COMPARTMENT: Contract LENGTH OF BAG (IN.): 20-30

NO. OF CARTRIDGES: FILTER SURFACE AREA PER CARTRIDGE (FT²): DIAMETER OF BAG (IN.): 5-15

TOTAL FILTER SURFACE AREA (FT²): AIR TO CLOTH RATIO: 1 to 4 : 1

DRAFT TYPE: INDUCED/NEGATIVE FORCED/POSITIVE FILTER MATERIAL: Cartridge Style WOVEN FELTED

DESCRIBE CLEANING PROCEDURES: <input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %

DESCRIBE INCOMING AIR STREAM: Air stream will contain fly ash.	10-25		
	25-50		
	50-100		
	>100		
TOTAL = 100			
Supplier specific, 94% passing 325 mesh			

ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):

COMMENTS:

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: STAR® Reactor	EMISSION SOURCE ID NO: ES-74
	CONTROL DEVICE ID NO(S): CD-74
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	EMISSION POINT (STACK) ID NO(S): EP-74

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 The STAR® Reactor will process feedstock (of any carbon content) like flyash (wet or dry) along with other ingredient materials into a variety of commercial products.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

Coal, wood, oil, gas, other burner (Form B1)
 Woodworking (Form B4)
 Manuf. of chemicals/coatings/inks (Form B5)
 Int. combustion engine/generator (Form B2)
 Coating/finishing/printing (Form B6)
 Incineration (Form B8)
 Liquid storage tanks (Form B3)
 Storage silos/bins (Form B6)
 Other (Form B9)

START CONSTRUCTION DATE: TBD DATE MANUFACTURED: TBD

MANUFACTURER / MODEL NO.: TBD EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Sum of (NG+Propane) AP-42+Fly Ash (Manufacturer)	4.87	21.34	N/A	N/A	4.87	21.34
PARTICULATE MATTER<10 MICRONS (PM ₁₀)		4.48	19.63	N/A	N/A	4.48	19.63
PARTICULATE MATTER<2.5 MICRONS (PM _{2.5})		2.58	11.31	N/A	N/A	2.58	11.31
SULFUR DIOXIDE (SO ₂)		40.23	163.63	804.63	3272.57	40.23	163.63
NITROGEN OXIDES (NO _x) 0.12 lb/MMBtu		18.22	112.29	N/A	N/A	18.22	112.29
CARBON MONOXIDE (CO)		22.40	91.10	N/A	N/A	22.40	91.10
VOLATILE ORGANIC COMPOUNDS (VOC)		2.24	9.11	N/A	N/A	2.24	9.11
LEAD		6.48E-04	2.84E-03	N/A	N/A	6.48E-04	2.84E-03
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			(AFTER CONTROLS / LIMITS)		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Benzene	71-43-2	Sum of (NG) AP-42+Fly Ash (Manufacturer)	1.24E-04	5.41E-04	N/A	N/A	1.24E-04	5.41E-04
Formaldehyde	50-00-0		4.41E-03	1.93E-02	N/A	N/A	4.41E-03	1.93E-02
Hexane	110-54-3		1.06E-01	4.64E-01	N/A	N/A	1.06E-01	4.64E-01
Naphthalene	91-20-3		3.59E-05	1.57E-04	N/A	N/A	3.59E-05	1.57E-04
Toluene	108-88-3		2.00E-04	8.76E-04	N/A	N/A	2.00E-04	8.76E-04
Arsenic	7440-38-2		5.89E-04	2.58E-03	N/A	N/A	5.89E-04	2.58E-03
Beryllium	7440-41-7		1.20E-04	5.27E-04	N/A	N/A	1.20E-04	5.27E-04
Cadmium	7440-43-9		1.68E-04	7.35E-04	N/A	N/A	1.68E-04	7.35E-04
Chromium	7440-47-3		7.84E-04	3.43E-03	N/A	N/A	7.84E-04	3.43E-03
Chromium VI	18540-29-9		7.71E-05	3.38E-04	N/A	N/A	7.71E-05	3.38E-04
Cobalt	7440-48-4		2.85E-04	1.25E-03	N/A	N/A	2.85E-04	1.25E-03
Manganese	7439-96-5		1.26E-03	5.52E-03	N/A	N/A	1.26E-03	5.52E-03
Mercury	7439-97-6		1.90E-05	8.32E-05	N/A	N/A	1.90E-05	8.32E-05
Nickel	7440-02-0		8.25E-04	3.61E-03	N/A	N/A	8.25E-04	3.61E-03
Selenium	7782-49-2		1.91E-04	8.37E-04	N/A	N/A	1.91E-04	8.37E-04

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Sulfuric Acid Mist	7664-93-9	Stack Test	0.1	2.40E+00	876
Benzene	71-43-2	Sum of (NG) AP-42+Fly Ash (Manufacturer)	1.24E-04	2.96E-03	1.08E+00
Formaldehyde	50-00-0		4.41E-03	1.06E-01	3.86E+01
Hexane	110-54-3		1.06E-01	2.54E+00	9.28E+02
Toluene	108-88-3		2.00E-04	4.80E-03	1.75E+00
Arsenic	7440-38-2		5.89E-04	1.41E-02	5.16E+00
Beryllium	7440-41-7		1.20E-04	2.89E-03	1.05E+00
Cadmium	7440-43-9		1.68E-04	4.03E-03	1.47E+00
Chromium VI	18540-29-9		7.71E-05	1.85E-03	6.76E-01
Manganese	7439-96-5		1.26E-03	3.02E-02	1.10E+01
Mercury	7439-97-6		1.90E-05	4.56E-04	1.66E-01
Nickel	7440-02-0	8.25E-04	1.98E-02	7.23E+00	

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: STAR® Reactor	EMISSION SOURCE ID NO: ES-74
OPERATING SCENARIO: _____1_____ OF _____1_____	CONTROL DEVICE ID NO(S): CD-74
	EMISSION POINT (STACK) ID NO(S): EP-74

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): The STAR® Reactor will process feedstock (of any carbon content) like flyash (wet or dry) along with other ingredient materials into a variety of commercial products. The fly ash is not a fuel and does not undergo combustion. The natural gas/propane burners are only used for startup or to maintain temperature in the reactor should the fly ash not contain enough carbon to be self-sustaining. These startup burners have a combined heating capacity of 60 million British thermal units per hour and are low-NOx burners.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Reactor- Feed Ash	MMBtu	140	140

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: Natural Gas/Propane	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): 140
MAX. CAPACITY HOURLY FUEL USE: NG-58,824 scf/hr & Propane- 663 gal/hr	REQUESTED CAPACITY ANNUAL FUEL USE: NG-58,824 scf/hr & Propane- 663 gal/hr

COMMENTS:

FORM C9

CONTROL DEVICE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C9

CONTROL DEVICE ID NO: CD-74A	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-74
------------------------------	---

EMISSION POINT (STACK) ID NO(S): EP-74	POSITION IN SERIES OF CONTROLS: NO. 1 OF 2 UNITS
--	--

OPERATING SCENARIO:	
---------------------	--

1 OF 1	P.E. SEAL REQUIRED (PER 2Q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
--------	--

DESCRIBE CONTROL SYSTEM: Dry scrubber for SO₂ removal.

POLLUTANT(S) COLLECTED:	SO ₂				
BEFORE CONTROL EMISSION RATE (LB/HR):	804.63				
CAPTURE EFFICIENCY:	N/A %	%	%	%	%
CONTROL DEVICE EFFICIENCY:	95 %	%	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	N/A %	%	%	%	%
EFFICIENCY DETERMINATION CODE:	2				
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	40.23				

PRESSURE DROP (IN. H ₂ O): 10 MIN 15 MAX	BULK PARTICLE DENSITY (LB/FT ³) Use gypsum as surrogate.
---	--

INLET TEMPERATURE (°F): 300 MIN 400 MAX	OUTLET TEMPERATURE (°F): 150 MIN 225 MAX
---	--

INLET AIR FLOW RATE (ACFM): 63,654	OUTLET AIR FLOW RATE (ACFM): 58,218
------------------------------------	-------------------------------------

INLET AIR FLOW VELOCITY (FT/SEC):	OUTLET AIR FLOW VELOCITY (FT/SEC):
-----------------------------------	------------------------------------

INLET MOISTURE CONTENT (%): 16	<input checked="" type="checkbox"/> FORCED AIR <input type="checkbox"/> INDUCED AIR
--------------------------------	---

COLLECTION SURFACE AREA (FT ²): N/A	FUEL USED: N/A	FUEL USAGE RATE: N/A
---	----------------	----------------------

DESCRIBE MAINTENANCE PROCEDURES: Maintenance to be performed as per manufacturing guidelines.

DESCRIBE ANY AUXILIARY MATERIALS INTRODUCED INTO THE CONTROL SYSTEM: None

DESCRIBE ANY MONITORING DEVICES, GAUGES, TEST PORTS, ETC: Typical for this type of installations.

ATTACH A DIAGRAM OF THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):

COMMENTS:

Attach manufacturer's specifications, schematics, and all other drawings necessary to describe this control.

Attach Additional Sheets As Necessary

FORM C1

CONTROL DEVICE (FABRIC FILTER)

C1

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

CONTROL DEVICE ID NO: CD-74B		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-74	
EMISSION POINT (STACK) ID NO(S): EP-74		POSITION IN SERIES OF CONTROLS NO. 2 OF 2 UNITS	
OPERATING SCENARIO:			
___1___ OF ___1___		P.E. SEAL REQUIRED (PER 2q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
DESCRIBE CONTROL SYSTEM: A baghouse for particulate control on the STAR reactor.			
POLLUTANTS COLLECTED:			
	PM	PM10	PM2.5
BEFORE CONTROL EMISSION RATE (LB/HR):	4.87	4.48	2.58
CAPTURE EFFICIENCY:	100 %	100 %	100 %
CONTROL DEVICE EFFICIENCY:	> 99.9 %	> 99.9 %	> 99.9 %
CORRESPONDING OVERALL EFFICIENCY:	> 99.9 %	> 99.9 %	> 99.9 %
EFFICIENCY DETERMINATION CODE:	2	2	2
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	4.87	4.48	2.58
PRESSURE DROP (IN H ₂ O): MIN: MAX: Avg: 4-12 wc GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
BULK PARTICLE DENSITY (LB/FT ³): 25		INLET TEMPERATURE (°F): MIN 170 MAX 350	
POLLUTANT LOADING RATE: <input type="checkbox"/> LB/HR <input checked="" type="checkbox"/> GR/FT ³ 437		OUTLET TEMPERATURE (°F) MIN 165 MAX 350	
INLET AIR FLOW RATE (ACFM): 58,218		FILTER OPERATING TEMP (°F): 170	
NO. OF COMPARTMENTS: 4	NO. OF BAGS PER COMPARTMENT: 169	LENGTH OF BAG (IN.): 315	
NO. OF CARTRIDGES:	FILTER SURFACE AREA PER CARTRIDGE (FT ²):	DIAMETER OF BAG (IN.): 6	
TOTAL FILTER SURFACE AREA (FT ²): 26,790		AIR TO CLOTH RATIO: 2.18 : 1	
DRAFT TYPE: <input checked="" type="checkbox"/> INDUCED/NEGATIVE <input type="checkbox"/> FORCED/POSITIVE		FILTER MATERIAL: <input type="checkbox"/> WOVEN <input checked="" type="checkbox"/> FELTED	
DESCRIBE CLEANING PROCEDURES:		PARTICLE SIZE DISTRIBUTION	
<input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:		SIZE (MICRONS)	WEIGHT % OF TOTAL
		CUMULATIVE %	
		0-1	
		1-10	
		10-25	
		25-50	
		50-100	
		>100	
		TOTAL = 100	
DESCRIBE INCOMING AIR STREAM: The fly ash entrained in the flue gas passes through baghouse for particulate control.		See attached jpeg.	
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):			
COMMENTS:			

Attach Additional Sheets As Necessary

Specific Surface Area:

5.34 m^2/g

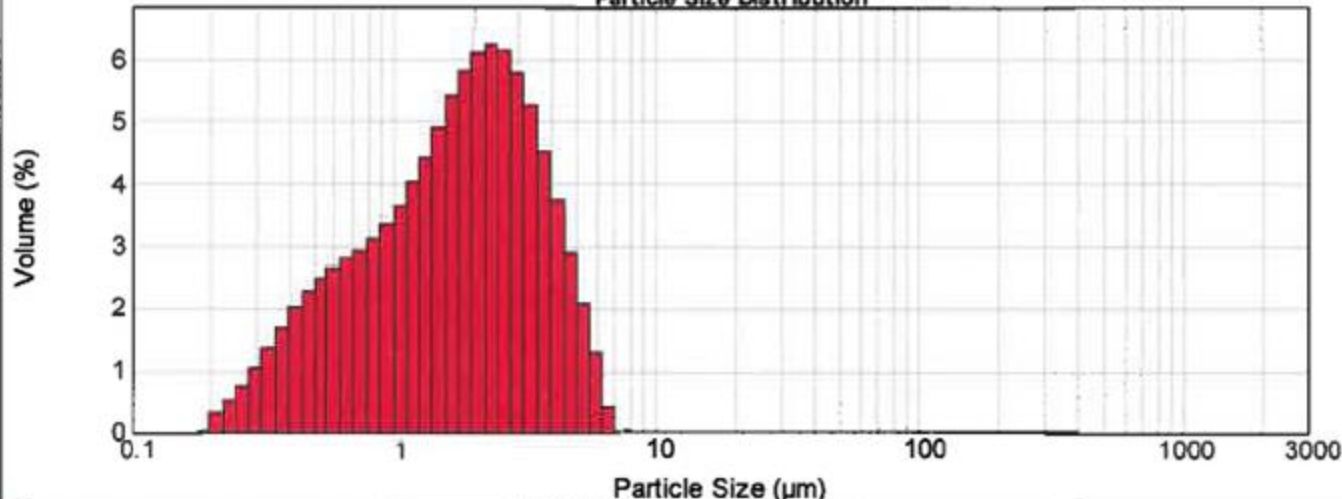
Surface Weighted Mean D[3,2]:

1.123 μm

Vol. Weighted Mean D[4,3]:

2.060 μm d(0.1): 0.502 μm d(0.5): 1.795 μm d(0.9): 4.041 μm

Particle Size Distribution



Fly Ash Powder - Average, Friday, August 01, 2014 9:43:24 AM

Size (μm)	Vol Under %	Size (μm)	Vol Under %	Size (μm)	Vol Under %	Size (μm)	Vol Under %	Size (μm)	Vol Under %	Size (μm)	Vol Under %
0.020	0.00	0.142	0.00	1.002	27.29	7.098	99.98	50.238	100.00	355.656	100.00
0.022	0.00	0.159	0.00	1.125	30.92	7.952	100.00	56.368	100.00	399.052	100.00
0.025	0.00	0.178	0.00	1.262	34.91	8.934	100.00	63.246	100.00	447.744	100.00
0.028	0.00	0.200	0.02	1.416	39.35	10.000	100.00	70.963	100.00	502.377	100.00
0.032	0.00	0.224	0.33	1.589	44.27	11.247	100.00	79.621	100.00	563.877	100.00
0.036	0.00	0.252	0.85	1.783	49.67	12.619	100.00	89.337	100.00	632.456	100.00
0.040	0.00	0.283	1.60	2.000	55.49	14.159	100.00	100.237	100.00	709.627	100.00
0.045	0.00	0.317	2.83	2.244	61.62	15.887	100.00	112.468	100.00	796.214	100.00
0.050	0.00	0.356	3.98	2.518	67.86	17.825	100.00	126.191	100.00	893.367	100.00
0.056	0.00	0.399	5.69	2.825	73.99	20.000	100.00	141.589	100.00	1002.374	100.00
0.063	0.00	0.448	7.72	3.170	79.78	22.440	100.00	158.868	100.00	1124.683	100.00
0.071	0.00	0.502	10.02	3.557	85.03	25.179	100.00	178.250	100.00	1261.915	100.00
0.080	0.00	0.564	12.51	3.991	89.55	28.251	100.00	200.000	100.00	1415.892	100.00
0.089	0.00	0.632	15.16	4.477	93.27	31.698	100.00	224.404	100.00	1588.656	100.00
0.100	0.00	0.710	17.94	5.024	96.16	35.586	100.00	251.785	100.00	1782.502	100.00
0.112	0.00	0.796	20.87	5.637	98.26	39.905	100.00	282.508	100.00	2000.000	100.00
0.128	0.00	0.893	23.97	6.325	99.55	44.774	100.00	316.979	100.00		

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: FGD Byproduct Silo	EMISSION SOURCE ID NO: ES-75
	CONTROL DEVICE ID NO(S): CD-75
OPERATING SCENARIO _____1_____ OF _____1_____	EMISSION POINT (STACK) ID NO(S): EP-75

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 The byproduct solids from the dry FGD system are discharged from the Fabric Filter baghouse into a byproduct storage silo.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B9)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Vendor	0.06	0.24	N/A	N/A	0.06	0.24
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Vendor	0.05	0.22	N/A	N/A	0.05	0.22
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Vendor	0.03	0.13	N/A	N/A	0.03	0.13
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD		N/A	N/A	N/A	N/A	N/A	N/A
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
N/A								

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
N/A					

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE
Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: FGD Byproduct Silo	EMISSION SOURCE ID NO: ES-75
	CONTROL DEVICE ID NO(S): CD-75

OPERATING SCENARIO: _____1_____ OF _____1_____	EMISSION POINT(STACK) ID NO(S): EP-75
--	---------------------------------------

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 The byproduct solids from the dry FGD system are discharged from the Fabric Filter baghouse into a byproduct storage silo.

MATERIAL STORED: Byproducts from FGD	DENSITY OF MATERIAL (LB/FT ³): Use gypsum as surrogate.
--------------------------------------	---

CAPACITY	CUBIC FEET: TBD	TONS: TBD
-----------------	-----------------	-----------

DIMENSIONS (FEET)	HEIGHT: TBD	DIAMETER: TBD	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	---------------	-------------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: TBD	MAXIMUM DESIGN CAPACITY: TBD
---	-------------	------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input checked="" type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input checked="" type="checkbox"/> OTHER: Dry Scrubber

NO. FILL TUBES: 1	
-------------------	--

MAXIMUM ACFM: 1300	
--------------------	--

MATERIAL IS UNLOADED TO:
 Trucks

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 Gravity unloading to trucks.

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): TBD
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): TBD
--

COMMENTS:

FORM C1

CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-75		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-75																																				
EMISSION POINT (STACK) ID NO(S): EP-75		POSITION IN SERIES OF CONTROLS	NO. 1 OF 1 UNITS																																			
OPERATING SCENARIO:																																						
1 OF 1		P.E. SEAL REQUIRED (PER 2q .0112)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																																			
DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the FGD Byproduct Silo.																																						
<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%;">POLLUTANTS COLLECTED:</td> <td style="width: 15%; text-align: center;">PM</td> <td style="width: 15%; text-align: center;">PM10</td> <td style="width: 15%; text-align: center;">PM2.5</td> <td style="width: 15%;"></td> </tr> <tr> <td>BEFORE CONTROL EMISSION RATE (LB/HR):</td> <td style="text-align: center;">0.06</td> <td style="text-align: center;">0.05</td> <td style="text-align: center;">0.03</td> <td></td> </tr> <tr> <td>CAPTURE EFFICIENCY:</td> <td style="text-align: center;"><= 0.005 gr/dscf %</td> <td style="text-align: center;"><= 0.005 gr/dscf %</td> <td style="text-align: center;"><= 0.005 gr/dscf %</td> <td></td> </tr> <tr> <td>CONTROL DEVICE EFFICIENCY:</td> <td style="text-align: center;">N/A %</td> <td style="text-align: center;">N/A %</td> <td style="text-align: center;">N/A %</td> <td></td> </tr> <tr> <td>CORRESPONDING OVERALL EFFICIENCY:</td> <td style="text-align: center;">N/A %</td> <td style="text-align: center;">N/A %</td> <td style="text-align: center;">N/A %</td> <td></td> </tr> <tr> <td>EFFICIENCY DETERMINATION CODE:</td> <td style="text-align: center;">2</td> <td style="text-align: center;">2</td> <td style="text-align: center;">2</td> <td></td> </tr> <tr> <td>TOTAL AFTER CONTROL EMISSION RATE (LB/HR):</td> <td style="text-align: center;">0.06</td> <td style="text-align: center;">0.05</td> <td style="text-align: center;">0.03</td> <td></td> </tr> </table>				POLLUTANTS COLLECTED:	PM	PM10	PM2.5		BEFORE CONTROL EMISSION RATE (LB/HR):	0.06	0.05	0.03		CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %		CONTROL DEVICE EFFICIENCY:	N/A %	N/A %	N/A %		CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %	N/A %		EFFICIENCY DETERMINATION CODE:	2	2	2		TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.06	0.05	0.03	
POLLUTANTS COLLECTED:	PM	PM10	PM2.5																																			
BEFORE CONTROL EMISSION RATE (LB/HR):	0.06	0.05	0.03																																			
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %																																			
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %	N/A %																																			
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %	N/A %																																			
EFFICIENCY DETERMINATION CODE:	2	2	2																																			
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.06	0.05	0.03																																			
PRESSURE DROP (IN H ₂ O): MIN: MAX: Avg: 10-15 wg GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																																						
BULK PARTICLE DENSITY (LB/FT ³): 25		INLET TEMPERATURE (°F): Contract MIN MAX																																				
POLLUTANT LOADING RATE: N/A <input type="checkbox"/> LB/HR <input type="checkbox"/> GR/FT ³		OUTLET TEMPERATURE (°F) Contract MIN MAX																																				
INLET AIR FLOW RATE (ACFM): 1300		FILTER OPERATING TEMP (°F): Contract																																				
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT: Contract	LENGTH OF BAG (IN.): 20-30																																				
NO. OF CARTRIDGES:	FILTER SURFACE AREA PER CARTRIDGE (FT ²):	DIAMETER OF BAG (IN.): 5-15																																				
TOTAL FILTER SURFACE AREA (FT ²):		AIR TO CLOTH RATIO: 1 to 4 : 1																																				
DRAFT TYPE: <input checked="" type="checkbox"/> INDUCED/NEGATIVE <input checked="" type="checkbox"/> FORCED/POSITIVE		FILTER MATERIAL: Cartridge Style <input type="checkbox"/> WOVEN <input type="checkbox"/> FELTED																																				
DESCRIBE CLEANING PROCEDURES:		PARTICLE SIZE DISTRIBUTION																																				
<input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">SIZE (MICRONS)</th> <th style="width: 30%;">WEIGHT % OF TOTAL</th> <th style="width: 40%;">CUMULATIVE %</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">0-1</td><td></td><td></td></tr> <tr><td style="text-align: center;">1-10</td><td></td><td></td></tr> <tr><td style="text-align: center;">10-25</td><td></td><td></td></tr> <tr><td style="text-align: center;">25-50</td><td></td><td></td></tr> <tr><td style="text-align: center;">50-100</td><td></td><td></td></tr> <tr><td style="text-align: center;">>100</td><td></td><td></td></tr> <tr><td colspan="3" style="text-align: right;">TOTAL = 100</td></tr> <tr><td colspan="3">Supplier specific, 94% passing 325 mesh</td></tr> </tbody> </table>		SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %	0-1			1-10			10-25			25-50			50-100			>100			TOTAL = 100			Supplier specific, 94% passing 325 mesh										
SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %																																				
0-1																																						
1-10																																						
10-25																																						
25-50																																						
50-100																																						
>100																																						
TOTAL = 100																																						
Supplier specific, 94% passing 325 mesh																																						
DESCRIBE INCOMING AIR STREAM:																																						
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):																																						
COMMENTS:																																						

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: FGD Absorbent Silo	EMISSION SOURCE ID NO: ES-76
	CONTROL DEVICE ID NO(S): CD-76
OPERATING SCENARIO _____1_____ OF _____1_____	EMISSION POINT (STACK) ID NO(S): EP-76

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Storage of absorbent (hydrated lime) used in the dry FGD system.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B9)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Vendor	0.06	0.24	N/A	N/A	0.06	0.24
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Vendor	0.05	0.22	N/A	N/A	0.05	0.22
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Vendor	0.03	0.13	N/A	N/A	0.03	0.13
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD		N/A	N/A	N/A	N/A	N/A	N/A
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
N/A								

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
N/A					

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE
Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: FGD Absorbent Silo	EMISSION SOURCE ID NO: ES-76
	CONTROL DEVICE ID NO(S): CD-76

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-76
--	---------------------------------------

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
Storage of absorbent (hydrated lime) used in the dry FGD system.

MATERIAL STORED: FGD Absorbent	DENSITY OF MATERIAL (LB/FT3): Use hydrated lime as surrogate.
--------------------------------	---

CAPACITY	CUBIC FEET: TBD	TONS: TBD
-----------------	-----------------	-----------

DIMENSIONS (FEET)	HEIGHT: TBD	DIAMETER: TBD	<i>(OR)</i>	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	---------------	-------------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: TBD	MAXIMUM DESIGN CAPACITY: TBD
---	-------------	------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input checked="" type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input checked="" type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: 1	
-------------------	--

MAXIMUM ACFM: 1300	
--------------------	--

MATERIAL IS UNLOADED TO:
Material is sent to dry scrubber.

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): TBD
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): TBD
--

COMMENTS:

Attach Additional Sheets As Necessary

FORM C1

CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-76		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-76																												
EMISSION POINT (STACK) ID NO(S): EP-76		POSITION IN SERIES OF CONTROLS	NO. 1 OF 1 UNITS																											
OPERATING SCENARIO:																														
1 OF 1		P.E. SEAL REQUIRED (PER 2q .0112)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																											
DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the FGD Absorbent Silo.																														
POLLUTANTS COLLECTED:																														
	PM	PM10	PM2.5																											
BEFORE CONTROL EMISSION RATE (LB/HR):	0.06	0.05	0.03																											
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %																											
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %	N/A %																											
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %	N/A %																											
EFFICIENCY DETERMINATION CODE:	2	2	2																											
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.06	0.05	0.03																											
PRESSURE DROP (IN H ₂ O): MIN: MAX: Avg: 10-15 wg GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																														
BULK PARTICLE DENSITY (LB/FT ³): 25		INLET TEMPERATURE (°F): Contract MIN MAX																												
POLLUTANT LOADING RATE: N/A <input type="checkbox"/> LB/HR <input type="checkbox"/> GR/FT ³		OUTLET TEMPERATURE (°F) Contract MIN MAX																												
INLET AIR FLOW RATE (ACFM): 1300		FILTER OPERATING TEMP (°F): Contract																												
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT: Contract		LENGTH OF BAG (IN.): 20-30																											
NO. OF CARTRIDGES:	FILTER SURFACE AREA PER CARTRIDGE (FT ²):		DIAMETER OF BAG (IN.): 5-15																											
TOTAL FILTER SURFACE AREA (FT ²):		AIR TO CLOTH RATIO: 1 to 4 : 1																												
DRAFT TYPE: <input checked="" type="checkbox"/> INDUCED/NEGATIVE <input checked="" type="checkbox"/> FORCED/POSITIVE		FILTER MATERIAL: Cartridge Style <input type="checkbox"/> WOVEN <input type="checkbox"/> FELTED																												
DESCRIBE CLEANING PROCEDURES:		PARTICLE SIZE DISTRIBUTION																												
<input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">SIZE (MICRONS)</th> <th style="width: 33%;">WEIGHT % OF TOTAL</th> <th style="width: 33%;">CUMULATIVE %</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">0-1</td><td></td><td></td></tr> <tr><td style="text-align: center;">1-10</td><td></td><td></td></tr> <tr><td style="text-align: center;">10-25</td><td></td><td></td></tr> <tr><td style="text-align: center;">25-50</td><td></td><td></td></tr> <tr><td style="text-align: center;">50-100</td><td></td><td></td></tr> <tr><td style="text-align: center;">>100</td><td></td><td></td></tr> <tr><td colspan="3" style="text-align: right;">TOTAL = 100</td></tr> <tr><td colspan="3">Supplier specific, 94% passing 325 mesh</td></tr> </tbody> </table>		SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %	0-1			1-10			10-25			25-50			50-100			>100			TOTAL = 100			Supplier specific, 94% passing 325 mesh		
SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %																												
0-1																														
1-10																														
10-25																														
25-50																														
50-100																														
>100																														
TOTAL = 100																														
Supplier specific, 94% passing 325 mesh																														
DESCRIBE INCOMING AIR STREAM:																														
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):																														
COMMENTS:																														

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: EHE- External Heat Exchanger 1 & 2	EMISSION SOURCE ID NO: ES-77 and ES-78
OPERATING SCENARIO: ____1____ OF ____1____	CONTROL DEVICE ID NO(S): CD-77 and CD-78
	EMISSION POINT (STACK) ID NO(S): EP-77 and EP-78

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Process heat exchanger

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Heat Exchanger	Tons	70	70

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS:

FORM C1

CONTROL DEVICE (FABRIC FILTER)

C1

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

CONTROL DEVICE ID NO: CD-77 & CD-78	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-77 & ES-78
EMISSION POINT (STACK) ID NO(S): EP-77 & EP-78	POSITION IN SERIES OF CONTROLS NO. 1 OF 1 UNITS
OPERATING SCENARIO:	
___1___ OF ___1___	P.E. SEAL REQUIRED (PER 2q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

DESCRIBE CONTROL SYSTEM: A baghouse for particulate control on the EHE- External Heat Exchanger 1 & 2. Emissions below are for one unit.

POLLUTANTS COLLECTED:	PM	PM10	PM2.5	_____
BEFORE CONTROL EMISSION RATE (LB/HR):	5.36	4.93	2.84	_____
CAPTURE EFFICIENCY:	99.95 %	99.95 %	99.95 %	_____ %
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %	N/A %	_____ %
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %	N/A %	_____ %
EFFICIENCY DETERMINATION CODE:	2	2	2	_____
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	5.36	4.93	2.84	_____

PRESSURE DROP (IN H ₂ O): MIN: MAX: Avg: 10"	GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
BULK PARTICLE DENSITY (LB/FT ³): 60	INLET TEMPERATURE (°F): MIN 180 MAX 325
POLLUTANT LOADING RATE: <input checked="" type="checkbox"/> LB/HR <input type="checkbox"/> GR/FT ³	OUTLET TEMPERATURE (°F) MIN 150 MAX 300
INLET AIR FLOW RATE (ACFM): 42,000	FILTER OPERATING TEMP (°F): 250
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT: N/A
NO. OF CARTRIDGES: N/A	FILTER SURFACE AREA PER CARTRIDGE (FT ²): N/A
TOTAL FILTER SURFACE AREA (FT ²): N/A	AIR TO CLOTH RATIO: 3:1
DRAFT TYPE: <input checked="" type="checkbox"/> INDUCED/NEGATIVE <input type="checkbox"/> FORCED/POSITIVE	FILTER MATERIAL: <input type="checkbox"/> WOVEN <input checked="" type="checkbox"/> FELTED

DESCRIBE CLEANING PROCEDURES: <input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %
	0-1		
	1-10		
	10-25		
	25-50		
	50-100		
	>100		
TOTAL = 100			
Particle Size Distribution 0-100 micron with an average of 20			

ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):

COMMENTS:

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Transfer Silo Filling	EMISSION SOURCE ID NO: ES-79A
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): CD-79
EMISSION POINT (STACK) ID NO(S): EP-79	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Transfer silo is filled at the rate of 125 ton/hr and equipped with bin vent product capture device.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	6.09E-03	9.74E-03	N/A	N/A	6.09E-03	9.74E-03
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	2.88E-03	4.60E-03	N/A	N/A	2.88E-03	4.60E-03
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	2.88E-03	4.60E-03	N/A	N/A	2.88E-03	4.60E-03
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	7.73E-07	1.24E-06	N/A	N/A	7.73E-07	1.24E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	7.21E-07	1.15E-06	N/A	N/A	7.21E-07	1.15E-06
Beryllium	7440-41-7	Ash Analysis	1.49E-07	2.39E-07	N/A	N/A	1.49E-07	2.39E-07
Cadmium	7440-43-9	Ash Analysis	1.29E-07	2.06E-07	N/A	N/A	1.29E-07	2.06E-07
Chromium	7440-47-3	Ash Analysis	8.76E-07	1.4E-06	N/A	N/A	8.76E-07	1.40E-06
Chromium VI	18540-29-9	Ash Analysis	9.64E-08	1.54E-07	N/A	N/A	9.64E-08	1.54E-07
Cobalt	7440-48-4	Ash Analysis	3.5E-07	5.61E-07	N/A	N/A	3.5E-07	5.61E-07
Manganese	7439-96-5	Ash Analysis	1.55E-06	2.47E-06	N/A	N/A	1.55E-06	2.47E-06
Mercury	7439-97-6	Ash Analysis	4.63E-09	7.4E-09	N/A	N/A	4.63E-09	7.40E-09
Nickel	7440-02-0	Ash Analysis	8.76E-07	1.4E-06	N/A	N/A	8.76E-07	1.40E-06
Selenium	7782-49-2	Ash Analysis	2.37E-07	3.79E-07	N/A	N/A	2.37E-07	3.79E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	7.21E-07	1.73E-05	2.31E-03
Beryllium	7440-41-7	Ash Analysis	1.49E-07	3.59E-06	4.78E-04
Cadmium	7440-43-9	Ash Analysis	1.29E-07	3.09E-06	4.12E-04
Chromium VI	18540-29-9	Ash Analysis	9.64E-08	2.31E-06	3.08E-04
Manganese	7439-96-5	Ash Analysis	1.55E-06	3.71E-05	4.95E-03
Mercury	7439-97-6	Ash Analysis	4.63E-09	1.11E-07	1.48E-05
Nickel	7440-02-0	Ash Analysis	8.76E-07	2.10E-05	2.80E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE
Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Transfer Silo Filling	EMISSION SOURCE ID NO: ES-79A
	CONTROL DEVICE ID NO(S): CD-79

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-79
--	---------------------------------------

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Transfer silo is filled at the rate of 125 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT ³): 60 bulk, 90 structural
--------------------------	---

CAPACITY	CUBIC FEET: N/A	TONS: 300
-----------------	-----------------	-----------

DIMENSIONS (FEET)	HEIGHT: 100	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	--------------	-------------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 400,000	MAXIMUM DESIGN CAPACITY: 400,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input checked="" type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: 3	
-------------------	--

MAXIMUM ACFM: 9000	
--------------------	--

MATERIAL IS UNLOADED TO:
 N/A

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): 125
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): N/A
--

COMMENTS:
 This form is for Transfer Silo Filling. Unloading data is provided in Form B6 for ES-79B.

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Transfer Silo Unloading	EMISSION SOURCE ID NO: ES-79B
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): CD-79
	EMISSION POINT (STACK) ID NO(S): EP-79

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Transfer silo unloaded at the rate of 75 ton/hr and equipped with bin vent product capture device.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	0.00365	0.00974	N/A	N/A	0.00365	0.00974
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	0.00173	0.00460	N/A	N/A	0.00173	0.00460
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	0.00173	0.00460	N/A	N/A	0.00173	0.00460
SULFUR DIOXIDE (SO ₂)				N/A	N/A		
NITROGEN OXIDES (NO _x)				N/A	N/A		
CARBON MONOXIDE (CO)				N/A	N/A		
VOLATILE ORGANIC COMPOUNDS (VOC)				N/A	N/A		
LEAD	Ash Analysis	4.64E-07	1.24E-06	N/A	N/A	4.64E-07	1.24E-06
OTHER				N/A	N/A		

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.15E-06	N/A	N/A	4.33E-07	1.15E-06
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.39E-07	N/A	N/A	8.97E-08	2.39E-07
Cadmium	7440-43-9	Ash Analysis	7.73E-08	2.06E-07	N/A	N/A	7.73E-08	2.06E-07
Chromium	7440-47-3	Ash Analysis	5.26E-07	1.4E-06	N/A	N/A	5.26E-07	1.40E-06
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.54E-07	N/A	N/A	5.78E-08	1.54E-07
Cobalt	7440-48-4	Ash Analysis	2.1E-07	5.61E-07	N/A	N/A	2.1E-07	5.61E-07
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.47E-06	N/A	N/A	9.28E-07	2.47E-06
Mercury	7439-97-6	Ash Analysis	2.78E-09	7.4E-09	N/A	N/A	2.78E-09	7.40E-09
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.4E-06	N/A	N/A	5.26E-07	1.40E-06
Selenium	7782-49-2	Ash Analysis	1.42E-07	3.79E-07	N/A	N/A	1.42E-07	3.79E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.04E-05	2.31E-03
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.15E-06	4.78E-04
Cadmium	7440-43-9	Ash Analysis	7.73E-08	1.85E-06	4.12E-04
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.39E-06	3.08E-04
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.23E-05	4.95E-03
Mercury	7439-97-6	Ash Analysis	2.78E-09	6.66E-08	1.48E-05
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.26E-05	2.80E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Transfer Silo Unloading	EMISSION SOURCE ID NO: ES-79B
OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): CD-79
DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Transfer silo unloaded at the rate of 75 ton/hr and equipped with bin vent product capture device.	EMISSION POINT(STACK) ID NO(S): EP-79

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
Transfer silo unloaded at the rate of 75 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT ³): 60 bulk, 90 structural
--------------------------	---

CAPACITY	CUBIC FEET: N/A	TONS: 300
-----------------	-----------------	-----------

DIMENSIONS (FEET)	HEIGHT: 100	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	--------------	------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 400,000	MAXIMUM DESIGN CAPACITY: 400,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: N/A	
MAXIMUM ACFM: 9000	

MATERIAL IS UNLOADED TO:
N/A

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
Gravity

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): N/A

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): 75

COMMENTS:
This form is for Transfer Silo Unloading. Filling data is provided in Form B6 for ES-79A.

Attach Additional Sheets As Necessary

FORM C1 CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-79	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-79A & ES-79B		
EMISSION POINT (STACK) ID NO(S): EP-79	POSITION IN SERIES OF CONTROLS	NO. 1 OF	1 UNITS

OPERATING SCENARIO:			
1 OF 1	P.E. SEAL REQUIRED (PER 2q.0112)?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO

DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the transfer silo.

POLLUTANTS COLLECTED:	PM (Filling)	PM10/PM2.5 (Filling)	PM (Unloading)	PM10/PM2.5 (Unloading)
BEFORE CONTROL EMISSION RATE (LB/HR):	0.0061	0.0029	0.0037	0.0017
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %	N/A %	N/A %
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %	N/A %	N/A %
EFFICIENCY DETERMINATION CODE:	2	2	2	2
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.0061	0.0029	0.0037	0.0017

PRESSURE DROP (IN H₂O): MIN: MAX: Avg: 10-15 wg GAUGE? YES NO

BULK PARTICLE DENSITY (LB/FT³): 25 INLET TEMPERATURE (°F): Contract MIN MAX

POLLUTANT LOADING RATE: N/A LB/HR GR/FT³ OUTLET TEMPERATURE (°F) Contract MIN MAX

INLET AIR FLOW RATE (ACFM): 1300 FILTER OPERATING TEMP (°F): Contract

NO. OF COMPARTMENTS: 1 NO. OF BAGS PER COMPARTMENT: Contract LENGTH OF BAG (IN.): 20-30

NO. OF CARTRIDGES: FILTER SURFACE AREA PER CARTRIDGE (FT²): DIAMETER OF BAG (IN.): 5-15

TOTAL FILTER SURFACE AREA (FT²): AIR TO CLOTH RATIO: 1 to 4 : 1

DRAFT TYPE: INDUCED/NEGATIVE FORCED/POSITIVE FILTER MATERIAL: Cartridge Style WOVEN FELTED

DESCRIBE CLEANING PROCEDURES: <input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %

0-1		
1-10		
10-25		
25-50		
50-100		
>100		
TOTAL = 100		

Supplier specific, 94% passing 325 mesh

ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):

COMMENTS:

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Storage Dome Filling	EMISSION SOURCE ID NO: ES-80A
OPERATING SCENARIO <u>1</u> OF <u>1</u>	CONTROL DEVICE ID NO(S): CD-80
EMISSION POINT (STACK) ID NO(S): EP-80	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Storage Dome silo is filled at the rate of 75 ton/hr and equipped with bin vent product capture device.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	0.0037	0.0097	N/A	N/A	0.0037	0.0097
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	0.0017	0.0046	N/A	N/A	0.0017	0.0046
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	0.0017	0.0046	N/A	N/A	0.0017	0.0046
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	4.64E-07	1.24E-06	N/A	N/A	4.64E-07	1.24E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.15E-06	N/A	N/A	4.33E-07	1.15E-06
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.39E-07	N/A	N/A	8.97E-08	2.39E-07
Cadmium	7440-43-9	Ash Analysis	7.73E-08	2.06E-07	N/A	N/A	7.73E-08	2.06E-07
Chromium	7440-47-3	Ash Analysis	5.26E-07	1.4E-06	N/A	N/A	5.26E-07	1.40E-06
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.54E-07	N/A	N/A	5.78E-08	1.54E-07
Cobalt	7440-48-4	Ash Analysis	2.1E-07	5.61E-07	N/A	N/A	2.1E-07	5.61E-07
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.47E-06	N/A	N/A	9.28E-07	2.47E-06
Mercury	7439-97-6	Ash Analysis	2.78E-09	7.4E-09	N/A	N/A	2.78E-09	7.40E-09
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.4E-06	N/A	N/A	5.26E-07	1.40E-06
Selenium	7782-49-2	Ash Analysis	1.42E-07	3.79E-07	N/A	N/A	1.42E-07	3.79E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.04E-05	2.31E-03
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.15E-06	4.78E-04
Cadmium	7440-43-9	Ash Analysis	7.73E-08	1.85E-06	4.12E-04
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.39E-06	3.08E-04
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.23E-05	4.95E-03
Mercury	7439-97-6	Ash Analysis	2.78E-09	6.66E-08	1.48E-05
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.26E-05	2.80E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Storage Dome Filling	EMISSION SOURCE ID NO: ES-80A
	CONTROL DEVICE ID NO(S): CD-80

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-80
--	---------------------------------------

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Storage Dome is filled at the rate of 75 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT ³): 60 bulk, 90 structural
--------------------------	---

CAPACITY	CUBIC FEET: N/A	TONS: 30,000
-----------------	-----------------	--------------

DIMENSIONS (FEET)	HEIGHT: 125	DIAMETER: 41	<i>(OR)</i>	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	--------------	-------------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 400,000	MAXIMUM DESIGN CAPACITY: 400,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input checked="" type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: 1	
-------------------	--

MAXIMUM ACFM: 7600	
--------------------	--

MATERIAL IS UNLOADED TO:
 N/A

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): 75

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): N/A
--

COMMENTS:
 This form is for Storage Dome Filling. Unloading data is provided in Form B6 for ES-80B.

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Storage Dome Unloading	EMISSION SOURCE ID NO: ES-80B
OPERATING SCENARIO <u>1</u> OF <u>1</u>	CONTROL DEVICE ID NO(S): CD-80
EMISSION POINT (STACK) ID NO(S): EP-80	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Storage Dome is unloaded at the rate of 275 ton/hr and equipped with bin vent product capture device.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B8)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	0.0134	0.0097	N/A	N/A	0.0134	0.0097
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	0.0063	0.0046	N/A	N/A	0.0063	0.0046
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	0.0063	0.0046	N/A	N/A	0.0063	0.0046
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	1.7E-06	1.24E-06	N/A	N/A	1.70E-06	1.24E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	1.59E-06	1.15E-06	N/A	N/A	1.59E-06	1.15E-06
Beryllium	7440-41-7	Ash Analysis	3.29E-07	2.39E-07	N/A	N/A	3.29E-07	2.39E-07
Cadmium	7440-43-9	Ash Analysis	2.83E-07	2.06E-07	N/A	N/A	2.83E-07	2.06E-07
Chromium	7440-47-3	Ash Analysis	1.93E-06	1.4E-06	N/A	N/A	1.93E-06	1.40E-06
Chromium VI	18540-29-9	Ash Analysis	2.12E-07	1.54E-07	N/A	N/A	2.12E-07	1.54E-07
Cobalt	7440-48-4	Ash Analysis	7.71E-07	5.61E-07	N/A	N/A	7.71E-07	5.61E-07
Manganese	7439-96-5	Ash Analysis	3.4E-06	2.47E-06	N/A	N/A	3.40E-06	2.47E-06
Mercury	7439-97-6	Ash Analysis	1.02E-08	7.4E-09	N/A	N/A	1.02E-08	7.40E-09
Nickel	7440-02-0	Ash Analysis	1.93E-06	1.4E-06	N/A	N/A	1.93E-06	1.40E-06
Selenium	7782-49-2	Ash Analysis	5.22E-07	3.79E-07	N/A	N/A	5.22E-07	3.79E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	1.59E-06	3.81E-05	2.31E-03
Beryllium	7440-41-7	Ash Analysis	3.29E-07	7.89E-06	4.78E-04
Cadmium	7440-43-9	Ash Analysis	2.83E-07	6.80E-06	4.12E-04
Chromium VI	18540-29-9	Ash Analysis	2.12E-07	5.09E-06	3.08E-04
Manganese	7439-96-5	Ash Analysis	3.40E-06	8.16E-05	4.95E-03
Mercury	7439-97-6	Ash Analysis	1.02E-08	2.44E-07	1.48E-05
Nickel	7440-02-0	Ash Analysis	1.93E-06	4.63E-05	2.80E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Storage Dome Unloading	EMISSION SOURCE ID NO: ES-80B
	CONTROL DEVICE ID NO(S): CD-80

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-80
--	---------------------------------------

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Storage Dome is unloaded at the rate of 275 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT ³): 60 bulk, 90 structural
--------------------------	---

CAPACITY	CUBIC FEET: N/A	TONS: 30,000
-----------------	-----------------	--------------

DIMENSIONS (FEET)	HEIGHT: 125	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	--------------	-------------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 400,000	MAXIMUM DESIGN CAPACITY: 400,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: N/A	
---------------------	--

MAXIMUM ACFM: 7600	
--------------------	--

MATERIAL IS UNLOADED TO:
 N/A

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): N/A
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): 275
--

COMMENTS:
 This form is for Storage Dome Unloading. Filling data is provided in Form B6 for ES-80A.

Attach Additional Sheets As Necessary

FORM C1 CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-80	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-80A & ES-80B		
EMISSION POINT (STACK) ID NO(S): EP-80	POSITION IN SERIES OF CONTROLS	NO. 1 OF	1 UNITS

OPERATING SCENARIO:	
1 OF 1	P.E. SEAL REQUIRED (PER 2q.0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the storage dome.

POLLUTANTS COLLECTED:	PM (Filling)	PM10/PM2.5 (Filling)	PM (Unloading)	PM10/PM2.5 (Unloading)
BEFORE CONTROL EMISSION RATE (LB/HR):	0.0037	0.0017	0.0134	0.0063
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %	N/A %	N/A %
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %	N/A %	N/A %
EFFICIENCY DETERMINATION CODE:	2	2	2	2
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.0037	0.0017	0.0134	0.0063

PRESSURE DROP (IN H₂O): MIN: MAX: Avg: 10-15 wg GAUGE? YES NO

BULK PARTICLE DENSITY (LB/FT³): 25 INLET TEMPERATURE (°F): Contract MIN MAX

POLLUTANT LOADING RATE: N/A LB/HR GR/FT³ OUTLET TEMPERATURE (°F) Contract MIN MAX

INLET AIR FLOW RATE (ACFM): 1300 FILTER OPERATING TEMP (°F): Contract

NO. OF COMPARTMENTS: 1 NO. OF BAGS PER COMPARTMENT: Contract LENGTH OF BAG (IN.): 20-30

NO. OF CARTRIDGES: FILTER SURFACE AREA PER CARTRIDGE (FT²): DIAMETER OF BAG (IN.): 5-15

TOTAL FILTER SURFACE AREA (FT²): AIR TO CLOTH RATIO: 1 to 4 : 1

DRAFT TYPE: INDUCED/NEGATIVE FORCED/POSITIVE FILTER MATERIAL: Cartridge Style WOVEN FELTED

DESCRIBE CLEANING PROCEDURES: <input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %

DESCRIBE INCOMING AIR STREAM: Air stream will contain fly ash.	10-25		
	25-50		
	50-100		
	>100		
TOTAL = 100			
Supplier specific, 94% passing 325 mesh			

ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):

COMMENTS:

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Loadout Silo	EMISSION SOURCE ID NO: ES-81
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): CD-81
	EMISSION POINT (STACK) ID NO(S): EP-81

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Loadout silo is unloaded at the rate of 75 ton/hr and equipped with bin vent product capture device.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input checked="" type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25	

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	0.0037	0.0097	N/A	N/A	0.0037	0.0097
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	0.0017	0.0046	N/A	N/A	0.0017	0.0046
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	0.0017	0.0046	N/A	N/A	0.0017	0.0046
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	4.64E-07	1.24E-06	N/A	N/A	4.64E-07	1.24E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.15E-06	N/A	N/A	4.33E-07	1.15E-06
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.39E-07	N/A	N/A	8.97E-08	2.39E-07
Cadmium	7440-43-9	Ash Analysis	7.73E-08	2.06E-07	N/A	N/A	7.73E-08	2.06E-07
Chromium	7440-47-3	Ash Analysis	5.26E-07	1.4E-06	N/A	N/A	5.26E-07	1.40E-06
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.54E-07	N/A	N/A	5.78E-08	1.54E-07
Cobalt	7440-48-4	Ash Analysis	2.1E-07	5.61E-07	N/A	N/A	2.10E-07	5.61E-07
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.47E-06	N/A	N/A	9.28E-07	2.47E-06
Mercury	7439-97-6	Ash Analysis	2.78E-09	7.4E-09	N/A	N/A	2.78E-09	7.40E-09
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.4E-06	N/A	N/A	5.26E-07	1.40E-06
Selenium	7782-49-2	Ash Analysis	1.42E-07	3.79E-07	N/A	N/A	1.42E-07	3.79E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	4.33E-07	1.04E-05	2.31E-03
Beryllium	7440-41-7	Ash Analysis	8.97E-08	2.15E-06	4.78E-04
Cadmium	7440-43-9	Ash Analysis	7.73E-08	1.85E-06	4.12E-04
Chromium VI	18540-29-9	Ash Analysis	5.78E-08	1.39E-06	3.08E-04
Manganese	7439-96-5	Ash Analysis	9.28E-07	2.23E-05	4.95E-03
Mercury	7439-97-6	Ash Analysis	2.78E-09	6.66E-08	1.48E-05
Nickel	7440-02-0	Ash Analysis	5.26E-07	1.26E-05	2.80E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Loadout Silo	EMISSION SOURCE ID NO: ES-81
	CONTROL DEVICE ID NO(S): CD-81

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-81
--	---------------------------------------

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Loadout silo is unloaded at the rate of 75 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT3): N/A
--------------------------	-----------------------------------

CAPACITY	CUBIC FEET: N/A	TONS: N/A
-----------------	-----------------	-----------

DIMENSIONS (FEET)	HEIGHT: 111	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	--------------	------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 400,000	MAXIMUM DESIGN CAPACITY: 400,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: N/A	
---------------------	--

MAXIMUM ACFM: 6000	
--------------------	--

MATERIAL IS UNLOADED TO:
 Trucks

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 Gravity

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): N/A
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): 75

COMMENTS:
 This silo only unloads.

Attach Additional Sheets As Necessary

FORM C1

CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-81		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-81																												
EMISSION POINT (STACK) ID NO(S): EP-81		POSITION IN SERIES OF CONTROLS NO. 1 OF 1 UNITS																												
OPERATING SCENARIO:																														
___1___ OF ___1___		P.E. SEAL REQUIRED (PER 2q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																												
DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the Loadout silo.																														
POLLUTANTS COLLECTED:																														
	PM	PM10/PM2.5																												
BEFORE CONTROL EMISSION RATE (LB/HR):	0.0037	0.0017																												
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %																												
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %																												
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %																												
EFFICIENCY DETERMINATION CODE:	2	2																												
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.0037	0.0017																												
PRESSURE DROP (IN H ₂ O): MIN: MAX: Avg: 10-15 wg GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																														
BULK PARTICLE DENSITY (LB/FT ³): 25		INLET TEMPERATURE (°F): Contract MIN MAX																												
POLLUTANT LOADING RATE: N/A <input type="checkbox"/> LB/HR <input type="checkbox"/> GR/FT ³		OUTLET TEMPERATURE (°F) Contract MIN MAX																												
INLET AIR FLOW RATE (ACFM): 1300		FILTER OPERATING TEMP (°F): Contract																												
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT: Contract	LENGTH OF BAG (IN.): 20-30																												
NO. OF CARTRIDGES:	FILTER SURFACE AREA PER CARTRIDGE (FT ²):	DIAMETER OF BAG (IN.): 5-15																												
TOTAL FILTER SURFACE AREA (FT ²):		AIR TO CLOTH RATIO: 1 to 4 : 1																												
DRAFT TYPE: <input checked="" type="checkbox"/> INDUCED/NEGATIVE <input checked="" type="checkbox"/> FORCED/POSITIVE		FILTER MATERIAL: Cartridge Style <input type="checkbox"/> WOVEN <input type="checkbox"/> FELTED																												
DESCRIBE CLEANING PROCEDURES:		PARTICLE SIZE DISTRIBUTION																												
<input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">SIZE (MICRONS)</th> <th style="width: 33%;">WEIGHT % OF TOTAL</th> <th style="width: 33%;">CUMULATIVE %</th> </tr> </thead> <tbody> <tr><td>0-1</td><td></td><td></td></tr> <tr><td>1-10</td><td></td><td></td></tr> <tr><td>10-25</td><td></td><td></td></tr> <tr><td>25-50</td><td></td><td></td></tr> <tr><td>50-100</td><td></td><td></td></tr> <tr><td>>100</td><td></td><td></td></tr> <tr><td colspan="3" style="text-align: center;">TOTAL = 100</td></tr> <tr><td colspan="3">Supplier specific, 94% passing 325 mesh</td></tr> </tbody> </table>		SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %	0-1			1-10			10-25			25-50			50-100			>100			TOTAL = 100			Supplier specific, 94% passing 325 mesh		
SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %																												
0-1																														
1-10																														
10-25																														
25-50																														
50-100																														
>100																														
TOTAL = 100																														
Supplier specific, 94% passing 325 mesh																														
DESCRIBE INCOMING AIR STREAM: Air stream will contain fly ash.																														
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):																														
COMMENTS:																														

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Loadout Silo Chute 1A	EMISSION SOURCE ID NO: ES-81A
	CONTROL DEVICE ID NO(S): CD-81A

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-81A
--	--

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Loadout silo chute 1A is unloaded at the rate of 100 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT ³): N/A
--------------------------	--

CAPACITY	CUBIC FEET: N/A	TONS: N/A
-----------------	-----------------	-----------

DIMENSIONS (FEET)	HEIGHT: 111	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	--------------	------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 200,000	MAXIMUM DESIGN CAPACITY: 200,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: N/A	
---------------------	--

MAXIMUM ACFM: 6000	
--------------------	--

MATERIAL IS UNLOADED TO:
 N/A

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): N/A
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): 100
--

COMMENTS:
 This silo only unloads.

Attach Additional Sheets As Necessary

FORM C1

CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-81A		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-81A																												
EMISSION POINT (STACK) ID NO(S): EP-81A		POSITION IN SERIES OF CONTROLS NO. 1 OF 1 UNITS																												
OPERATING SCENARIO:																														
___1___ OF ___1___		P.E. SEAL REQUIRED (PER 2q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																												
DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the Loadout silo chute 1A.																														
POLLUTANTS COLLECTED:																														
	PM	PM10/PM2.5																												
BEFORE CONTROL EMISSION RATE (LB/HR):	0.005	0.002																												
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %																												
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %																												
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %																												
EFFICIENCY DETERMINATION CODE:	2	2																												
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.005	0.002																												
PRESSURE DROP (IN H ₂ O): MIN: MAX: Avg: 10-15 wg GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																														
BULK PARTICLE DENSITY (LB/FT ³): 25		INLET TEMPERATURE (°F): Contract MIN MAX																												
POLLUTANT LOADING RATE: N/A <input type="checkbox"/> LB/HR <input type="checkbox"/> GR/FT ³		OUTLET TEMPERATURE (°F) Contract MIN MAX																												
INLET AIR FLOW RATE (ACFM): 1300		FILTER OPERATING TEMP (°F): Contract																												
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT: Contract	LENGTH OF BAG (IN.): 20-30																												
NO. OF CARTRIDGES:	FILTER SURFACE AREA PER CARTRIDGE (FT ²):	DIAMETER OF BAG (IN.): 5-15																												
TOTAL FILTER SURFACE AREA (FT ²):		AIR TO CLOTH RATIO: 1 to 4 : 1																												
DRAFT TYPE: <input checked="" type="checkbox"/> INDUCED/NEGATIVE <input checked="" type="checkbox"/> FORCED/POSITIVE		FILTER MATERIAL: Cartridge Style <input type="checkbox"/> WOVEN <input type="checkbox"/> FELTED																												
DESCRIBE CLEANING PROCEDURES:		PARTICLE SIZE DISTRIBUTION																												
<input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">SIZE (MICRONS)</th> <th style="width: 30%;">WEIGHT % OF TOTAL</th> <th style="width: 40%;">CUMULATIVE %</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">0-1</td><td></td><td></td></tr> <tr><td style="text-align: center;">1-10</td><td></td><td></td></tr> <tr><td style="text-align: center;">10-25</td><td></td><td></td></tr> <tr><td style="text-align: center;">25-50</td><td></td><td></td></tr> <tr><td style="text-align: center;">50-100</td><td></td><td></td></tr> <tr><td style="text-align: center;">>100</td><td></td><td></td></tr> <tr><td colspan="3" style="text-align: right;">TOTAL = 100</td></tr> <tr><td colspan="3">Supplier specific, 94% passing 325 mesh</td></tr> </tbody> </table>		SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %	0-1			1-10			10-25			25-50			50-100			>100			TOTAL = 100			Supplier specific, 94% passing 325 mesh		
SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %																												
0-1																														
1-10																														
10-25																														
25-50																														
50-100																														
>100																														
TOTAL = 100																														
Supplier specific, 94% passing 325 mesh																														
DESCRIBE INCOMING AIR STREAM: Air stream will contain fly ash.																														
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):																														
COMMENTS:																														

Attach Additional Sheets As Necessary

FORM B6

EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B6

EMISSION SOURCE DESCRIPTION: Loadout Silo Chute 1B	EMISSION SOURCE ID NO: ES-81B
	CONTROL DEVICE ID NO(S): CD-81B

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT(STACK) ID NO(S): EP-81B
--	--

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Loadout silo chute 1B is unloaded at the rate of 100 ton/hr and equipped with bin vent product capture device.

MATERIAL STORED: Fly Ash	DENSITY OF MATERIAL (LB/FT3): N/A
--------------------------	-----------------------------------

CAPACITY	CUBIC FEET: N/A	TONS: N/A
-----------------	-----------------	-----------

DIMENSIONS (FEET)	HEIGHT: 111	DIAMETER: 41	(OR)	LENGTH:	WIDTH:	HEIGHT:
--------------------------	-------------	--------------	------	---------	--------	---------

ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: 200,000	MAXIMUM DESIGN CAPACITY: 200,000
---	-----------------	----------------------------------

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER:

NO. FILL TUBES: N/A	
---------------------	--

MAXIMUM ACFM: 6000	
--------------------	--

MATERIAL IS UNLOADED TO:
 N/A

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?
 N/A

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): N/A
--

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): 100
--

COMMENTS:
 This silo only unloads.

FORM C1

CONTROL DEVICE (FABRIC FILTER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

C1

CONTROL DEVICE ID NO: CD-81B		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-81B																												
EMISSION POINT (STACK) ID NO(S): EP-81B		POSITION IN SERIES OF CONTROLS NO. 1 OF 1 UNITS																												
OPERATING SCENARIO:																														
___1___ OF ___1___		P.E. SEAL REQUIRED (PER 2q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																												
DESCRIBE CONTROL SYSTEM: A bin vent for particulate control on the Loadout silo chute 1B.																														
POLLUTANTS COLLECTED:																														
	PM	PM10/PM2.5																												
BEFORE CONTROL EMISSION RATE (LB/HR):	0.005	0.002																												
CAPTURE EFFICIENCY:	<= 0.005 gr/dscf %	<= 0.005 gr/dscf %																												
CONTROL DEVICE EFFICIENCY:	N/A %	N/A %																												
CORRESPONDING OVERALL EFFICIENCY:	N/A %	N/A %																												
EFFICIENCY DETERMINATION CODE:	2	2																												
TOTAL AFTER CONTROL EMISSION RATE (LB/HR):	0.005	0.002																												
PRESSURE DROP (IN H ₂ O): MIN: MAX: Avg: 10-15 wg GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																														
BULK PARTICLE DENSITY (LB/FT ³): 25		INLET TEMPERATURE (°F): Contract MIN MAX																												
POLLUTANT LOADING RATE: N/A <input type="checkbox"/> LB/HR <input type="checkbox"/> GR/FT ³		OUTLET TEMPERATURE (°F) Contract MIN MAX																												
INLET AIR FLOW RATE (ACFM): 1300		FILTER OPERATING TEMP (°F): Contract																												
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT: Contract	LENGTH OF BAG (IN.): 20-30																												
NO. OF CARTRIDGES:	FILTER SURFACE AREA PER CARTRIDGE (FT ²):	DIAMETER OF BAG (IN.): 5-15																												
TOTAL FILTER SURFACE AREA (FT ²):		AIR TO CLOTH RATIO: 1 to 4 : 1																												
DRAFT TYPE: <input checked="" type="checkbox"/> INDUCED/NEGATIVE <input checked="" type="checkbox"/> FORCED/POSITIVE		FILTER MATERIAL: Cartridge Style <input type="checkbox"/> WOVEN <input type="checkbox"/> FELTED																												
DESCRIBE CLEANING PROCEDURES:		PARTICLE SIZE DISTRIBUTION																												
<input checked="" type="checkbox"/> AIR PULSE <input type="checkbox"/> SONIC <input type="checkbox"/> REVERSE FLOW <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> RING BAG COLLAPSE <input type="checkbox"/> OTHER:		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">SIZE (MICRONS)</th> <th style="width: 33%;">WEIGHT % OF TOTAL</th> <th style="width: 33%;">CUMULATIVE %</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">0-1</td><td></td><td></td></tr> <tr><td style="text-align: center;">1-10</td><td></td><td></td></tr> <tr><td style="text-align: center;">10-25</td><td></td><td></td></tr> <tr><td style="text-align: center;">25-50</td><td></td><td></td></tr> <tr><td style="text-align: center;">50-100</td><td></td><td></td></tr> <tr><td style="text-align: center;">>100</td><td></td><td></td></tr> <tr><td colspan="3" style="text-align: right;">TOTAL = 100</td></tr> <tr><td colspan="3">Supplier specific, 94% passing 325 mesh</td></tr> </tbody> </table>		SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %	0-1			1-10			10-25			25-50			50-100			>100			TOTAL = 100			Supplier specific, 94% passing 325 mesh		
SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %																												
0-1																														
1-10																														
10-25																														
25-50																														
50-100																														
>100																														
TOTAL = 100																														
Supplier specific, 94% passing 325 mesh																														
DESCRIBE INCOMING AIR STREAM: Air stream will contain fly ash.																														
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):																														
COMMENTS:																														

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Screener	EMISSION SOURCE ID NO: ES-82A
OPERATING SCENARIO <u>1</u> OF <u>1</u>	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): EP-82	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 The screening process will occur to produce free flowing feedstock suitable for the STAR® reactor.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 2600 hours/year

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	0.015	0.020	N/A	N/A	0.015	0.020
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	AP-42	0.005	0.007	N/A	N/A	0.005	0.007
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	AP-42	0.0003	0.0004	N/A	N/A	0.0003	0.0004
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	1.92E-06	2.50E-06	N/A	N/A	1.92E-06	2.50E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	1.79E-06	2.33E-06	N/A	N/A	1.79E-06	2.33E-06
Beryllium	7440-41-7	Ash Analysis	3.71E-07	4.83E-07	N/A	N/A	3.71E-07	4.83E-07
Cadmium	7440-43-9	Ash Analysis	3.20E-07	4.16E-07	N/A	N/A	3.20E-07	4.16E-07
Chromium	7440-47-3	Ash Analysis	2.18E-06	2.83E-06	N/A	N/A	2.18E-06	2.83E-06
Chromium VI	18540-29-9	Ash Analysis	2.39E-07	3.11E-07	N/A	N/A	2.39E-07	3.11E-07
Cobalt	7440-48-4	Ash Analysis	8.71E-07	1.13E-06	N/A	N/A	8.71E-07	1.13E-06
Manganese	7439-96-5	Ash Analysis	3.84E-06	4.99E-06	N/A	N/A	3.84E-06	4.99E-06
Mercury	7439-97-6	Ash Analysis	1.15E-08	1.49E-08	N/A	N/A	1.15E-08	1.49E-08
Nickel	7440-02-0	Ash Analysis	2.18E-06	2.83E-06	N/A	N/A	2.18E-06	2.83E-06
Selenium	7782-49-2	Ash Analysis	5.89E-07	7.66E-07	N/A	N/A	5.89E-07	7.66E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	1.79E-06	4.30E-05	4.66E-03
Beryllium	7440-41-7	Ash Analysis	3.71E-07	8.91E-06	9.65E-04
Cadmium	7440-43-9	Ash Analysis	3.20E-07	7.68E-06	8.32E-04
Chromium VI	18540-29-9	Ash Analysis	2.39E-07	5.75E-06	6.23E-04
Manganese	7439-96-5	Ash Analysis	3.84E-06	9.22E-05	9.99E-03
Mercury	7439-97-6	Ash Analysis	1.15E-08	2.76E-07	2.99E-05
Nickel	7440-02-0	Ash Analysis	2.18E-06	5.22E-05	5.66E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Screener	EMISSION SOURCE ID NO: ES-82A
OPERATING SCENARIO: _____1_____ OF _____1_____	CONTROL DEVICE ID NO(S): N/A

OPERATING SCENARIO: _____1_____ OF _____1_____	EMISSION POINT (STACK) ID NO(S): EP-82
--	--

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): The screening process will occur to produce free flowing feedstock suitable for the STAR® reactor

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Capacity	ton	165	165

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):

REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
--	---------------

FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
----------------	---

MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A
------------------------------------	---

COMMENTS:

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Screener-Diesel Engine	EMISSION SOURCE ID NO: ES-82B
	CONTROL DEVICE ID NO(S): N/A
OPERATING SCENARIO _____1_____ OF _____1_____	EMISSION POINT (STACK) ID NO(S): EP-82

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Diesel Engine to run the Screener.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B8)
<input checked="" type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE							
AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	2.00E-01	2.60E-01	N/A	N/A	2.00E-01	2.60E-01
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	AP-42	2.00E-01	2.60E-01	N/A	N/A	2.00E-01	2.60E-01
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	AP-42	2.00E-01	2.60E-01	N/A	N/A	2.00E-01	2.60E-01
SULFUR DIOXIDE (SO ₂)	AP-42	0.187	0.243	N/A	N/A	0.187	0.243
NITROGEN OXIDES (NO _x)	AP-42	2.821	3.667	N/A	N/A	2.821	3.667
CARBON MONOXIDE (CO)	AP-42	0.608	0.790	N/A	N/A	0.608	0.790
VOLATILE ORGANIC COMPOUNDS (VOC)	AP-42	0.225	0.292	N/A	N/A	0.225	0.292
LEAD		N/A	N/A	N/A	N/A	N/A	N/A
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE								
HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Benzene	71-43-2	AP-42	5.94E-04	7.73E-04	N/A	N/A	5.94E-04	7.73E-04
Toluene	108-88-3	AP-42	2.61E-04	3.39E-04	N/A	N/A	2.61E-04	3.39E-04
Xylenes	1330-20-7	AP-42	1.82E-04	2.36E-04	N/A	N/A	1.82E-04	2.36E-04
1,3-Butadiene	106-99-0	AP-42	2.49E-05	3.24E-05	N/A	N/A	2.49E-05	3.24E-05
Formaldehyde	50-00-0	AP-42	7.52E-04	9.77E-04	N/A	N/A	7.52E-04	9.77E-04
Acetaldehyde	75-07-0	AP-42	4.89E-04	6.35E-04	N/A	N/A	4.89E-04	6.35E-04
Acrolein	107-02-8	AP-42	5.89E-05	7.66E-05	N/A	N/A	5.89E-05	7.66E-05
Total PAH		AP-42	1.07E-04	1.39E-04	N/A	N/A	1.07E-04	1.39E-04
Naphthalene	91-20-3	AP-42	5.40E-05	7.02E-05	N/A	N/A	5.40E-05	7.02E-05
Acenaphthalene	208-96-8	AP-42	3.22E-06	4.19E-06	N/A	N/A	3.22E-06	4.19E-06
Acenaphthene	83-32-9	AP-42	9.05E-07	1.18E-06	N/A	N/A	9.05E-07	1.18E-06
Fluorene	86-73-7	AP-42	1.86E-05	2.42E-05	N/A	N/A	1.86E-05	2.42E-05
Phenanthrene	85-01-8	AP-42	1.87E-05	2.43E-05	N/A	N/A	1.87E-05	2.43E-05
Anthracene	120-12-7	AP-42	1.19E-06	1.55E-06	N/A	N/A	1.19E-06	1.55E-06
Fluoranthene	206-44-0	AP-42	4.85E-06	6.30E-06	N/A	N/A	4.85E-06	6.30E-06
Pyrene	129-00-0	AP-42	3.04E-06	3.96E-06	N/A	N/A	3.04E-06	3.96E-06
Benzo(a)anthracene	56-55-3	AP-42	1.07E-06	1.39E-06	N/A	N/A	1.07E-06	1.39E-06
Chrysene	218-01-9	AP-42	2.25E-07	2.92E-07	N/A	N/A	2.25E-07	2.92E-07
Benzo(b)fluoranthene	205-99-2	AP-42	6.31E-08	8.21E-08	N/A	N/A	6.31E-08	8.21E-08
Benzo(k)fluoranthene	207-08-9	AP-42	9.87E-08	1.28E-07	N/A	N/A	9.87E-08	1.28E-07
Benzo(a)pyrene	50-32-8	AP-42	1.20E-07	1.56E-07	N/A	N/A	1.20E-07	1.56E-07
Indeno(1,2,3-cd)pyrene	193-39-5	AP-42	2.39E-07	3.11E-07	N/A	N/A	2.39E-07	3.11E-07
Dibenz(a,h)anthracene	53-70-3	AP-42	3.71E-07	4.83E-07	N/A	N/A	3.71E-07	4.83E-07
Benzo(g,h,i)perylene	191-24-2	AP-42	3.11E-07	4.05E-07	N/A	N/A	3.11E-07	4.05E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE					
TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Benzene	71-43-2	AP-42	5.94E-04	1.43E-02	1.55E+00
Toluene	108-88-3	AP-42	2.61E-04	6.25E-03	6.77E-01
Xylenes	1330-20-7	AP-42	1.82E-04	4.36E-03	4.72E-01
1,3-Butadiene	106-99-0	AP-42	2.49E-05	5.98E-04	6.48E-02
Formaldehyde	50-00-0	AP-42	7.52E-04	1.80E-02	1.95E+00
Acetaldehyde	75-07-0	AP-42	4.89E-04	1.17E-02	1.27E+00
Acrolein	107-02-8	AP-42	5.89E-05	1.41E-03	1.53E-01

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B2

EMISSION SOURCE (INTERNAL COMBUSTION ENGINES/TURBINES/GENERATORS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B2

EMISSION SOURCE DESCRIPTION: Screener-Diesel Engine	EMISSION SOURCE ID NO: ES-82B
	CONTROL DEVICE ID NO(S): N/A

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____	EMISSION POINT (STACK) ID NO(S): EP-82
--	--

ENGINE SERVICE <input type="checkbox"/>	EMERGENCY <input type="checkbox"/>	SPACE HEAT <input type="checkbox"/>	ELECTRICAL GENERATION <input type="checkbox"/>
(CHECK ALL THAT APPLY) <input type="checkbox"/>	PEAK SHAVER <input type="checkbox"/>	<input checked="" type="checkbox"/> OTHER (DESCRIBE): To operate the screener.	

GENERATOR OUTPUT (KW):	ANTICIPATED ACTUAL HOURS OF OPERATION (HRS/YR): 2600
------------------------	--

ENGINE OUTPUT (HP): 91

<input type="checkbox"/> TYPE ICE: <input type="checkbox"/> GASOLINE ENGINE	<input checked="" type="checkbox"/> DIESEL ENGINE UP TO 600 HP	<input type="checkbox"/> DIESEL ENGINE GREATER THAN 600 HP	<input type="checkbox"/> DUAL FUEL ENGINE
<input type="checkbox"/> OTHER (DESCRIBE): _____	(complete below)		

<input type="checkbox"/> ENGINE TYPE <input type="checkbox"/> RICH BURN	<input type="checkbox"/> LEAN BURN
---	------------------------------------

<input type="checkbox"/> EMISSION REDUCTION MODIFICATIONS <input type="checkbox"/> INJECTION TIMING RETARD	<input type="checkbox"/> PREIGNITION CHAMBER COMBUSTION	<input type="checkbox"/> OTHER _____
--	---	--------------------------------------

<input type="checkbox"/> OR <input type="checkbox"/> STATIONARY GAS TURBINE (complete below)	<input type="checkbox"/> NATURAL GAS PIPELINE COMPRESSOR OR TURBINE (complete below)
--	--

FUEL: <input type="checkbox"/> NATURAL GAS <input type="checkbox"/> OIL <input type="checkbox"/> OTHER (DESCRIBE): _____ CYCLE: <input type="checkbox"/> COGENERATION <input type="checkbox"/> SIMPLE <input type="checkbox"/> REGENERATIVE <input type="checkbox"/> COMBINED CONTROLS: <input type="checkbox"/> WATER-STEAM INJECTION <input type="checkbox"/> UNCONTROLLED <input type="checkbox"/> LEAN-PREMIX <input type="checkbox"/> OTHER (SPECIFY): _____	ENGINE TYPE: <input type="checkbox"/> 2-CYCLE LEAN BURN <input type="checkbox"/> 4-CYCLE LEAN <input type="checkbox"/> TURBINE <input type="checkbox"/> 4-CYCLE RICH BURN <input type="checkbox"/> OTHER (DESCRIBE): _____ CONTROLS: <input type="checkbox"/> COMBUSTION MODIFICATIONS (DESCRIBE): _____ <input type="checkbox"/> NONSELECTIVE CATALYTIC REDUCTION <input type="checkbox"/> SELECTIVE CATALYTIC REDUCTION <input type="checkbox"/> CLEAN BURN AND PRECOMBUSTION CHAMBER <input type="checkbox"/> UNCONTROLLED
--	---

FUEL USAGE (INCLUDE STARTUP/BACKUP FUEL)

FUEL TYPE	UNITS	MAXIMUM DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
Diesel	gallons	3.75 @ 75 % load	2600 hr/yr

FUEL CHARACTERISTICS (COMPLETE ALL THAT ARE APPLICABLE)

FUEL TYPE	BTU/UNIT	UNITS	SULFUR CONTENT (% BY WEIGHT)
Diesel	6.40E+05	Hour	0.0015%

MANUFACTURER'S SPECIFIC EMISSION FACTORS (IF AVAILABLE)

POLLUTANT	NOX	CO	PM	PM10	VOC	OTHER
EMISSION FACTOR LB/UNIT						
UNIT						

DESCRIBE METHODS TO MINIMIZE VISIBLE EMISSIONS DURING IDLING, OR LOW LOAD OPERATIONS:

COMMENTS:

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Crusher	EMISSION SOURCE ID NO: ES-83A
	CONTROL DEVICE ID NO(S): N/A
OPERATING SCENARIO <u>1</u> OF <u>1</u>	EMISSION POINT (STACK) ID NO(S): EP-83

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Fly ash will be processed further by passing through a crusher to remove larger particles and to produce more fine and free flowing feedstock.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 365 hours/year

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	0.008	0.002	N/A	N/A	0.008	0.002
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	AP-42	0.004	0.001	N/A	N/A	0.004	0.001
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	AP-42	0.0007	0.0001	N/A	N/A	0.0007	0.0001
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	1.05E-06	1.91E-07	N/A	N/A	1.05E-06	1.912E-07
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	9.78E-07	1.78E-07	N/A	N/A	9.78E-07	1.78E-07
Beryllium	7440-41-7	Ash Analysis	2.03E-07	3.70E-08	N/A	N/A	2.03E-07	3.70E-08
Cadmium	7440-43-9	Ash Analysis	1.75E-07	3.19E-08	N/A	N/A	1.75E-07	3.19E-08
Chromium	7440-47-3	Ash Analysis	1.19E-06	2.17E-07	N/A	N/A	1.19E-06	2.17E-07
Chromium VI	18540-29-9	Ash Analysis	1.31E-07	2.38E-08	N/A	N/A	1.31E-07	2.38E-08
Cobalt	7440-48-4	Ash Analysis	4.75E-07	8.67E-08	N/A	N/A	4.75E-07	8.67E-08
Manganese	7439-96-5	Ash Analysis	2.10E-06	3.82E-07	N/A	N/A	2.10E-06	3.82E-07
Mercury	7439-97-6	Ash Analysis	6.27E-09	1.14E-09	N/A	N/A	6.27E-09	1.14E-09
Nickel	7440-02-0	Ash Analysis	1.19E-06	2.17E-07	N/A	N/A	1.19E-06	2.17E-07
Selenium	7782-49-2	Ash Analysis	3.21E-07	5.86E-08	N/A	N/A	3.21E-07	5.86E-08

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	9.78E-07	2.35E-05	3.57E-04
Beryllium	7440-41-7	Ash Analysis	2.03E-07	4.86E-06	7.39E-05
Cadmium	7440-43-9	Ash Analysis	1.75E-07	4.19E-06	6.37E-05
Chromium VI	18540-29-9	Ash Analysis	1.31E-07	3.13E-06	4.77E-05
Manganese	7439-96-5	Ash Analysis	2.10E-06	5.03E-05	7.65E-04
Mercury	7439-97-6	Ash Analysis	6.27E-09	1.50E-07	2.29E-06
Nickel	7440-02-0	Ash Analysis	1.19E-06	2.85E-05	4.33E-04

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Crusher	EMISSION SOURCE ID NO: ES-83A
OPERATING SCENARIO: _____1_____ OF _____1_____	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): EP-83	

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Fly ash will be processed further by passing through a crusher to remove larger particles and to produce more fine and free flowing feedstock.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Capacity	ton	165 ton/day	165 ton/day

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS:

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Crusher-Diesel Engine	EMISSION SOURCE ID NO: ES-83B
	CONTROL DEVICE ID NO(S): N/A
OPERATING SCENARIO _____1_____ OF _____1_____	EMISSION POINT (STACK) ID NO(S): EP-83

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Diesel Engine to run the Crusher.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B8)
<input checked="" type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE							
AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	6.60E-01	1.20E-01	N/A	N/A	6.60E-01	1.20E-01
PARTICULATE MATTER<10 MICRONS (PM ₁₀)	AP-42	6.60E-01	1.20E-01	N/A	N/A	6.60E-01	1.20E-01
PARTICULATE MATTER<2.5 MICRONS (PM _{2.5})	AP-42	6.60E-01	1.20E-01	N/A	N/A	6.60E-01	1.20E-01
SULFUR DIOXIDE (SO ₂)	AP-42	0.615	0.112	N/A	N/A	0.615	0.112
NITROGEN OXIDES (NO _x)	AP-42	9.300	1.697	N/A	N/A	9.300	1.697
CARBON MONOXIDE (CO)	AP-42	2.004	0.366	N/A	N/A	2.004	0.366
VOLATILE ORGANIC COMPOUNDS (VOC)	AP-42	0.741	0.135	N/A	N/A	0.741	0.135
LEAD		N/A	N/A	N/A	N/A	N/A	N/A
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE								
HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Benzene	71-43-2	AP-42	1.96E-03	3.58E-04	N/A	N/A	1.96E-03	3.58E-04
Toluene	108-88-3	AP-42	8.59E-04	1.57E-04	N/A	N/A	8.59E-04	1.57E-04
Xylenes	1330-20-7	AP-42	5.99E-04	1.09E-04	N/A	N/A	5.99E-04	1.09E-04
1,3-Butadiene	106-99-0	AP-42	8.21E-05	1.50E-05	N/A	N/A	8.21E-05	1.50E-05
Formaldehyde	50-00-0	AP-42	2.48E-03	4.52E-04	N/A	N/A	2.48E-03	4.52E-04
Acetaldehyde	75-07-0	AP-42	1.61E-03	2.94E-04	N/A	N/A	1.61E-03	2.94E-04
Acrolein	107-02-8	AP-42	1.94E-04	3.55E-05	N/A	N/A	1.94E-04	3.55E-05
Total PAH		AP-42	3.53E-04	6.44E-05	N/A	N/A	3.53E-04	6.44E-05
Naphthalene	91-20-3	AP-42	1.78E-04	3.25E-05	N/A	N/A	1.78E-04	3.25E-05
Acenaphthalene	208-96-8	AP-42	1.06E-05	1.94E-06	N/A	N/A	1.06E-05	1.94E-06
Acenaphthene	83-32-9	AP-42	2.98E-06	5.44E-07	N/A	N/A	2.98E-06	5.44E-07
Fluorene	86-73-7	AP-42	6.13E-05	1.12E-05	N/A	N/A	6.13E-05	1.12E-05
Phenanthrene	85-01-8	AP-42	6.17E-05	1.13E-05	N/A	N/A	6.17E-05	1.13E-05
Anthracene	120-12-7	AP-42	3.93E-06	7.17E-07	N/A	N/A	3.93E-06	7.17E-07
Fluoranthene	206-44-0	AP-42	1.60E-05	2.92E-06	N/A	N/A	1.60E-05	2.92E-06
Pyrene	129-00-0	AP-42	1.00E-05	1.83E-06	N/A	N/A	1.00E-05	1.83E-06
Benzo(a)anthracene	56-55-3	AP-42	3.53E-06	6.44E-07	N/A	N/A	3.53E-06	6.44E-07
Chrysene	218-01-9	AP-42	7.41E-07	1.35E-07	N/A	N/A	7.41E-07	1.35E-07
Benzo(b)fluoranthene	205-99-2	AP-42	2.08E-07	3.80E-08	N/A	N/A	2.08E-07	3.80E-08
Benzo(k)fluoranthene	207-08-9	AP-42	3.26E-07	5.94E-08	N/A	N/A	3.26E-07	5.94E-08
Benzo(a)pyrene	50-32-8	AP-42	3.95E-07	7.21E-08	N/A	N/A	3.95E-07	7.21E-08
Indeno(1,2,3-cd)pyrene	193-39-5	AP-42	7.88E-07	1.44E-07	N/A	N/A	7.88E-07	1.44E-07
Dibenz(a,h)anthracene	53-70-3	AP-42	1.22E-06	2.23E-07	N/A	N/A	1.22E-06	2.23E-07
Benzo(g,h,i)perylene	191-24-2	AP-42	1.03E-06	1.87E-07	N/A	N/A	1.03E-06	1.87E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE					
TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Benzene	71-43-2	AP-42	1.96E-03	4.70E-02	7.15E-01
Toluene	108-88-3	AP-42	8.59E-04	2.06E-02	3.13E-01
Xylenes	1330-20-7	AP-42	5.99E-04	1.44E-02	2.18E-01
1,3-Butadiene	106-99-0	AP-42	8.21E-05	1.97E-03	3.00E-02
Formaldehyde	50-00-0	AP-42	2.48E-03	5.95E-02	9.04E-01
Acetaldehyde	75-07-0	AP-42	1.61E-03	3.87E-02	5.88E-01
Acrolein	107-02-8	AP-42	1.94E-04	4.66E-03	7.09E-02

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B2

EMISSION SOURCE (INTERNAL COMBUSTION ENGINES/TURBINES/GENERATORS)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B2

EMISSION SOURCE DESCRIPTION: Crusher-Diesel Engine	EMISSION SOURCE ID NO: ES-83B
	CONTROL DEVICE ID NO(S): N/A

OPERATING SCENARIO: _____ 1 _____ OF _____ 1 _____ EMISSION POINT (STACK) ID NO(S): EP-83

ENGINE SERVICE EMERGENCY SPACE HEAT ELECTRICAL GENERATION
 (CHECK ALL THAT APPLY) PEAK SHAVER OTHER (DESCRIBE): To operate the crusher. _____

GENERATOR OUTPUT (KW): _____ ANTICIPATED ACTUAL HOURS OF OPERATION (HRS/YR): 365

ENGINE OUTPUT (HP): 300

TYPE ICE: GASOLINE ENGINE DIESEL ENGINE UP TO 600 HP DIESEL ENGINE GREATER THAN 600 HP DUAL FUEL ENGINE
 OTHER (DESCRIBE): _____ (complete below)

ENGINE TYPE RICH BURN LEAN BURN

EMISSION REDUCTION MODIFICATIONS INJECTION TIMING RETARD PREIGNITION CHAMBER COMBUSTION OTHER _____

OR STATIONARY GAS TURBINE (complete below) NATURAL GAS PIPELINE COMPRESSOR OR TURBINE (complete below)

FUEL: NATURAL GAS OIL
 OTHER (DESCRIBE): _____

CYCLE: COGENERATION SIMPLE
 REGENERATIVE COMBINED

CONTROLS: WATER-STEAM INJECTION
 UNCONTROLLED LEAN-PREMIX
 OTHER (SPECIFY): _____

ENGINE TYPE: 2-CYCLE LEAN BURN 4-CYCLE LEAN TURBINE
 4-CYCLE RICH BURN OTHER (DESCRIBE): _____

CONTROLS: COMBUSTION MODIFICATIONS (DESCRIBE): _____
 NONSELECTIVE CATALYTIC REDUCTION SELECTIVE CATALYTIC REDUCTION
 CLEAN BURN AND PRECOMBUSTION CHAMBER UNCONTROLLED

FUEL USAGE (INCLUDE STARTUP/BACKUP FUEL)

FUEL TYPE	UNITS	MAXIMUM DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
Diesel	gallons	11.71 @ 75% load	365 hr/yr

FUEL CHARACTERISTICS (COMPLETE ALL THAT ARE APPLICABLE)

FUEL TYPE	BTU/UNIT	UNITS	SULFUR CONTENT (% BY WEIGHT)
Diesel	2.10E+06	Hour	0.0015%

MANUFACTURER'S SPECIFIC EMISSION FACTORS (IF AVAILABLE)

POLLUTANT	NOX	CO	PM	PM10	VOC	OTHER
EMISSION FACTOR LB/UNIT						
UNIT						

DESCRIBE METHODS TO MINIMIZE VISIBLE EMISSIONS DURING IDLING, OR LOW LOAD OPERATIONS:

COMMENTS:

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Wet Ash Receiving-Transfer to Shed	EMISSION SOURCE ID NO: F-1
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-1	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Transfer of materials to storage shed.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B8)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	0.0025	0.0073	N/A	N/A	0.0025	0.0073
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	AP-42	0.0012	0.0034	N/A	N/A	0.0012	0.0034
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	AP-42	0.0002	0.0005	N/A	N/A	0.0002	0.0005
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	3.23E-07	9.22E-07	N/A	N/A	3.23E-07	9.22E-07
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	3.01E-07	8.6E-07	N/A	N/A	3.01E-07	8.60E-07
Beryllium	7440-41-7	Ash Analysis	6.24E-08	1.78E-07	N/A	N/A	6.24E-08	1.78E-07
Cadmium	7440-43-9	Ash Analysis	5.38E-08	1.54E-07	N/A	N/A	5.38E-08	1.54E-07
Chromium	7440-47-3	Ash Analysis	3.66E-07	1.04E-06	N/A	N/A	3.66E-07	1.04E-06
Chromium VI	18540-29-9	Ash Analysis	4.02E-08	1.15E-07	N/A	N/A	4.02E-08	1.15E-07
Cobalt	7440-48-4	Ash Analysis	1.46E-07	4.18E-07	N/A	N/A	1.46E-07	4.18E-07
Manganese	7439-96-5	Ash Analysis	6.45E-07	1.84E-06	N/A	N/A	6.45E-07	1.84E-06
Mercury	7439-97-6	Ash Analysis	1.94E-09	5.53E-09	N/A	N/A	1.94E-09	5.53E-09
Nickel	7440-02-0	Ash Analysis	3.66E-07	1.04E-06	N/A	N/A	3.66E-07	1.04E-06
Selenium	7782-49-2	Ash Analysis	9.89E-08	2.83E-07	N/A	N/A	9.89E-08	2.83E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	3.01E-07	7.23E-06	1.72E-03
Beryllium	7440-41-7	Ash Analysis	6.24E-08	1.50E-06	3.56E-04
Cadmium	7440-43-9	Ash Analysis	5.38E-08	1.29E-06	3.07E-04
Chromium VI	18540-29-9	Ash Analysis	4.02E-08	9.65E-07	2.30E-04
Manganese	7439-96-5	Ash Analysis	6.45E-07	1.55E-05	3.69E-03
Mercury	7439-97-6	Ash Analysis	1.94E-09	4.65E-08	1.11E-05
Nickel	7440-02-0	Ash Analysis	3.66E-07	8.78E-06	2.09E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Wet Ash Receiving-Transfer to Shed	EMISSION SOURCE ID NO: F-1
OPERATING SCENARIO: _____1_____ OF _____1_____	CONTROL DEVICE ID NO(S): N/A
	EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-1

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Transfer of materials to storage shed.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Transfer	Tons	70	70

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS:

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Wet Ash Receiving-Transfer to Hopper	EMISSION SOURCE ID NO: F-2
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-2	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Transfer of materials to feed hopper.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	0.0051	0.0145	N/A	N/A	0.0051	0.0145
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	AP-42	0.0024	0.0069	N/A	N/A	0.0024	0.0069
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	AP-42	0.0004	0.0010	N/A	N/A	0.0004	0.0010
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	6.45E-07	1.84E-06	N/A	N/A	6.45E-07	1.84E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	6.02E-07	1.72E-06	N/A	N/A	6.02E-07	1.72E-06
Beryllium	7440-41-7	Ash Analysis	1.25E-07	3.56E-07	N/A	N/A	1.25E-07	3.56E-07
Cadmium	7440-43-9	Ash Analysis	1.08E-07	3.07E-07	N/A	N/A	1.08E-07	3.07E-07
Chromium	7440-47-3	Ash Analysis	7.31E-07	2.09E-06	N/A	N/A	7.31E-07	2.09E-06
Chromium VI	18540-29-9	Ash Analysis	8.04E-08	2.3E-07	N/A	N/A	8.04E-08	2.30E-07
Cobalt	7440-48-4	Ash Analysis	2.93E-07	8.36E-07	N/A	N/A	2.93E-07	8.36E-07
Manganese	7439-96-5	Ash Analysis	1.29E-06	3.69E-06	N/A	N/A	1.29E-06	3.69E-06
Mercury	7439-97-6	Ash Analysis	3.86E-09	1.1E-08	N/A	N/A	3.86E-09	1.10E-08
Nickel	7440-02-0	Ash Analysis	7.31E-07	2.09E-06	N/A	N/A	7.31E-07	2.09E-06
Selenium	7782-49-2	Ash Analysis	1.98E-07	5.65E-07	N/A	N/A	1.98E-07	5.65E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	6.02E-07	1.45E-05	3.44E-03
Beryllium	7440-41-7	Ash Analysis	1.25E-07	2.99E-06	7.13E-04
Cadmium	7440-43-9	Ash Analysis	1.08E-07	2.58E-06	6.14E-04
Chromium VI	18540-29-9	Ash Analysis	8.04E-08	1.93E-06	4.60E-04
Manganese	7439-96-5	Ash Analysis	1.29E-06	3.10E-05	7.37E-03
Mercury	7439-97-6	Ash Analysis	3.86E-09	9.27E-08	2.21E-05
Nickel	7440-02-0	Ash Analysis	7.31E-07	1.76E-05	4.18E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Wet Ash Receiving-Transfer to Hopper	EMISSION SOURCE ID NO: F-2
OPERATING SCENARIO: ____1____ OF ____1____	CONTROL DEVICE ID NO(S): N/A
	EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-2

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Transfer of materials to feed hopper.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Transfer	Tons	70	70

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS:

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Wet Ash Receiving-Unloading Pile	EMISSION SOURCE ID NO: F-3
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-3	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Unloading Pile Windblown Fugitive Dust Emissions.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B8)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: TBD	DATE MANUFACTURED: TBD
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42, Chapter 11.9	0.0049	0.0215	N/A	N/A	0.0049	0.0215
PARTICULATE MATTER <10 MICRONS (PM ₁₀)		0.0025	0.0107	N/A	N/A	0.0025	0.0107
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})		0.0010	0.0043	N/A	N/A	0.0010	0.0043
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	6.23E-07	2.73E-06	N/A	N/A	6.23E-07	2.73E-06
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	5.81E-07	2.55E-06	N/A	N/A	5.81E-07	2.55E-06
Beryllium	7440-41-7	Ash Analysis	1.2E-07	5.27E-07	N/A	N/A	1.20E-07	5.27E-07
Cadmium	7440-43-9	Ash Analysis	1.04E-07	4.54E-07	N/A	N/A	1.04E-07	4.54E-07
Chromium	7440-47-3	Ash Analysis	7.06E-07	3.09E-06	N/A	N/A	7.06E-07	3.09E-06
Chromium VI	18540-29-9	Ash Analysis	7.76E-08	3.4E-07	N/A	N/A	7.76E-08	3.40E-07
Cobalt	7440-48-4	Ash Analysis	2.82E-07	1.24E-06	N/A	N/A	2.82E-07	1.24E-06
Manganese	7439-96-5	Ash Analysis	1.25E-06	5.45E-06	N/A	N/A	1.25E-06	5.45E-06
Mercury	7439-97-6	Ash Analysis	3.73E-09	1.63E-08	N/A	N/A	3.73E-09	1.63E-08
Nickel	7440-02-0	Ash Analysis	7.06E-07	3.09E-06	N/A	N/A	7.06E-07	3.09E-06
Selenium	7782-49-2	Ash Analysis	1.91E-07	8.36E-07	N/A	N/A	1.91E-07	8.36E-07

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	5.81E-07	1.39E-05	5.09E-03
Beryllium	7440-41-7	Ash Analysis	1.20E-07	2.89E-06	1.05E-03
Cadmium	7440-43-9	Ash Analysis	1.04E-07	2.49E-06	9.09E-04
Chromium VI	18540-29-9	Ash Analysis	7.76E-08	1.86E-06	6.80E-04
Manganese	7439-96-5	Ash Analysis	1.25E-06	2.99E-05	1.09E-02
Mercury	7439-97-6	Ash Analysis	3.73E-09	8.94E-08	3.26E-05
Nickel	7440-02-0	Ash Analysis	7.06E-07	1.69E-05	6.18E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Wet Ash Receiving-Unloading Pile	EMISSION SOURCE ID NO: F-3
OPERATING SCENARIO: ____1____ OF ____1____	CONTROL DEVICE ID NO(S): N/A
	EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-3

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Unloading Pile Windblown Fugitive Dust Emissions.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Area	Acres	0.03 Acres	N/A
MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS:

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Ash Basin	EMISSION SOURCE ID NO: F-4
OPERATING SCENARIO <u>1</u> OF <u>1</u>	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-4	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Dust may be generated by wind erosion of exposed area within an industrial facility.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: N/A	DATE MANUFACTURED: N/A
MANUFACTURER / MODEL NO.: N/A	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25	

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	0.507	2.222	N/A	N/A	0.507	2.222
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	AP-42	0.254	1.111	N/A	N/A	0.254	1.111
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	AP-42	0.038	0.167	N/A	N/A	0.038	0.167
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	6.44E-05	2.82E-04	N/A	N/A	6.44E-05	2.82E-04
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	6.01E-05	2.63E-04	N/A	N/A	6.01E-05	2.63E-04
Beryllium	7440-41-7	Ash Analysis	1.25E-05	5.45E-05	N/A	N/A	1.25E-05	5.45E-05
Cadmium	7440-43-9	Ash Analysis	1.07E-05	4.70E-05	N/A	N/A	1.07E-05	4.70E-05
Chromium	7440-47-3	Ash Analysis	7.30E-05	3.20E-04	N/A	N/A	7.30E-05	3.20E-04
Chromium VI	18540-29-9	Ash Analysis	8.03E-06	3.52E-05	N/A	N/A	8.03E-06	3.52E-05
Cobalt	7440-48-4	Ash Analysis	2.92E-05	1.28E-04	N/A	N/A	2.92E-05	1.28E-04
Manganese	7439-96-5	Ash Analysis	1.29E-04	5.64E-04	N/A	N/A	1.29E-04	5.64E-04
Mercury	7439-97-6	Ash Analysis	3.86E-07	1.69E-06	N/A	N/A	3.86E-07	1.69E-06
Nickel	7440-02-0	Ash Analysis	7.30E-05	3.20E-04	N/A	N/A	7.30E-05	3.20E-04
Selenium	7782-49-2	Ash Analysis	1.98E-05	8.65E-05	N/A	N/A	1.98E-05	8.65E-05

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	6.01E-05	1.44E-03	5.27E-01
Beryllium	7440-41-7	Ash Analysis	1.25E-05	2.99E-04	1.09E-01
Cadmium	7440-43-9	Ash Analysis	1.07E-05	2.58E-04	9.40E-02
Chromium VI	18540-29-9	Ash Analysis	8.03E-06	1.93E-04	7.03E-02
Manganese	7439-96-5	Ash Analysis	1.29E-04	3.09E-03	1.13E+00
Mercury	7439-97-6	Ash Analysis	3.86E-07	9.25E-06	3.38E-03
Nickel	7440-02-0	Ash Analysis	7.30E-05	1.75E-03	6.40E-01

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Ash Basin	EMISSION SOURCE ID NO: F-4
OPERATING SCENARIO: _____1_____ OF _____1_____	CONTROL DEVICE ID NO(S): N/A
	EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-4

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Dust may be generated by wind erosion of exposed area within an industrial facility.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Active Basin Area	Acres	67 Acres	N/A
MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS: Maximum ash throughput = 430,000 ton/yr

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Ash Handling	EMISSION SOURCE ID NO: F-5
OPERATING SCENARIO _____ 1 _____ OF _____ 1 _____	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-4	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 Emissions from the handling of material at an industrial site.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B8)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: N/A	DATE MANUFACTURED: N/A
MANUFACTURER / MODEL NO.: N/A	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT NSPS (SUBPARTS?): _____ NESHAP (SUBPARTS?): _____

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42	0.086	0.376	N/A	N/A	0.086	0.376
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	AP-42	0.041	0.178	N/A	N/A	0.041	0.178
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	AP-42	0.006	0.027	N/A	N/A	0.006	0.027
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD	Ash Analysis	1.09E-05	4.77E-05	N/A	N/A	1.09E-05	4.77E-05
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		AFTER CONTROLS / LIMITS	
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Arsenic	7440-38-2	Ash Analysis	1.02E-05	4.45E-05	N/A	N/A	1.02E-05	4.45E-05
Beryllium	7440-41-7	Ash Analysis	2.11E-06	9.22E-06	N/A	N/A	2.11E-06	9.22E-06
Cadmium	7440-43-9	Ash Analysis	1.81E-06	7.95E-06	N/A	N/A	1.81E-06	7.95E-06
Chromium	7440-47-3	Ash Analysis	1.23E-05	5.41E-05	N/A	N/A	1.23E-05	5.41E-05
Chromium VI	18540-29-9	Ash Analysis	1.36E-06	5.95E-06	N/A	N/A	1.36E-06	5.95E-06
Cobalt	7440-48-4	Ash Analysis	4.94E-06	2.16E-05	N/A	N/A	4.94E-06	2.16E-05
Manganese	7439-96-5	Ash Analysis	2.18E-05	9.54E-05	N/A	N/A	2.18E-05	9.54E-05
Mercury	7439-97-6	Ash Analysis	6.52E-08	2.85E-07	N/A	N/A	6.52E-08	2.85E-07
Nickel	7440-02-0	Ash Analysis	1.23E-05	5.41E-05	N/A	N/A	1.23E-05	5.41E-05
Selenium	7782-49-2	Ash Analysis	3.34E-06	1.46E-05	N/A	N/A	3.34E-06	1.46E-05

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
Arsenic	7440-38-2	Ash Analysis	1.02E-05	2.44E-04	8.90E-02
Beryllium	7440-41-7	Ash Analysis	2.11E-06	5.05E-05	1.84E-02
Cadmium	7440-43-9	Ash Analysis	1.81E-06	4.36E-05	1.59E-02
Chromium VI	18540-29-9	Ash Analysis	1.36E-06	3.26E-05	1.19E-02
Manganese	7439-96-5	Ash Analysis	2.18E-05	5.23E-04	1.91E-01
Mercury	7439-97-6	Ash Analysis	6.52E-08	1.56E-06	5.71E-04
Nickel	7440-02-0	Ash Analysis	1.23E-05	2.96E-04	1.08E-01

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Ash Handling	EMISSION SOURCE ID NO: F-5
OPERATING SCENARIO: ____1____ OF ____1____	CONTROL DEVICE ID NO(S): N/A
	EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-4

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): Emissions from the handling of material at an industrial site.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Ash throughput	Tons	49.09	N/A
MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS: Maximum ash throughput = 430,000 ton/yr

Attach Additional Sheets as Necessary

FORM B

SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/1

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Haul Roads	EMISSION SOURCE ID NO: F-6
OPERATING SCENARIO _____1_____ OF _____1_____	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-4	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 A portion of the ash will be moved by truck to an offsite location. Particulate emissions are generated from the haul roads from the force of the wheels on the road surface. This force causes pulverization of the surface material. The particles are lifted and dropped from the rolling wheels and the road surface is exposed to strong air currents, which generate airborne particulate emissions.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input checked="" type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: N/A	DATE MANUFACTURED: N/A
MANUFACTURER / MODEL NO.: N/A	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
IS THIS SOURCE SUBJECT <input type="checkbox"/> NSPS (SUBPARTS?): _____ <input type="checkbox"/> NESHAP (SUBPARTS?): _____	
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25	

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Section 13.2.2 (Unpaved Roads) of the U.S. EPA's AP-42	1.65E-01	7.22E-01	N/A	N/A	1.65E-01	7.22E-01
PARTICULATE MATTER <10 MICRONS (PM ₁₀)		4.26E-02	1.86E-01	N/A	N/A	4.26E-02	1.86E-01
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})		4.26E-03	1.87E-02	N/A	N/A	4.26E-03	1.87E-02
SULFUR DIOXIDE (SO ₂)		N/A	N/A	N/A	N/A	N/A	N/A
NITROGEN OXIDES (NO _x)		N/A	N/A	N/A	N/A	N/A	N/A
CARBON MONOXIDE (CO)		N/A	N/A	N/A	N/A	N/A	N/A
VOLATILE ORGANIC COMPOUNDS (VOC)		N/A	N/A	N/A	N/A	N/A	N/A
LEAD		N/A	N/A	N/A	N/A	N/A	N/A
OTHER		N/A	N/A	N/A	N/A	N/A	N/A

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS				
			AFTER CONTROLS / LIMITS		BEFORE CONTROLS / LIMITS		(AFTER CONTROLS / LIMITS)		
			lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	
N/A									

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
			lb/hr	lb/day	lb/yr
N/A					

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE

Attach Additional Sheets As Necessary

FORM B9

EMISSION SOURCE (OTHER)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B9

EMISSION SOURCE DESCRIPTION: Haul Roads	EMISSION SOURCE ID NO: F-6
OPERATING SCENARIO: _____1_____ OF _____1_____	CONTROL DEVICE ID NO(S): N/A
	EMISSION POINT (STACK) ID NO(S): FUGITIVE FEP-4

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): A portion of the ash will be moved by truck to an offsite location. Particulate emissions are generated from the haul roads from the force of the wheels on the road surface. This force causes pulverization of the surface material. The particles are lifted and dropped from the rolling wheels and the road surface is exposed to strong air currents, which generate airborne particulate emissions.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):	
REQUESTED LIMITATION (BATCHES / HOUR):	(BATCHES/YR):
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR): N/A
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE: N/A

COMMENTS: Haul Roads- Max loading throughput = 101,191 lbs and Max unloading throughput = 51,191 lbs.

FORM D1

FACILITY-WIDE EMISSIONS SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D1

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION - FACILITY-WIDE				
--	--	--	--	--

	EXPECTED ACTUAL EMISSIONS (AFTER CONTROLS / LIMITATIONS)	POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITATIONS)	POTENTIAL EMISSIONS (AFTER CONTROLS / LIMITATIONS)
AIR POLLUTANT EMITTED	tons/yr	tons/yr	tons/yr
PARTICULATE MATTER (PM)	256.09	N/A	256.09
PARTICULATE MATTER < 10 MICRONS (PM ₁₀)	212.43	N/A	212.43
PARTICULATE MATTER < 2.5 MICRONS (PM _{2.5})	193.48	N/A	193.48
SULFUR DIOXIDE (SO ₂)	272.73	N/A	272.73
NITROGEN OXIDES (NO _x)	723.17	N/A	723.17
CARBON MONOXIDE (CO)	246.47	N/A	246.47
VOLATILE ORGANIC COMPOUNDS (VOC)	55.70	N/A	55.70
LEAD	0.02	N/A	0.02
GREENHOUSE GASES (GHG) (SHORT TONS)	2,785,682	N/A	2,785,682
OTHER			

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION - FACILITY-WIDE				
---	--	--	--	--

	CAS NO.	EXPECTED ACTUAL EMISSIONS (AFTER CONTROLS / LIMITATIONS)	POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITATIONS)	POTENTIAL EMISSIONS (AFTER CONTROLS / LIMITATIONS)
HAZARDOUS AIR POLLUTANT EMITTED	CAS NO.	tons/yr	tons/yr	tons/yr
Benzene	71-43-2	2.22E-01	N/A	2.22E-01
Formaldehyde	50-00-0	3.97E+00	N/A	3.97E+00
Hexane	110-54-3	2.29E+00	N/A	2.29E+00
Naphthalene	91-20-3	1.78E-03	N/A	1.78E-03
Toluene	108-88-3	1.16E+00	N/A	1.16E+00
Arsenic	7440-38-2	1.02E-02	N/A	1.02E-02
Beryllium	7440-41-7	1.44E-03	N/A	1.44E-03
Cadmium	7440-43-9	2.59E-02	N/A	2.59E-02
Chromium	7440-47-3	7.20E-03	N/A	7.20E-03
Chromium VI	18540-29-9	2.24E-03	N/A	2.24E-03
Cobalt	7440-48-4	2.76E-03	N/A	2.76E-03
Manganese	7439-96-5	2.13E-02	N/A	2.13E-02
Mercury	7439-97-6	3.99E-03	N/A	3.99E-03
Nickel	7440-02-0	5.52E-02	N/A	5.52E-02
Selenium	7782-49-2	1.86E-03	N/A	1.86E-03
Xylene	1330-20-7	3.45E-04	N/A	3.45E-04
1,3-Butadiene	106-99-0	4.74E-05	N/A	4.74E-05
Acetaldehyde	75-07-0	9.29E-04	N/A	9.29E-04
Acrolein	107-02-8	5.57E-02	N/A	5.57E-02
Total PAH (exclude Naphthalene)		1.01E-04	N/A	1.01E-04

TOXIC AIR POLLUTANT EMISSIONS INFORMATION - FACILITY-WIDE						
---	--	--	--	--	--	--

INDICATE REQUESTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS. EMISSIONS ABOVE THE TOXIC PERMIT EMISSION RATE (TPER) IN 15A NCAC 2Q .0711 MAY REQUIRE AIR DISPERSION MODELING. USE NETTING FORM D2 IF NECESSARY.

TOXIC AIR POLLUTANT EMITTED	CAS NO.	lb/hr	lb/day	lb/year	Modeling Required ?	
					Yes	No
Sulfuric Acid Mist	7664-93-9	3.50	84.00		X	
Benzene	71-43-2			444.93	X	
Formaldehyde	50-00-0	0.91			X	
Hexane	110-54-3		12.538			X
Toluene	108-88-3	0.26	62.149			X
Arsenic	7440-38-2			20.34	X	
Beryllium	7440-41-7			2.89	X	
Cadmium	7440-43-9			51.89	X	
Chromium VI	18540-29-9		0.012		X	
Manganese	7439-96-5		0.117			X
Mercury	7439-97-6		0.022		X	
Nickel	7440-02-0		0.302		X	

COMMENTS:
 For modeling purposes toxic air pollutant facility wide emissions include emissions from the STAR facility and the Combined Cycle facility. TAPS from diesel engines (ES-82B and ES-83B) were not included in the TPER analysis per 15A NCAC 2Q.0702 (a)(27). Chromium VI total emission is less than TPER, but to be conservative it is still modeled because the emissions are very close to the threshold.

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS	
TOXIC AIR POLLUTANT: Sulfuric Acid Mist	CAS NO.: 7664-93-9
EMISSION SOURCE ID NOS.: ES-74, ES-11, ES-12, ES-14	

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE	N/A		
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE	N/A		
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION	N/A		

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	N/A	84	3.50
TPER LEVELS (2Q .0711)	N/A	0.25	0.25

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS			
TOXIC AIR POLLUTANT: Benzene		CAS NO.: 71-43-2	
EMISSION SOURCE ID NOS.: ES-74, ES-11, ES-12, ES-14			

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE		N/A	N/A
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE		N/A	N/A
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION		N/A	N/A

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	445	N/A	N/A
TPER LEVELS (2Q .0711)	8.1	N/A	N/A

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS	
TOXIC AIR POLLUTANT: Formaldehyde	CAS NO.: 50-00-0
EMISSION SOURCE ID NOS.: ES-74, ES-11, ES-12, ES-14	

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE	N/A	N/A	
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE	N/A	N/A	
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION	N/A	N/A	

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	N/A	N/A	0.91
TPER LEVELS (2Q .0711)	N/A	N/A	0.04

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS

TOXIC AIR POLLUTANT: Arsenic CAS NO.: 7440-38-2

EMISSION SOURCE ID NOS.: ES-11, ES-12, ES-14, ES-73A, ES-73B, ES-74, ES-77, ES-78, ES-79A, ES-79B, ES-80A, ES-80B, ES-81, ES-81A, ES-81B, ES-82A, ES-83A, F-1, F-2, F-3, F-4, F-5

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE		N/A	N/A
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE		N/A	N/A
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION		N/A	N/A

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	20.34	N/A	N/A
TPER LEVELS (2Q .0711)	0.053	N/A	N/A

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS

TOXIC AIR POLLUTANT: Beryllium CAS NO.: 7440-41-7

EMISSION SOURCE ID NOS.: ES-11, ES-12, ES-14, ES-73A, ES-73B, ES-74, ES-77, ES-78, ES-79A, ES-79B, ES-80A, ES-80B, ES-81, ES-81A, ES-81B, ES-82A, ES-83A, F-1, F-2, F-3, F-4, F-5

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE		N/A	N/A
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE		N/A	N/A
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION		N/A	N/A

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	2.89	N/A	N/A
TPER LEVELS (2Q .0711)	0.28	N/A	N/A

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS

TOXIC AIR POLLUTANT: Cadmium CAS NO.: 7440-43-9

EMISSION SOURCE ID NOS.: ES-11, ES-12, ES-14, ES-73A, ES-73B, ES-74, ES-77, ES-78, ES-79A, ES-79B, ES-80A, ES-80B, ES-81, ES-81A, ES-81B, ES-82A, ES-83A, F-1, F-2, F-3, F-4, F-5

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE		N/A	N/A
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE		N/A	N/A
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION		N/A	N/A

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	51.89	N/A	N/A
TPER LEVELS (2Q .0711)	0.37	N/A	N/A

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS

TOXIC AIR POLLUTANT: Chromium VI CAS NO.: 18540-29-9

EMISSION SOURCE ID NOS.: ES-11, ES-12, ES-14, ES-73A, ES-73B, ES-74, ES-77, ES-78, ES-79A, ES-79B, ES-80A, ES-80B, ES-81, ES-81A, ES-81B, ES-82A, ES-83A, F-1, F-2, F-3, F-4, F-5

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE	N/A		N/A
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE	N/A		N/A
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION	N/A		N/A

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	N/A	0.012	N/A
TPER LEVELS (2Q .0711)	N/A	0.013	N/A

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS: Chromium VI total emission is less than TPER, but to be conservative it is still modeled because the emissions are very close to the threshold.

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS

TOXIC AIR POLLUTANT: Mercury CAS NO.: 7439-97-6

EMISSION SOURCE ID NOS.: ES-11, ES-12, ES-14, ES-73A, ES-73B, ES-74, ES-77, ES-78, ES-79A, ES-79B, ES-80A, ES-80B, ES-81, ES-81A, ES-81B, ES-82A, ES-83A, F-1, F-2, F-3, F-4, F-5

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE	N/A		N/A
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE	N/A		N/A
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION	N/A		N/A

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	N/A	0.022	N/A
TPER LEVELS (2Q .0711)	N/A	0.0013	N/A

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D2

AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D2

PURPOSE OF NETTING: AIR TOXICS

TOXIC AIR POLLUTANT: Nickel CAS NO.: 7440-02-0

EMISSION SOURCE ID NOS.: ES-11, ES-12, ES-14, ES-73A, ES-73B, ES-74, ES-77, ES-78, ES-79A, ES-79B, ES-80A, ES-80B, ES-81, ES-81A, ES-81B, ES-82A, ES-83A, F-1, F-2, F-3, F-4, F-5

SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/YEAR	LB/DAY	LB/HR
MODIFICATION INCREASE	N/A		N/A
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE	N/A		N/A
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CHANGE FROM MODIFICATION	N/A		N/A

SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
= EQUALS =	= EQUALS =	= EQUALS =	= EQUALS =
NET CREDITABLE CHANGE			

SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS	N/A	0.302	N/A
TPER LEVELS (2Q .0711)	N/A	0.13	N/A

Are the total facility-wide emissions less than the TPER levels?: YES NO

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 2Q .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 2Q .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

Attach Additional Sheets As Necessary

FORM D5

TECHNICAL ANALYSIS TO SUPPORT PERMIT APPLICATION

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D5

PROVIDE DETAILED TECHNICAL CALCULATIONS TO SUPPORT ALL EMISSION, CONTROL, AND REGULATORY DEMONSTRATIONS MADE IN THIS APPLICATION. INCLUDE A COMPREHENSIVE PROCESS FLOW DIAGRAM AS NECESSARY TO SUPPORT AND CLARIFY CALCULATIONS AND ASSUMPTIONS. ADDRESS THE FOLLOWING SPECIFIC ISSUES ON SEPARATE PAGES:

A SPECIFIC EMISSIONS SOURCE (EMISSION INFORMATION) (FORM B and B1 through B9) - SHOW CALCULATIONS USED, INCLUDING EMISSION FACTORS, MATERIAL BALANCES, AND/OR OTHER METHODS FROM WHICH THE POLLUTANT EMISSION RATES IN THIS APPLICATION WERE DERIVED. INCLUDE CALCULATION OF POTENTIAL BEFORE AND, WHERE APPLICABLE, AFTER CONTROLS. CLEARLY STATE ANY ASSUMPTIONS MADE AND PROVIDE ANY REFERENCES AS NEEDED TO SUPPORT MATERIAL BALANCE CALCULATIONS.

B SPECIFIC EMISSION SOURCE (REGULATORY INFORMATION)(FORM E2 - TITLE V ONLY) - PROVIDE AN ANALYSIS OF ANY REGULATIONS APPLICABLE TO INDIVIDUAL SOURCES AND THE FACILITY AS A WHOLE. INCLUDE A DISCUSSION OUTING METHODS (e.g. FOR TESTING AND/OR MONITORING REQUIREMENTS) FOR COMPLYING WITH APPLICABLE REGULATIONS, PARTICULARLY THOSE REGULATIONS LIMITING EMISSIONS BASED ON PROCESS RATES OR OTHER OPERATIONAL PARAMETERS. PROVIDE JUSTIFICATION FOR AVOIDANCE OF ANY FEDERAL REGULATIONS (PREVENTION OF SIGNIFICANT DETERIORATION (PSD), NEW SOURCE PERFORMANCE STANDARDS (NSPS), NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS), TITLE V), INCLUDING EXEMPTIONS FROM THE FEDERAL REGULATIONS WHICH WOULD OTHERWISE BE APPLICABLE TO THIS FACILITY. SUBMIT ANY REQUIRED INFORMATION TO DOCUMENT COMPLIANCE WITH ANY REGULATIONS. INCLUDE EMISSION RATES CALCULATED IN ITEM "A" ABOVE, DATES OF MANUFACTURE, CONTROL EQUIPMENT, ETC. TO SUPPORT THESE CALCULATIONS.

C CONTROL DEVICE ANALYSIS (FORM C and C1 through C9) - PROVIDE A TECHNICAL EVALUATION WITH SUPPORTING REFERENCES FOR ANY CONTROL EFFICIENCIES LISTED ON SECTION C FORMS, OR USED TO REDUCE EMISSION RATES IN CALCULATIONS UNDER ITEM "A" ABOVE. INCLUDE PERTINENT OPERATING PARAMETERS (e.g. OPERATING CONDITIONS, MANUFACTURING RECOMMENDATIONS, AND PARAMETERS AS APPLIED FOR IN THIS APPLICATION) CRITICAL TO ENSURING PROPER PERFORMANCE OF THE CONTROL DEVICES). INCLUDE AND LIMITATIONS OR MALFUNCTION POTENTIAL FOR THE PARTICULAR CONTROL DEVICES AS EMPLOYED AT THIS FACILITY. DETAIL PROCEDURES FOR ASSURING PROPER OPERATION OF THE CONTROL DEVICE INCLUDING MONITORING SYSTEMS AND MAINTENANCE TO BE PERFORMED.

D PROCESS AND OPERATIONAL COMPLIANCE ANALYSIS - (FORM E3 - TITLE V ONLY) - SHOWING HOW COMPLIANCE WILL BE ACHIEVED WHEN USING PROCESS, OPERATIONAL, OR OTHER DATA TO DEMONSTRATE COMPLIANCE. REFER TO COMPLIANCE REQUIREMENTS IN THE REGULATORY ANALYSIS IN ITEM "B" WHERE APPROPRIATE. LIST ANY CONDITIONS OR PARAMETERS THAT CAN BE MONITORED AND REPORTED TO DEMONSTRATE COMPLIANCE WITH THE APPLICABLE REGULATIONS.

E PROFESSIONAL ENGINEERING SEAL - PURSUANT TO 15A NCAC 2Q .0112 "APPLICATION REQUIRING A PROFESSIONAL ENGINEERING SEAL," A PROFESSIONAL ENGINEER REGISTERED IN NORTH CAROLINA SHALL BE REQUIRED TO SEAL TECHNICAL PORTIONS OF THIS APPLICATION FOR NEW SOURCES AND MODIFICATIONS OF EXISTING SOURCES. (SEE INSTRUCTIONS FOR FURTHER APPLICABILITY).

I, Thomas O. Pritcher attest that this application for Duke Energy Carolinas LLC - Buck Combined Cycle Facility has been reviewed by me and is accurate, complete and consistent with the information supplied in the engineering plans, calculations, and all other supporting documentation to the best of my knowledge. I further attest that to the best of my knowledge the proposed design **concept** has been prepared in accordance with the applicable regulations. Although certain portions of this submittal package may have been developed by other professionals, inclusion of these materials under my seal signifies that I have reviewed this material and have judged it to be consistent with the proposed design **concept**. Note: In accordance with NC General Statutes 143-215.6A and 143-215.6B, any person who knowingly makes any false statement, representation, or certification in any application shall be guilty of a Class 2 misdemeanor which may include a fine not to exceed \$10,000 as well as civil penalties up to \$25,000 per violation.

(PLEASE USE BLUE INK TO COMPLETE THE FOLLOWING)

NAME: _____
 DATE: _____
 COMPANY: Environmental Consulting & Technology of North Ca
 ADDRESS: 7208 Falls of Neuse Road, Suite 102, Raleigh, NC
 TELEPHONE: 919-861-8888
 SIGNATURE: _____
 PAGES CERTIFIED: Appendix A & Appendix B

(IDENTIFY ABOVE EACH PERMIT FORM AND ATTACHMENT THAT IS BEING CERTIFIED BY THIS SEAL)

PLACE NORTH CAROLINA SEAL HERE

Attach Additional Sheets As Necessary

FORM D6

NORTH CAROLINA MODELING PROTOCOL CHECKLIST (2 Pages)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

D6-1

The North Carolina Modeling Protocol Checklist may be used in lieu of developing the traditional written modeling plan for North Carolina toxics and criteria pollutant modeling. The protocol checklist is designed to provide the same level of information as requested in a modeling protocol as discussed in Chapter 2 of the **Guideline for Evaluating the Air Quality Impacts of Toxic Pollutants in North Carolina**. The modeling protocol checklist is submitted with the modeling analysis. The above referenced **Guideline** can be found at the following web link:

<https://ncdenr.s3.amazonaws.com/s3fs-public/Air%20Quality/permits/mets/Guidance.pdf>

Although most of the information requested in the modeling protocol checklist is self-explanatory, additional comments are provided, where applicable, and are discussed in greater detail in the toxics modeling **Guideline** referenced above. References to sections, tables, figures, appendices, etc., in the protocol checklist are found in the toxics modeling **Guideline**.

INSTRUCTIONS: The modeling report supporting the compliance demonstration should include most of the information listed below. As appropriate, answer the following questions or indicate by check mark the information provided or action taken is reflected in your report.

FACILITY INFORMATION

Facility Name:	Buck Combined Cycle Facility	Consultant (if applicable):	Environmental Consulting & Technology of North Carolina, PLLC
Facility ID:	8000004		
Address:	1385 Dukeville Road Salisbury, NC, 28146		7208 Falls Of Neuse Road Suite 102 Raleigh, NC 27615
Contact Name:	Dan Markley	Contact Name:	Thomas Pritcher
Phone Number:	(704)-382-0696	Phone Number:	919-861-8888
Email Address:	dan.markley@duke-energy.com	Email Address:	tpritcher@ectinc.com

GENERAL INFORMATION

Description of New Source or Source/Process Modification: Provide a short description of the new or modified source(s) and a brief discussion of how this change affects facility production or process operation.	<input checked="" type="checkbox"/> Included <input type="checkbox"/> N/A
Source/Pollutant Identification: Provide a table of the affected pollutants, by source, which identifies the source type (point, area, or volume), maximum pollutant emission rates over the applicable averaging period(s), and, for point sources, indicate if the stack is capped or non-vertical (C/N).	<input checked="" type="checkbox"/> Included <input type="checkbox"/> N/A
Pollutant Emission Rate Calculations: Indicate how the pollutant emission rates were derived (e.g. AP-42 emission factors, mass balance, etc.) and where applicable, provide the calculations	<input checked="" type="checkbox"/> Included <input type="checkbox"/> N/A
Site/Facility Diagram: Provide a diagram or drawing showing the location of all existing and proposed emission sources, buildings or structures, public right-of-ways, and the facility property (toxics)/fence line (criteria pollutants) boundaries. The diagram should also include a scale, true north indicator, and the UTM or latitude/longitude of at least one point.	<input checked="" type="checkbox"/> Included <input type="checkbox"/> N/A
Certified Plat or Signed Survey: a certified plat (map) from the County Register of Deeds or a signed survey must be submitted to validate property boundaries modeled.	<input checked="" type="checkbox"/> Included <input type="checkbox"/> N/A
Topographic Map: a topographic map covering approximately 5 km around the facility must be submitted. The facility boundaries should be annotated on the map as accurately as possible.	<input checked="" type="checkbox"/> Included <input type="checkbox"/> N/A
Cavity Impact Analysis: no cavity analysis is required if using AERMOD. <i>See Section 4.2</i>	<input type="checkbox"/> Included <input checked="" type="checkbox"/> N/A
Background Concentrations (criteria Pollutant analyses only): Background concentrations must be determined for each pollutant for each averaging period evaluated. The averaged background value used (e.g. high, high-second-high, high-third-high, etc.) is based on the pollutant and averaging period evaluated. The background concentrations are added to the modeled concentrations, which are then compared to the applicable air quality standard to determine compliance.	<input type="checkbox"/> Included <input checked="" type="checkbox"/> N/A
Offsite Source Inventories (criteria pollutant analyses only): Offsite source inventories must be developed and modeled for all pollutants for which onsite source emissions are modeled in excess of the specific pollutant significant impact levels (SILs) as defined in the PSD New Source Review Workshop Manual. The DAQ AQAB must approve the inventories. An initial working inventory can be requested from the AQAB.	<input type="checkbox"/> Included <input checked="" type="checkbox"/> N/A

Attach Additional Sheets as Necessary

SCREEN LEVEL MODELING		D6-2
Model: The latest version of the AERSCREEN model must be used. The use of other screening models should be approved by NCDAQ prior to submitting the modeling report.	AERSCREEN Version	NA
Source/Source Emission Parameters: Provide a table listing the sources modeled and the applicable source emission parameters. See NC Form 3 - Appendix A.		NA
Merged Sources: Identify merged sources and show all appropriate calculations. See Section 3.3		NA
GEP Analysis: See Section 3.2 and NC Form 1 - Appendix A		NA
Terrain: Indicate the terrain modeled: simple (Section 4.4), and complex (Section 4.5 and NC Form 4 -- Appendix A). If complex terrain is within 5 kilometers of the facility, complex terrain must be evaluated. Simple terrain must include terrain elevations if any terrain is greater than the stack base of any source modeled. Mark the appropriate terrain type.	<input type="checkbox"/> Simple <input type="checkbox"/> Complex	
Meteorology: Refer to Section 4.1 for AERSCREEN inputs.		NA
Receptors: AERSCREEN - use shortest distance to property boundary for each source modeled and use sufficient range to find maximum [See Section 4.1(i) and (j)]. Terrain above stack base must be evaluated.		NA
Modeling Results: For each affected pollutant, modeling results should be summarized, converted to the applicable averaging period (See Table 3), and presented in tabular format indicating compliance status with the applicable AAL, SIL, or NAAQS. See NC Form S5 - Appendix A.		NA
Modeling Files: Either electronic or hard copies of AERSCREEN output must be submitted.	<input type="checkbox"/> Electronic <input type="checkbox"/> Hard Copy	

REFINED LEVEL MODELING		
Model: The latest version of AERMOD should be used. The use of other refined models must be approved by NCDAQ prior to submitting the modeling report.	AERMOD Version	
The latest version of AERMOD may be found at the following web address: http://www.epa.gov/scram001/dispersion_prefrec.htm		16216r
Source/Source Emission Parameters: Provide a table listing the sources modeled and the applicable source emission parameters. See NC Form 3 - Appendix A.		Y
GEP Analysis: Use BPIP-Prime with AERMOD.		NA
Cavity Impact Analysis: No separate cavity analysis is required when using AERMOD as long as receptors are placed in cavity susceptible areas. See Section 4.2 and 5.2.		NA
Terrain: Use digital elevation data from the USGS NED database. Use of other sources of terrain elevations or the non-regulatory Flat Terrain option will require prior approval from DAQ AQAB.	<input checked="" type="checkbox"/> USGS NED <input type="checkbox"/> Other	
The USGS NED database can be found at the following web address: http://viewer.nationalmap.gov/launch/		
Coordinate System: Specify the coordinate system used (e.g. NAD27, NAD83, etc.) to identify the source, building, and receptor locations. Note: Be sure to specify in the AERMAP input file the correct base datum (NADA) to be used for identifying source input data locations. Clearly note in both the protocol checklist and the modeling report which datum was used.	Coordinate System:	NAD83
Receptors: The receptor grid should be of sufficient size and resolution to identify the maximum pollutant impact. See Section 5.3.		Y
Meteorology: Indicate the AQAB, pre-processed, 5-year data set used in the modeling demonstration: See Section 5.5 and Appendix B)	Data Set Used:	Charlotte (surface) / Greensboro (upper)
AERMOD Version:		NA
If processing your own raw meteorology, then pre-approval from AQAB is required. Additional documentation files (e.g. AERMET state processing files) will also be necessary. For NC toxics, the modeling demonstration requires only the last year of the standard 5-year data set (e.g. 2005) provided the maximum impacts are less than 50% of the applicable AAL(s).		NA
Modeling Results: For each affected pollutant and averaging period, modeling results should be summarized and presented in tabular format indicating compliance status with the applicable AAL, SIL, or NAAQS. See NC Form R5 - Appendix A.		Y
Modeling Files: Submit input and output files for AERMOD. Also include BPIP-Prime files, AERMAP files, DEM files, and any AERMET input and output files, including raw meteorological data.		Y

Attach Additional Sheets as Necessary

APPENDIX B
SUPPORTING EMISSION CALCULATIONS

TOXIC EMISSIONS-Modeling

Pollutants	Existing Turbine ES-11			Existing Turbine ES-12			Existing Auxiliary Boiler			Existing Auxiliary Equipment			STAR Facility			Total			TPER			Modeling Required?				
	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr	lb/hr	lb/day	lb/yr		
Sulfuric Acid Mist	1.7	40.8		1.7	40.8								1.00E-01	2.40	3.34	3.50	84.00		0.025	0.25		8.1	YES	YES	YES	
Benzene			220			220			0.206	1.38E-02	3.31E-01	1.38E+00			3.34		444.93				8.1			YES	YES	
Formaldehyde	4.46E-01			4.46E-01			0.00368			3.20E-03	7.68E-02	3.20E-01	7.64E-03			0.91			0.04					YES		YES
Hexane		3.94E+00			3.94E+00			2.1168						2.54						23.0				NO	NO	
Toluene	1.29E-01	3.10E+01		1.29E-01	3.10E+01		1.64E-04	3.94E-03		4.74E-03	1.14E-01	4.74E-01	1.32E-03	3.17E-02		0.26	62.15			14.4	98.0			NO	NO	
Arsenic			4.47			4.47			0.0196	6.97E-05	1.67E-03	6.97E-03			11.37							0.053			YES	
Beryllium			0.27			0.27			0.00118	5.23E-05	1.25E-03	5.23E-03			2.34							2.89			YES	
Cadmium			24.6			24.6			0.108	5.23E-05	1.25E-03	5.23E-03			2.58							0.37			YES	
Soluble chromate compounds as Chromium VI equivalent	1.43E-04	3.42E-03	1.25	1.43E-04	3.42E-03	1.25	6.27E-07	1.50E-05	0.00549	5.23E-05	1.25E-03	5.23E-03			4.14E-03		0.012								NO	
Manganese		2.33E-02			2.33E-02			0.000447		1.05E-04	2.51E-03	1.05E-02			6.70E-02		0.117					0.630			NO	
Mercury		9.86E-03			9.86E-03			0.000305		5.23E-05	1.25E-03	5.23E-03			5.66E-04		0.022					0.013			YES	
Nickel		1.29E-01			1.29E-01			0.00247		5.23E-05	1.25E-03	5.23E-03			4.06E-02		0.302					0.013			YES	

Existing Turbine: Bold values are emission limits listed in Permit 03786T34 condition 2.2-A.1. Values not in bold are from Buck Duct Burner Application 2-15-13, Form B.
 Existing Auxiliary Boiler: Values are from emission limits listed in Permit 03786T34 condition 2.2-A.1. Values not in bold from Buck Duct Burner Application, Table B-4.
 Existing Auxiliary Equipment: Includes emissions from existing emergency generators and fire water pump. Emissions from NC Emission Estimation Spreadsheets.
 Per conversation with Nancy Jones on April 11, 2017 Chromium VI was listed incorrectly in Permit 03786T34 as Non-specific Chromium VI. Chromium from NG combustion should be considered Soluable Chromate compounds
 Chromium VI total emission is less than TPER, but to be conservative it is still modeled because the emissions are very close to the threshold.

Duke Energy Buck Station
Facility-wide Emissions Summary - Shortterm

Pollutant	STAR [®] Fly Ash + Worst-Case Fuel Controlled Emissions		EHE Emissions		Silo/Dome Emissions		Pollution Control Silo Emissions		Wet Ash Receiving Emissions		Storage Pile Emissions		Ash Basin		Ash Handling		Haul Roads		Screener		Crusher		Screener/Crusher Engines		Facility Total Controlled Emissions		Facility Total Permitted Emissions			
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr		
PM ₁₀	4.87	--	5.36	--	0.05	--	0.11	--	7.62E-03	--	4.90E-03	--	5.07E-01	--	8.58E-02	--	1.65E-01	--	0.02	--	0.01	--	0.86	--	12.05	--	12.05	--		
PM _{2.5}	4.48	--	4.93	--	0.02	--	0.10	--	3.61E-03	--	2.45E-03	--	2.54E-01	--	4.06E-02	--	4.26E-02	--	0.01	--	0.004	--	0.86	--	10.75	--	10.75	--		
SO ₂	2.58	--	2.84	--	0.02	--	0.06	--	5.46E-04	--	9.81E-04	--	3.80E-02	--	6.14E-03	--	4.26E-03	--	0.0003	--	0.001	--	0.86	--	6.42	--	6.42	--		
NO _x	40.23	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.80	--	41.03	--	41.03	--		
CO	18.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	12.12	--	30.34	--	30.34	--		
CO ₂	47.60	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	12.12	--	59.72	--	59.72	--		
VOC	22.40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.61	--	25.01	--	25.01	--		
GHG (Mass Basis) ¹	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--		
GHG (CO ₂ e Basis) ²	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--		
Sulfuric Acid Mist	0.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.10	--	0.10	--		
Lead	6.48E-04	--	6.80E-04	--	6.34E-06	--	--	--	9.68E-07	--	6.23E-07	--	6.44E-05	--	1.09E-05	--	--	--	1.92E-06	--	1.05E-06	--	--	--	1.41E-03	--	1.41E-03	--		
Benzene	1.24E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.55E-03	--	2.68E-03	--	2.68E-03	--		
Formaldehyde	4.41E-03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	3.23E-03	--	7.64E-03	--	7.64E-03	--		
Hexane	1.06E-01	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.06E-01	--	1.06E-01	--	1.06E-01	--	
Toluene	2.00E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.12E-03	--	1.32E-03	--	1.32E-03	--		
Arsenic	5.89E-04	--	6.35E-04	--	5.92E-06	--	--	--	9.03E-07	--	5.81E-07	--	6.01E-05	--	1.02E-05	--	1.79E-06	--	9.78E-07	--	9.78E-07	--	--	--	1.30E-03	--	1.30E-03	--		
Berillium	1.20E-04	--	1.32E-04	--	1.23E-06	--	--	--	1.87E-07	--	1.26E-07	--	1.25E-05	--	2.11E-06	--	3.71E-07	--	2.03E-07	--	2.03E-07	--	--	--	2.69E-04	--	2.69E-04	--	2.69E-04	--
Cadmium	1.68E-04	--	1.13E-04	--	1.06E-06	--	--	--	1.61E-07	--	1.04E-07	--	1.07E-05	--	1.81E-06	--	3.20E-07	--	1.75E-07	--	1.75E-07	--	--	--	2.96E-04	--	2.96E-04	--	2.96E-04	--
Chromium	7.84E-04	--	7.71E-04	--	7.18E-06	--	--	--	1.10E-06	--	7.06E-07	--	7.30E-05	--	1.23E-05	--	2.18E-06	--	1.19E-06	--	1.19E-06	--	--	--	1.65E-03	--	1.65E-03	--	1.65E-03	--
Chromium VI	7.71E-05	--	8.48E-05	--	7.99E-07	--	--	--	1.21E-07	--	7.78E-08	--	8.03E-06	--	1.36E-06	--	2.39E-07	--	1.31E-07	--	1.31E-07	--	--	--	1.73E-04	--	1.73E-04	--	1.73E-04	--
Cobalt	2.85E-04	--	3.08E-04	--	2.87E-06	--	--	--	4.39E-07	--	2.82E-07	--	2.92E-05	--	4.94E-06	--	8.71E-07	--	4.75E-07	--	4.75E-07	--	--	--	6.33E-04	--	6.33E-04	--	6.33E-04	--
Manganese	1.26E-03	--	1.36E-03	--	1.27E-05	--	--	--	1.84E-06	--	1.25E-06	--	1.29E-04	--	2.18E-05	--	3.84E-06	--	2.10E-06	--	2.10E-06	--	--	--	2.79E-03	--	2.79E-03	--	2.79E-03	--
Mercury	1.90E-05	--	4.07E-06	--	3.78E-08	--	--	--	5.80E-09	--	3.73E-09	--	3.86E-07	--	6.52E-08	--	1.15E-08	--	6.47E-09	--	6.47E-09	--	--	--	2.36E-06	--	2.36E-06	--	2.36E-06	--
Nickel	8.25E-04	--	7.71E-04	--	7.18E-06	--	--	--	1.10E-06	--	7.06E-07	--	7.30E-05	--	1.23E-05	--	2.18E-06	--	1.19E-06	--	1.19E-06	--	--	--	1.65E-03	--	1.65E-03	--	1.65E-03	--
Selenium	1.91E-04	--	2.09E-04	--	1.94E-06	--	--	--	2.97E-07	--	1.91E-07	--	1.98E-05	--	3.34E-06	--	5.89E-07	--	3.21E-07	--	3.21E-07	--	--	--	4.26E-04	--	4.26E-04	--	4.26E-04	--
Xylenes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.80E-04	--	7.80E-04	--	7.80E-04	--	7.80E-04	--
1,3-Butadiene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.07E-04	--	1.07E-04	--	1.07E-04	--	1.07E-04	--
Acetaldehyde	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.10E-03	--	2.10E-03	--	2.10E-03	--	2.10E-03	--
Acrolein	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.53E-04	--	2.53E-04	--	2.53E-04	--	2.53E-04	--
Total PAH	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.60E-04	--	4.60E-04	--	4.60E-04	--	4.60E-04	--
Naphthalene	3.59E-05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.32E-04	--	2.68E-04	--	2.68E-04	--	2.68E-04	--
Acenaphthalene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.38E-05	--	1.38E-05	--	1.38E-05	--	1.38E-05	--
Acenaphthene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	3.89E-06	--	3.89E-06	--	3.89E-06	--	3.89E-06	--
Fluorene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.99E-05	--	7.99E-05	--	7.99E-05	--	7.99E-05	--
Phenanthrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	8.05E-05	--	8.05E-05	--	8.05E-05	--	8.05E-05	--
Anthracene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5.12E-06	--	5.12E-06	--	5.12E-06	--	5.12E-06	--
Fluoranthene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.08E-05	--	2.08E-05	--	2.08E-05	--	2.08E-05	--
Pyrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.31E-05	--	1.31E-05	--	1.31E-05	--	1.31E-05	--
Benzo(a)anthracene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.60E-06	--	4.60E-06	--	4.60E-06	--	4.60E-06	--
Chrysene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	9.66E-07	--	9.66E-07	--	9.66E-07	--	9.66E-07	--
Benzo(b)fluoranthene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.71E-07	--	2.71E-07	--	2.71E-07	--	2.71E-07	--
Benzo(k)fluoranthene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.24E-07	--	4.24E-07	--	4.24E-07	--	4.24E-07	--
Benzo(a)pyrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5.15E-07	--	5.15E-07	--	5.15E-07	--	5.15E-07	--
Indeno(1,2,3-cd)pyrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.03E-06	--	1.03E-06	--	1.03E-06	--	1.03E-06	--
Dibenz(a,h)anthracene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.60E-06	--	1.60E-06	--	1.60E-06	--	1.60E-06	--
Benzo(g,h,i)perylene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.34E-06	--	1.34E-06	--	1.34E-06	--	1.34E-06	--
Maximum HAP	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.05E-01	--	1.05E-01	--	1.05E-01	--	1.05E-01	--
Total HAP	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.31E-01	--	1.31E-01	--	1.31E-01	--	1.31E-01	--

Note: Duke Energy expects 6%-15% LOI. LOI will affect throughput. Duke Energy went up above 400,000 tpy.
¹ Based on SEFA stack test performed September 2016. Sulfuric Acid Mist was 0.05 lb/hr for contingency ECT doubled the number to 0.1 lb/hr.

NC15A NCAC 020 .0711 EMISSION RATES REQUIRING A PERMIT

Pollutant	Facility Total Controlled Emissions	
	lb/hr	lb/day
Sulfuric Acid Mist	1.06E-01	2.400
Benzene	7.64E-03	--
Formaldehyde	7.64E-03	2.541
Hexane	1.32E-03	0.032
Toluene	--	--
Arsenic	--	--
Berillium	--	--
Cadmium	--	--
Chromium	--	--
Chromium VI	0.004	--
Manganese	0.007	--
Mercury	0.001	--
Nickel	0.041	--

Duke Energy Buck Station
Facility-wide Emissions Summary - Annual

Pollutant	STAR [®] Fly Ash + Worst-Case Fuel Controlled Emissions		EHE Emissions		Silo/Dome Emissions		Pollution Control Silo Emissions		Wet Ash Receiving Emissions		Storage Pile Emissions		Ash Basin		Ash Handling		Haul Roads		Screeners		Crusher		Facility Total Controlled Emissions		Facility Total Permitted Emissions				
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr			
PM ₁₀	--	21.34	--	23.46	--	0.08	--	0.49	--	2.18E-02	--	2.15E-02	--	2.22E+00	--	3.78E-01	--	7.22E-01	--	1.97E-02	--	1.51E-03	--	3.81E-01	--	49.14	--	49.14	
PM _{2.5}	--	19.63	--	21.59	--	0.04	--	0.45	--	1.03E-02	--	1.07E-02	--	1.11E+00	--	1.78E-01	--	1.86E-01	--	6.61E-03	--	6.79E-04	--	3.81E-01	--	43.59	--	43.59	
PM _{2.5} - ex	--	11.31	--	12.44	--	0.04	--	0.26	--	1.56E-03	--	4.30E-03	--	1.67E-01	--	2.69E-02	--	1.87E-02	--	4.47E-04	--	1.25E-04	--	3.81E-01	--	24.64	--	24.64	
SO ₂	--	163.63	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.35	--	163.98	--	163.98	
NO _x	--	112.29	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5.36	--	117.66	--	117.66	
CO	--	91.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.16	--	92.26	--	92.26	
VOC	--	9.11	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.43	--	9.54	--	9.54	
GHG (Mass Basis) ¹	--	116.401	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	198.14	--	116.598.85	--	116.599	
GHG (CO ₂ e Basis) ¹	--	116.406	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	198.14	--	116.604.15	--	116.604	
Sulfuric Acid Mist ²	--	0.44	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	0.44	--	0.44	--	0.44
Lead	--	9.84E-03	--	2.98E-03	--	9.90E-06	--	--	--	2.77E-06	--	2.73E-06	--	2.82E-04	--	4.77E-05	--	--	2.50E-06	--	1.91E-07	--	--	--	6.17E-03	--	6.17E-03	--	6.17E-03
Benzene	--	5.41E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.13E-03	--	1.67E-03	--	1.67E-03	
Formaldehyde	--	1.93E-02	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.43E-03	--	2.08E-02	--	2.08E-02	
Hexane	--	4.64E-01	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.64E-01	--	4.64E-01	--	4.64E-01
Toluene	--	8.76E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.95E-04	--	1.37E-03	--	1.37E-03	
Arsenic	--	2.58E-03	--	2.78E-03	--	9.24E-06	--	--	--	2.58E-06	--	2.55E-06	--	2.63E-04	--	4.45E-05	--	--	2.33E-06	--	1.78E-07	--	--	--	5.69E-03	--	5.69E-03	--	5.69E-03
Beryllium	--	5.27E-04	--	5.76E-04	--	1.91E-06	--	--	--	5.35E-07	--	5.27E-07	--	5.45E-06	--	9.22E-06	--	--	4.83E-07	--	3.70E-08	--	--	--	1.17E-03	--	1.17E-03	--	1.17E-03
Cadmium	--	7.95E-04	--	4.97E-04	--	1.65E-06	--	--	--	4.61E-07	--	4.54E-07	--	4.70E-05	--	7.95E-06	--	--	4.16E-07	--	3.19E-08	--	--	--	9.29E-04	--	9.29E-04	--	9.29E-04
Chromium	--	3.43E-03	--	3.38E-03	--	1.12E-05	--	--	--	3.13E-06	--	3.09E-06	--	3.20E-04	--	5.41E-05	--	--	2.83E-06	--	2.17E-07	--	--	--	7.20E-03	--	7.20E-03	--	7.20E-03
Chromium VI	--	3.38E-04	--	3.71E-04	--	1.23E-06	--	--	--	3.45E-07	--	3.40E-07	--	3.52E-05	--	5.95E-06	--	--	3.11E-07	--	2.38E-08	--	--	--	7.53E-04	--	7.53E-04	--	7.53E-04
Cobalt	--	1.29E-03	--	1.35E-03	--	4.49E-06	--	--	--	1.25E-06	--	1.24E-06	--	1.29E-04	--	2.16E-05	--	--	1.13E-06	--	8.67E-07	--	--	--	2.76E-03	--	2.76E-03	--	2.76E-03
Manganese	--	5.52E-03	--	5.96E-03	--	1.98E-05	--	--	--	5.53E-06	--	5.45E-06	--	5.64E-04	--	9.54E-05	--	--	4.99E-06	--	3.82E-07	--	--	--	1.22E-02	--	1.22E-02	--	1.22E-02
Mercury	--	8.32E-05	--	1.78E-05	--	5.92E-08	--	--	--	1.66E-08	--	1.63E-08	--	1.69E-06	--	2.85E-07	--	--	1.49E-08	--	1.14E-09	--	--	--	1.03E-04	--	1.03E-04	--	1.03E-04
Nickel	--	3.61E-03	--	3.38E-03	--	1.12E-05	--	--	--	3.13E-06	--	3.09E-06	--	3.20E-04	--	5.41E-05	--	--	2.83E-06	--	2.17E-07	--	--	--	7.38E-03	--	7.38E-03	--	7.38E-03
Selenium	--	8.37E-04	--	9.14E-04	--	3.03E-06	--	--	--	8.48E-07	--	8.35E-07	--	8.65E-05	--	1.46E-05	--	--	7.66E-07	--	5.86E-08	--	--	--	1.86E-03	--	1.86E-03	--	1.86E-03
Xylenes	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	3.45E-04	--	3.45E-04	--	3.45E-04	
1,3-Butadiene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.74E-05	--	4.74E-05	--	4.74E-05	
Acetaldehyde	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	9.29E-04	--	9.29E-04	--	9.29E-04	
Acrolein	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.12E-04	--	1.12E-04	--	1.12E-04	
Total PAH	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.04E-04	--	2.04E-04	--	2.04E-04	
Naphthalene	--	1.57E-04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.03E-04	--	2.60E-04	--	2.60E-04	
Acenaphthalene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	6.13E-06	--	6.13E-06	--	6.13E-06	
Acenaphthylene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.72E-06	--	1.72E-06	--	1.72E-06	
Fluorene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	3.54E-05	--	3.54E-05	--	3.54E-05	
Phenanthrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	3.56E-05	--	3.56E-05	--	3.56E-05	
Anthracene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.27E-06	--	2.27E-06	--	2.27E-06	
Fluoranthene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	9.22E-06	--	9.22E-06	--	9.22E-06	
Pyrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5.79E-06	--	5.79E-06	--	5.79E-06	
Benzo(a)anthracene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.04E-06	--	2.04E-06	--	2.04E-06	
Chrysene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.28E-07	--	4.28E-07	--	4.28E-07	
Benzo(b)fluoranthene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.20E-07	--	1.20E-07	--	1.20E-07	
Benzo(k)fluoranthene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	1.88E-07	--	1.88E-07	--	1.88E-07	
Benzo(a)pyrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	2.28E-07	--	2.28E-07	--	2.28E-07	
Indeno(1,2,3-cd)pyrene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.54E-07	--	4.54E-07	--	4.54E-07	
Dibenz(a,h)anthracene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	7.06E-07	--	7.06E-07	--	7.06E-07	
Benzo(g,h,i)perylene	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5.92E-07	--	5.92E-07	--	5.92E-07	
Maximum HAP	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4.64E-01	--	4.64E-01	--	4.64E-01	
Total HAP	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	5.30E-01	--	5.30E-01	--	5.30E-01	

Note: Duke Energy expects 6%-15% LOI. LOI will affect throughput. Duke Energy won't go above 400,000 tpy.
¹ Based on SEFA stack test performed September 2016. Sulfuric Acid Mist was 0.05 lb/hr for contingency ECT doubled the number to 0.1 lb/hr.

NC15A NCAC 02Q .0711 EMISSION RATES REQUIRING A PERMIT

Pollutant	Facility Total Controlled Emissions		
	lb/hr	lb/day	lb/yr
Sulfuric Acid Mist	--	--	3,342
Benzene	--	--	--
Formaldehyde	--	--	--
Hexane	--	--	--
Toluene	--	--	11,373
Arsenic	--	--	2,341
Beryllium	--	--	2,579
Cadmium	--	--	14,407
Chromium	--	--	1,505
Chromium VI	--		

Duke Energy Buck Station
STAR® Emissions - Shortterm (ES-74)

Natural Gas Emissions

Pollutant	Emission Factor	Units	Throughput	Units	Emissions		Reference
					lb/hr	ton/yr	
PM/PM ₁₀ /PM _{2.5}	7.6	lb/MMscf	58,824	scf/hr	0.45	1.96	EPA AP-42, Table 1.4-2 (07/98)
SO ₂	0.6	lb/MMscf	58,824	scf/hr	0.04	0.15	EPA AP-42, Table 1.4-2 (07/98)
NO _x	140	lb/MMscf	58,824	scf/hr	8.24	36.07	EPA AP-42, Table 1.4-1 (07/98)
CO	84	lb/MMscf	58,824	scf/hr	4.94	21.64	EPA AP-42, Table 1.4-1 (07/98)
VOC	5.5	lb/MMscf	58,824	scf/hr	0.32	1.42	EPA AP-42, Table 1.4-2 (07/98)
Lead	0.0005	lb/MMscf	58,824	scf/hr	2.94E-05	1.29E-04	EPA AP-42, Table 1.4-2 (07/98)
Benzene	0.0021	lb/MMscf	58,824	scf/hr	1.24E-04	5.41E-04	EPA AP-42, Table 1.4-3 (07/98)
Formaldehyde	0.075	lb/MMscf	58,824	scf/hr	4.41E-03	1.93E-02	EPA AP-42, Table 1.4-3 (07/98)
Hexane	1.8	lb/MMscf	58,824	scf/hr	1.06E-01	4.64E-01	EPA AP-42, Table 1.4-3 (07/98)
Naphthalene	0.00061	lb/MMscf	58,824	scf/hr	3.59E-05	1.57E-04	EPA AP-42, Table 1.4-3 (07/98)
Toluene	0.0034	lb/MMscf	58,824	scf/hr	2.00E-04	8.76E-04	EPA AP-42, Table 1.4-3 (07/98)
Arsenic	0.0002	lb/MMscf	58,824	scf/hr	1.18E-05	5.15E-05	EPA AP-42, Table 1.4-4 (07/98)
Beryllium	0.000012	lb/MMscf	58,824	scf/hr	7.06E-07	3.09E-06	EPA AP-42, Table 1.4-4 (07/98)
Cadmium	0.0011	lb/MMscf	58,824	scf/hr	6.47E-05	2.83E-04	EPA AP-42, Table 1.4-4 (07/98)
Chromium	0.0014	lb/MMscf	58,824	scf/hr	8.24E-05	3.61E-04	EPA AP-42, Table 1.4-4 (07/98)
Cobalt	0.000084	lb/MMscf	58,824	scf/hr	4.94E-06	2.16E-05	EPA AP-42, Table 1.4-4 (07/98)
Manganese	0.00038	lb/MMscf	58,824	scf/hr	2.24E-05	9.79E-05	EPA AP-42, Table 1.4-4 (07/98)
Mercury	0.00026	lb/MMscf	58,824	scf/hr	1.53E-05	6.70E-05	EPA AP-42, Table 1.4-4 (07/98)
Nickel	0.0021	lb/MMscf	58,824	scf/hr	1.24E-04	5.41E-04	EPA AP-42, Table 1.4-4 (07/98)
Selenium	0.000024	lb/MMscf	58,824	scf/hr	1.41E-06	6.18E-06	EPA AP-42, Table 1.4-4 (07/98)

Sample Calculations

$$\text{Natural Gas Flow} = \frac{60 \text{ MMBtu}}{\text{hr}} \times \frac{10^6 \text{ Btu}}{\text{MMBtu}} \times \frac{\text{scf Nat. Gas}}{1020 \text{ Btu}} = 58,824 \text{ scf/hr Natural Gas}$$

$$\text{NO}_x \text{ Emissions} = \frac{58824 \text{ scf}}{\text{hr}} \times \frac{\text{MMscf}}{10^6 \text{ scf}} \times \frac{140 \text{ lb NO}_x}{\text{MMscf}} = 8.24 \text{ lb/hr NO}_x$$

$$\frac{8.24 \text{ lb NO}_x}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 36.07 \text{ tpy NO}_x$$

$$\text{CO Emissions} = \frac{58824 \text{ scf}}{\text{hr}} \times \frac{\text{MMscf}}{10^6 \text{ scf}} \times \frac{84 \text{ lb CO}}{\text{MMscf}} = 4.94 \text{ lb/hr CO}$$

$$\frac{4.94 \text{ lb CO}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 21.64 \text{ tpy CO}$$

Annual Natural Gas usage provided by SEFA

Duke Energy Buck Station
STAR® Emissions - Shortterm (ES-74)

Propane Emissions

Pollutant	Emission Factor	Units	Throughput	Units	Emissions		Reference
					lb/hr	ton/yr	
PM/PM ₁₀ /PM _{2.5}	0.7	lb/10 ³ gal	663	gal/hr	0.46	2.03	EPA AP-42, Table 1.5-1 (07/08)
SO ₂	0.018	lb/10 ³ gal	663	gal/hr	0.01	0.05	EPA AP-42, Table 1.5-1 (07/08)
NO _x	13	lb/10 ³ gal	663	gal/hr	8.62	37.75	EPA AP-42, Table 1.5-1 (07/08)
CO	7.5	lb/10 ³ gal	663	gal/hr	4.97	21.78	EPA AP-42, Table 1.5-1 (07/08)
VOC	1	lb/10 ³ gal	663	gal/hr	0.66	2.90	EPA AP-42, Table 1.5-1 (07/08)

Propane sulfur content 0.18 gr/100 ft3

Sample Calculations

$$\text{Propane Flow} = \frac{60 \text{ MMBtu}}{\text{hr}} \times \frac{10^6 \text{ Btu}}{\text{MMBtu}} \times \frac{\text{gal Propane}}{90,500 \text{ Btu}} = 663 \text{ gal/hr Propane}$$

$$\text{NO}_x \text{ Emissions} = \frac{663 \text{ gal}}{\text{hr}} \times \frac{10^3 \text{ gal}}{1000 \text{ gal}} \times \frac{13 \text{ lb NO}_x}{10^3 \text{ gal}} = 8.62 \text{ lb/hr NO}_x$$

$$\frac{8.62 \text{ lb NO}_x}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 37.75 \text{ tpy NO}_x$$

$$\text{CO Emissions} = \frac{663 \text{ gal}}{\text{hr}} \times \frac{10^3 \text{ gal}}{1000 \text{ gal}} \times \frac{7.5 \text{ lb CO}}{10^3 \text{ gal}} = 4.97 \text{ lb/hr CO}$$

$$\frac{4.97 \text{ lb CO}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 21.78 \text{ tpy CO}$$

Annual Propane usage provided by SEFA

Duke Energy Buck Station
STAR® Emissions - Shortterm (ES-74)

Flvash Emissions

Pollutant	Emission Factor	Units	Throughput	Units	Uncontrolled Emissions		Controlled Emissions		Reference
					lb/hr	ton/yr	lb/hr	ton/yr	
NO _x	0.12	lb/MMBtu	140	MMBtu/hr	16.80	73.58	16.80	73.58	Emission Factor based on information provided by The SEFA Group Inc.
NO _x	0.34	lb/MMBtu	140	MMBtu/hr	47.60	208.49	47.60	208.49	Emission Factor based on information provided by The SEFA Group Inc.
CO	0.16	lb/MMBtu	140	MMBtu/hr	22.40	98.11	22.40	98.11	Emission Factor based on information provided by The SEFA Group Inc.
VOC	0.016	lb/MMBtu	140	MMBtu/hr	2.24	9.81	2.24	9.81	Emission Factor based on information provided by The SEFA Group Inc.
Lead	126.99	ppmw			6.19E-04	2.71E-03	6.19E-04	2.71E-03	Duke Energy Average Ash Analysis
Arsenic	118.52	ppmw			5.77E-04	2.53E-03	5.77E-04	2.53E-03	Duke Energy Average Ash Analysis
Beryllium	24.55	ppmw			1.20E-04	5.24E-04	1.20E-04	5.24E-04	Duke Energy Average Ash Analysis
Cadmium	21.16	ppmw			1.03E-04	4.52E-04	1.03E-04	4.52E-04	Duke Energy Average Ash Analysis
Chromium	143.92	ppmw			7.01E-04	3.07E-03	7.01E-04	3.07E-03	Duke Energy Average Ash Analysis
Chromium VI	15.83	ppmw			7.71E-05	3.38E-04	7.71E-05	3.38E-04	Duke Energy Average Ash Analysis
Cobalt	57.57	ppmw			2.81E-04	1.23E-03	2.81E-04	1.23E-03	Duke Energy Average Ash Analysis
Manganese	253.98	ppmw			1.24E-03	5.42E-03	1.24E-03	5.42E-03	Duke Energy Average Ash Analysis
Mercury	0.76	ppmw			3.70E-06	1.62E-05	3.70E-06	1.62E-05	Duke Energy Average Ash Analysis
Nickel	143.92	ppmw			7.01E-04	3.07E-03	7.01E-04	3.07E-03	Duke Energy Average Ash Analysis
Selenium	38.94	ppmw			1.90E-04	8.31E-04	1.90E-04	8.31E-04	Duke Energy Average Ash Analysis

Sample Calculations

$$\text{NO}_x \text{ Emissions} = \frac{0.12 \text{ lb NO}_x}{\text{MMBtu}} \times \frac{140 \text{ MMBtu}}{\text{hour}} = 16.80 \text{ lb/hr NO}_x$$

$$\text{Arsenic Emissions (Uncontrolled)} = \frac{118.52 \text{ lb As}}{10^6 \text{ lb}} \times \frac{4.87 \text{ lb PM}}{\text{hr}} = 5.77\text{E-}04 \text{ lb/hr Arsenic}$$

Duke Energy Buck Station
STAR® Emissions - Shortterm (ES-74)

Worst-Case STAR® Reactor Unit Emissions

Pollutant	Natural Gas Emissions		Propane Emissions		Fly Ash Emissions		STAR® Reactor Fly Ash + Worst-Case Fuel Controlled Emissions		STAR® Reactor Fly Ash + Worst-Case Fuel Permitted Emissions	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
PM	--	--	--	--	--	--	4.87	--	4.87	--
PM ₁₀	--	--	--	--	--	--	4.48	--	4.48	--
PM _{2.5}	--	--	--	--	--	--	2.58	--	2.58	--
SO ₂	--	--	--	--	--	--	40.23	--	40.23	--
NO _x	8.24	36.07	8.62	37.75	16.80	73.58	18.22	--	18.22	--
NO _x	8.24	36.07	8.62	37.75	47.60	208.49	35.82	--	47.60	--
CO	4.94	21.64	4.97	21.78	22.40	98.11	17.77	--	22.40	--
VOC	0.32	1.42	0.66	2.90	2.24	9.81	1.94	--	2.24	--
Lead	2.94E-05	1.29E-04			6.19E-04	2.71E-03	6.48E-04	--	6.48E-04	--
Benzene	1.24E-04	5.41E-04					1.24E-04	--	1.24E-04	--
Formaldehyde	4.41E-03	1.93E-02					4.41E-03	--	4.41E-03	--
Hexane	1.06E-01	4.64E-01					1.06E-01	--	1.06E-01	--
Naphthalene	3.59E-05	1.57E-04					3.59E-05	--	3.59E-05	--
Toluene	2.00E-04	8.76E-04					2.00E-04	--	2.00E-04	--
Arsenic	1.18E-05	5.15E-05			5.77E-04	2.53E-03	5.89E-04	--	5.89E-04	--
Beryllium	7.06E-07	3.09E-06			1.20E-04	5.24E-04	1.20E-04	--	1.20E-04	--
Cadmium	6.47E-05	2.83E-04			1.03E-04	4.52E-04	1.68E-04	--	1.68E-04	--
Chromium	8.24E-05	3.61E-04			7.01E-04	3.07E-03	7.84E-04	--	7.84E-04	--
Chromium VI					7.71E-05	3.38E-04	7.71E-05	--	7.71E-05	--
Cobalt	4.94E-06	2.16E-05			2.81E-04	1.23E-03	2.85E-04	--	2.85E-04	--
Manganese	2.24E-05	9.79E-05			1.24E-03	5.42E-03	1.26E-03	--	1.26E-03	--
Mercury	1.53E-05	6.70E-05			3.70E-06	1.62E-05	1.90E-05	--	1.90E-05	--
Nickel	1.24E-04	5.41E-04			7.01E-04	3.07E-03	8.25E-04	--	8.25E-04	--
Selenium	1.41E-06	6.18E-06			1.90E-04	8.31E-04	1.91E-04	--	1.91E-04	--

Duke Energy Buck Station
STAR® Emissions - Annual (ES-74)

Natural Gas Emissions

Pollutant	Emission Factor	Units	Throughput	Units	Emissions		Reference
					lb/hr	ton/yr	
PM/PM ₁₀ /PM _{2.5}	7.6	lb/MMscf	58,824	scf/hr	0.45	1.96	EPA AP-42, Table 1.4-2 (07/98)
SO ₂	0.6	lb/MMscf	58,824	scf/hr	0.04	0.15	EPA AP-42, Table 1.4-2 (07/98)
NO _x	140	lb/MMscf	58,824	scf/hr	8.24	36.07	EPA AP-42, Table 1.4-1 (07/98)
CO	84	lb/MMscf	58,824	scf/hr	4.94	21.64	EPA AP-42, Table 1.4-1 (07/98)
VOC	5.5	lb/MMscf	58,824	scf/hr	0.32	1.42	EPA AP-42, Table 1.4-2 (07/98)
Lead	0.0005	lb/MMscf	58,824	scf/hr	2.94E-05	1.29E-04	EPA AP-42, Table 1.4-2 (07/98)
Benzene	0.0021	lb/MMscf	58,824	scf/hr	1.24E-04	5.41E-04	EPA AP-42, Table 1.4-3 (07/98)
Formaldehyde	0.075	lb/MMscf	58,824	scf/hr	4.41E-03	1.93E-02	EPA AP-42, Table 1.4-3 (07/98)
Hexane	1.8	lb/MMscf	58,824	scf/hr	1.06E-01	4.64E-01	EPA AP-42, Table 1.4-3 (07/98)
Naphthalene	0.00061	lb/MMscf	58,824	scf/hr	3.59E-05	1.57E-04	EPA AP-42, Table 1.4-3 (07/98)
Toluene	0.0034	lb/MMscf	58,824	scf/hr	2.00E-04	8.76E-04	EPA AP-42, Table 1.4-3 (07/98)
Arsenic	0.0002	lb/MMscf	58,824	scf/hr	1.18E-05	5.15E-05	EPA AP-42, Table 1.4-4 (07/98)
Beryllium	0.000012	lb/MMscf	58,824	scf/hr	7.06E-07	3.09E-06	EPA AP-42, Table 1.4-4 (07/98)
Cadmium	0.0011	lb/MMscf	58,824	scf/hr	6.47E-05	2.83E-04	EPA AP-42, Table 1.4-4 (07/98)
Chromium	0.0014	lb/MMscf	58,824	scf/hr	8.24E-05	3.61E-04	EPA AP-42, Table 1.4-4 (07/98)
Cobalt	0.000084	lb/MMscf	58,824	scf/hr	4.94E-06	2.16E-05	EPA AP-42, Table 1.4-4 (07/98)
Manganese	0.00038	lb/MMscf	58,824	scf/hr	2.24E-05	9.79E-05	EPA AP-42, Table 1.4-4 (07/98)
Mercury	0.00026	lb/MMscf	58,824	scf/hr	1.53E-05	6.70E-05	EPA AP-42, Table 1.4-4 (07/98)
Nickel	0.0021	lb/MMscf	58,824	scf/hr	1.24E-04	5.41E-04	EPA AP-42, Table 1.4-4 (07/98)
Selenium	0.000024	lb/MMscf	58,824	scf/hr	1.41E-06	6.18E-06	EPA AP-42, Table 1.4-4 (07/98)

Sample Calculations

$$\text{Natural Gas Flow} = \frac{60 \text{ MMBtu}}{\text{hr}} \times \frac{10^6 \text{ Btu}}{\text{MMBtu}} \times \frac{\text{scf Nat. Gas}}{1020 \text{ Btu}} = 58,824 \text{ scf/hr Natural Gas}$$

$$\text{NO}_x \text{ Emissions} = \frac{58824 \text{ scf}}{\text{hr}} \times \frac{\text{MMscf}}{10^6 \text{ scf}} \times \frac{140 \text{ lb NO}_x}{\text{MMscf}} = 8.24 \text{ lb/hr NO}_x$$

$$\frac{8.24 \text{ lb NO}_x}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 36.07 \text{ tpy NO}_x$$

$$\text{CO Emissions} = \frac{58824 \text{ scf}}{\text{hr}} \times \frac{\text{MMscf}}{10^6 \text{ scf}} \times \frac{84 \text{ lb CO}}{\text{MMscf}} = 4.94 \text{ lb/hr CO}$$

$$\frac{4.94 \text{ lb CO}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 21.64 \text{ tpy CO}$$

Annual Natural Gas usage provided by SEFA

Duke Energy Buck Station
STAR® Emissions - Annual (ES-74)

Propane Emissions

Pollutant	Emission Factor	Units	Throughput	Units	Emissions		Reference
					lb/hr	ton/yr	
PM/PM ₁₀ /PM _{2.5}	0.7	lb/10 ³ gal	663	gal/hr	0.46	2.03	EPA AP-42, Table 1.5-1 (07/08)
SO ₂	0.018	lb/10 ³ gal	663	gal/hr	0.01	0.05	EPA AP-42, Table 1.5-1 (07/08)
NO _x	13	lb/10 ³ gal	663	gal/hr	8.62	37.75	EPA AP-42, Table 1.5-1 (07/08)
CO	7.5	lb/10 ³ gal	663	gal/hr	4.97	21.78	EPA AP-42, Table 1.5-1 (07/08)
VOC	1	lb/10 ³ gal	663	gal/hr	0.66	2.90	EPA AP-42, Table 1.5-1 (07/08)

Propane sulfur content 0.18 gr/100 ft3

Sample Calculations

$$\text{Propane Flow} = \frac{60 \text{ MMBtu}}{\text{hr}} \times \frac{10^6 \text{ Btu}}{\text{MMBtu}} \times \frac{\text{gal Propane}}{90,500 \text{ Btu}} = 663 \text{ gal/hr Propane}$$

$$\text{NO}_x \text{ Emissions} = \frac{663 \text{ gal}}{\text{hr}} \times \frac{10^3 \text{ gal}}{1000 \text{ gal}} \times \frac{13 \text{ lb NO}_x}{10^3 \text{ gal}} = 8.62 \text{ lb/hr NO}_x$$

$$\frac{8.62 \text{ lb NO}_x}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 37.75 \text{ tpy NO}_x$$

$$\text{CO Emissions} = \frac{663 \text{ gal}}{\text{hr}} \times \frac{10^3 \text{ gal}}{1000 \text{ gal}} \times \frac{7.5 \text{ lb CO}}{10^3 \text{ gal}} = 4.97 \text{ lb/hr CO}$$

$$\frac{4.97 \text{ lb CO}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2000 \text{ lb}} = 21.78 \text{ tpy CO}$$

Annual Propane usage provided by SEFA

Duke Energy Buck Station
STAR® Emissions - Annual (ES-74)

Flvash Emissions

Pollutant	Emission Factor	Units	Throughput	Units	Uncontrolled Emissions		Controlled Emissions		Reference
					lb/hr	ton/yr	lb/hr	ton/yr	
NO _x	0.12	lb/MMBtu	130	MMBtu/hr	15.60	68.33	15.60	68.33	Emission Factor based on information provided by The SEFA Group Inc.
NO _x	0.34	lb/MMBtu	130	MMBtu/hr	44.20	193.60	44.20	193.60	Emission Factor based on information provided by The SEFA Group Inc.
CO	0.16	lb/MMBtu	130	MMBtu/hr	20.80	91.10	20.80	91.10	Emission Factor based on information provided by The SEFA Group Inc.
VOC	0.016	lb/MMBtu	130	MMBtu/hr	2.08	9.11	2.08	9.11	Emission Factor based on information provided by The SEFA Group Inc.
Lead	126.99	ppmw			6.19E-04	2.71E-03	6.19E-04	2.71E-03	Duke Energy Average Ash Analysis
Arsenic	118.52	ppmw			5.77E-04	2.53E-03	5.77E-04	2.53E-03	Duke Energy Average Ash Analysis
Beryllium	24.55	ppmw			1.20E-04	5.24E-04	1.20E-04	5.24E-04	Duke Energy Average Ash Analysis
Cadmium	21.16	ppmw			1.03E-04	4.52E-04	1.03E-04	4.52E-04	Duke Energy Average Ash Analysis
Chromium	143.92	ppmw			7.01E-04	3.07E-03	7.01E-04	3.07E-03	Duke Energy Average Ash Analysis
Chromium VI	15.83	ppmw			7.71E-05	3.38E-04	7.71E-05	3.38E-04	Duke Energy Average Ash Analysis
Cobalt	57.57	ppmw			2.81E-04	1.23E-03	2.81E-04	1.23E-03	Duke Energy Average Ash Analysis
Manganese	253.98	ppmw			1.24E-03	5.42E-03	1.24E-03	5.42E-03	Duke Energy Average Ash Analysis
Mercury	0.76	ppmw			3.70E-06	1.62E-05	3.70E-06	1.62E-05	Duke Energy Average Ash Analysis
Nickel	143.92	ppmw			7.01E-04	3.07E-03	7.01E-04	3.07E-03	Duke Energy Average Ash Analysis
Selenium	38.94	ppmw			1.90E-04	8.31E-04	1.90E-04	8.31E-04	Duke Energy Average Ash Analysis

Sample Calculations

$$\text{NO}_x \text{ Emissions} = \frac{0.12 \text{ lb NO}_x}{\text{MMBtu}} \times \frac{130 \text{ MMBtu}}{\text{hour}} = 15.60 \text{ lb/hr NO}_x$$

$$\text{Arsenic Emissions (Uncontrolled)} = \frac{118.52 \text{ lb As}}{10^6 \text{ lb}} \times \frac{4.87 \text{ lb PM}}{\text{hr}} = 5.77\text{E-}04 \text{ lb/hr Arsenic}$$

Duke Energy Buck Station
STAR® Emissions - Annual (ES-74)

Worst-Case STAR® Reactor Unit Emissions

Pollutant	Natural Gas Emissions		Propane Emissions		Fly Ash Emissions		STAR® Reactor Fly Ash + Worst-Case Fuel Controlled Emissions		STAR® Reactor Fly Ash + Worst-Case Fuel Permitted Emissions	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
PM	--	--	--	--	--	--	--	21.34	--	21.34
PM ₁₀	--	--	--	--	--	--	--	19.63	--	19.63
PM _{2.5}	--	--	--	--	--	--	--	11.31	--	11.31
SO ₂	--	--	--	--	--	--	--	163.63	--	163.63
NO _x	8.24	36.07	8.62	37.75	15.60	68.33	--	112.29	--	112.29
CO	4.94	21.64	4.97	21.78	20.80	91.10	--	70.84	--	91.10
VOC	0.32	1.42	0.66	2.90	2.08	9.11	--	7.81	--	9.11
Lead	2.94E-05	1.29E-04			6.19E-04	2.71E-03	--	2.84E-03	--	2.84E-03
Benzene	1.24E-04	5.41E-04					--	5.41E-04	--	5.41E-04
Formaldehyde	4.41E-03	1.93E-02					--	1.93E-02	--	1.93E-02
Hexane	1.06E-01	4.64E-01					--	4.64E-01	--	4.64E-01
Naphthalene	3.59E-05	1.57E-04					--	1.57E-04	--	1.57E-04
Toluene	2.00E-04	8.76E-04					--	8.76E-04	--	8.76E-04
Arsenic	1.18E-05	5.15E-05			5.77E-04	2.53E-03	--	2.58E-03	--	2.58E-03
Beryllium	7.06E-07	3.09E-06			1.20E-04	5.24E-04	--	5.27E-04	--	5.27E-04
Cadmium	6.47E-05	2.83E-04			1.03E-04	4.52E-04	--	7.35E-04	--	7.35E-04
Chromium	8.24E-05	3.61E-04			7.01E-04	3.07E-03	--	3.43E-03	--	3.43E-03
Chromium VI					7.71E-05	3.38E-04	--	3.38E-04	--	3.38E-04
Cobalt	4.94E-06	2.16E-05			2.81E-04	1.23E-03	--	1.25E-03	--	1.25E-03
Manganese	2.24E-05	9.79E-05			1.24E-03	5.42E-03	--	5.52E-03	--	5.52E-03
Mercury	1.53E-05	6.70E-05			3.70E-06	1.62E-05	--	8.32E-05	--	8.32E-05
Nickel	1.24E-04	5.41E-04			7.01E-04	3.07E-03	--	3.61E-03	--	3.61E-03
Selenium	1.41E-06	6.18E-06			1.90E-04	8.31E-04	--	8.37E-04	--	8.37E-04

Duke Energy Buck Station
STAR[®] Emissions - PM - Shortterm (ES-74)

Est. Gas Flow, acfm	56,846
PM Emission Rate, gr/acf	0.01
Estimated Emissions	
PM (lb/hr)	4.87
PM (TPY)	21.34
	lb/hr
PM	4.87
PM ₁₀ (Note 2)	4.48
PM _{2.5} (Note 3)	2.58

Notes:

1. PM Emission Factor (grains/acf)
2. PM₁₀ = 92% of Total PM (From AP-42 Table 1.1-6 (09/98))
3. PM_{2.5} = 53% of Total PM (From AP-42 Table 1.1-6 (09/98))
4. TPY = Tons per Year

Duke Energy Buck Station
STAR® Emissions - SO₂ - Shortterm (ES-74)

Process Throughput										
Raw Feed LOI (%)	6.0%	7.0%	8.0%	9.0%	10.0%	11.0%	12.0%	13.0%	14.0%	15.0%
Max Heat Input (MMBtu/hr)	140	140	140	140	140	140	140	140	140	140
Carbon (lb/hr)	9,655	9,655	9,655	9,655	9,655	9,655	9,655	9,655	9,655	9,655
Raw Feed Rate (TPH)	80.46	68.97	60.34	53.64	48.28	43.89	40.23	37.14	34.48	32.18
Feed Ash Sulfur %	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%
Estimated Emissions										
SO ₂ (lb/hr) - Uncontrolled - Ash	804.60	689.66	603.45	536.40	482.76	438.87	402.30	371.35	344.83	321.84
SO ₂ (lb/hr) - Uncontrolled - NG/Propane	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04
SO ₂ (lb/hr) - Uncontrolled - Total	804.63	689.69	603.48	536.43	482.79	438.91	402.33	371.39	344.86	321.87
SO ₂ (lb/hr) - Controlled										
95.00%	40.23	34.48	30.17	26.82	24.14	21.95	20.12	18.57	17.24	16.09

Duke Energy Buck Station
STAR® Emissions - SO₂ - Annual (ES-74)

Process Throughput										
Raw Feed LOI (%)	6.0%	7.0%	8.0%	9.0%	10.0%	11.0%	12.0%	13.0%	14.0%	15.0%
Max Heat Input (MMBtu/hr)	130	130	130	130	130	130	130	130	130	130
Carbon (lb/hr)	8,966	8,966	8,966	8,966	8,966	8,966	8,966	8,966	8,966	8,966
Raw Feed Rate (TPH)	74.71	64.04	56.03	49.81	44.83	40.75	37.36	34.48	32.02	29.89
Feed Ash Sulfur %	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%	0.25%
Estimated Emissions										
SO ₂ (lb/hr) - Uncontrolled - Ash	747.13	640.39	560.34	498.08	448.28	407.52	373.56	344.83	320.20	298.85
SO ₂ (lb/hr) - Uncontrolled - NG/Propane	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04	0.04
SO ₂ (lb/hr) - Uncontrolled - Total	747.16	640.43	560.38	498.12	448.31	407.56	373.60	344.86	320.23	298.89
SO ₂ (lb/hr) - Controlled										
95.00%	37.36	32.02	28.02	24.91	22.42	20.38	18.68	17.24	16.01	14.94

Duke Energy Buck Station EHE Emissions Unit 1 and Unit 2 (ES-77 and ES-78)

Total operation of unit 1 and 2 combined will not exceed 8760 hours per years
Therefore annual emission are based on the lb/hr of a single unit * 8760 hours per year.

	Est. Emissions	
	lb/hr (per unit)	TPY (Total for both units)
PM ^(Note 2)	5.36	23.46
PM ₁₀ ^(Note 3)	4.93	21.59
PM _{2.5} ^(Note 4)	2.84	12.44

Pollutant	Emission Factor	Units	Emissions		Reference
			lb/hr (per unit)	ton/yr (Total for both units)	
Lead	126.99	ppmw	6.80E-04	2.98E-03	Duke Energy Average Ash Analysis
Arsenic	118.52	ppmw	6.35E-04	2.78E-03	Duke Energy Average Ash Analysis
Beryllium	24.55	ppmw	1.32E-04	5.76E-04	Duke Energy Average Ash Analysis
Cadmium	21.16	ppmw	1.13E-04	4.97E-04	Duke Energy Average Ash Analysis
Chromium	143.92	ppmw	7.71E-04	3.38E-03	Duke Energy Average Ash Analysis
Chromium VI	15.83	ppmw	8.48E-05	3.71E-04	Duke Energy Average Ash Analysis
Cobalt	57.57	ppmw	3.08E-04	1.35E-03	Duke Energy Average Ash Analysis
Manganese	253.98	ppmw	1.36E-03	5.96E-03	Duke Energy Average Ash Analysis
Mercury	0.76	ppmw	4.07E-06	1.78E-05	Duke Energy Average Ash Analysis
Nickel	143.92	ppmw	7.71E-04	3.38E-03	Duke Energy Average Ash Analysis
Selenium	38.94	ppmw	2.09E-04	9.14E-04	Duke Energy Average Ash Analysis

Notes:

1. Exhaust Flow (dSCFM): 25,000
2. PM Emission Factor (grains/dSCF) 0.025 Vendor Guarantee
3. PM₁₀ = 92% of Total PM (From AP-42 Table 1.1-6 (09/98))
4. PM_{2.5} = 53% of Total PM (From AP-42 Table 1.1-6 (09/98))
5. TPY = Tons per Year

**Duke Energy Buck Station
Silos and Dome Emissions**

Potential Emissions

Pollutant	Emission Factor	Units	ES-73A Feed Silo Filling (125 tph, 400,000 tpy)		ES-73B Feed Silo Unloading (75 tph, 400,000 tpy)		ES-81 Loadout Silo (75 tph, 400,000 tpy)		ES-81A Loadout Silo Chute 1A (100 tph, 200,000 tpy)		ES-81B Loadout Silo Chute 1B (100 tph, 200,000 tpy)		ES-80A Storage Dome Filling (75 tph, 400,000 tpy)		ES-80B Storage Dome Unloading (275 tph, 400,000 tpy)		ES-79A Transfer Silo Filling (125 tph, 400,000 tpy)		ES-79B Transfer Silo Unloading (75 tph, 400,000 tpy)		Total Silo Emissions		Reference
			lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	
PM	0.0000487	lb/ton	6.09E-03	9.74E-03	3.65E-03	9.74E-03	3.65E-03	9.74E-03	4.87E-03	4.87E-03	4.87E-03	4.87E-03	3.65E-03	9.74E-03	1.34E-02	9.74E-03	6.09E-03	9.74E-03	3.65E-03	9.74E-03	4.99E-02	7.79E-02	Emission Factor based on information provided by The SEFA Group Inc.
PM ₁₀	0.000023	lb/ton	2.88E-03	4.60E-03	1.73E-03	4.60E-03	1.73E-03	4.60E-03	2.30E-03	2.30E-03	2.30E-03	2.30E-03	1.73E-03	4.60E-03	6.33E-03	4.60E-03	2.88E-03	4.60E-03	1.73E-03	4.60E-03	2.36E-02	3.68E-02	Emission Factor based on information provided by The SEFA Group Inc.
PM _{2.5}	0.000023	lb/ton	2.88E-03	4.60E-03	1.73E-03	4.60E-03	1.73E-03	4.60E-03	2.30E-03	2.30E-03	2.30E-03	2.30E-03	1.73E-03	4.60E-03	6.33E-03	4.60E-03	2.88E-03	4.60E-03	1.73E-03	4.60E-03	2.36E-02	3.68E-02	Emission Factor based on information provided by The SEFA Group Inc.
Lead	126.99	ppmw	7.73E-07	1.24E-06	4.64E-07	1.24E-06	4.64E-07	1.24E-06	6.18E-07	6.18E-07	6.18E-07	6.18E-07	4.64E-07	1.24E-06	1.70E-06	1.24E-06	7.73E-07	1.24E-06	4.64E-07	1.24E-06	6.34E-06	9.90E-06	Duke Energy Average Ash Analysis
Arsenic	118.52	ppmw	7.21E-07	1.15E-06	4.33E-07	1.15E-06	4.33E-07	1.15E-06	5.77E-07	5.77E-07	5.77E-07	5.77E-07	4.33E-07	1.15E-06	1.59E-06	1.15E-06	7.21E-07	1.15E-06	4.33E-07	1.15E-06	5.92E-06	9.24E-06	Duke Energy Average Ash Analysis
Beryllium	24.55	ppmw	1.49E-07	2.39E-07	8.97E-08	2.39E-07	8.97E-08	2.39E-07	1.20E-07	1.20E-07	1.20E-07	1.20E-07	8.97E-08	2.39E-07	3.29E-07	2.39E-07	1.49E-07	2.39E-07	8.97E-08	2.39E-07	1.23E-06	1.91E-06	Duke Energy Average Ash Analysis
Cadmium	21.16	ppmw	1.29E-07	2.06E-07	7.73E-08	2.06E-07	7.73E-08	2.06E-07	1.03E-07	1.03E-07	1.03E-07	1.03E-07	7.73E-08	2.06E-07	2.83E-07	2.06E-07	1.29E-07	2.06E-07	7.73E-08	2.06E-07	1.06E-06	1.65E-06	Duke Energy Average Ash Analysis
Chromium	143.92	ppmw	8.76E-07	1.40E-06	5.26E-07	1.40E-06	5.26E-07	1.40E-06	7.01E-07	7.01E-07	7.01E-07	7.01E-07	5.26E-07	1.40E-06	1.93E-06	1.40E-06	8.76E-07	1.40E-06	5.26E-07	1.40E-06	7.18E-06	1.12E-05	Duke Energy Average Ash Analysis
Chromium VI	15.83	ppmw	9.64E-08	1.54E-07	5.78E-08	1.54E-07	5.78E-08	1.54E-07	7.71E-08	7.71E-08	7.71E-08	7.71E-08	5.78E-08	1.54E-07	2.12E-07	1.54E-07	9.64E-08	1.54E-07	5.78E-08	1.54E-07	7.90E-07	1.23E-06	Duke Energy Average Ash Analysis
Cobalt	57.57	ppmw	3.50E-07	5.61E-07	2.10E-07	5.61E-07	2.10E-07	5.61E-07	2.80E-07	2.80E-07	2.80E-07	2.80E-07	2.10E-07	5.61E-07	7.71E-07	5.61E-07	3.50E-07	5.61E-07	2.10E-07	5.61E-07	2.87E-06	4.49E-06	Duke Energy Average Ash Analysis
Manganese	253.98	ppmw	1.55E-06	2.47E-06	9.28E-07	2.47E-06	9.28E-07	2.47E-06	1.24E-06	1.24E-06	1.24E-06	1.24E-06	9.28E-07	2.47E-06	3.40E-06	2.47E-06	1.55E-06	2.47E-06	9.28E-07	2.47E-06	1.27E-05	1.98E-05	Duke Energy Average Ash Analysis
Mercury	0.76	ppmw	4.63E-09	7.40E-09	2.78E-09	7.40E-09	2.78E-09	7.40E-09	3.70E-09	3.70E-09	3.70E-09	3.70E-09	2.78E-09	7.40E-09	1.02E-08	7.40E-09	4.63E-09	7.40E-09	2.78E-09	7.40E-09	3.79E-08	5.92E-08	Duke Energy Average Ash Analysis
Nickel	143.92	ppmw	8.76E-07	1.40E-06	5.26E-07	1.40E-06	5.26E-07	1.40E-06	7.01E-07	7.01E-07	7.01E-07	7.01E-07	5.26E-07	1.40E-06	1.93E-06	1.40E-06	8.76E-07	1.40E-06	5.26E-07	1.40E-06	7.18E-06	1.12E-05	Duke Energy Average Ash Analysis
Selenium	38.94	ppmw	2.37E-07	3.79E-07	1.42E-07	3.79E-07	1.42E-07	3.79E-07	1.90E-07	1.90E-07	1.90E-07	1.90E-07	1.42E-07	3.79E-07	5.22E-07	3.79E-07	2.37E-07	3.79E-07	1.42E-07	3.79E-07	1.94E-06	3.03E-06	Duke Energy Average Ash Analysis

Sample Calculations

$$PM_{10} \text{ Emissions} = \frac{0.000023 \text{ lb } PM_{10}}{\text{ton ash}} \times \frac{125 \text{ ton ash}}{\text{hour}} = 2.88E-03 \text{ lb/hr } PM_{10}$$

$$PM_{10} \text{ Emissions} = \frac{0.000023 \text{ lb } PM_{10}}{\text{ton ash}} \times \frac{400,000 \text{ tons ash}}{\text{year}} \times \frac{\text{ton}}{2000 \text{ lb}} = 4.60E-03 \text{ tpy } PM_{10}$$

$$\text{Arsenic Emissions} = \frac{118.52 \text{ lb As}}{10^6 \text{ lb}} \times \frac{0.00609 \text{ lb PM}}{\text{hr}} = 7.21E-07 \text{ lb/hr Arsenic}$$

**Duke Energy Buck Station
Pollution Control Silos**

		FGD Absorbent Silo (ES-76)		FGD Byproduct Silo (ES-75)		Total	
Est. Gas Flow, acfm		1,300		1,300			
PM loading Rate, gr/acf		0.005		0.005			
Estimated Emissions							
		lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
	PM	0.06	0.24	0.06	0.24	0.11	0.49
	PM ₁₀ (Note 2)	0.05	0.22	0.05	0.22	0.10	0.45
	PM _{2.5} (Note 3)	0.03	0.13	0.03	0.13	0.06	0.26

Notes:

1. PM Emission Factor (grains/acf)
2. PM₁₀ = 92% of Total PM (From AP-42 Table 1.1-6 (09/98))
3. PM_{2.5} = 53% of Total PM (From AP-42 Table 1.1-6 (09/98))
4. TPY = Tons per Year

Duke Energy Buck Station Wet Ash Receiving Emissions (F-1 and F-2)

Transfer of material to storage shed (F-1)

Section 13.2-4 Aggregate Handling and Storage Piles, Ap-42 Fifth Edition November 2006

$$E = k \cdot 0.0032 \cdot \left(\frac{U}{5} \right)^{1.3} / \left(\frac{M}{2} \right)^{1.4}$$

E = lb/ton
k = particle size multiplier (dimensionless)
PM 0.74
PM₁₀ 0.35
PM_{2.5} 0.053

U = mean wind speed, miles per hour (mph) *Average wind speed for 2016 Rowan County airport about 9 miles from the site from weatherunderground.com*
3
M = material moisture content *15% moisture content is an conservatively low estimate typical moisture is 20%*
15

70 tph
400,000 tpy *Based on Air Permit info 2-17-17, Item 9*

	lb/hr	tpy
PM	2.54E-03	7.26E-03
PM ₁₀	1.20E-03	3.43E-03
PM _{2.5}	1.82E-04	5.20E-04

Note: assumed 50% control as a result of the shed having three side to enclose pile

Pollutant	Emission Factor	Units	Emissions		Reference
			lb/hr	ton/yr	
Lead	126.99	ppmw	3.23E-07	9.22E-07	Duke Energy Average Ash Analysis
Arsenic	118.52	ppmw	3.01E-07	8.60E-07	Duke Energy Average Ash Analysis
Beryllium	24.55	ppmw	6.24E-08	1.78E-07	Duke Energy Average Ash Analysis
Cadmium	21.16	ppmw	5.38E-08	1.54E-07	Duke Energy Average Ash Analysis
Chromium	143.92	ppmw	3.66E-07	1.04E-06	Duke Energy Average Ash Analysis
Chromium VI	15.83	ppmw	4.02E-08	1.15E-07	Duke Energy Average Ash Analysis
Cobalt	57.57	ppmw	1.46E-07	4.18E-07	Duke Energy Average Ash Analysis
Manganese	253.98	ppmw	6.45E-07	1.84E-06	Duke Energy Average Ash Analysis
Mercury	0.76	ppmw	1.94E-09	5.53E-09	Duke Energy Average Ash Analysis
Nickel	143.92	ppmw	3.66E-07	1.04E-06	Duke Energy Average Ash Analysis
Selenium	38.94	ppmw	9.89E-08	2.83E-07	Duke Energy Average Ash Analysis

Duke Energy Buck Station Wet Ash Receiving Emissions (F-1 and F-2)

Transfer of material to hopper (F-2)

Section 13.2-4 Aggregate Handling and Storage Piles, Ap-42 Fifth Edition November 2006

$$E = k * 0.0032 * (((U/5)^{1.3}) / ((M/2)^{1.4}))$$

E = lb/ton
 k = particle size multiplier (dimensionless)
 PM 0.74
 PM₁₀ 0.35
 PM_{2.5} 0.053

U = mean wind speed, miles per hour (mph) *Average wind speed for 2016 Rowan County airport about 9 miles from the site from weatherunderground.com*
 3
 M = material moisture content *15% moisture content is an conservatively low estimate typical moisture is 20%*
 15

70 tph
 400,000 tpy *Based on Air Permit info 2-17-17, Item 9*

	lb/hr	tpy
PM	5.08E-03	1.45E-02
PM ₁₀	2.40E-03	6.87E-03
PM _{2.5}	3.64E-04	1.04E-03

Pollutant	Emission Factor	Units	Emissions		Reference
			lb/hr	ton/yr	
Lead	126.99	ppmw	6.45E-07	1.84E-06	Duke Energy Average Ash Analysis
Arsenic	118.52	ppmw	6.02E-07	1.72E-06	Duke Energy Average Ash Analysis
Beryllium	24.55	ppmw	1.25E-07	3.56E-07	Duke Energy Average Ash Analysis
Cadmium	21.16	ppmw	1.08E-07	3.07E-07	Duke Energy Average Ash Analysis
Chromium	143.92	ppmw	7.31E-07	2.09E-06	Duke Energy Average Ash Analysis
Chromium VI	15.83	ppmw	8.04E-08	2.30E-07	Duke Energy Average Ash Analysis
Cobalt	57.57	ppmw	2.93E-07	8.36E-07	Duke Energy Average Ash Analysis
Manganese	253.98	ppmw	1.29E-06	3.69E-06	Duke Energy Average Ash Analysis
Mercury	0.76	ppmw	3.86E-09	1.10E-08	Duke Energy Average Ash Analysis
Nickel	143.92	ppmw	7.31E-07	2.09E-06	Duke Energy Average Ash Analysis
Selenium	38.94	ppmw	1.98E-07	5.65E-07	Duke Energy Average Ash Analysis

Duke Energy Buck Station
Wet Ash Receiving Emissions (F-1 and F-2)

Total Emissions

Pollutant	lb/hr	tpy
PM	7.62E-03	2.18E-02
PM ₁₀	3.61E-03	1.03E-02
PM _{2.5}	5.46E-04	1.56E-03
Lead	9.68E-07	2.77E-06
Arsenic	9.03E-07	2.58E-06
Beryllium	1.87E-07	5.35E-07
Cadmium	1.61E-07	4.61E-07
Chromium	1.10E-06	3.13E-06
Chromium VI	1.21E-07	3.45E-07
Cobalt	4.39E-07	1.25E-06
Manganese	1.94E-06	5.53E-06
Mercury	5.80E-09	1.66E-08
Nickel	1.10E-06	3.13E-06
Selenium	2.97E-07	8.48E-07

**Duke Energy Buck Station
GHG Emissions**

Heating Value of Natural Gas	1,028	btu/scf	Table C-1 to subpart C of 40 CFR Part 98 (natural gas)
Heat Input	15,840	MMBtu/yr	Total Supplemental / Auxiliary Fuel = 12 months x 3 cold starts x 400 MM Btu = 14,400 MM Btu's + 10% = 15,840 MM Btu's per year.
Operation Hours	24 8,760	hrs/day hrs/year	

Emission Factors

CO ₂	53.06	kg CO ₂ /MMBtu	Table C-1 to subpart C of 40 CFR Part 98 (natural gas)
CH ₄	1.00E-03	kg CH ₄ /MMBtu	Table C-2 to subpart C of 40 CFR Part 98 (natural gas)
N ₂ O	1.00E-04	kg N ₂ O/MMBtu	Table C-2 to subpart C of 40 CFR Part 98 (natural gas)
	2.20462	lb/kg	Table A-2 to subpart A of 40 CFR Part 98
CO ₂	116.98	lb/MMBtu	
CH ₄	2.20E-03	lb/MMBtu	
N ₂ O	2.20E-04	lb/MMBtu	

Global Warming Potential

CO ₂	1	Table A-1 to subpart A of 40 CFR Part 98
CH ₄	25	Table A-1 to subpart A of 40 CFR Part 98
N ₂ O	298	Table A-1 to subpart A of 40 CFR Part 98

Emission Rates - GHG (CO₂e)

	lb/yr	tpy
CO ₂	1,852,917.85	926.46
CH ₄ (CO ₂ e)	873.03	0.44
N ₂ O (CO ₂ e)	1,040.65	0.52
GHG (CO₂e)		927.42
	lb/yr	tpy
CO ₂	1,852,917.85	926.46
CH ₄	34.92	0.02
N ₂ O	3.49	0.00
GHG (Mass Basis)		926.48

**Duke Energy Buck Station
GHG Emissions**

Heating Value of Propane	0.091	MMBtu/gal	Table C-1 to subpart C of 40 CFR Part 98 (petroleum products)
Heat Input	15,840	MMBtu/yr	

Emission Factors

CO ₂	61.46	kg CO ₂ /MMBtu	Table C-1 to subpart C of 40 CFR Part 98 (propane - petroleum products)
CH ₄	3.00E-03	kg CH ₄ /MMBtu	Table C-2 to subpart C of 40 CFR Part 98 (petroleum)
N ₂ O	6.00E-04	kg N ₂ O/MMBtu	Table C-2 to subpart C of 40 CFR Part 98 (petroleum)
	2.20462	lb/kg	Table A-2 to subpart A of 40 CFR Part 98
CO ₂	135.50	lb/MMBtu	
CH ₄	6.61E-03	lb/MMBtu	
N ₂ O	1.32E-03	lb/MMBtu	

Global Warming Potential

CO ₂	1	Table A-1 to subpart A of 40 CFR Part 98
CH ₄	25	Table A-1 to subpart A of 40 CFR Part 98
N ₂ O	298	Table A-1 to subpart A of 40 CFR Part 98

Emission Rates - GHG (CO₂e)

	lb/yr	tpy
CO ₂	2,146,255.77	1,073.13
CH ₄ (CO ₂ e)	2,619.09	1.31
N ₂ O (CO ₂ e)	6,243.91	3.12
GHG (CO₂e)		1,077.56

	lb/yr	tpy
CO ₂	2,146,255.77	1,073.13
CH ₄	104.76	0.05
N ₂ O	20.95	0.01
GHG (Mass Basis)		1,073.19

STAR CO₂ Production

Yearly Feed Rate (TPY)	400,000	
Average Feed LOI	7.80%	
Availability	80.00%	
Avg. Feed Rate (TPH)	57.08	400,000/ (8760*80%)
Avg. Fuel Input (MMBtu/hr)	129.11	57.08*2000*7.80%*14500/1000000
Max. CO ₂ Production (TPY)	114,401	57.08*2000*7.80%*3.6667*8760*80%/2000

Note: Duke Energy expects 6%-15% LOI. LOI will affect throughput.

Expected GHG Emission Range

CO ₂	116,400.63
CH ₄ (CO ₂ e)	1.75
N ₂ O (CO ₂ e)	3.64
GHG (CO₂e)	116,406.02
CO ₂	116,400.63
CH ₄	0.07
N ₂ O	0.01
GHG (Mass Basis)	116,400.71

**Duke Energy Buck Station
Unloading Pile Windblown Fugitive Dust Emissions (F-3)**

$$E_1 = E_f * A$$

$$E_f = J * 1.7 * ((sL)/1.5) * ((365-I)$$

Where,

- E₁ = Particulate matter emission
- E_f = Emission Factor in tons/ac
- A = Exposed surface area of s
- J = Particulate aerodynamic fa
- J (TSP) = 1
- J (PM₁₀) = 0.5
- J (PM_{2.5}) = 0.2
- sL = Average silt loading of stor
- P = Average number of days/y
- I = Percent of time with unobs

$$E_2 = \text{Particulate matter emission}$$

$$E_2 = E_1/8760*2000$$

From Emissions Inventory Guidance, Mineral
(Methodology Derived From AP-42, Chapter 1

- Silt Loading = 12 %
- Conservative Days with Precipitation = 120 days
- Conservative Windy Hours = 8.3 %
- Acreage of Fly Ash Pile = 0.03 acres
- Control Efficiency (Dust Suppression) = 50 %

Pollutant	Potential Emissions (with Control)			
			(lb/hr)	(ton/yr)
PM	4.90E-03	2.15E-02		
PM ₁₀	2.45E-03	1.07E-02		
PM _{2.5}	9.81E-04	4.30E-03		
	(lb/hr)	(ton/yr)		
Lead	126.99	ppmw	6.23E-07	2.73E-06
Arsenic	118.52	ppmw	5.81E-07	2.55E-06
Beryllium	24.55	ppmw	1.20E-07	5.27E-07
Cadmium	21.16	ppmw	1.04E-07	4.54E-07
Chromium	143.92	ppmw	7.06E-07	3.09E-06
Chromium VI	15.83	ppmw	7.76E-08	3.40E-07
Cobalt	57.57	ppmw	2.82E-07	1.24E-06
Manganese	253.98	ppmw	1.25E-06	5.45E-06
Mercury	0.76	ppmw	3.73E-09	1.63E-08
Nickel	143.92	ppmw	7.06E-07	3.09E-06
Selenium	38.94	ppmw	1.91E-07	8.36E-07
<i>Note: Emission rates may need to adjusted for applicable averaging period when used for modeling.</i>				
Variable	Data Source			
Silt Loading	AP-42 Section 13.2.4, Table 13.2.4-1 (Misc Fill Materials)			
Conservative Days with Precipitation	AP-42 Section 13.2.2, Figure 13.2.2-1			
Conservative Windy Hours	Wind data from Charlotte Airport 2011-2015			
Acreage of Ash Pile	SEFA 2017			
Control Efficiency (Dust Suppression)	SEFA 2017 - Fly Ash will be wet with up to 20% moisture			

Duke Energy Buck Station

Emissions Estimate: Wind Erosion at the Ash Basin (F-4)

Dust may be generated by wind erosion of exposed area within an industrial facility. Section 13.2.5 of the U.S. EPA's AP-42 document was used to estimate emissions from the monofill.

The first step is to calculate a height-to-base ratio to determine if Equation (4) can be used to determine the friction velocity (u^*):

67	acres, Typical Active Area of Ash Pond
4,046.9	m ² /acre, Conversion Factor
271,140.3	m ² , Typical Active Area of Monofill

Assuming a square area, this active area yields an approximate length as follows:

520.7	m, Linear Dimension of Active Area
3.3	ft/m, Conversion Factor
1708.4	ft, Linear Dimension of Active Area
15	ft, Approximate Mean Elevation of the Active Area (Above Grade)

Per page 13.2.5-5 of AP-42, if the height to base ratio is less than 0.2 then Equation (4) can be used to calculate the friction velocity (u^*).

0.009	Calculated Height to Base Ratio
-------	---------------------------------

Therefore equation (4) from AP-42 13.2.5 can be used for calculation of the friction velocity.

Per the following website: http://www.nc-climate.ncsu.edu/dynamic_scripts/cronos/query.php (maintained by the North Carolina State Climate Office), the anemometer height for the fastest mile data is:

10	m, Anemometer Height
----	----------------------

Since the reported fastest wind speeds are from an anemometer of height 10 m, using equation (5) on page 13.2.5-6 is not necessary:

When the calculated friction velocity (u^*) exceeds the threshold friction velocity (u_t^*), emissions from wind erosion occur. As shown in Equation 3 of AP-42, if $u^* \leq u_t^*$, emissions are zero.

From Table 13.2.5-1 threshold friction velocity (u_t^*) is as follows. The most conservative value presented in AP-42 has been used.

0.43	m/s, u_t^* Threshold Friction Velocity
------	--

Therefore, in order to generate emissions, the following wind speed must be exceeded.

3,600	sec/hr, Conversion Factor
1,609.3	m/mile, Conversion Factor
18.15	mph, u_{10}^+
8.11	m/s, u_{10}^+
0.43	m/s, u^*

Duke Energy Buck Station

Emissions Estimate: Wind Erosion at the Ash Basin (F-4)

AERMOD allows users to account for the variability of wind speed when determining offsite impacts. The scalars below are used based on the respective wind speed range. (AERMOD User Guide 3.3.4. Using Variable Emission Rates). There are zero wind based emissions in classes 1 thru 4 because the threshold friction velocity is not exceeded (u^*). The scalar for Class 5 is determined as the ratio of emission factors for Class 5 and Class 6. Emission factor derivation follows.

Wind Speed Range Class	1	2	3	4	5	6
Scalar	0	0	0	0	0.18	1.00

where:

- Class 1 = 0 - 3.4 mph
- Class 2 = 3.4 - 6.8 mph
- Class 3 = 6.8 - 11.3 mph
- Class 4 = 11.3 - 18.1 mph
- Class 5 = 18.1 - 23.8 mph
- Class 6 = greater than 23.8 mph

The emissions rate (which is dependent on the friction velocity (u^*)) varies linearly with wind speed. For Class 5, emissions will increase linearly as wind speed increases. AERMOD does not facilitate the variable emission rates based on wind speed. Therefore, the friction velocity for Class 5 is determined using the upper end wind speed of 23.8 mph. Using Equation (4) on page 13.2.5-5, the equivalent friction velocity (u^*) may be calculated.

$$u^* = 0.053u_{10}^+$$

Class 5	23.8	mph, u_{10}^+
	10.64	m/s, u_{10}^+
	0.56	m/s, u^* , Class 5 Wind Speed Range

The friction velocity for Class 6 is determined using the average of the maximum daily wind gusts for each month.

Class 6	37.60	mph, u_{10}^+
	16.81	m/s, u_{10}^+
	0.89	m/s, u^* , Class 6 Wind Speed Range

Emission factors for Class 5 and Class 6 are determined using AP-42 Section 13.2.5 Equation (3) which is shown below:

$$PM \left(\frac{g}{m^2} \right) = 58 (u^* - u_t^*)^2 + 25 (u^* - u_t^*)$$

Equation (3) from AP-42 13.2.5

Where: u^* is the friction velocity (m/s)
 u_t^* is the threshold friction velocity (m/s)

Class 5	4.39	g/m ² (of Disturbed Area), Class 5 Wind Speed Range
Class 6	23.84	g/m ² (of Disturbed Area), Class 6 Wind Speed Range

Duke Energy Buck Station

Emissions Estimate: Wind Erosion at the Ash Basin (F-4)

As stated in AP-42, on page 13.2.5-2, emissions generated by wind erosion are also dependent on the frequency of disturbance of the erodible surface because each time that a surface is disturbed, its erosion potential is restored. A disturbance is defined as an action that results in the exposure of fresh surface material. Only a fraction of the active area is disturbed each day. This disturbed area is used to calculate the potential daily emission rate.

10	acres, Working Area	85%	Fraction of Inactive Area
15%	Fraction of Active Area Disturbed Daily	230,671.59	m ² , Average Inactive Area
40,468.70	m ² , Average Area Disturbed Daily	453.6	g/lb, Conversion Factor
453.6	g/lb, Conversion Factor	453.6	g/lb, Conversion Factor
Class 5	391.4 lb/day	Class 5	2231.1 lb/day
Class 6	2127.0 lb/day	Class 6	12123.7 lb/day

The facility will implement mitigation to suppress dust emissions. Control efficiencies are based on engineering judgment and supported by *WRAP Fugitive Dust Handbook, September 7, 2006*. The controlled emission rates for Class 5 and Class 6 emissions are as follows:

Class 5**	61%	Apply Water every 3.2 hours to disturbed areas	Class 5	80%	Inherent Moisture and Watering
Class 6**	152.7	lb/day	Class 5	446.2	lb/day
Class 6**	829.5	lb/day	Class 6	2424.7	lb/day

For the purposes of determining potential emissions for permitting, wind data has been applied as shown below.

Total Class 5 Emissions	598.9	lb/day
Total Class 6 Emissions	3254.2	lb/day

Fraction of time in Class 5 0.0116 (approximately 102 hours in Class 5)
 Fraction of time in Class 6 0.0016 (approximately 14 hours in Class 6)

Time fraction spent in Class 5 and Class 6 determined by analyzing hourly wind speeds for 1992 from DAQ Approved RDU Met Data. 1992 is the worst case modeling year for the 5 year period required to be modeled (1988 - 1992)

Total emissions per day 12.17 lb/day

Emissions from the ash pond will only occur when Class 5 and Class 6 wind speed conditions are met. AERMOD will utilize meteorological data to determine when these conditions occur. For the purposes of the PSD analysis, permitting, and TPER evaluation, it is conservatively assumed that Class 6 condition occur year round.

Compound	Avg Ash Analysis (ppm)	Emissions (lb/hr)	Emissions (lb/day)	Emissions (lb/yr)	Emissions (ton/yr)
PM	1.00 **	0.51	12.17	4,443.49	2.22
PM10	0.50 **	0.25	6.09	2,221.74	1.11
PM2.5	0.08 **	0.04	0.91	333.26	0.17
Lead	126.99	6.44E-05	1.55E-03	0.56	2.82E-04
Arsenic	118.52	6.01E-05	1.44E-03	0.53	2.63E-04
Beryllium	24.55	1.25E-05	2.99E-04	0.11	5.45E-05
Cadmium	21.16	1.07E-05	2.58E-04	0.09	4.70E-05
Chromium	143.92	7.30E-05	1.75E-03	0.64	3.20E-04
Chromium VI	15.83	8.03E-06	1.93E-04	0.07	3.52E-05
Cobalt	57.57	2.92E-05	7.01E-04	0.26	1.28E-04
Manganese	253.98	1.29E-04	3.09E-03	1.13	5.64E-04
Mercury	0.76	3.86E-07	9.25E-06	0.00	1.69E-06
Nickel	143.92	7.30E-05	1.75E-03	0.64	3.20E-04
Selenium	38.94	1.98E-05	4.74E-04	0.17	8.65E-05

** PM distribution factors (k value) taken from AP-42 Page 13.2.5-3 All other values in ppm.

Duke Energy Buck Station

Truck Traffic VMT Estimates

	Ash Trucked Offsite (ton/yr)	Truck Capacity (ton/truck)	Truck Loads/Year	Route Distance (miles)	Total Miles Traveled VMT/yr	Total VMT/yr
Empty Trucks to Loading Area	430,000	25.00	17,200	1.10	18,920.00	37,840.00
Loaded Trucks to Offsite				1.10	18,920.00	

Duke Energy Buck Station

Documentation Supporting Haul Road VMT Estimates



Duke Energy Buck Station

Emissions Estimate: Ash Handling Operations (F-5)

Section 13.2.4 (Aggregate Handling and Storage Piles) of U.S. EPA's AP-42 document is used to estimate emissions from the handling of material at an industrial site. The "Drop Equation" is shown below:

$$E = k (0.0032) \frac{(U/5)^{1.3}}{(M/2)^{1.4}}$$

Where:

E is the emission factor in [lb/ton]
 K is the particle size multiplier [dimensionless]
 U is the average wind speed [mph]
 M is the average moisture content [%]

Constant	PM2.5	PM10	PM
k	0.053	0.35	0.74

7	mph, Average Wind Speed
15	%, Moisture

The HAP and TAP emissions are derived from the PM estimate based on the average trace element analysis: Emissions are calculated assuming a maximum throughput of ash:

430,000	ton/yr, Potential Ash Throughput
8	Number of Drop Points

AshTrace Element Analysis	Average Concentration (ppm)	Emission Factor (lb/ton)	Annual PTE (lb/yr)	Annual PTE (lb/hr)	Total Annual PTE (ton/yr)
PM	--	2.18E-04	751.31	0.09	0.38
PM10	--	1.03E-04	355.35	0.04	0.18
PM2.5	--	1.56E-05	53.81	0.01	0.03
Lead	126.99	2.77E-08	0.10	1.09E-05	4.77E-05
Arsenic	118.52	2.59E-08	0.09	1.02E-05	4.45E-05
Beryllium	24.55	5.36E-09	0.02	2.11E-06	9.22E-06
Cadmium	21.16	4.62E-09	0.02	1.81E-06	7.95E-06
Chromium	143.92	3.14E-08	0.11	1.23E-05	5.41E-05
Chromium VI	15.83	3.46E-09	0.01	1.36E-06	5.95E-06
Cobalt	57.57	1.26E-08	0.04	4.94E-06	2.16E-05
Manganese	253.98	5.55E-08	0.19	2.18E-05	9.54E-05
Mercury	0.76	1.66E-10	0.001	6.52E-08	2.85E-07
Nickel	143.92	3.14E-08	0.11	1.23E-05	5.41E-05
Selenium	38.94	8.50E-09	0.03	3.34E-06	1.46E-05

Duke Energy Buck Station

Additional Haul Roads Supporting the Movement of Ash Offsite - Loaded Trucks (F-6)

A portion of the ash will be moved by truck to an offsite location. Particulate emissions are generated from the haul roads from the force of the wheels on the road surface. This force causes pulverization of the surface material. The particles are lifted and dropped from the rolling wheels and the road surface is exposed to strong air currents, which generate airborne particulate emissions.

The methodology presented below is taken from Section 13.2.2 (Unpaved Roads) of the U.S. EPA's AP-42 document and is based on the vehicle miles traveled (VMT) at the site.

$$E = k \left(\frac{s}{12} \right)^a \left(\frac{W}{3} \right)^b$$

Where: E is the size-specific emission factor (lb/VMT)
s is the surface material silt content (%)
W is the mean vehicle weight (tons)
k, a, and b are empirical constants

Equation 1a of AP-42 Section 13.2.2 for vehicles traveling on unpaved surfaces at industrial sites

Constant	Industrial Roads		
	PM2.5	PM10	PM
k	0.15	1.5	4.9
a	0.9	0.9	0.7
b	0.45	0.45	0.45

5.1	%	Average Silt Content of Plant Roads at a Coal Mining Site (Table 13.2.2-1)
50	tons	Mean Vehicle Loaded Weight (Fleet Average)

0.25	lb/VMT	Calculated PM2.5 Emission Factor (Road Silt Portion)
2.46	lb/VMT	Calculated PM10 Emission Factor (Road Silt Portion)
9.55	lb/VMT	Calculated PM Emission Factor (Road Silt Portion)

Emissions associated with the exhaust, brake wear, and tire wear must be added to the values calculated above. The values shown below were taken from Table 13.2.2-4.

Particle Size	PM2.5	PM10	PM
lb/VMT "adder"	0.00036	0.00047	0.00047

0.25	lb/VMT	Calculated PM2.5 Emission Factor (Total, No natural mitigation)
2.46	lb/VMT	Calculated PM10 Emission Factor (Total, No natural mitigation)
9.55	lb/VMT	Calculated PM Emission Factor (Total, No natural mitigation)

All roads are subject to natural mitigation because of rainfall and other precipitation. The following equation accounts for reductions in the emission factor due to natural mitigation.

$$E_{EXT} = E \left[\frac{(365 - P)}{365} \right]$$

Where: E_{EXT} is the adjusted emission factor accounting for natural mitigation
E is emission factor from Equation 1a
P is the number of days per year with at least 0.01 inches of precipitation

120	days	Precipitation Greater than 0.01 inches at Plant Location (Figure 13.2.2-1)
-----	------	--

0.17	lb/VMT	Calculated PM2.5 Emission Factor (Total, With natural mitigation)
1.65	lb/VMT	Calculated PM10 Emission Factor (Total, With natural mitigation)
6.41	lb/VMT	Calculated PM Emission Factor (Total, With natural mitigation)

In addition to natural mitigation, the following mitigation will be implemented at the site. Control efficiencies taken from the WRAP Fugitive Dust Handbook, September 7, 2006.

57%	Limit on-site vehicle speeds (on unpaved roads) to 15 mph.
84%	Application of Gravel on Dirt Surfaces
90%	Implement watering for industrial unpaved road.

0.04	lb/VMT	Calculated PM Emission Factor (Total, With natural mitigation, and water sprays)
0.01	lb/VMT	Calculated PM10 Emission Factor (Total, With natural mitigation, and water sprays)
0.001	lb/VMT	Calculated PM2.5 Emission Factor (Total, With natural mitigation, and water sprays)

18,920	miles/year	"Loaded Truck VMT"
2000	lb/ton	Conversion Factor

4.17E-01	tpy	PM Emissions
1.08E-01	tpy	PM10 Emissions
1.08E-02	tpy	PM2.5 Emissions

9.52E-02	lb/hr	PM Emissions
2.46E-02	lb/hr	PM10 Emissions
2.46E-03	lb/hr	PM2.5 Emissions

Duke Energy Buck Station

Additional Haul Roads Supporting the Movement of Ash Offsite - Unloaded Trucks (F-6)

A portion of the ash will be trucked to an offsite location. Particulate emissions are generated from the haul roads from the force of the wheels on the road surface. This force causes pulverization of the surface material. The particles are lifted and dropped from the rolling wheels and the road surface is exposed to strong air currents, which generate airborne particulate emissions.

The methodology presented below is taken from Section 13.2.2 (Unpaved Roads) of the U.S. EPA's AP-42 document and is based on the vehicle miles traveled (VMT) at the site.

$$E = k \left(\frac{s}{12} \right)^a \left(\frac{W}{3} \right)^b$$

Where: E is the size-specific emission factor (lb/VMT)
s is the surface material silt content (%)
W is the mean vehicle weight (tons)
k, a, and b are empirical constants

Equation 1a of AP-42 Section 13.2.2 for vehicles traveling on unpaved surfaces at industrial sites

Constant	Industrial Roads		
	PM2.5	PM10	PM
k	0.15	1.5	4.9
a	0.9	0.9	0.7
b	0.45	0.45	0.45

5.1% , Average Silt Content of Plant Roads at a Coal Mining Site (Table 13.2.2-1)
25 tons, Mean Vehicle Empty Weight (Fleet Average)

0.18 lb/VMT, Calculated PM2.5 Emission Factor (Road Silt Portion)
1.80 lb/VMT, Calculated PM10 Emission Factor (Road Silt Portion)
6.99 lb/VMT, Calculated PM Emission Factor (Road Silt Portion)

Emissions associated with the exhaust, brake wear, and tire wear must be added to the values calculated above. The values shown below were taken from Table 13.2.2-4.

Particle Size	PM2.5	PM10	PM
lb/VMT "adder"	0.00036	0.00047	0.00047

0.18 lb/VMT, Calculated PM2.5 Emission Factor (Total, No natural mitigation)
1.80 lb/VMT, Calculated PM10 Emission Factor (Total, No natural mitigation)
6.99 lb/VMT, Calculated PM Emission Factor (Total, No natural mitigation)

All roads are subject to natural mitigation because of rainfall and other precipitation. The following equation accounts for reductions in the emission factor due to natural mitigation.

$$E_{EXT} = E \left[\frac{(365 - P)}{365} \right]$$

Where: E_{EXT} is the adjusted emission factor accounting for natural mitigation
E is emission factor from Equation 1a
P is the number of days per year with at least 0.01 inches of precipitation

120 days, Precipitation Greater than 0.1 inches at Plant Location (Figure 13.2.2-1)

0.12 lb/VMT, Calculated PM2.5 Emission Factor (Total, With natural mitigation)
1.21 lb/VMT, Calculated PM10 Emission Factor (Total, With natural mitigation)
4.69 lb/VMT, Calculated PM Emission Factor (Total, With natural mitigation)

In addition to natural mitigation, the following mitigation will be implemented at the site. Control efficiencies taken from the WRAP Fugitive Dust Handbook, September 7, 2006.

57% Limit on-site vehicle speeds (on unpaved roads) to 15 mph.
84% Application of Gravel on Dirt Surfaces
90% Implement watering for industrial unpaved road.

0.03 lb/VMT, Calculated PM Emission Factor (Total, With natural mitigation, and water sprays)
0.008 lb/VMT, Calculated PM10 Emission Factor (Total, With natural mitigation, and water sprays)
0.0008 lb/VMT, Calculated PM2.5 Emission Factor (Total, With natural mitigation, and water sprays)

18,920 miles/day, One-way Vehicle Distance from Source to Offsite
2000 lb/ton, Conversion Factor

3.05E-01 tpy, PM Emissions
7.88E-02 tpy, PM10 Emissions
7.89E-03 tpy, PM2.5 Emissions

6.97E-02 lb/hr, PM Emissions
1.80E-02 lb/hr, PM10 Emissions
1.80E-03 lb/hr, PM2.5 Emissions

Duke Energy Buck Station
Screeners Emissions (ES-82A)
Spyder 514TS Double Deck

Capacity, ton/yr 430,000 Duke Energy
 Hours of operation, hr/yr 2600 Based on 50/wk M-F
 Capacity, ton/hr 165 Duke Energy

Pollutant	Emission Factor ¹	Potential Emission Rates	
	lb/ton	(lb/hr)	(tpy)
PM	0.0022	0.015	0.020
PM ₁₀	0.00074	0.005	0.007
PM _{2.5}	0.00005	0.0003	0.0004

Lead	126.99	1.92E-06	2.50E-06	Duke Energy Average Ash Analysis
Arsenic	118.52	1.79E-06	2.33E-06	Duke Energy Average Ash Analysis
Beryllium	24.55	3.71E-07	4.83E-07	Duke Energy Average Ash Analysis
Cadmium	21.16	3.20E-07	4.16E-07	Duke Energy Average Ash Analysis
Chromium	143.92	2.18E-06	2.83E-06	Duke Energy Average Ash Analysis
Chromium VI	15.83	2.39E-07	3.11E-07	Duke Energy Average Ash Analysis
Cobalt	57.57	8.71E-07	1.13E-06	Duke Energy Average Ash Analysis
Manganese	253.98	3.84E-06	4.99E-06	Duke Energy Average Ash Analysis
Mercury	0.76	1.15E-08	1.49E-08	Duke Energy Average Ash Analysis
Nickel	143.92	2.18E-06	2.83E-06	Duke Energy Average Ash Analysis
Selenium	38.94	5.89E-07	7.66E-07	Duke Energy Average Ash Analysis

Notes:

1. Emission Factor for Screening operation from AP-42, Table 11.19.2-2

Duke Energy Buck Station
Crusher Emissions (ES-83A)
4043T Impact Crusher

Capacity, ton/yr 43,000 Duke Energy
 Max Hours of operation, hr/day 1 Duke Energy
 Hours of operation, hr/yr 365 Based on 1 hr/day 365 days/year
 Capacity, ton/day 165 Duke Energy

Pollutant	Emission Factor ¹	Potential Emission Rates	
	lb/ton	(lb/hr)	(tpy)
PM	0.0012	0.008	0.002
PM ₁₀	0.00054	0.004	0.001
PM _{2.5}	0.0001	0.001	0.0001

Lead	126.99	1.05E-06	1.91E-07	Duke Energy Average Ash Analysis
Arsenic	118.52	9.78E-07	1.78E-07	Duke Energy Average Ash Analysis
Beryllium	24.55	2.03E-07	3.70E-08	Duke Energy Average Ash Analysis
Cadmium	21.16	1.75E-07	3.19E-08	Duke Energy Average Ash Analysis
Chromium	143.92	1.19E-06	2.17E-07	Duke Energy Average Ash Analysis
Chromium VI	15.83	1.31E-07	2.38E-08	Duke Energy Average Ash Analysis
Cobalt	57.57	4.75E-07	8.67E-08	Duke Energy Average Ash Analysis
Manganese	253.98	2.10E-06	3.82E-07	Duke Energy Average Ash Analysis
Mercury	0.76	6.27E-09	1.14E-09	Duke Energy Average Ash Analysis
Nickel	143.92	1.19E-06	2.17E-07	Duke Energy Average Ash Analysis
Selenium	38.94	3.21E-07	5.86E-08	Duke Energy Average Ash Analysis

Notes:

1. Emission Factor for Crushing operation from AP-42, Table 11.19.2-2

**Duke Energy Buck Station
Screener Engine Emissions (ES-82B)**

Engine rating: 91 hp ACERT Diesel Engine Caterpillar C4.4
 Permitted Hours: 2,600 hrs/yr
 No. of Engines: 1 Diesel Sulfur Content: 0.0015 weight %
 Heat Input: 0.64 MMBtu/hr (HHV) Diesel Heat Content: 7,000 Btu/hp-hr

Pollutant	Emission Factor (lb/hp-hr)	Potential Emission Rates		HAP Pollutant ¹	Emission Factor (lb/MMBtu)	Potential Emission Rates	
		(lb/hr)	(tpy)			(lb/hr)	(tpy)
NO _x	0.031	2.82	3.667	Benzene	9.33E-04	5.94E-04	7.73E-04
CO	6.68E-03	0.61	0.790	Toluene	4.09E-04	2.61E-04	3.39E-04
VOC	2.47E-03	0.22	0.292	Xylenes	2.85E-04	1.82E-04	2.36E-04
SO ₂	2.05E-03	0.19	0.243	1,3-Butadiene	3.91E-05	2.49E-05	3.24E-05
PM	2.20E-03	0.20	0.260	Formaldehyde	1.18E-03	7.52E-04	9.77E-04
PM ₁₀	2.20E-03	0.20	0.260	Acetaldehyde	7.67E-04	4.89E-04	6.35E-04
PM _{2.5}	2.20E-03	0.20	0.260	Acrolein	9.25E-05	5.89E-05	7.66E-05
				Total PAH	1.68E-04	1.07E-04	1.39E-04
				Naphthalene	8.48E-05	5.40E-05	7.02E-05
				Acenaphthalene	5.06E-06	3.22E-06	4.19E-06
				Acenaphthene	1.42E-06	9.05E-07	1.18E-06
				Fluorene	2.92E-05	1.86E-05	2.42E-05
				Phenanthrene	2.94E-05	1.87E-05	2.43E-05
				Anthracene	1.87E-06	1.19E-06	1.55E-06
				Fluoranthene	7.61E-06	4.85E-06	6.30E-06
				Pyrene	4.78E-06	3.04E-06	3.96E-06
				Benzo(a)anthracene	1.68E-06	1.07E-06	1.39E-06
				Chrysene	3.53E-07	2.25E-07	2.92E-07
				Benzo(b)fluoranthene	9.91E-08	6.31E-08	8.21E-08
				Benzo(k)fluoranthene	1.55E-07	9.87E-08	1.28E-07
				Benzo(a)pyrene	1.88E-07	1.20E-07	1.56E-07
				Indeno(1,2,3-cd)pyrene	3.75E-07	2.39E-07	3.11E-07
				Dibenz(a,h)anthracene	5.83E-07	3.71E-07	4.83E-07
				Benzo(g,h,i)perylene	4.89E-07	3.11E-07	4.05E-07

Summary of GHG Emissions:

Pollutant	Emission Factor (kg/MMBtu) ²	Emissions (metric tons/yr) ³	Emissions (US tons/yr) ⁴
CO ₂	73.96	122.5	134.99
CH ₄	3.0E-03	0.005	0.005
N ₂ O	6.0E-04	0.001	0.001
CO ₂ e ⁵	--	122.91	135.45

Notes

Assume PM = PM10 = PM2.5

Emission Factor based on Table 3.3 1, EPA AP 42, Chapter 3.3 Gasoline & Diesel Industrial Engines

1. HAPs Emission Factor based on Table 3.3 2, Chapter 3.3 Gasoline & Diesel Industrial Engines. Per 15A NCAC 2Q.0702 (a)(27) these emissions were not included in the TPER analysis.

2. Based on EPA default factors in Subpart C Tables C-1 and C-2 for Distillate Fuel Oil No. 2.

3. Calculated based on the heat input, emission factors, and equations C-1b and C-8b of Subpart C. CO₂e based on Subpart A Table A-1 factors.

$$CO_2, CH_4, \text{ or } N_2O \text{ (metric tpy)} = 1E-03 * \text{Gas (MMBtu/yr)} * \text{Emission Factor (kg/MMBtu)}$$

4. 1 metric ton = 1.102 US ton

5. CO₂e = CO₂, CH₄, or N₂O (tpy) * Global Warming Potential factor (GWP)

CO ₂ GWP	1
CH ₄ GWP	25
N ₂ O GWP	298

**Duke Energy Buck Station
Crusher Engine Emissions (ES-83B)**

Engine rating: 300 hp ACERT Diesel Engine Caterpillar C9
 Permitted Hours: 365 hrs/yr
 No. of Engines: 1
 Heat Input: 2.10 MMBtu/hr (HHV)
 Diesel Sulfur Content: 0.0015 weight %
 Diesel Heat Content: 7,000 Btu/hp-hr

Pollutant	Emission Factor (lb/hp-hr)	Potential Emission Rates		HAP Pollutant ¹	Emission Factor (lb/MMBtu)	Potential Emission Rates	
		(lb/hr)	(tpy)			(lb/hr)	(tpy)
NO _x	0.031	9.30	1.697	Benzene	9.33E-04	1.96E-03	3.58E-04
CO	6.68E-03	2.00	0.366	Toluene	4.09E-04	8.59E-04	1.57E-04
VOC	2.47E-03	0.74	0.135	Xylenes	2.85E-04	5.99E-04	1.09E-04
SO ₂	2.05E-03	0.62	0.112	1,3-Butadiene	3.91E-05	8.21E-05	1.50E-05
PM	2.20E-03	0.66	0.120	Formaldehyde	1.18E-03	2.48E-03	4.52E-04
PM ₁₀	2.20E-03	0.66	0.120	Acetaldehyde	7.67E-04	1.61E-03	2.94E-04
PM _{2.5}	2.20E-03	0.66	0.120	Acrolein	9.25E-05	1.94E-04	3.55E-05
				Total PAH	1.68E-04	3.53E-04	6.44E-05
				Naphthalene	8.48E-05	1.78E-04	3.25E-05
				Acenaphthalene	5.06E-06	1.06E-05	1.94E-06
				Acenaphthene	1.42E-06	2.98E-06	5.44E-07
				Fluorene	2.92E-05	6.13E-05	1.12E-05
				Phenanthrene	2.94E-05	6.17E-05	1.13E-05
				Anthracene	1.87E-06	3.93E-06	7.17E-07
				Fluoranthene	7.61E-06	1.60E-05	2.92E-06
				Pyrene	4.78E-06	1.00E-05	1.83E-06
				Benzo(a)anthracene	1.68E-06	3.53E-06	6.44E-07
				Chrysene	3.53E-07	7.41E-07	1.35E-07
				Benzo(b)fluoranthene	9.91E-08	2.08E-07	3.80E-08
				Benzo(k)fluoranthene	1.55E-07	3.26E-07	5.94E-08
				Benzo(a)pyrene	1.88E-07	3.95E-07	7.21E-08
				Indeno(1,2,3-cd)pyrene	3.75E-07	7.88E-07	1.44E-07
				Dibenz(a,h)anthracene	5.83E-07	1.22E-06	2.23E-07
				Benzo(g,h,i)perylene	4.89E-07	1.03E-06	1.87E-07

Summary of GHG Emissions:

Pollutant	Emission Factor (kg/MMBtu) ²	Emissions (metric tons/yr) ³	Emissions (US tons/yr) ⁴
CO ₂	73.96	56.7	62.47
CH ₄	3.0E-03	0.002	0.003
N ₂ O	6.0E-04	0.0005	0.0005
CO ₂ e ⁵	--	56.88	62.69

Notes

Assume PM = PM10 = PM2.5

Emission Factor based on Table 3.3 1, EPA AP 42, Chapter 3.3 Gasoline & Diesel Industrial Engines

1. HAPs Emission Factor based on Table 3.3 2, Chapter 3.3 Gasoline & Diesel Industrial Engines. Per 15A NCAC 2Q.0702 (a)(27) these emissions were not included in the TPER analysis.

2. Based on EPA default factors in Subpart C Tables C-1 and C-2 for Distillate Fuel Oil No. 2.

3. Calculated based on the heat input, emission factors, and equations C-1b and C-8b of Subpart C. CO₂e based on Subpart A Table A-1 factors.

$$CO_2, CH_4, \text{ or } N_2O \text{ (metric tpy)} = 1E-03 * \text{Gas (MMBtu/yr)} * \text{Emission Factor (kg/MMBtu)}$$

4. 1 metric ton = 1.102 US ton

5. CO₂e = CO₂, CH₄, or N₂O (tpy) * Global Warming Potential factor (GWP)

CO ₂ GWP	1
CH ₄ GWP	25
N ₂ O GWP	298

APPENDIX C

**PSD NETTING ANALYSIS AND SUPPORT
DOCUMENTATION**

Proposed Project Emissions and Comparison with the respective SERs

Pollutant	lb/hr	tpy	SER (tpy)	Netting Required
PM	12.05	49.14	25	Yes
PM ₁₀	10.75	43.59	15	Yes
PM _{2.5}	6.42	24.64	10	Yes
SO ₂	41.03	163.98	40	Yes
NO _x *	30.34	117.66	40	Yes
CO	25.01	92.26	100	No
VOC	3.21	9.54	40	No
Lead	0.001	0.0062	0.6	No
GHG	--	116,604	75,000	Yes
H ₂ SO ₄	0.1	0.44	7	No

* NO_x emissions from STAR unit is based on NO_x at 0.12 lb/MMBtu.

Duke Buck Station- PSD Netting Analysis

Description of Emissions	NO _x	SO ₂	PM	PM ₁₀	PM _{2.5}	CO _{2e}	Unit Operation/Retired date	Notes
	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)		
STAR Facility Emissions (Increases)	117.66	163.98	49.14	43.59	24.64	116,604	Expected operation to begin after May 2018	Emissions Calcs dated 10/26/17 (NO _x at 0.12 lb/MMBtu). Application submitted on 4/21/2017.
PSD Avoidance Cap for ES11 and ES12 (Increases)	599.8		198.90	160.8			Unit 11 began operation - 9/25/2011 and Unit 12 - 10/3/2011 (PSD Avoidance limits)	Permit No. 03786T34, 2.1-A.6.a (CO, NO _x , PM, PM ₁₀).
ES11 and ES12 (Increases)		108.52			160.8	2,669,078		Application BK Hot gas path mod Table A-4 dated May 7, 2014 (SO ₂). Duct Burner Modification Application Table 3-2 dated Feb 15 2013 (CO _{2e}). PM _{2.5} assumed to equal the PM ₁₀ avoidance cap.
ES13 - 10 cell cooling tower (Increases)			7	7	7		November 2011 (Potential to Emit)	Application Hot gas path mod Table A-7 dated May 7, 2014. PM _{2.5} assumed to equal PM ₁₀ .
ES14 - Auxiliary Boiler, 36.74 MMBtu/hr (Increases)	1.8	0.22	0.40	0.4	0.4		November 2011 (Potential to Emit)	
ES15 - Fuel oil fired emergency generator (1490 hp) (Increases)	0.8	0.0009	0.028	0.023	0.023		November 2011 (Potential to Emit)	
ES16 - Fuel oil fired fire water pump (237 hp) (Increases)	0.1	0.0001	0.004	0.004	0.004		November 2011 (Potential to Emit)	
ES72 - Chiller cooling tower (Increases)			0.60	0.6	0.6		June 2012 (Potential to Emit)	
Ash Basin Water Management Pump (Increases)	2.5	0.004	0.016	0.016	0.016		Unit added- February 2017 (Potential to Emit)	
ES17 - Fuel Oil fired emergency generator (762 hp) (Increases)	0.513	0.0005	0.003	0.002	0.002		Unit added- February 2015 (Potential to Emit)	Application BK ES-17EmGen Application dated May 18, 2016.
Total Increases	723.17	272.73	256.09	212.43	193.48	2,785,682		
Contemporaneous Emission Decreases (Unit 5, Blr 8), 2010	447.80	2,833.80	143.13	127.69	109.86		Units retired - 4/1/2013	NC DAQ Actual Emissions Inventory 2010 (Unit 5, Blr 8).
Contemporaneous Emission Decreases (Unit 6, Blr 9), 2010	476.60	2,776.10	156.16	134.61	109.88			NC DAQ Actual Emissions Inventory 2010 (Unit 6, Blr 9).
Contemporaneous Emission Decreases (Unit 5, Blr 8), 2011	305.80	1,931.50	160.30	140.87	118.54			NC DAQ Actual Emissions Inventory 2011 (Unit 5, Blr 8).
Contemporaneous Emission Decreases (Unit 6, Blr 9), 2011	333.20	1,907.50	120.93	112.70	103.39			NC DAQ Actual Emissions Inventory 2011 (Unit 6, Blr 9).
Contemporaneous Emission Decreases Avg 2010-2011	781.70	4724.45	290.26	257.94	220.84			Average actual emissions from 2010 and 2011.
PSD SERs	40	40	25	15	10	75,000		
Difference	-58.53	-4451.72	-34.17	-45.50	-27.35	2,785,682		
Significant Modification (Yes/No)	No	No	No	No	No	Yes		

Notes:

Emissions from Units 3 and 4 (Blr 5, 6 and 7) are not included for decreases because it does not fall under the 7-year contemporaneous window from the expected start of operation of the current project. 2010-2011, 24 month period is used for the contemporaneous emission decreases.

EMISSION INCREASES

SECTION 2- SPECIFIC LIMITATIONS AND CONDITIONS

2.1- Emission Source(s) 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 specifically identified herein as applicable requirements:

- A. two natural gas-fired combined-cycle combustion turbines (ID Nos. ES-11 and ES-12), each equipped dry low-NOx combustors, a heat recovery steam generator (HRSG) with a natural gas-fired duct burner, and a common steam turbine generator supplied by the two HRSGs; and associated selective catalytic reduction (SCR) (ID Nos. C11A and C12A) and associated CO/VOC oxidation catalyst (ID Nos. C11B and C12B)**

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

Regulated Pollutant	Limits/Standards	Applicable Regulation
particulate matter	0.125 lb/mmBtu heat input (applies only when duct burners are firing)	15A NCAC 02D .0503
visible emissions	20 percent opacity	15A NCAC 02D .0521
nitrogen oxides	15 ppm at 15% O ₂ (30-day rolling average)	15A NCAC 02D .0524 (40 CFR Part 60, Subpart KKKK)
	96 ppm at 15% O ₂ when operating at less than 75 percent of peak load or operating at ambient temperature below 0 °F (30-day rolling average)	
	Phase II Acid Rain Permit Requirements (see Section 2.3)	15A NCAC 02Q .0402 (40 CFR Part 72)
	2.0 ppmvd at 15% O ₂ for the first 500 hours of operation and 2.5 ppmvd at 15% O ₂ after 500 hours (30-day rolling average)	15A NCAC 02D .1418 (RACT)
	Federally-Enforceable Only Cross State Air Pollution Rules See Section 2.1.A.8.	40 CFR Part 97, Subparts AAAAA and BBBB
sulfur dioxide	0.06 lb/million Btu heat input	15A NCAC 02D .0524 (40 CFR Part 60, Subpart KKKK)
	Phase II Acid Rain Permit Requirements (see Section 2.3)	15A NCAC 02Q .0402 (40 CFR Part 72)
	Federally-Enforceable Only Cross State Air Pollution Rules See Section 2.1.A.8.	40 CFR Part 97, Subpart CCCCC
carbon monoxide nitrogen oxides particulate matter PM-10 sulfuric acid	See Section 2.1.A.4.	15A NCAC 02Q .0317 (PSD avoidance)

Regulated Pollutant	Limits/Standards	Applicable Regulation
volatile organic compounds	Less than 44.7 ton/yr, combined	15A NCAC 02Q .0317 (NSR avoidance)
toxic air pollutants	See Section 2.2 A.1 - State-only requirement	15A NCAC 02D .1100
toxic air pollutants	See Section 2.2 A.2 - State-only requirement	15A NCAC 02Q .0711
nitrogen oxides sulfur dioxide particulate matter PM-10 VOC lead sulfuric acid CO ₂ e	See Section 2.1.A.7	15A NCAC 02D .0530(u)

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

- a. Emissions of particulate matter from the combustion of natural gas in these sources (**ID Nos. ES-11 and ES-12**) that are discharged from these sources into the atmosphere shall not exceed **0.125 pounds per million Btu heat input** when the duct burners are in service.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1.A.1.a., above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for emissions of particulate matter from the firing of natural gas in these sources (**ID Nos. ES-11 and ES-12**).

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

- a. Visible emissions from these sources (**ID Nos. ES-11 and ES-12**) shall not be more than 20 percent opacity (except during startup, shutdowns, and malfunctions approved as such according to procedures approved under 15A NCAC 02D .0535) 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 .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1.A.2.a., above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required for opacity from the firing of natural gas in these sources (**ID Nos. ES-11 and ES-12**).

3. 15A NCAC 02D .0524: NEW SOURCE PERFORMANCE STANDARDS (40 CFR PART 60 SUBPART KKKK)

- a. The Permittee shall comply with all applicable provisions, including the requirements for emission

- ii. The SCR shall operate at all times that the turbine is operating except during turbine start-up and shutdown periods to the extent recommended by the manufacturer and operated in a manner so as to minimize ammonia slip.
- iii. During NOX CEM downtimes or CEM malfunctions, the Permittee shall operate at the ammonia injection rates shown in paragraph i above. In the case of a missing hour in conjunction with a Calibration Error Test or a Quarterly Linearity Test, the ammonia injection rate for the hour following the test shall be adjusted to the injection rate shown in paragraph i above until a valid data status has been achieved.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1418 if the ammonia injection rate to the SCR system is not continuously measured and recorded or the ammonia injection rate is less than the above injection rates during NOx CEM downtimes or CEM malfunctions.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit reports of excess emissions and monitor downtime as described in Section 2.1.A.3.j. Excess emissions and monitor downtime for NOx for purposes of compliance with the applicable RACT limits are defined in Section 2.1.A.3.j.
- f. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**6. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS
(Avoidance of 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION)**

- a. In order to avoid applicability of 15A NCAC 02D .0530(g), the following emission limits shall not be exceeded for the combustion turbines (**ID Nos. ES-11 and ES-12**):

POLLUTANT	EMISSION LIMITS	CONTROL TECHNOLOGY
carbon monoxide	147.0 tons per 12-month rolling average (total both turbines) (PSD avoidance)	oxidation catalyst
nitrogen oxides	599.8 tons per 12-month rolling average (total both turbines) (PSD avoidance)	selective catalytic reduction
particulate matter	198.9 tons per 12-month rolling average (total both turbines) (PSD avoidance)	none
PM-10	160.8 tons per 12-month rolling average (total both turbines) (PSD avoidance)	sulfur content of natural gas shall not exceed 1.7 gr/100 scf
sulfuric acid	18.5 tons per 12-month rolling average (total both turbines) (PSD avoidance)	sulfur content of natural gas shall not exceed 1.7 gr/100 scf

* Emission limits shall apply at all times except the following: Emissions resulting from start-up, shutdown or malfunction above those given above are permitted provided that optimal operational practices are adhered to and periods of excess emissions are minimized. Periods of excess emissions due to start-up and/or shutdown or operation below 50% load shall not exceed six hours in any 24-hour block period beginning at midnight. Start-up is defined as the period from initial firing to 50% load. Shutdown is defined

$$\text{PM10 emissions from ES-11 or ES-12 (pound/month)} = (\text{OT}_{\text{db}})(\text{E}_{\text{db}}) + (\text{OT}_{\text{ndb}})(\text{E}_{\text{ndb}})$$

where:

OT_{db} = Operating time (hours per month) when the duct burners are operating.

E_{db} = PM10 emission factor when the duct burners are operating. (i.e. 16.97 pound/hour)

OT_{ndb} = Operating time (hours per month) the duct burners not are operating.

E_{ndb} = PM10 emission factor when the duct burners are not operating. (i.e. 11.53 pound/hour)

$$\text{Total monthly PM-10 emissions} = \text{PM-10 emissions CT ES-11} + \text{PM-10 emissions CT ES-12}$$

- g. The sulfur content of the natural gas shall not exceed 1.7 gr/100 scf.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if records of the calculations in Paragraphs d. and f. are not maintained, if the records required by Section 2.1.A.3.e. are not maintained, if the catalyst inlet temperature is not monitored, and/or if the calculations or records indicate an exceedance of the limits in Paragraph a., above.

Reporting [15A NCAC 02Q .0508(f)]

- h. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the monthly CO emissions from each source (ID Nos. ES-11 and ES-12) and the total monthly CO emissions from both sources for the previous 17 months based on the calculations above. The emissions must be calculated for each of the 12-month periods over the previous 17 months. All instances of deviations from the requirements of this permit must be clearly identified.

**7. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS
(Avoidance of 15A NCAC 02D .0531: SOURCES IN NONATTAINMENT AREAS)**

- a. In order to avoid applicability of 15A NCAC 02D .0531, the following emission limits shall not be exceeded for the combustion turbines (ID Nos. ES-11 and ES-12):

POLLUTANT	EMISSION LIMITS*	CONTROL TECHNOLOGY
volatile organic compounds	44.7 tons per 12-month rolling average (total both turbines) (NSR avoidance)	oxidation catalyst

* Emission limits shall apply at all times except the following: Emissions resulting from start-up, shutdown or malfunction above those given above are permitted provided that optimal operational practices are adhered to and periods of excess emissions are minimized. Periods of excess emissions due to start-up and/or shutdown or operation below 50% load shall not exceed six hours in any 24-hour block period beginning at midnight. Start-up is defined as the period from initial firing to 50% load. Shutdown is defined as the period from 50% load to flame out.

Testing [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in 2.1.A.7.a above, the Permittee shall be deemed in

Table 3-2 Total Annual Project Emissions

Description of Emissions Increase/Decrease	CO ₂ e (ton/yr)	NO _x (ton/yr)	SO ₂ (ton/yr)	PM (ton/yr)	PM ₁₀ (ton/yr)	PM _{2.5} (ton/yr)	CO (ton/yr)	VOC (ton/yr)	H ₂ SO ₄ (ton/yr)	Lead (ton/yr)
Future Combustion Turbine and Duct Burners Emissions	2,669,078	209.94	127.67	122.29	195.55	195.55	153.38	58.57	14.89	1.12E-02
Current Maximum Potential Combustion Turbine and Duct Burner Emissions	2,323,780	182.78	11.34	98.68	154.30	154.30	112.37	41.94	3.30	9.74E-03
Proposed Project Emissions Increases	345,298	27.16	116.33	23.61	41.25	41.25	41.01	16.63	11.58	1.45E-03
PSD/NNSR Significant Emission Rate ¹	75,000	40.0	40.0	25.0	15.0	10.0	100.0	40.0	7.0	0.60
Netting Required? (Yes/No)	Yes	No	Yes	No	Yes	Yes	No	No	Yes	No
Other Emissions Increases and Decreases										
Shutdown of Boilers 8 & 9	-879,988	-797	-4,845	-294	-261	-224	-727	-11.8	-6.2	-2.84E-02
GE 7FA Combined Cycle Project December 2011	1,989,090	-538.4	-1,854.8	-74.8	9.0	8.4	70.5	38.0	-2.4	-3.80E-03
Total Net Emission Change	1,454,400	NA	-6,583	NA	-211	-174	NA	NA	3	NA
PSD Threshold	75,000	40	40	25	15	10	100	40	7	0.6
Proposed Project Subject to PSD/NNSR ¹ ?	Yes	No	No	No	No	No	No	No	No	No

(1) Rowan County is designated as moderate nonattainment for the 1997 8-hour ozone standard effective May 31, 2011, and marginal nonattainment for the 2008 8-hour ozone standard effective July 20, 2012. Therefore the NO_x and VOC emissions increases are compared to the nonattainment New Source Review significant emission rates.

3.5 Toxic air pollutant emissions

The Buck Steam Station has previously demonstrated compliance, as of June 1, 2011, with the NC Toxic Air Pollutants regulations under 15A NCAC 2D.1100 and 2Q.0700, and Section 2.2.B. of the air quality permit for the facility includes source-specific emissions limits based on that demonstration. Any future demonstrations to comply with 15A NCAC 2D.1104 shall only be required on a five-year basis, as stated in the permit.

**Duke Power
Buck Station - PSD Evaluation
2 GE7FA Combustion Turbine x 1 Steam Turbine Configuration, HRSG with DB**

Table A-4 Revised Project Emissions Increases and Emission Caps

Description of Emissions Increase/Decrease	NO _x (ton/yr)	SO ₂ (ton/yr)	PM (ton/yr)	PM ₁₀ (ton/yr)	CO (ton/yr)	VOC (ton/yr)	H ₂ SO ₄ (ton/yr)	Lead (ton/yr)
Future Combustion Turbine and Duct Burners Emissions	209.94	108.52	122.29	148.65	127.82	43.92	12.65	1.12E-02
Non turbine emissions (10 cell mechanical draft cooling tower, auxiliary boiler rated at 36.74 MMBtu/hr, diesel-fired emergency generator, diesel-fired fire water pump, Chiller Cooling Towers) ^(a)	2.70	0.22	8.01	8.00	4.50	1.45	0.00	1.80E-05
Total Project Potential Emissions	212.6	108.7	130.3	156.6	132.3	45.38	12.7	1.12E-02
Emission decreases from the March 2008 minor source permit application ^(b)	727.8	1,866.5	181.9	153.8	51.5	6.10	5.7	1.36E-02
PSD/NNSR Significant Emission Rate ^(c)	40.0	40.0	25.0	15.0	100.0	40.0	7.0	6.00E-01
PSD avoidance emission caps for the combustion turbines (emission decreases plus PSD significant emission rate - non-turbine emissions)	765.1	1,906.3	198.9	160.8	147.0	44.65	12.7	0.6
Combustion turbine emissions minus PSD avoidance emissions caps	-557.86	-1,797.98	-84.61	-20.15	-23.68	-2.18	-0.05	-6.02E-01

(a) Appendix B, Permit Application Addendum for the Buck Station, March 2008, updated for "as built" emergency engines and auxiliary boiler emissions.

(b) Appendix C, Permit Application Addendum for the Buck Steam Station, March 2008.

(c) Rowan County is designated as moderate nonattainment for the 1997 8-hour ozone standard effective May 31, 2011, and marginal nonattainment for the 2008 8-hour ozone standard effective July 20, 2012. Therefore the NO_x and VOC emissions increases are compared to the nonattainment New Source Review significant emission rates.

Duke Energy Carolinas, LLC

Buck Combined Cycle Facility
 Salisbury, North Carolina
 Rowan County
 Facility ID: 8000004
 Permit No. 03786T34

Estimation of Emissions from Diesel-Fired Engines

Given Information:

Engine Rating					Use	Potential Hours/Year	
Ash Basin Water Management Pump	55	kW	73.8	hp	Non-Emerg	8,760	hr/yr

Conversion Factors: 1.341 hp/kW
 7,000 Btu/hp-hr, Brake Specific Fuel Consumption

Compound	Emission Factor ^{1,2}		Potential Emissions		Insignificant Activity Threshold per Engine	Does Engine Qualify as an Insignificant Activity?
			55 kW Engine			
NOx	4.70	g/kW-hr	2.50	ton/yr	5 tpy	Yes
VOC	4.70	g/kW-hr	2.50	ton/yr	5 tpy	Yes
CO	5.00	g/kW-hr	2.66	ton/yr	5 tpy	Yes
SO2	1.21E-05	lb/hp-hr	0.00	ton/yr	5 tpy	Yes
PM	3.00E-02	g/kW-hr	0.02	ton/yr	5 tpy	Yes
PM10	3.00E-02	g/kW-hr	0.02	ton/yr	5 tpy	Yes
PM2.5	3.00E-02	g/kW-hr	0.02	ton/yr	5 tpy	Yes
Benzene	9.33E-04	lb/MMBtu	4.22	lb/yr	1,000 lb/yr	Yes
Toluene	4.09E-04	lb/MMBtu	1.85	lb/yr	1,000 lb/yr	Yes
Xylene	2.85E-04	lb/MMBtu	1.29	lb/yr	1,000 lb/yr	Yes
1,3 Butadiene	3.91E-05	lb/MMBtu	0.18	lb/yr	1,000 lb/yr	Yes
Formaldehyde	1.18E-03	lb/MMBtu	5.34	lb/yr	1,000 lb/yr	Yes
Acetaldehyde	7.67E-04	lb/MMBtu	3.47	lb/yr	1,000 lb/yr	Yes
Acrolein	9.25E-05	lb/MMBtu	0.42	lb/yr	1,000 lb/yr	Yes
Naphthalene	8.48E-05	lb/MMBtu	0.38	lb/yr	1,000 lb/yr	Yes
Total PAH	1.68E-04	lb/MMBtu	0.76	lb/yr	1,000 lb/yr	Yes

1 - SO2 and HAP from Section 3.3 of AP-42 (using 0.0015%S fuel).

2 - NOx, VOC, CO and PM are based on emission limits from Tier 4 standards. Conservatively assumed that 4.7 g/kW-hr applies to both NOx and VOC. Actually, sum of VOC and NOx must be less than 4.7 g/kW-hr.

FORM B

SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 12/01/01

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Diesel-fired emergency standby generator, 762 BHP	EMISSION SOURCE ID NO: ES-17(EmGen)
OPERATING SCENARIO <u>1</u> OF <u>1</u>	CONTROL DEVICE ID NO(S): N/A
DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM): Emergency standby electric generation in event of loss of electric power on old CT demolition site.	
EMISSION POINT (STACK) ID NO(S): EP-17	

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form B4)	<input type="checkbox"/> Manufact. of chemicals/coatings/inks (Form B7)
<input checked="" type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form B8)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: 2/1/2015	OPERATION DATE: 5/29/2015	DATE MANUFACTURED: Aug-06
MANUFACTURER / MODEL NO.: CAT C15, DM8155	EXPECTED OP. SCHEDULE: _____ HR/DAY _____ DAY/WK _____ WK/YR	
IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): IIII	NESHAP (SUBPART?): 63	MACT (SUBPART?): ZZZZ
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25	MAR-MAY 25	JUN-AUG 25
SEP-NOV 25		
EXPECTED ANNUAL HOURS OF OPERATION: <100	VISIBLE STACK EMISSIONS UNDER NORMAL OPERATION: <20 % OPACITY	

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	Manufacturer	0.06	0.003			0.06	0.003
PARTICULATE MATTER <10 MICRONS (PM ₁₀)	Manufacturer	0.04	0.002			0.04	0.002
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})	Manufacturer	0.04	0.002			0.04	0.002
SULFUR DIOXIDE (SO ₂) 15 ppm ultra low S distillate	Manufacturer	0.01	0.0005			0.01	0.0005
NITROGEN OXIDES (NO _x)	Manufacturer	10.26	0.513			10.26	0.513
CARBON MONOXIDE (CO)	Manufacturer	1.25	0.0625			1.25	0.0625
VOLATILE ORGANIC COMPOUNDS (VOC)	Manufacturer	0.03	0.0015			0.03	0.0015
LEAD	AP-42 1996	4.80E-05	2.50E-06			4.80E-05	2.50E-06
OTHER							

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT AND CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Acetaldehyde 75070	AP-42 1996	1.30E-04	6.50E-06			1.30E-04	6.50E-06
Acrolein 107028	AP-42 1996	4.20E-05	2.10E-06			4.20E-05	2.10E-06
Benzene 71432	AP-42 1996	4.14E-03	2.07E-04			4.14E-03	2.07E-04
Toluene 108883	AP-42 1996	1.50E-03	7.50E-05			1.50E-03	7.50E-05
Xylene 1330207	AP-42 1996	1.00E-03	5.00E-05			1.00E-03	5.00E-05
Propylene	AP-42 1996	0	0			0	0
Formaldehyde 50000	AP-42 1996	4.20E-04	2.10E-05			4.20E-04	2.10E-05
Naphthalene 91203	AP-42 1996	6.90E-04	1.52E-03			6.90E-04	1.52E-03

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	lb/hr	lb/day	lb/yr
Benzo-a-pyrene 50328	AP-42 1996	1.40E-06	3.36E-05	1.40E-04
Beryllium metal 7440417	AP-42 1996	1.50E-05	3.80E-04	1.60E-03

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE
Attach Additional Sheets As Necessary

EMISSION DECREASES

Facility Name: Duke Energy Carolinas, LLC – Buck Combined Cycle Facility
 1385 Dukeville Road
 Salisbury, NC 28146

Facility ID : 8000004
Permit : 03786
County : Rowan
DAQ Region : Mooresville

**North Carolina Department of Environment and Natural Resources
 Division of Air Quality
 Air Pollutant Point Source Emissions Inventory – Calendar Year 2010**

- 1. Emission Source ID (from permit) or Emission Source Group ID** ES-4 (B8).13A
- 2. Emission Source Description:** Coal/No. 2 fuel oil-fired electric utility boiler (1,440 million Btu per hour maximum heat input, Unit No. 5 – Boiler No. 8)
- 3. Operating Scenario ID/Description:** OS – 8/electric utility boiler fired by coal
- 4. SCC Number/Description:** 10100202 / Bituminous Coal ; Pulverized Coal: Dry Bottom
- 5. Throughput/units in 2010:** 239798.5 TON/yr
 (e.g. production or fuel use):
- 6. Fuel Information** (If fuel is used)
- | | | | | | |
|----------|------|-------|-------|--------------------------|----------------|
| % Sulfur | 0.64 | % Ash | 12.59 | Heat Content (Btu/units) | 11792.4 Btu/lb |
|----------|------|-------|-------|--------------------------|----------------|
- 7. Capture Efficiency**
 (% of Emissions from this Process Vented to Control Device or Stack): 100

8. Control Device Information :

Order	CS-ID	CD ID (as listed in permit)	Control Device Description
1	CS-3	CD-3.13A	Hot-side electrostatic precipitator (80,640 square feet of plate area)

9. Emission Release Point (ERP) Information: (Sources vented to more than one ERP use additional entry lines):

ERP ID	ERP Type	Height (in feet)	Diameter Circle (enter #): Rectangle (L x W) (in 0.1 feet)	Temperature (F)	Velocity (Feet/sec)	Volume Flow Rate (Acfm)	ERP Description
ES-9 Stack	VERTICAL STACK	216	8	334	92	277465.46	ES-9 Discharge Stack

10. Operating Schedule: (Source/Operating Scenario that best characterizes Calendar Year 2010)

Hours per Day (24) Days per Week (7) Weeks per Year (52)

11. Typical Start & End Times For Operating Scenario: Start: 0 End: 2359

12. Seasonal Periods Percent Annual Throughput:

Jan–Feb + Dec 2010	27%	March–May 2010	29%	June–Aug. 2010	36%	Sept.–Nov. 2010	8%
-----------------------	-----	-------------------	-----	-------------------	-----	--------------------	----

13. Actual Emissions per Pollutant Listed :

Attach calculations and documentation of emission factors or other estimation methods used.

GHG Pollutants	CAS	Emissions– GHG Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	Ef Control
		2010				
Criteria (NAAQS) Pollutants	Pollutant Code	Emissions– Criteria Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
CO	CO	448.4	08	0		
NOx	NOx	447.8	01	0		
TSP	TSP	142.9	08	99.69		
PM10	PM10	127.5	08	0		
PM2.5	PM2.5	109.7	08	0		
SO2	SO2	2833.8	01	0		
VOC	VOC	7.19	08	0	0.06	AFTER
HAP/TAP Pollutants (In Alphabetical Order)	CAS (see instructions)	Emissions HAP/TAPS (Pounds/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
Acetaldehyde	75–07–0	18.63836	08	0	0.0000777251	
Acrolein	107–02–8	11.06653	08	0	0.0000461493	
Allyl chloride	107–05–1	53.0029	08	0	0.000221031	
Ammonia (as NH3)	7664–41–7	14	08	0		
Arsenic Unlisted Compounds – Specify Compound (Component of ASC)	ASC–Other	20.8	08	0		

Benzene	71-43-2	22.71549	08	0	0.0000947274	
Beryllium Metal (unreacted) (Component of BEC)	7440-41-7	2.9	08	0		
Cadmium Metal, elemental, unreacted (Component of CDC)	7440-43-9	2.1	08	0		
Carbon disulfide	75-15-0	6.40694	08	0	0.000026718	
Chromic acid (VI) (Component of SolCR6 CRC)	7738-94-5	5.856	08	0		
Chromium Unlisted Compounds – Specify Compound (Component of CRC)	CRC-Other	42.94	08	0		
Cobalt Unlisted Compounds – Specify Compound (Component of COC)	COC-Other	13.3	08	0		
Cresol, p-	106-44-5	6.40694	08	0	0.000026718	
DEHP (Di(2-ethylhexyl)phthalate)	117-81-7	20.96815	08	0	0.0000874407	
Dichlorobenzene(p), 1,4-	106-46-7	6.40694	08	0	0.000026718	
Dichloropropene, 1,3-	542-75-6	4.19362	08	0	0.0000174881	
Dinitrotoluene, 2,4-	121-14-2	1.1649	08	0	0.00000485782	
Ethylene dibromide (dibromoethane)	106-93-4	15.14366	08	0	0.0000631516	
Fluoranthene (Component of 83329/POMTV)	206-44-0	0.87367	08	0	0.00000364336	
Fluorene (Component of 83329/POMTV)	86-73-7	0.81543	08	0	0.00000340047	
Formaldehyde	50-00-0	15.14366	08	0	0.0000631516	
Furans – Dibenzofurans (group total – CAA – unchlorinated) (Component of 83329/POMTV)	132-64-9	3.37821	08	0	0.0000140877	
Hydrogen chloride (hydrochloric acid)	7647-01-0	526958	02	0		
Hydrogen fluoride (hydrofluoric acid as mass of HF) (Component of 16984488/Fluorides)	7664-39-3	35773	02	10		
Isophorone	78-59-1	6.98938	08	0	0.0000291469	
Lead Unlisted Compounds – Specify Compound (Component of PBC)	PBC-Other	29.9	08	0		
MIBK (methyl isobutyl ketone)	108-10-1	13.39632	08	0	0.0000558649	
Manganese Unlisted Compounds – Specify Compound (Component of MNC)	MNC-Other	41	08	0		
Mercury, vapor (Component of HGC)	7439-97-6	36.4	08	24		
Methyl bromide (bromomethane)	74-83-9	5.1838	08	0	0.0000216173	
Methyl chloride (chloromethane)	74-87-3	6.40694	08	0	0.000026718	
Methyl iodide (iodomethane)	74-88-4	11.64898	08	0	0.0000485782	
Methylene chloride	75-09-2	20.96815	08	0	0.0000874407	
Naphthalene (Component of 83329/POMTV)	91-20-3	3.61117	08	0	0.0000150592	
Nickel metal (Component of NIC)	7440-02-0	42.9	08	0		

Phenanthrene (Component of 83329/POMTV)	85-01-8	2.44628	08	0	0.0000102014	
Polycyclic Organic Matter (Inc PAH, dioxins, etc. NC AP 42 historic)	POM	12.06834	08	0	0.000050327	
Propionaldehyde	123-38-6	11.06653	08	0	0.0000461493	
Pyrene (Component of 83329/POMTV)	129-00-0	0.38442	08	0	0.00000160308	
Selenium Compounds	SEC	1334.3	08	44		
Sulfuric acid	7664-93-9	2247	08	99		
Vinyl chloride	75-01-4	4.25187	08	0	0.000017731	

Facility Name: Duke Energy Carolinas, LLC – Buck Combined Cycle Facility
 1385 Dukeville Road
 Salisbury, NC 28146

Facility ID : 8000004
Permit : 03786
County : Rowan
DAQ Region : Mooresville

**North Carolina Department of Environment and Natural Resources
 Division of Air Quality
 Air Pollutant Point Source Emissions Inventory – Calendar Year 2010**

- 1. Emission Source ID (from permit) or Emission Source Group ID** ES-4 (B8).13A
- 2. Emission Source Description:** Coal/No. 2 fuel oil-fired electric utility boiler (1,440 million Btu per hour maximum heat input, Unit No. 5 – Boiler No. 8)
- 3. Operating Scenario ID/Description:** OS – 9/electric utility boiler fired by No. 2 fuel
- 4. SCC Number/Description:** 10100501 / Distillate Oil (No. 1 2) ; Normal Firing
- 5. Throughput/units in 2010:** 138839 GAL/yr
 (e.g. production or fuel use):
- 6. Fuel Information** (If fuel is used)
- | | | | | | |
|----------|--------|-------|------|--------------------------|-------------------|
| % Sulfur | 0.0015 | % Ash | 0.01 | Heat Content (Btu/units) | 138110 Btu/gallon |
|----------|--------|-------|------|--------------------------|-------------------|
- 7. Capture Efficiency**
 (% of Emissions from this Process Vented to Control Device or Stack): 100

8. Control Device Information :

Order	CS-ID	CD ID (as listed in permit)	Control Device Description
1	CS-3	CD-3.13A	Hot-side electrostatic precipitator (80,640 square feet of plate area)

9. Emission Release Point (ERP) Information: (Sources vented to more than one ERP use additional entry lines):

ERP ID	ERP Type	Height (in feet)	Diameter Circle (enter #): Rectangle (L x W) (in 0.1 feet)	Temperature (F)	Velocity (Feet/sec)	Volume Flow Rate (Acfm)	ERP Description
ES-9 Stack	VERTICAL STACK	216	8	334	92	277465.46	ES-9 Discharge Stack

10. Operating Schedule: (Source/Operating Scenario that best characterizes Calendar Year 2010)
Hours per Day (24) Days per Week (7) Weeks per Year (52)

11. Typical Start & End Times For Operating Scenario: Start: 0 End: 2359

12. Seasonal Periods Percent Annual Throughput:

Jan–Feb + Dec 2010	25%	March–May 2010	25%	June–Aug. 2010	25%	Sept.–Nov. 2010	25%
--------------------	-----	----------------	-----	----------------	-----	-----------------	-----

13. Actual Emissions per Pollutant Listed :

Attach calculations and documentation of emission factors or other estimation methods used.

GHG Pollutants	CAS	Emissions–GHG Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	Ef Control
		2010				
Criteria (NAAQS) Pollutants	Pollutant Code	Emissions–Criteria Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
CO	CO	0.35	08	0	0.005	AFTER
TSP	TSP	0.23	08	50		
PM10	PM10	0.19	08	0		
PM2.5	PM2.5	0.16	08	0		
VOC	VOC	0.01	08	0	0.0002	AFTER
HAP/TAP Pollutants (In Alphabetical Order)	CAS (see instructions)	Emissions HAP/TAPS (Pounds/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
Arsenic Unlisted Compounds – Specify Compound (Component of ASC)	ASC–Other	0.07719	08	0	5.56E–7	
Beryllium Metal (unreacted) (Component of BEC)	7440–41–7	0.0579	08	0	4.17E–7	
Cadmium Metal, elemental, unreacted (Component of CDC)	7440–43–9	0.0579	08	0	4.17E–7	
Chromic acid (VI) (Component of SolCR6 CRC)	7738–94–5	0.0579	08	0	4.17E–7	
Cobalt Unlisted Compounds – Specify Compound	COC–Other	0.82984	08	0	0.000005977	

(Component of COC)						
Formaldehyde	50-00-0	4.58169	08	0	0.000033	
Lead Unlisted Compounds – Specify Compound (Component of PBC)	PBC-Other	0.17369	08	0	0.000001251	
Manganese Unlisted Compounds – Specify Compound (Component of MNC)	MNC-Other	0.11579	08	0	8.34E-7	
Mercury, vapor (Component of HGC)	7439-97-6	0.0579	08	0	4.17E-7	
Naphthalene (Component of 83329/POMTV)	91-20-3	0.15689	08	0	0.00000113	
Selenium Compounds	SEC	0.28948	08	0	0.000002085	

Facility Name: Duke Energy Carolinas, LLC – Buck Combined Cycle Facility
 1385 Dukeville Road
 Salisbury, NC 28146

Facility ID : 8000004
Permit : 03786
County : Rowan
DAQ Region : Mooresville

**North Carolina Department of Environment and Natural Resources
 Division of Air Quality
 Air Pollutant Point Source Emissions Inventory – Calendar Year 2010**

- 1. Emission Source ID (from permit) or Emission Source Group ID** ES-5 (B9).13A
-
- 2. Emission Source Description:** Coal/No. 2 fuel oil-fired electric utility boiler (1,440 million Btu per hour maximum heat input, Unit No. 6 – Boiler No. 9)
-
- 3. Operating Scenario ID/Description:** OS – 10/electric utility boiler fired by coal
-
- 4. SCC Number/Description:** 10100202 / Bituminous Coal ; Pulverized Coal: Dry Bottom
-
- 5. Throughput/units in 2010:** 225818.5 TON/yr
 (e.g. production or fuel use):
-
- 6. Fuel Information** (If fuel is used)
- | | | | | | |
|----------|------|-------|-------|--------------------------|-----------------|
| % Sulfur | 0.64 | % Ash | 12.54 | Heat Content (Btu/units) | 11830.21 Btu/lb |
|----------|------|-------|-------|--------------------------|-----------------|
-
- 7. Capture Efficiency**
 (% of Emissions from this Process Vented to Control Device or Stack): 100
-

8. Control Device Information :

Order	CS-ID	CD ID (as listed in permit)	Control Device Description
1	CS-3	CD-3.13A	Hot-side electrostatic precipitator (80,640 square feet of plate area)

9. Emission Release Point (ERP) Information: (Sources vented to more than one ERP use additional entry lines):

ERP ID	ERP Type	Height (in feet)	Diameter Circle (enter #): Rectangle (L x W) (in 0.1 feet)	Temperature (F)	Velocity (Feet/sec)	Volume Flow Rate (Acfm)	ERP Description
ES-9 Stack	VERTICAL STACK	216	8	334	92	277465.46	ES-9 Discharge Stack

10. Operating Schedule: (Source/Operating Scenario that best characterizes Calendar Year 2010)

Hours per Day (24) Days per Week (7) Weeks per Year (52)

11. Typical Start & End Times For Operating Scenario: Start: 0 End: 2359

12. Seasonal Periods Percent Annual Throughput:

Jan–Feb + Dec 2010	21%	March–May 2010	28%	June–Aug. 2010	41%	Sept.–Nov. 2010	10%
-----------------------	-----	-------------------	-----	-------------------	-----	--------------------	-----

13. Actual Emissions per Pollutant Listed :

Attach calculations and documentation of emission factors or other estimation methods used.

GHG Pollutants	CAS	Emissions– GHG Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	Ef Control
		2010				
Criteria (NAAQS) Pollutants	Pollutant Code	Emissions– Criteria Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
CO	CO	427.1	08	0		
NOx	NOx	476.6	01	0		
TSP	TSP	155.9	08	99.54		
PM10	PM10	134.4	08	0		
PM2.5	PM2.5	109.7	08	0		
SO2	SO2	2776.1	01	0		
VOC	VOC	6.9	08	0		
HAP/TAP Pollutants (In Alphabetical Order)	CAS (see instructions)	Emissions HAP/TAPS (Pounds/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
Acetaldehyde	75–07–0	17.55177	08	0	0.0000777251	
Acrolein	107–02–8	10.42137	08	0	0.0000461493	
Allyl chloride	107–05–1	49.91289	08	0	0.000221031	
Ammonia (as NH3)	7664–41–7	18.2	08	0		
Arsenic Unlisted Compounds – Specify Compound (Component of ASC)	ASC–Other	27.7	08	0		

Benzene	71-43-2	21.3912	08	0	0.0000947274	
Beryllium Metal (unreacted) (Component of BEC)	7440-41-7	4.2	08	0		
Cadmium Metal, elemental, unreacted (Component of CDC)	7440-43-9	2.4	08	0		
Carbon disulfide	75-15-0	6.03342	08	0	0.000026718	
Chromic acid (VI) (Component of SolCR6 CRC)	7738-94-5	6.948	08	0		
Chromium Unlisted Compounds – Specify Compound (Component of CRC)	CRC-Other	50.95	08	0		
Cobalt Unlisted Compounds – Specify Compound (Component of COC)	COC-Other	16.5	08	0		
Cresol, p-	106-44-5	6.03342	08	0	0.000026718	
DEHP (Di(2-ethylhexyl)phthalate)	117-81-7	19.74573	08	0	0.0000874407	
Dichlorobenzene(p), 1,4-	106-46-7	6.03342	08	0	0.000026718	
Dichloropropene, 1,3-	542-75-6	3.94914	08	0	0.0000174881	
Dinitrotoluene, 2,4-	121-14-2	1.09699	08	0	0.00000485782	
Ethylene dibromide (dibromoethane)	106-93-4	14.26044	08	0	0.00006315	
Fluoranthene (Component of 83329/POMTV)	206-44-0	0.82274	08	0	0.00000364336	
Fluorene (Component of 83329/POMTV)	86-73-7	0.76789	08	0	0.00000340047	
Formaldehyde	50-00-0	14.2608	08	0	0.0000631516	
Furans – Dibenzofurans (group total – CAA – unchlorinated) (Component of 83329/POMTV)	132-64-9	3.18178	08	0	0.00001409	
Hydrogen chloride (hydrochloric acid)	7647-01-0	496721	02	0		
Hydrogen fluoride (hydrofluoric acid as mass of HF) (Component of 16984488/Fluorides)	7664-39-3	33709	02	10		
Isophorone	78-59-1	6.58191	08	0	0.0000291469	
Lead Unlisted Compounds – Specify Compound (Component of PBC)	PBC-Other	38.5	08	0		
MIBK (methyl isobutyl ketone)	108-10-1	12.61533	08	0	0.0000558649	
Manganese Unlisted Compounds – Specify Compound (Component of MNC)	MNC-Other	62.5	08	0		
Mercury, vapor (Component of HGC)	7439-97-6	34.3	08	24		
Methyl bromide (bromomethane)	74-83-9	4.88159	08	0	0.0000216173	
Methyl chloride (chloromethane)	74-87-3	6.03387	08	0	0.00002672	
Methyl iodide (iodomethane)	74-88-4	10.96986	08	0	0.0000485782	
Methylene chloride	75-09-2	19.74573	08	0	0.0000874407	
Naphthalene (Component of 83329/POMTV)	91-20-3	3.40065	08	0	0.0000150592	
Nickel metal (Component of NIC)	7440-02-0	49.2	08	0		

Phenanthrene (Component of 83329/POMTV)	85-01-8	2.30366	08	0	0.0000102014	
Polycyclic Organic Matter (Inc PAH, dioxins, etc. NC AP 42 historic)	POM	11.36477	08	0	0.000050327	
Propionaldehyde	123-38-6	10.42137	08	0	0.0000461493	
Pyrene (Component of 83329/POMTV)	129-00-0	0.36201	08	0	0.00000160308	
Selenium Compounds	SEC	1257.3	08	44		
Sulfuric acid	7664-93-9	0	08	99.9		
Vinyl chloride	75-01-4	4.00399	08	0	0.000017731	

Facility Name: Duke Energy Carolinas, LLC – Buck Combined Cycle Facility
 1385 Dukeville Road
 Salisbury, NC 28146

Facility ID : 8000004
Permit : 03786
County : Rowan
DAQ Region : Mooresville

**North Carolina Department of Environment and Natural Resources
 Division of Air Quality
 Air Pollutant Point Source Emissions Inventory – Calendar Year 2010**

- 1. Emission Source ID (from permit) or Emission Source Group ID** ES-5 (B9).13A
- 2. Emission Source Description:** Coal/No. 2 fuel oil-fired electric utility boiler (1,440 million Btu per hour maximum heat input, Unit No. 6 – Boiler No. 9)
- 3. Operating Scenario ID/Description:** OS – 11/electric utility boiler fired by No. 2 fuel
- 4. SCC Number/Description:** 10100501 / Distillate Oil (No. 1 2) ; Normal Firing
- 5. Throughput/units in 2010:** 159835 GAL/yr
 (e.g. production or fuel use):
- 6. Fuel Information** (If fuel is used)
- | | | | | | |
|----------|--------|-------|------|--------------------------|-------------------|
| % Sulfur | 0.0015 | % Ash | 0.01 | Heat Content (Btu/units) | 138083 Btu/gallon |
|----------|--------|-------|------|--------------------------|-------------------|
- 7. Capture Efficiency**
 (% of Emissions from this Process Vented to Control Device or Stack): 100

8. Control Device Information :

Order	CS-ID	CD ID (as listed in permit)	Control Device Description
1	CS-3	CD-3.13A	Hot-side electrostatic precipitator (80,640 square feet of plate area)

9. Emission Release Point (ERP) Information: (Sources vented to more than one ERP use additional entry lines):

ERP ID	ERP Type	Height (in feet)	Diameter Circle (enter #): Rectangle (L x W) (in 0.1 feet)	Temperature (F)	Velocity (Feet/sec)	Volume Flow Rate (Acfm)	ERP Description
ES-9 Stack	VERTICAL STACK	216	8	334	92	277465.46	ES-9 Discharge Stack

10. Operating Schedule: (Source/Operating Scenario that best characterizes Calendar Year 2010)
Hours per Day (24) Days per Week (7) Weeks per Year (52)

11. Typical Start & End Times For Operating Scenario: Start: 0 End: 2359

12. Seasonal Periods Percent Annual Throughput:

Jan–Feb + Dec 2010	25%	March–May 2010	25%	June–Aug. 2010	25%	Sept.–Nov. 2010	25%
--------------------	-----	----------------	-----	----------------	-----	-----------------	-----

13. Actual Emissions per Pollutant Listed :

Attach calculations and documentation of emission factors or other estimation methods used.

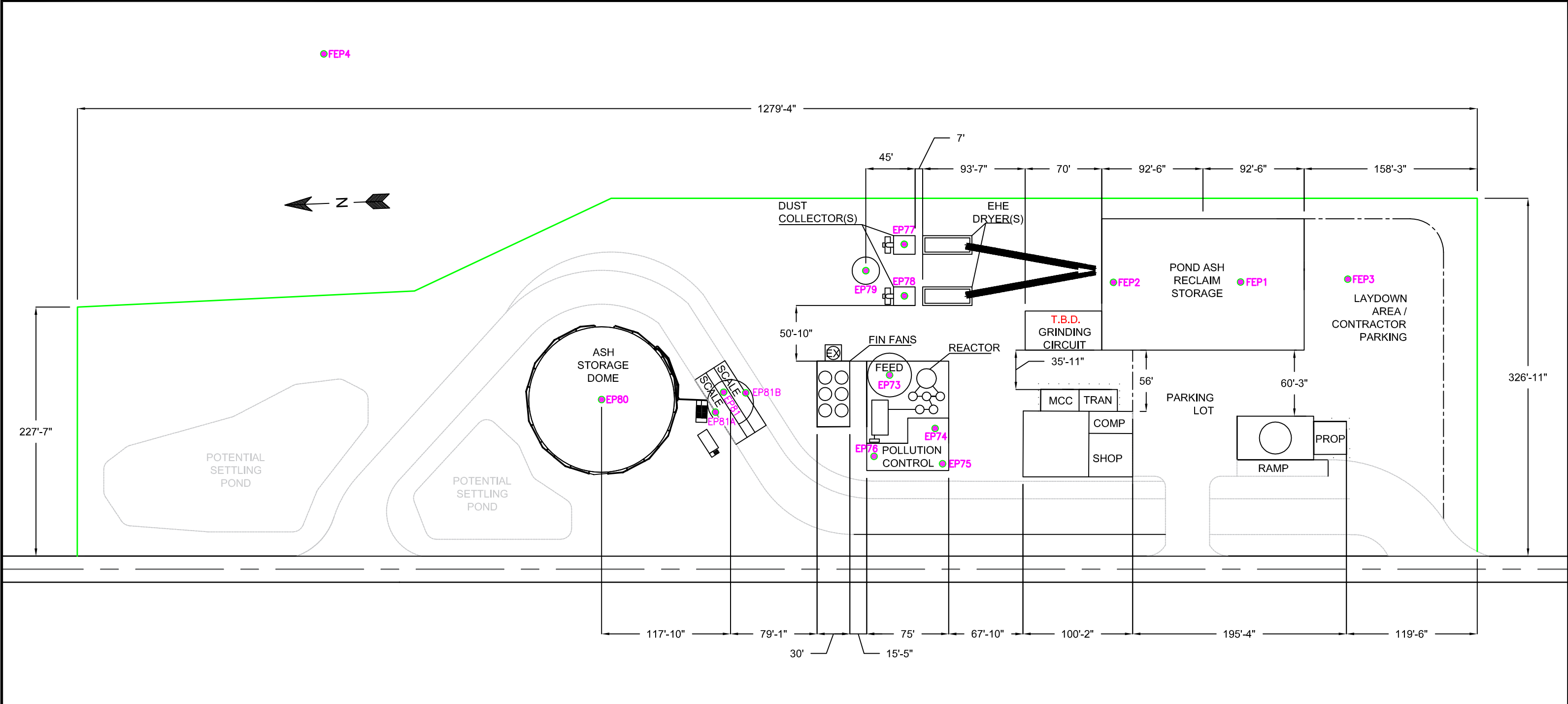
GHG Pollutants	CAS	Emissions–GHG Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	Ef Control
		2010				
Criteria (NAAQS) Pollutants	Pollutant Code	Emissions–Criteria Pollutants (Tons/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
CO	CO	0.4	08	0	0.005	AFTER
TSP	TSP	0.26	08	50		
PM10	PM10	0.21	08	0		
PM2.5	PM2.5	0.18	08	0		
VOC	VOC	0.02	08	0	0.0002	AFTER
HAP/TAP Pollutants (In Alphabetical Order)	CAS (see instructions)	Emissions HAP/TAPS (Pounds/Year)	Emission Estimation Method Code (See Instructions)	Control Efficiency (Net after all controls)	Emission Factor	EF Control
		2010				
Arsenic Unlisted Compounds – Specify Compound (Component of ASC)	ASC–Other	0.08887	08	0	5.56E–7	
Beryllium Metal (unreacted) (Component of BEC)	7440–41–7	0.06665	08	0	4.17E–7	
Cadmium Metal, elemental, unreacted (Component of CDC)	7440–43–9	0.06665	08	0	4.17E–7	
Chromic acid (VI) (Component of SolCR6 CRC)	7738–94–5	0.06665	08	0	4.17E–7	
Cobalt Unlisted Compounds – Specify Compound	COC–Other	0.95533	08	0	0.000005977	

(Component of COC)						
Formaldehyde	50-00-0	5.27456	08	0	0.000033	
Lead Unlisted Compounds – Specify Compound (Component of PBC)	PBC-Other	0.19995	08	0	0.000001251	
Manganese Unlisted Compounds – Specify Compound (Component of MNC)	MNC-Other	0.1333	08	0	8.34E-7	
Mercury, vapor (Component of HGC)	7439-97-6	0.06665	08	0	4.17E-7	
Naphthalene (Component of 83329/POMTV)	91-20-3	0.18061	08	0	0.00000113	
Nickel metal (Component of NIC)	7440-02-0	0.06665	08	0	4.17E-7	
Selenium Compounds	SEC	0.33326	08	0	0.000002085	

**Buck Total Criteria Emissions
Reporting Year: 2011**

	Unit 5 Blr. 8 Emissions (tons)	Unit 6 Blr. 9 Emissions (tons)	Unit 7-C Emissions (tons)	Unit 8-C Emissions (tons)	Unit 9-C Emissions (tons)	Unit 10CC Emis. (tons)	Unit 11CC Emis. (tons)	Unit 10-Aux. Emissions (tons)	Total Emissions (tons)
Filterable PM	58.82	24.87	0.00	0.00	0.00	1.25	0.00	0.00	84.94
Filterable PM-10	39.39	16.64	0.00	0.00	0.00	1.25	0.00	0.00	57.28
Filterable PM-2.5	17.06	7.33	0.00	0.00	0.00	0.63	0.00	0.00	25.02
Condensable PM	101.48	96.06	0.01	0.01	0.00	3.10	0.00	0.00	200.66
SO2	1,931.50	1,907.50	0.00	0.00	0.00	0.49	0.00	0.01	3839.5
NOx	305.80	333.20	0.74	0.51	0.00	7.97	0.00	0.00	648.22
VOC	4.41	4.41	0.00	0.00	0.00	1.38	0.00	0.00	10.20
CO	274.68	265.41	0.19	0.13	0.00	5.81	0.00	0.00	546.23
TSP - total	160.30	120.93	0.01	0.01	0.00	4.35	0.00	0.00	285.60
PM-10 - total	140.87	112.70	0.01	0.01	0.00	4.35	0.00	0.00	257.94
PM-2.5 - total	118.54	103.39	0.01	0.01	0.00	3.73	0.00	0.00	225.68

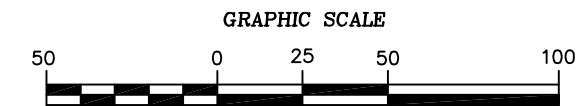
APPENDIX D
FACILITY DRAWINGS



SITE MAP

FUGITIVE EMISSIONS/EMISSIONS POINT LOCATIONS				
LOCATION #	DESCRIPTION	APPROX. DIMENSIONS	BASE ELEVATION	HEIGHT
FEP1	WET ASH RECEIVING - TRANSFER TO SHED	185'-0" X 120'-0"	729'-0"	5'-0"
FEP2	WET ASH RECEIVING - TRANSFER TO HOPPER	36'-0" X 70'-0"	723'-0"	10'-0"
FEP3	WET ASH RECEIVING - UNLOADING PILE	13'-0" X 45'-0"	721'-0"	4'-0"
FEP4	ASH BASIN	13'-0" X 45'-0"	721'-1"	10'-0"
EP81A	LOAD OUT SILO CHUTE 1A	77'-0" X 84'-0" (COMBINED)	710'-0"	111'-0"
EP81B	LOADOUT SILO CHUTE 1B	77'-0" X 84'-0" (COMBINED)	710'-0"	111'-0"
EP73	FEED SILO (1500 TON)	40'-0" Ø	716'-0"	111'-0"
EP74	STAR REACTOR (EXHAUST STACK)	10'-0" Ø	716'-0"	110'-0"
EP75	FGD BYPRODUCT SILO	N/A	716'-0"	65'-0"
EP76	FGD ABSORBENT SILO	37'-0" X 42'-0"	712'-0"	100'-0"
EP77	EHE 1 (DUST COLLECTOR)	17'-0" X 30'-0"	720'-0"	65'-0"
EP78	EHE 2 (DUST COLLECTOR)	17'-0" X 30'-0"	719'-0"	65'-0"
EP79	TRANSFER SILO (300 TON)	14'-0" Ø	719'-0"	100'-0"
EP80	STORAGE DOME (ASH)	120'-0" Ø	704'-0"	125'-0"
EP81	LOADOUT SILO (1500 TON)	40'-0" Ø	710'-0"	111'-0"
	FIN FANS	75'-0" X 30'-0"	714'-0"	45'-0"
	BAG HOUSE	15'-0" X 32'-0"	714'-0"	60'-0"
	CONTROL	80'-0" X 100'-0"	720'-0"	20'-0"
	PROPANE STATION	30'-0" X 30'-0"	727'-0"	N/A

NOTES:
 - BASE ELEVATION IS TAKEN FROM SEA LEVEL AND TO BE CONSIDERED PRELIMINARY.
 - HEIGHTS ARE FROM BASE ELEVATION AND CONSIDERED APPROXIMATE.



PROPRIETARY AND CONFIDENTIAL
 THE INFORMATION CONTAINED IN THIS DRAWING IS THE SOLE PROPERTY OF THE SEFA GROUP. ANY REPRODUCTION IN PART OR AS A WHOLE WITHOUT THE WRITTEN PERMISSION OF THE SEFA GROUP IS PROHIBITED.

PRELIMINARY



DUKE ENERGY
 BUCK STEAM STATION AREA 2
 SITE LAYOUT

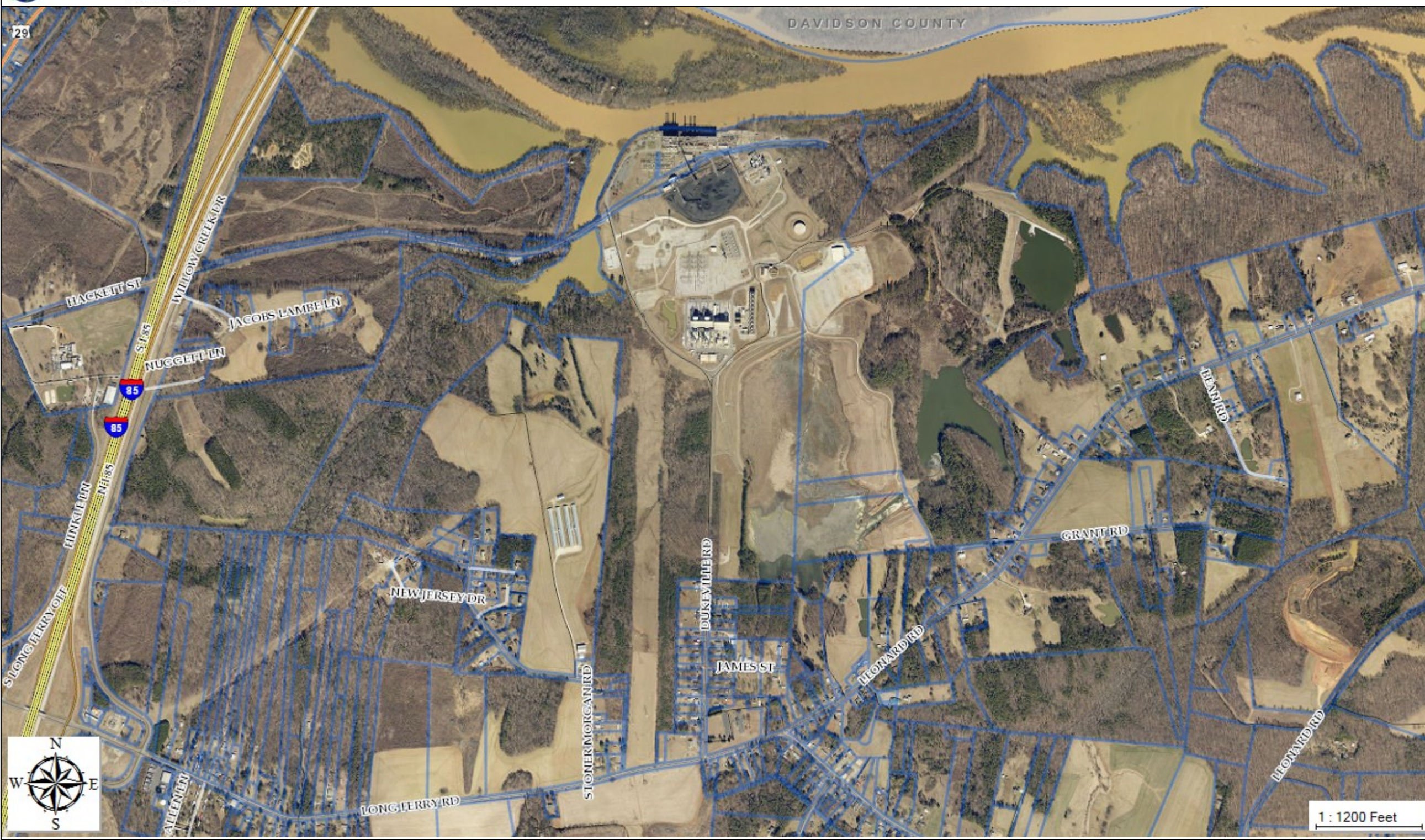
DESIGNED BY	ADS	2-9-17	REV. BY	ACM	4-18-17
DRAWN BY	ACM	2-9-17	REV. BY	ACM	4-18-17

SCALE	DRAWING NUMBER	REV.
NTS	BAB-16406-00-C-003	E

REV.	DESCRIPTION	CHK.	DATE	APP.	DATE



Rowan2
Printed April 03, 2017
See Below for Disclaimer



- Surrounding Counties
- Surrounding Counties
- Major Roads
- <all other values>
 - INTERSTATE
 - NC_HWY
 - US_HWY
- Roads
- CITY/TOWN STREET
 - DRIVE IN PROCESS OF BEING NA
 - DRIVE SERVING 2 OR LESS HOME
 - DRIVE THAT ACCESSES 3 OR MOI
 - INTERSTATE
 - NORTH CAROLINA HIGHWAY
 - ON/OFF RAMP
 - STATE MAINTAINED ROADS
 - UNITED STATES HIGHWAY
- Parcel Information Lines
- Parcel Information Lines



1 : 1200 Feet

This information was prepared from the Rowan County, NC Geographic Information System. Rowan County has made substantial efforts to ensure the accuracy of location and labeling information contained on this site. The information provided is a representation of various City and County data sources and does not serve as an official map. Rowan County promotes and recommends the independent verification of any information contained on this site by the user. Rowan County makes no warranty or other assertion as to the fitness of the maps for any particular purpose and neither Rowan County nor it's agents or employees shall be liable for any claim alleged to have resulted from any use thereof.

APPENDIX E
AIR DISPERSION MODELING

**AIR DISPERSION MODELING
Duke Energy Carolinas, LLC**

**Buck STAR[®] Plant
Rowan County,
North Carolina**

**November
2017**

**Modeling Input/
Output Files**

ECT Environmental Consulting
& Technology of
North Carolina, PLLC
Raleigh, North Carolina
ECT No.170140-0100

APPENDIX F
NHSM DETERMINATION



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

June 10, 2015

Mr. Jim Clayton
The SEFA Group
217 Cedar Road
Lexington, SC 29073

SUBJECT: Applicability Determination No. 2501
The SEFA Group
Lexington, SC

Dear Mr. Clayton:

The North Carolina Division of Air Quality (DAQ) received your letter dated September 5, 2014, requesting the DAQ's concurrence with its determination of regulatory status of certain coal combustion residues, when used in its Staged Turbulent Air Reactor (STAR Reactor), in accordance with 40 CFR 241 "Solid Wastes Used As Fuels or Ingredients in Combustion Units" ("Solid Waste Definition Rule" or "Rule" hereinafter).

Specifically, SEFA Group (SEFA) requests the confirmation that coal ash obtained from the following specific sources meets the requirements in §241: flyash received directly from coal-fired power plant's particulate collection infrastructure (i.e., electrostatic precipitator or baghouse), and processed flyash received from landfills and ash ponds.

Unless exempt, combustion of "non-hazardous secondary material (NHSM), as defined in §241.2 would subject the emissions unit (such as STAR reactor) to requirements in 40 CFR 60 Subpart CCCC "Standards of Performance for Commercial and Industrial Solid Waste Incineration Units" or, Subpart DDDD "Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units". These regulations are commonly known as CISWI ("Commercial and Industrial Solid Waste Incineration").

The DAQ has determined that the coal ash received directly from the coal-fired power plant's particulate collection infrastructure (i.e., electrostatic precipitator or baghouse) is a NHSM and an "ingredient", as defined in §241.2. DAQ has further determined that this flyash meets the legitimacy criteria included in §241.3(d)(2) and thus, concludes that it is not a solid waste. Therefore, the STAR Reactor is not subject to the requirements in CISWI.

Moreover, the processed flyash received from landfills or ash ponds is a NHSM and an ingredient, and DAQ has determined that this flyash also meets the legitimacy criteria included in §241.3(d)(2), and thus, concludes that it is not a solid waste. Therefore, the STAR Reactor is not subject to the requirements in CISWI.

1641 Mail Service Center, Raleigh, North Carolina 27699-1641
Phone: 919-707-8400 / Internet: www.ncdenr.gov

The following includes discussion on STAR Reactor, and technical and regulatory analysis supporting these conclusions for each of the above types of flyash:

STAR Reactor

The STAR Reactor is a patented technology developed by SEFA for thermal beneficiation / processing of either a low or high-Btu value fine particulate matter, such as the above described flyash [hereinafter “feedstock”], along with other ingredient materials (gas, solids, and liquids) into a variety of commercial products. These products are used not only for application as a partial cement replacement but for many other commercial and industrial applications. There are several products which SEFA is currently capable of producing because of the flexibility embodied in this reactor. For example, STAR[®] RP, Ultrix[®], Spherix[®], Fortimix[®], and Permanix[™].

The STAR Reactor process is inherently flexible in that operating parameters can be varied and different ingredients can be added to produce a desired product. The primary component of the STAR Reactor is a cylindrical refractory-lined vessel in which the majority of the process reactions take place. These reactions can include a range of both chemical and physical reactions. Air is required for pneumatic uplift of the solids and for the process reactions enters through the floor of the STAR Reactor as well as through the walls at multiple locations. The raw feedstock and any other ingredients are introduced through the walls of the STAR Reactor. All of the solids and gases exit together at the top of the reactor. The gas/solids mixture enters a hot cyclone where the majority of solids are separated from the gas and recycled back to the STAR Reactor. The very high rate of hot recycle solids increases the operating flexibility of the process. The process reactions can occur through this reactor/hot cyclone loop. Due to the high gas velocity, the multiple injection points, and the recycle solids, there is a significant amount of turbulence created which enhances the mixing of the ingredients and optimizes the reactions. The gas and remaining solids not collected by the hot cyclone are passed over a heat exchanger which can be designed to preheat the process air, used in heat recovery, or to simply cool the gas/solids mixture. Once cooled, the solids are separated from the gas in a fabric filter recovery device. Solids can also exit the STAR Reactor at the bottom or from the recycle loop. These solids can be combined with the solids/gas stream before the heat recovery equipment or, since they have different characteristics as compared to the solids exiting the hot cyclone, they can be processed separately for a particular application. By design the STAR Reactor operates under a wide range of process parameters.

Technical and Regulatory Analysis

Flyash Received Directly from Coal-fired Power Plant’s Particulate Collection Infrastructure (i.e., Electrostatic precipitator or Baghouse)

As described above, the STAR Reactor is capable of utilizing flyash, received directly from coal-fired power plant’s particulate emissions controls, as its primary ingredient along with other select ingredients in order to produce a variety of products for markets.

§241.2(b)(3) of the rule defines NHSM as "a secondary material that, when discarded, would not be identified as a hazardous waste under Part 261 of this chapter". Further the same section defines secondary material as "any material that is not the primary product of a manufacturing or commercial process, and can include post-consumer material, off-specification commercial chemical products or manufacturing chemical intermediates, post-industrial material, and scrap."

It is indisputable that flyash generated from combustion of coal is not a "primary product of a manufacturing" facility (such as electric generating facility) and this product can be deemed as "post-industrial material". Moreover, coal flyash is not regulated as a hazardous waste as per Part 261 of 40 CFR "Identification and Listing of Hazardous Waste". In fact, EPA has promulgated a rule on April 17, 2015 (80 FR 21302) to regulate disposal of coal combustion residues (fly ash, bottom ash, boiler slag, and flue gas desulfurization materials generated from burning coal for the purpose of generating electricity by electric utilities and independent power producers) [CCR] as solid waste under Subtitle D "State or Regional Solid Waste Plans" of the Resource Conservation Act (RCRA) [administrative regulations included in 40 CFR 257) and not under the Subtitle C of the RCRA "Hazardous Waste Management" [administrative regulations included in 40 CFR 261]. In addition, the beneficial uses (e.g., use of flyash in concrete manufacturing replacing traditional product cement) of CCR is exempt from this regulation.

Based, on the above discussion, it is concluded that the flyash generated from the coal combustion and received directly from coal-fired power plant's particulate emissions control devices, is a NHSM.

§241.3(b)(3) of the Solid Waste Definition Rule provides that NHSMs are not solid waste when "used as an ingredient in a combustion unit that meet the legitimacy criteria specified in paragraph (d)(2) of this section." §241.2 of the Solid Waste Definition Rule defines "ingredient" as "a non-hazardous secondary material that is a component in a compound, process or product." The feedstock is merely one component among a number of variables which are introduced to the STAR Reactor to produce many different products. Therefore, feedstock processed in the STAR Reactor is an ingredient under the Solid Waste Definition Rule.

Legitimacy Criteria

For a non-hazardous secondary material used as an ingredient to be excluded from the definition of solid waste under §241.3 of the Solid Waste Definition Rule, the material must satisfy the following legitimacy criteria under Subsection (d)(2):

- (i) The non-hazardous secondary material must be managed as a valuable commodity;
- (ii) The non-hazardous secondary material must provide a useful contribution to the production or manufacturing process.
- (iii) The non-hazardous secondary material must be used to produce a valuable product or intermediate.

- (iv) The non-hazardous secondary material must result in products that contain contaminants at levels that are comparable in concentration to or lower than those found in traditional products that are manufactured without the non-hazardous secondary material.

Managed as a Valuable Commodity - §241.3(d)(2)(i)

SEFA stores its feedstock in silos and or covered shelters prior to using it as an ingredient in the STAR Reactor and conveys the material to the process equipment pneumatically. As per §241.3(d)(2)(i), the Solid Waste Definition Rule identifies the following three factors to be considered in determining whether a material is managed as a valuable commodity:

- (A) The storage of the non-hazardous secondary material prior to use must not exceed reasonable time frames;
- (B) Where there is an analogous ingredient, the non-hazardous secondary material must be managed in a manner consistent with the analogous ingredient or otherwise be adequately contained to prevent releases to the environment;
- (C) If there is no analogous ingredient, the non-hazardous secondary material must be adequately contained to prevent releases to the environment;

As per SEFA, in a previously permitted design, the storage capacity of the silos and partially enclosed storage bins for incoming feedstock ranges from 800-2000 tons and could accommodate approximately three to ten days of production when the STAR Reactor is operating on SEFA's normal production schedule. As such, under normal operations, the incoming feedstock is typically stored no more than three days prior to introduction into the STAR Reactor process. However, during shutdown of the STAR Reactor or when off-specification feedstock is received from a supplier, the feedstock may be stored for longer periods of time, but usually no more than sixty days. In the past, as per SEFA, shutdown of the STAR Reactor has generally not exceeded twenty days. With respect to the management of off-specification feedstock, SEFA has indicated that if this off-specification material can be blended with other feedstock at ratios which ensure that processing in the STAR Reactor produces an end product which meets SEFA's quality control standards, it will attempt to do so. Depending on the nature and amount of the material's deviation from SEFA's feedstock specifications, if it cannot be blended, the off-specification feedstock will have to be rejected and returned to the supplier. If it is capable of being blended, the blending process may require storage of the off-specification feedstock for as long as 60 days depending upon the quantity involved. Accordingly, even outside of the normal three-day processing scheduling for incoming feedstock, SEFA's storage of incoming feedstock does not exceed a reasonable time frame.

Additionally, SEFA manages the incoming feedstock as a valuable commodity and takes measures to prevent loss of material during off-loading and storage. In the preamble to the rule, EPA explains that "If on the other hand, a company does not manage the non-hazardous secondary material as it would traditional ingredients, that behavior may indicate that the non-

hazardous secondary material is being discarded.” Refer to 76 FR 15543. The material must be “stored in a manner that both adequately prevents releases or other hazards to human health and the environment, considering the nature and toxicity of the non-hazardous secondary material.” *Id.* In most cases, this requirement is satisfied if the material is in some manner “contained.” *Id.* As noted, SEFA stores its feedstock in enclosed silos or covered and partially enclosed storage bins and therefore meets this criterion. Additionally, at all times prior to processing, SEFA handles the material in a manner consistent with this criterion. Feedstock is transferred from its suppliers (typically, coal-fired power plants) to SEFA either (i) directly by pneumatic conveyor into the silos or (ii) by truck to the SEFA facility. All bin vents within the pneumatic conveyor system are equipped with fabric filter recovery devices to minimize loss of this valuable material. Thus, SEFA believes that it unquestionably manages its feedstock as a valuable commodity.

Useful Contribution to the Production or Manufacturing Process - §241.3(d)(2)(ii)

SEFA believes that there is no question that the feedstock processed in the STAR Reactor provides a useful contribution to its production of the various end products marketed by SEFA. In the preamble to the Solid Waste Definition Rule, at 76 FR 15543, EPA explains the rationale behind this criterion for legitimacy:

A non-hazardous secondary material used as an ingredient in combustion systems provides a useful contribution if it contributes valuable ingredients to the production/manufacturing process or to the product or intermediate of the production/manufacturing process. This criterion is an essential component in the determination of legitimacy because legitimate use is not occurring if the non-hazardous secondary material doesn’t add anything to the process, such that the non-hazardous secondary material is basically being disposed of or discarded. This criterion is intended to prevent the practice of “sham” recycling by adding non-hazardous secondary materials to a manufacturing operation simply as a means of disposing of them.

SEFA states that the feedstock processed in the STAR Reactor is clearly not added to dispose of that material and the processing of the feedstock in the STAR Reactor can in no manner be characterized as “sham” recycling. Additionally, the fact that some of the constituents of the feedstock are not needed or desirable for the STAR Process does not affect the status of the “useful contribution” of the feedstock:

For purposes of satisfying this criterion, not every constituent or component of the non-hazardous secondary material has to make a contribution to the production/manufacturing activity. **For example, non-hazardous secondary materials used as ingredients may contain some constituents that are needed in the manufacturing process, such as, for example, zinc in non-hazardous secondary materials that are used to produce zinc-containing micronutrient fertilizers, while other constituents in the non-hazardous secondary material, such as lead, do not provide a useful contribution.** Provided the zinc is at levels that provides a useful contribution, we believe the non-hazardous

secondary material would satisfy this criterion, although we would note that the constituents not directly contributing to the manufacturing process could still result in the non-hazardous secondary material not meeting the contaminant part of the legitimacy criteria. The Agency is not quantitatively defining how much of the non-hazardous secondary material needs to provide a useful contribution for this criterion to be met, since we believe that defining such a level would be difficult and is likely to be different, depending on the non-hazardous secondary material. The Agency recognizes that this could be an issue if persons argue that a non-hazardous secondary material is being legitimately used as an ingredient, but in fact, only a small amount or percentage of the non-hazardous secondary material is used.

76 FR 15543-44 (emphasis added).

The fact that reactions in the STAR Reactor eliminate certain undesirable constituents of the feedstock material does not preclude a determination that the feedstock meets the legitimacy criteria as an ingredient. As described above, the STAR Reactor has the capability to control the chemical and physical reactions in the process to produce marketable materials with a broad range of characteristics. The constituents and characteristics of each STAR Reactor product are tailored to the intended market and vary depending on the needs of that market. The elimination of certain constituents does not affect the determination that the feedstock is an ingredient which makes a useful contribution to the products produced in the STAR Reactor.

Produces a Valuable Product or Intermediate - §241.3(d)(2)(iii)

As per SEFA, it is undisputed that feedstock material is used in the STAR Reactor to make valuable products. “The product or intermediate is valuable if it is (i) sold to a third party or (ii) used as an effective substitute for a commercial product or as an ingredient or intermediate in an industrial process.” Refer to 76 FR 15544. Also, as discussed above, the STAR Reactor has the capability to process its fly ash and other materials to produce a broad range of products. All of the products currently produced in the STAR Reactor are sold to third parties. Additionally, the various products produced in the STAR Reactor have application as both substitutes for commercial products and as ingredients in an industrial process. Ultrix® and STAR RP® are sold for use as partial replacement for Portland cement. Fortimix® is sold for use as an additive for rubber compounds. Permanix™ is designed for use as a broad-spectrum UV blocker. Accordingly, in all respects, SEFA’s feedstock processed in the STAR Reactor satisfies this criterion for legitimacy as an ingredient.

Comparable Contaminants Concentration of End Product - § 241.3(d)(2)(iv)

Again, as discussed above, the STAR Reactor has the capability to process its feedstock to reduce or eliminate some undesirable constituents and to alter the chemical and physical characteristics of others in its various end products. The Solid Waste Definition Rules provides as follows:

The non-hazardous secondary material must result in products that contain contaminants at levels that are comparable in concentration to or lower than those found in traditional products that are manufactured without the non-hazardous secondary material.

Refer to §241.3(d)(2)(iv).

The preamble to the Rule includes the following:

The assessment of whether the products produced from the use of nonhazardous secondary materials that have contaminants that are comparable to (or lower) in concentration can be made by a comparison of contaminant levels in the ingredients themselves to the traditional ingredients they are replacing, or by comparing the contaminant levels in the product itself with and without the use of the nonhazardous secondary material.

Refer to 76 FR 15544.

As applied to the use of the feedstock as an ingredient in the STAR Reactor, the relevant comparison is a comparison of the various STAR Reactor end products to comparable products in the industries in which each is used. For example, Ultrix[®] and STAR RP[®] are both used as supplementary cementitious materials in concrete, but, due to the unique processing regime of the STAR Reactor, neither has varying quantities of adsorptive unburned carbon, which characterize by-product fly ashes typically used in the marketplace. In fact, the air-entraining characteristics of Ultrix[®] and STAR RP[®] are tailored by STAR Reactor to exactly match the air-entraining characteristics of plain cement concrete.

The preamble to the proposed rule for the Solid Waste Definition Rule explains the rationale for and purpose of the comparison of contaminants in the legitimacy criteria for use of a non-hazardous secondary material as an ingredient:

The Agency recognizes that there may be instances where the contaminant levels in the products manufactured from non-hazardous secondary material ingredients may be somewhat higher than found in the traditional products that are manufactured without the non-hazardous secondary material, but the resulting concentrations would not be an indication of discard and would not pose a risk to human health and the environment.

Refer to 75 FR 31844, 31885 (Jun. 4, 2010).

In addition, EPA has recognized that contaminant levels in the products made from NHSM can have contaminant levels within a "small acceptable range" at 76 FR 15523 (March 21, 2011).

The above discussion clearly provides that it may be allowable under §241.3(d)(2)(iv) for certain contaminants in the end product made with non-hazardous secondary materials ingredients to be "somewhat higher" or within a "small acceptable range" than those in traditional products. Thus, SEFA's fly ash feedstock satisfies the legitimacy criterion in §241.3(d)(2)(iv) despite the slightly higher concentrations of arsenic and beryllium in the STAR RP[®] as compared to Portland Cement, as included in Attachment A to the SEFA's September 2014 letter. Also, using additional analytical data received from SEFA¹, it can be said that the contaminant levels in the SEFA product are within the range of contaminants levels or within a "small acceptable range" for Portland Cement (traditional product).

Additionally, as stated in the preamble to the proposed rule above, the purpose of the contaminant comparison criterion is to demonstrate that the use of the non-hazardous secondary material ingredient is not indicative of discard and does not pose a risk to human health and the environment. Expanding of the "indication of discard" aspect of this component of the legitimacy criteria, EPA further explains:

Based on our assessment of all of the comments, we believe it appropriate to include contaminant levels as a legitimacy criterion. Thus, we do not agree with those commenters that assert that contaminant comparisons are not appropriate to require as part of the legitimacy criteria. The Agency believes the criterion is necessary because non-hazardous secondary materials that contain contaminants that are not comparable in concentration to those contained in traditional fuel products or ingredients **would suggest that these contaminants are being combusted as a means of discarding them**, and thus the non-hazardous secondary material should be classified as a solid waste. **In some cases, this can also be an indicator of sham recycling.**

Refer to 75 FR 31871-72 (emphasis added).

As such, the primary purpose of the comparison on contaminants in an end product using the non-hazardous secondary material ingredient to that of traditional products made without the non-hazardous secondary material ingredient is to demonstrate that such use is not a means of discarding the non-hazardous secondary material or indicative of sham recycling.

With respect to the additional industrial uses for products produced by using fly ash feedstock as an ingredient in the STAR Reactor, a direct comparison of SEFA's end product to a traditional product which is manufactured without fly ash feedstock is not feasible for many of the end products produced in the STAR Reactor. However, based on the detailed comparison of the STAR[®] RP to Portland Cement and the various markets for SEFA's other STAR Reactor products as included in the above referenced submittal, it is clear that SEFA is not processing the fly ash feedstock as a means of discarding the fly ash or any of its constituents.

¹ Email dated 5/12/2015 from Thomas Pritcher, Environmental Consulting & Technology, Inc., to Rahul Thaker, NCDAQ.

To the extent that the purpose of the contaminant comparison is to demonstrate that these products do not pose a risk to human health and the environment, SEFA has provided additional information as well as copies of the material safety data sheets for these products to demonstrate that no such risk is posed in the various industrial uses of STAR Reactor end products. For example, the material safety data sheets for Spherix[®] and Fortimix[®] included in Attachment B to the SEFA's September 2014 letter. As per SEFA, in many cases, the STAR[®] Reactor end products provide a safe alternative to traditional products which may pose a potential risk to human health and the environment.

Flyash Received from Landfill or Ash Pond

§241.3(b)(4) of the rule provides that NHSMs are not solid waste when “fuel or ingredient products that are used in a combustion unit, and that are produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in paragraph (d)(1) of this section, with respect to fuels, and paragraph (d)(2) of this section, with respect to ingredients.”

As discussed above, the coal flyash disposed off in a landfill or an ash pond can be deemed as a NHSM. Prior to being used as an acceptable ingredient (feedstock) in the STAR Reactor, any flyash received from landfills or ash ponds must be “processed,” as that term is defined in the rule. As discussed below, any commercial agreement between a supplier and SEFA will specify the acceptable criteria (i.e., specifications) for a feedstock that can be used in the STAR Reactor as a condition for supplying processed flyash to SEFA.

Pursuant to §241.2, “processing” means any operations that transform discarded non-hazardous secondary material into a non-waste fuel or non-waste ingredient product. Processing includes, but is not limited to, operations necessary to: remove or destroy contaminants; significantly improve fuel characteristics of the material, e.g. sizing or drying the material in combination with other operations; or chemically improve the as-fired energy content. Minimal operations that result only in modifying the size of the material by shredding do not constitute processing for purposes of this definition. Under the same section of the Rule, “Secondary material” is defined as any material that is not the primary product of a manufacturing or commercial process, and can include post-consumer material, off-specification commercial chemical products or manufacturing chemical intermediates, post-industrial material, and scrap.

While it is recognized that coal flyash which was initially placed into a landfill may be considered to have been “previously discarded” by custom and practice, coal-fired utilities also collect this coal ash in permitted wastewater treatment ponds. This coal ash has not historically been considered “discarded” as it was merely solids settling within a permitted wastewater unit. SEFA believes that the processing of these materials as required to satisfy SEFA's specifications for its feedstock would meet the requirements for processing of “previously discarded” materials under the Solid Waste Definition Rule as applied to CISWI. As such, the requisite processing of materials to be used as feedstock in the STAR Reactor would be sufficient to transform them to an ingredient.

The Solid Waste Definition Rule provides that a previously discarded material may be processed to transform the waste to a non-waste ingredient. Specifically, §241.3(b)(4) of the Solid Waste Definition Rule provides as follows:

Fuel or ingredient products that are used in a combustion unit, and are produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in paragraph (d)(1) of this section, with respect to fuels, and paragraph (d)(2) of this section, with respect to ingredients. The legitimacy criteria apply after the non-hazardous secondary material is processed to produce a fuel or ingredient product. Until the discarded nonhazardous secondary material is processed to produce a non-waste fuel or ingredient, the discarded non-hazardous secondary material is considered a solid waste and would be subject to all appropriate federal, state, and local requirements.

As per SEFA, any processing of materials from landfills or from ash ponds to meet SEFA's feedstock specifications will be undertaken under the control of the supplier prior to being received by SEFA for use as an ingredient in its STAR Reactor. Accordingly, this feedstock when received by SEFA or used in the STAR Reactor would meet the legitimacy criteria for direct use as an ingredient and therefore would not be a solid waste under the Solid Waste Definition Rule. All feedstock shipped to SEFA for use as an ingredient in the STAR Reactor will first be required to undergo processing by the supplier to be:

- A. Free of all, but minimal contaminants (e.g., organic debris, slag);
- B. Finely-divided and free-flowing,
- C. Have consistent moisture content of $\leq 25\%$; and
- D. Have a consistent chemical composition, including organic content as measured by loss on ignition.

The above are SEFA specifications for acceptance of any coal flyash (discarded in landfills or ash ponds).

As per SEFA, the specific processing steps that may be needed to meet the SEFA specifications (as described above) and produce a suitable feedstock for the STAR Reactor will vary depend upon the specific characteristics of each source of coal flyash. Generally speaking, one or more of the following four processing steps will be necessary to produce a suitable feedstock for the STAR Reactor:

- 1) Dewatering,
- 2) Screening/Separation,
- 3) Milling, and
- 4) Blending.

For use as a feedstock in the STAR Reactor, coal ash from an ash pond having higher moisture content will likely need to be processed using most, if not all, of these steps. Coal ash

from a landfill may not require every step. For example, it may be unnecessary to dewater coal ash from landfills if the material has consistent and acceptable moisture content.

Depending on the source of the ash, the general steps described above can require sub processes. For example, feedstock appropriate for the STAR Reactor, it may be necessary to remove larger particles or other materials found with the ash. In addition, to meet SEFA's specifications, some coal ash may require further processing through a separate loop that includes equipment (e.g., roll crusher) needed to produce a more finely-divided, free-flowing feedstock. For others, it may be necessary to utilize a magnetic separator to remove metal constituents. Also, materials such as coal, pyrites, or other more coarse materials may need to be screened. The Screening/Separation step will occur routinely to produce a free-flowing, finely-divided feedstock suitable for the STAR Reactor. Depending on the source of coal ash, milling may not be necessary to achieve a finely-divided and free-flowing material.

As emphasized by SEFA, the specific processing steps and the specific processing equipment cited above are typical examples for how these materials might be processed to produce a suitable feedstock. Those performing the actual work (i.e., suppliers) will elect to use different techniques and/or equipment. SEFA states that as long as the processed coal ash conforms to SEFA's general specifications outlined above, the coal flyash received from landfills or ash ponds will have been sufficiently "processed" and will be a suitable feedstock as an ingredient in the STAR Reactor.

It needs to be noted here that the EPA has recognized similar processing steps (similar to SEFA suggested processing steps as above to meet the SEFA specifications) are "likely to meet our definition of processing, as it appears that these processes in fact remove contaminants and improve the ingredient characteristics of these recovered CCRs (i.e., **ash from ponds and landfills**)". Refer to 76 FR 15518, March 21, 2011 (emphasis added).

With respect to the requirement for meeting the legitimacy criteria in §241.3(d)(2), pursuant to §241.3(b)(4), for flyash received from landfill or ash pond, SEFA emphasizes that after completion of "processing", it will become similar to the flyash received directly from coal-fired plant's particulate collection infrastructure (i.e., Electrostatic precipitator or Baghouse), and thus, will meet all legitimacy criteria as discussed above for it.

Finally, with respect to the particular criterion for comparable contaminants concentration of end product (traditional products) in §241.3(d)(2)(iv), SEFA analyzed each of these materials for semi-volatile organic compounds, organo-chlorine pesticides, PCBs, chlorides, metals and sulfur content, during engineering studies to assess the suitability of coal ash previously placed in water treatment ponds (pond ash) or previously placed in landfills (landfill ash). A comparison of the constituents in dry source feedstock, pond ash and landfill ash from SCE&G's² Wateree facility is provided in Attachment C to the SEFA's September 2014 submittal. In comparison to the dry collection feedstock, the landfill ash is comparable with slightly higher results for a few constituents. The sampling results on pond ash indicate that all constituents detected were lower

² www.sceg.com

than those for the dry collection feedstock and the landfill ash. Despite certain variables in the manner in which coal ash were previously placed in ponds or landfills, as per SEFA, these sampling results are sufficient to demonstrate that contaminants in coal flyash previously placed in ponds and landfills are comparable to or lower than those in dry collection coal flyash processed as feedstock (that is, flyash received directly from the coal-fired power plant's particulate emissions control) for the STAR Reactor. Furthermore, the metals and sulfur levels of the landfill ash are comparable to those of the dry collection feedstock, and the metals and sulfur levels of the pond ash are significantly lower than those of the dry collection feedstock. Finally, more recent sampling data (March-April 2015) for dry ash and pond ash, provided by SEFA, indicates that the contaminants in pond ash are lower than the dry ash received directly from electric utility plant.³ Therefore, SEFA concludes that there will be no increase in emissions as a result of the use of pond ash and landfill ash as a feedstock for the STAR Reactor.

Conclusions

In summary, the DAQ has determined that the fly ash received directly from the coal-fired power plant's particulate collection infrastructure (i.e., electrostatic precipitator or baghouse) is a NHSM and an "ingredient", as defined in §241.2. DAQ has further determined that this flyash meets the legitimacy criteria included in §241.3(d)(2). Thus, it concludes that it is not a solid waste and therefore, STAR Reactor is not subject to the requirements in CISWI.

Moreover, the processed flyash received from ash landfills or ash ponds meets the definition of "processing" in §241.2, and is also a NHSM and an ingredient. DAQ has further determined that this flyash also meets the legitimacy criteria included in §241.3(d)(2). Thus, it concludes that it is not a solid waste and therefore, STAR Reactor is not subject to the requirements in CISWI.

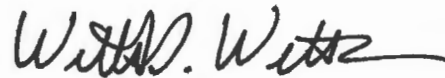
It needs to be emphasized here that this letter includes only the "non-waste" determination, which is specific to the materials discussed herein. Further, the determination does not give any permission to SEFA to burn or process flyash in the STAR Reactor. SEFA will need to evaluate and submit a permit application for an air permit, as needed, for burning / processing flyash, as discussed herein, in the STAR Reactor at any location in NC.

If you have any questions regarding this determination, please contact Rahul P. Thaker, P.E., QEP, at (919) 707-8470.

³ Email dated 5/12/2015 from Thomas Pritcher, Environmental Consulting & Technology, Inc., to Rahul Thaker, NCDAQ.

Mr. Jim Clayton
June 10, 2015
Page 13

Sincerely,

A handwritten signature in black ink, appearing to read "William D. Willets". The signature is fluid and cursive, with a long horizontal stroke at the end.

William D. Willets, P.E., Chief, Permitting Section
Division of Air Quality, NCDENR

c: Central Files

APPENDIX G
RACT ANALYSIS

REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) ANALYSIS FOR STAR[®] UNIT

Duke Energy Carolinas, LLC (Duke Energy) is currently permitted (Air Permit No. 03786T34) to operate the Buck Steam Station located in Rowan County, North Carolina. Duke Energy is proposing to install and operate a fly ash processing facility consisting of a Staged Turbulent Air Reactor (STAR[®]) plant and associated ash handling activities. The proposed STAR[®] unit will be a source of nitrogen oxides (NO_x) and does not meet the definition of a boiler, indirect-fired process heater, stationary combustion turbine, or stationary internal combustion engine. However, the source is located at a facility that has the potential to emit 100 tons per year or more of NO_x or 560 pounds per calendar day or more from May 1 through September 30. As a result, the proposed emission unit is subject to the NO_x RACT requirements listed in 15A 02D.1413 – Sources Not Otherwise Listed in this Section.

The NO_x RACT analysis was performed in accordance with EPA's top-down method. The first step in the top-down RACT procedure is identification of available control technologies. Following identification of available control technologies, the next step in the analysis is to determine which technologies may be technically infeasible. The third step in the top-down RACT process is the ranking of the remaining technically feasible control technologies from high to low in order of control effectiveness. And fourth step is to evaluate the most suitable technology.

The fifth and final step is the selection of a RACT emissions limitation or a design, equipment, work practice, operational standard, or combination thereof corresponding to a reasonable, technically feasible control technology that was not eliminated based on adverse energy, environmental, or economic grounds.

RACT ANALYSIS FOR NO_x

Step 1—Potential Control Technologies

Available technologies for controlling NO_x emissions from STAR reactor include the following:

- Selective catalytic reduction (SCR).
- Selective non-catalytic reduction (SNCR).

- Staging of Air.
- Water Injection.

A description of each of the listed control technologies is provided in the following subsections.

Selective Catalytic Reduction

SCR reduces NO_x emissions by reacting ammonia or urea with exhaust gas NO_x to yield nitrogen and water vapor in the presence of a catalyst. Ammonia is injected upstream of the catalyst bed where the following primary reactions take place:



The catalyst serves to lower the activation energy of these reactions, which allows NO_x conversions to take place at a lower temperature than the exhaust gas. The optimum temperatures range from as low as 350°F to as high as 1,100°F (typically 600 to 750°F), depending on the catalyst. Typical SCR catalysts include metal oxides (titanium oxide and vanadium), noble metals (combinations of platinum and rhodium), zeolite (alumino-silicates), and ceramics.

Factors affecting SCR performance include space velocity (volume per hour of flue gas divided by the volume of the catalyst bed), ammonia/NO_x molar ratio, and catalyst bed temperature. Space velocity is a function of catalyst bed depth. Decreasing the space velocity (increasing catalyst bed depth) will improve NO_x removal efficiency by increasing residence time but will also cause an increase in catalyst bed pressure drop. The reaction of NO_x with ammonia theoretically requires a one-to-one molar ratio. Ammonia/NO_x molar ratios greater than one-to-one are necessary to achieve high NO_x removal efficiencies due to imperfect mixing and other reaction limitations. Reaction temperature is critical for proper SCR operation. Below this critical temperature range, reduction reactions (1) and (2) will not proceed. At temperatures exceeding the optimal range, oxidation of ammonia will take place resulting in an increase in NO_x emissions. NO_x removal efficiencies for SCR systems typically range from 80 to 90 percent.

Selective Noncatalytic Reduction

The SNCR process involves the gas phase reaction, in the absence of a catalyst, of NO_x in the exhaust gas stream with injected ammonia or urea to yield nitrogen and water vapor. The two commercial applications of SNCR include the Electric Power Research Institute's NO_xOUT™ and Exxon's Thermal DeNO_x™ processes. The two processes are similar in that either ammonia (Thermal DeNO_x™) or urea (NO_xOUT™) is injected into a hot exhaust gas stream at a location specifically chosen to achieve the optimum reaction temperature and residence time. Simplified chemical reactions for the Thermal DeNO_x™ process are as follows:



The NO_xOUT™ process is similar with the exception that urea is used in place of ammonia. The critical design parameter for both SNCR processes is the reaction temperature. At temperatures below 1,600 degrees Fahrenheit (°F), rates for both reactions decrease allowing unreacted ammonia to exit with the exhaust stream. Temperatures between 1,600 and 2,000°F will favor reaction (3), resulting in a reduction in NO_x emissions. Reaction (4) will dominate at temperatures above approximately 2,000°F, causing an increase in NO_x emissions. Due to reaction temperature considerations, the SNCR injection system must be located at a point in the exhaust duct where temperatures are consistently between 1,600 and 2,000°F.

Staging of Air and Water Injection

Staging of air and injection of water into the primary combustion reduces formation of thermal NO_x by decreasing the peak combustion temperature and reduces the residence time at the peak temperature. Water injection decreases the peak flame temperature by diluting the combustion gas stream and acting as a heat sink by absorbing heat necessary to vaporize the water (latent heat of vaporization) and raise the vaporized water temperature to the combustion temperature. A lower peak temperature occurs at stoichiometric ratios where NO_x formation is less likely to occur. A smaller residence time at the peak temperature reduces the amount of nitrogen that can become ionized and therefore reduces the formation of NO_x.

Step 2—Technical Feasibility

SCR uses either ammonia or urea as a reagent along with a catalyst to reduce NO_x into molecular nitrogen and water vapor. The optimum temperature for SCR varies based on the catalyst used and the composition of the flue gas, but typically occurs between 480°F and 800°F. Due to this requirement, the application point would need to occur before the product baghouse which would expose the SCR to 100% of the product ash loading. This would result in severe erosion of the pollution control equipment. In addition, any ammonia slip from the SCR would result in product contamination.

SNCR uses either ammonia or urea as a reagent to reduce NO_x into molecular nitrogen and water vapor. The optimum temperature for SNCR varies based on the composition of the flue gas, but typically occurs between 1650°F and 2000°F. These temperature requirements are above the normal operating regime for the STAR reactor. In addition, since this application point occurs before the product baghouse, ammonia slip would result in product contamination.

Staging of Air and Water Injection:

As discussed above in Step 1, Staging of air and Water injection reduces the peak temperature within the reactor, and reduces the residence time at the peak temperature which reduces the formation of NO_x . Staging of air and water injection in the STAR[®] unit already occur since air and water are part of the ingredients added to the reactor to create the final ash product. Therefore, both methods can be easily used to suppress NO_x formation.

Step 3—Ranking of Controls

Due to the risk of product contamination from SCR and SNCR processes, use of both air staging and water injection is the only feasible control measure; therefore, no ranking of the potential control approaches is necessary.

Step 4—Evaluation of Most Effective Controls

As stated previously, use of a combination of air staging and water injection is the only feasible control measure available to the STAR process.

Step 5—Selection of RACT

Due to the risk of product contamination from SCR and SNCR processes, a combination of air staging and water injection are the best methods to control NO_x formation in the STAR[®] unit. There are three permitted STAR[®] units (two in South Carolina and one in Maryland), and none were subject to a control technology review analysis. Duke Energy is proposing a NO_x emissions limit of 0.12 lb/MMBtu for the STAR[®] unit. The proposed limit is based on:

- Review of the other permitted STAR[®] units that have permit limits ranging from 0.34 lb NO_x/MMBtu to 0.05 lb NO_x/MMBtu. Please note that the 0.05 lb NO_x/MMBtu permit limit is associated with a STAR[®] unit that is not currently permitted to process ash from ponds and/or landfills.
- Review of 2016 NO_x stack test data for the Winyah STAR[®] unit that showed values ranging from 0.05 lb NO_x/MMBtu to 0.08 lb NO_x/MMBtu
- Consideration of the potential variability and inconsistency in the proposed ash pond feedstock, which can create variability in NO_x emission rates.
- Consideration of a reasonable limit for a technology/process that is still developing.

Proposed Demonstration of Compliance

Duke Energy proposes to demonstrate compliance with the proposed NO_x RACT limit through an initial performance test and subsequent performance testing on an annual basis. Duke Energy also proposes that if two consecutive annual source tests show compliance, then the frequency of testing be reduced to once every five years. If after the frequency of testing is reduced, a source test shows that the proposed emission limit is exceeded, the STAR[®] unit will be tested annually until two consecutive annual tests show compliance.

APPENDIX H

CAM PLAN

COMPLIANCE ASSURANCE MONITORING PLAN

for

Sulfur Dioxide (SO₂) Emissions from STAR® Unit

Duke Energy Carolinas, LLC - Buck Combined Cycle Facility

Salisbury, Rowan County, North Carolina

I. Background

A. Emissions Unit and Control Device

EU ID: ES-74

Description: STAR® (Staged Turbulent Air Reactor) system with a 140 million Btu/hour total heat rate input that processes feedstock (fly ash and other ingredient materials) into a variety of commercial products

Control Device Dry Flue Gas Desulfurization (FGD) scrubber and bagfilter for SO₂ emissions control

B. Applicable Emissions Limits and Monitoring Practices

Emissions Limits:

SO₂ : 2.3 pounds of sulfur dioxide per million BTU input per 15A NCAC 02D .0516 *Sulfur Dioxide Emission From Combustion*

Compliance Demonstration Requirements:

SO₂ Initial performance tests will be conducted.

Lime-to-Sulfur Ratio XXX establish compliance demonstration procedures for parametric monitoring systems.

Baghouse ΔP XXX establish compliance demonstration procedures for parametric monitoring systems.

Periodic Monitoring Requirements:

SO₂ **TBD**

Lime-to-Sulfur Ratio **TBD**

Baghouse ΔP **TBD**

C. Control Technology

Dry FGD scrubber and bagfilter for SO₂ emissions control

D. Potential Emission Rates

Pre-control SO₂: XXX tons/year

Post-control SO₂: XXX tons/year (assumes 95% control)

II. **Monitoring Approach**

A. Background

For emissions of sulfur dioxide (SO₂) from the STAR® system, Duke Energy is subject to Compliance Assurance Monitoring (CAM) requirements for the state SO₂ standard, i.e., 2.3 lb/MMBtu per 15A NCAC 02D .0516.

Duke Energy selected Lime-to-Sulfur Ratio and Pressure drop across the baghouse (Baghouse ΔP) as indicators for the CAM Plan for SO₂ emissions from the STAR® system. Duke Energy conducted testing for SO₂ emissions to derive a relationship between the Lime-to-Sulfur Ratio and SO₂ emissions of the STAR® system. This relationship was then used to determine a Lime-to-Sulfur Ratio value for the applicable SO₂ limit, such that as long as the Lime-to-Sulfur Ratio is at or above the value during normal operation, there is a reasonable assurance that the STAR® system will also comply with the respective applicable SO₂ emission limit. This relationship was used to determine appropriate Lime-to-Sulfur Ratio value for the state standard of 2.3 lb/mmBtu. In addition, Duke Energy established an appropriate Baghouse ΔP range based on manufacturer's specifications and recommendations. It is assumed as long as the Baghouse ΔP is within the established range during normal operation, there is a reasonable assurance that the dry FGD baghouse is operating as designed and the STAR® system will also comply with the respective applicable SO₂ emission limit.

B. CAM SO₂ Testing

SO₂ testing was conducted to derive a relationship between the Lime-to-Sulfur Ratio and SO₂ emissions of the STAR® system. The SO₂ testing was conducted for operating conditions of the dry FGD system resulting in High-Ash Sulfur Content, Mid- Ash Sulfur Content and Low- Ash Sulfur Content.

The table below provides a summary of the test results for CAM testing completed on XXXX. Each test consisted of at least three runs using USEPA Test Method XXX for XXX. For the operating conditions tested, all SO₂ emission test results were less than XX percent of the applicable state SO₂ emission limitation (2.3 lb/mmBtu).

Insert Table of Results

Baghouse ΔP was monitored and recorded during the testing to verify that the operating range of is appropriate for the baghouse

C. CAM Averaging Period

The CAM Rule does not provide specific averaging periods to be used in the development of monitoring approaches. However, 40 CFR 64.3(d)(3)(i) implies that the appropriate averaging period is the averaging period of the underlying emissions standard. Since emissions testing for SO₂ includes at least three test runs, each nominally one-hour in duration, this indicates that a three-hour averaging period is an appropriate averaging time for purposes of CAM for the state rule.

D. CAM Excursion

During “normal operation”, (i.e., periods other than startup, shutdown or malfunction), an excursion is a rolling three-hour period Lime-to-Sulfur Ratio is less than the establish value during testing. Each excursion must be investigated by the source to determine the monitoring status and operating conditions responsible for the excursion.

E. CAM Excursion Corrective Action

Upon detecting an excursion, Duke Energy will implement corrective action to restore the indicator to the appropriate indicator range. Corrective action should begin with an evaluation of the monitoring system to determine if the excursion is related to the monitoring system or the control device. Individual unit process and control device operating parameters will be reviewed to determine the cause of the excursion. To the extent possible, any corrective action should reduce the potential of similar excursions from recurring.

F. CAM Reporting Requirements

All excursions must be reported in the facility's semi-annual report. As required by the CAM Rule, the Permittee shall include summary information on the number, duration and cause of excursions and the corrective actions taken. It is not necessary to report SO₂ control equipment malfunctions that do not cause an excursion. Duke Energy will also include summary information on the number, duration, and cause of monitor downtime incidents.

G. Summary of Proposed CAM for SO₂

Continuous monitoring of Lime-to-Sulfur Ratio is required. If the Lime-to-Sulfur Ratio does not fall below the level established during initial compliance testing and the Baghouse ΔP is within the established range provided by manufacturer's specifications and recommendations, then compliance will be reasonably assured. The minimum Lime-to-Sulfur Ratio will not apply during periods of startup, shutdown, or malfunction. A summary of the CAM plan is provided in Table 1.

Table 1 SO₂ CAM Plan Summary – Buck Combined Cycle Facility

STAR® Unit (ES-74)

<p>A. Indicator</p> <p>Measurement Approach</p>	<p>Lime-to-Sulfur Ratio and Baghouse ΔP</p> <p>XXXX</p>
<p>B. Indicator Range</p>	<p>An excursion is defined as</p> <p>The Lime-to-Sulfur Ratio to be determined during the initial performance testing will provide reasonable assurance of compliance with limits to be contained in the Title V air permit. Excursions will trigger an inspection of the Lime injection system to determine the cause and necessary corrective action.</p> <p>If the Lime-to-Sulfur Ratio falls below acceptable levels (e.g. an excursion) for more than XX consecutive unit operating hours, a test will be performed to re-establish the SO₂ emission rate and lime injection correlation for the ash sulfur content range.</p> <p>Baghouse ΔP</p>
<p>C. Performance Criteria</p> <ol style="list-style-type: none"> 1. Data Representativeness 2. Verification of Operational Status 3. QA/QC Practices and Criteria 4. Monitoring Frequency 5. Data Averaging Period 6. Data Collection 	<p>TBD</p> <p>TBD</p> <p>TBD</p> <p>TBD</p> <p>TBD</p> <p>Automated data acquisition system (DAHS)</p>

III. Monitoring Approach Justification

A. Explanation of Applicability

Justification will be added based on final vendor design data

B. Rationale for Selection of Indicator Ranges

To be determined...

NC DEQ will be provided copies of test results from all required tests.

C. Rationale for Selection of Corrective Actions

To be determined...

DRAFT

APPENDIX I
ZONING COMMISSION DOCUMENTATION