

Application Review

Issue Date:

Region: Raleigh Regional Office
County: Northampton
NC Facility ID: 6600041
Inspector's Name: Dawn Reddix
Date of Last Inspection: 12/16/2021
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): West Fraser - Seaboard Lumber Mill</p> <p>Facility Address: West Fraser - Seaboard Lumber Mill 4400 NC Highway 186 East Seaboard, NC 27876</p> <p>SIC: 2421 / Sawmills & Planing Mills General NAICS: 321113 / Sawmills</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02D .0512, 02D .0515, 02D .0516, 02D .0521, .02D .0530, 02D .1111, 02D .1806, 02D .0540, and 02Q .0513 NSPS: No NESHAP: MACT DDDD, MACT ZZZZ PSD: Yes (VOCs) PSD Avoidance: No NC Toxics: No 112(r): No Other: N/A</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> Ronald Sweet EHS Supervisor (252) 589-8210 PO Box 459 Seaboard, NC 27876	<p style="text-align: center;">Authorized Contact</p> Greg Anthony General Manager (252) 589-8202 PO Box 459 Seaboard, NC 27876	<p style="text-align: center;">Technical Contact</p> Ronald Sweet EHS Supervisor (252) 589-8210 PO Box 459 Seaboard, NC 27876	<p>Application Number: 6600041.21A Date Received: 11/29/2021 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 03937/T26 Existing Permit Issue Date: 09/05/2017 Existing Permit Expiration Date: 08/31/2022</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	5.82	18.71	251.09	48.72	18.52	18.02	10.77 [Methanol (methyl alcohol)]
2020	5.86	19.92	267.34	51.88	19.59	19.19	11.47 [Methanol (methyl alcohol)]
2019	5.80	19.56	262.37	50.94	19.30	18.86	11.28 [Methanol (methyl alcohol)]
2018	6.14	19.52	261.98	50.83	19.04	18.81	11.25 [Methanol (methyl alcohol)]
2017	5.87	42.80	284.08	114.80	24.88	24.82	12.44 [Methanol (methyl alcohol)]

<p>Review Engineer: Suraiya Akter</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue: 03937/T27 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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1. Purpose of Application

West Fraser – Seaboard Lumber Mill currently holds Title V Permit No. 03937T26 with an expiration date of November 30, 2021, for a lumber mill in Seaboard, Northampton County, North Carolina. This permit application is for a TV permit renewal without modification. The renewal application was received on November 29, 2021, or at least six months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

The Seaboard Lumber Mill manufactures dimensional lumber from southern pine logs. Current operation consists of a log yard, continuous kilns, a planer mill, and other mill operation.

Initial Log Processing Area

Tree length logs are delivered by truck to West Fraser on paved and unpaved roads. The log crane loads logs from the storage areas onto the log deck, which manually feeds them to the debarkers. Log debarking, log sawing, lumber sawing, byproduct material collection, conveyance and storage are all included as part of the sawmill operations (ID No. F-Log Sawing). These operations were updated under Air Permit No. 03937T25 issued on June 20, 2017. Sawdust generated from the sawmill operations is supplied as fuel to the lumber drying kilns (ID No. ES-DK) through dedicated silos (ID No. I-Silos).

Lumber Drying Area

Packs of lumber from the sawmill area are heated to dry the lumber to a moisture content of 15 to 20% in the two direct wood-fired continuous double track lumber kilns (ID No. ES-DK). Each continuous kiln is direct fired with a green sawdust burner with a heat input capacity of 35 million Btu/hr. The kilns are permitted at a maximum throughput of 200 million board feet per year total.

A sawdust burner is used to generate heat to dry the green lumber. Sawdust is burned in the two new direct wood fired continuous double track lumber kilns. The heat generated in from the kiln burner system is used to produce the steam that is then used to heat the drying kilns.

Each kiln consists of two tracks traveling in opposite directions and three chambers designed to provide and control the environmental conditions of heat, relative humidity, and air circulation necessary for the proper drying of wood. The first chamber preheats the incoming green lumber using the heat coming off the dry lumber while providing added moisture and saturated cooling for the dried lumber. In the middle chamber, heat in the form of steam will be introduced to dry the lumber. The third chamber conditions the dried wood while preheating the incoming green lumber. Lumber is advanced automatically within each kiln based on its moisture content in the central heating zone.

Planer mill

The Planer mill operations were updated under Air Permit No. 03937T25 which was issued on June 20, 2017, with the permitting of a new planer and trimmer/hog operation (ID No. ES-P2). To date, Planer ES-P2 has not been constructed. The planer operations process rough, kiln dried dimensional lumber into finished lumber. These operations include planing of rough lumber and byproduct material collection, conveyance and storage. All planer operations are conducted within the planer mill building, limiting the emissions of fugitive particulate matter. A simple cyclone (ID No. CD-PC-1) functions to separate and recover the shavings and hogged material.

Additional Mill Operations

Additional mill operations include handling and loading wood byproducts. Fugitive particulate matter (PM) and PM₁₀ emissions from loading and handling wood byproducts (chips, sawdust, planer shavings and bark) are emitted throughout the site as noted above. Logs, lumber, chips, sawdust, bark and shavings are all shipped into or out by truck.

Various uses have been found for the byproducts. Primarily sawdust is burned in the lumber kilns. Rejected boards are chipped and sent to the Westrock (formerly KapStone Kraft Paper mill) in Roanoke Rapids, NC. KapStone in return ships sawdust to West Fraser. The facility operates 3 shifts on Monday through Friday and performs maintenance and special projects on weekends; there are 150 employees at this facility.

In 2018, the facility replaced the insignificant 210 horsepower diesel-fired emergency fire pump with a new 305 horsepower diesel-fired emergency fire pump. In addition, two insignificant tanks (one diesel storage tank and one gasoline storage tank) are added.

3. History/Background/Application Chronology

History/Background

- | | |
|-------------------|--|
| September 5, 2017 | TV permit renewal issued. Air Permit No. 03937T26 was issued on September 5, 2017 with an expiration date of August 31, 2022. |
| November 19, 2018 | A Notice of violation was sent due to lack of visible emissions monitoring and reporting requirements based on the compliance inspection by Steve Carr at the facility on August 28, 2018. The facility failed on twenty-three separate occasions to perform the required weekly visible observations on the emissions generated by the planer and trimmer operation (ID No. ES-P1). |
| May 09, 2019 | An inspection was conducted by Dawn Reddix and was certified that West Fraser was in compliance with the applicable air quality regulations and Title V Air Permit No. 03937T26. A recommendation was made to re-inspect the facility in one year. |

- June 01, 2020 An inspection was conducted by Dawn Reddix and certified that West Fraser was in compliance with the applicable air quality regulations and Title V Air Permit No. 03937T26. A recommendation was made for on-site inspection of the facility after covid19 restrictions lifted.
- December 16, 2021 An inspection was conducted by Dawn Reddix and certified that West Fraser was in compliance with the applicable air quality regulations and Title V Air Permit No. 03937T26. A recommendation was made to re-inspect the facility in one year. Two insignificant activity tanks were found onsite and the inspector suggested that they be added to the air permit during the next modification or renewal.
- August 08, 2023 An inspection was conducted by Dawn Reddix and certified that West Fraser was in compliance with the applicable air quality regulations and Title V Air Permit No. 03937T26. A recommendation was made to re-inspect the facility in one year. Two insignificant activity tanks were found onsite and the inspector suggested that they be added to the air permit during the next modification or renewal.

Application Chronology

- November 29, 2021 Received permit application 6600041.21A for renewal.
- November 30, 2021 Sent acknowledgment letter indicating that the application for permit renewal was complete.
- August 28, 2023 Draft permit and review forwarded for comments.
- September 5, 2023 Comments received from, Pullen Booker and the draft was updated per review
- September 8, 2023 Draft sent to Dena Pitman from ARO, Samir Parekh and contact person from West Fraser
- September 13, 2023 Samir indicated he had no comments via e-mail
- September 29, 2023 Dena Pittman provided her feedback and the draft was updated per review
- October 3, 2023 Kevin DeBerry from West Fraser indicated via e-mail that they had no comments on the draft permit or permit review
- October 3, 2023 Most updated draft of permit and review was forwarded to Marc and Connie for comments

4. Permit Modifications/Changes and TVEE Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page No.	Section	Description of Changes
Cover Letter		Modified to reflect current permit number, issue and effective dates and associated renewal information
--	Throughout permit	Updated all dates and permit revision numbers
--	Cover letter	A notice regarding the right to contest a division of air quality permit decision is added to the renewed permit.
--	Table of Contents	Revised the list to add Insignificant Activities as Section 3 and the General Conditions as Section 4.
3	List of acronyms	Moved from the cover letter in the previous permit to page 3 in the body of the renewed permit.
5	2.1 A 1.a through c	Updated monitoring, recordkeeping, and reporting requirements under 15A NCAC 02D .0512 with most current permitting language.
6	2.1 A 2.c through c	Updated monitoring, recordkeeping, and reporting requirements under 15A NCAC 02D .0521 with most current permitting language.
10	2.2 A 1. a	Updated the monitoring, recordkeeping and reporting requirements for odorous emissions under 15A NCAC 02D .1806 with most current permitting language.
11	3	Moved Insignificant Activities list from attachment to Section 3. Removed the footnote stating the additional information regarding applicability of MACT and GACT.
14	4	Updated General Conditions with the most current version (Version 7.0, 08/21/2023) and moved to Section 4.

This permit renewal is without modification; however, two insignificant activities (storage tanks) will be added to the Title V Equipment Editor.

5. Regulatory Review

West Fraser is subject to the following regulations. The facility's equipment and operations have not changed since the last renewal in 2017 except for the change of fire pump and addition of two insignificant activities (storage tanks). The permit was updated to reflect the most current stipulations for all applicable regulations, where necessary.

- 15A NCAC 02D .0512, Particulates from Miscellaneous Wood Products Finishing Plants – This regulation applies to the planer and trimmer/hog operation (ID No. ES-P1 or ES-P2). Minimal particulate matter (PM) emissions result from the processing of rough, kiln dried dimensional lumber into finished lumber. West Fraser must conduct inspection and maintenance of the control devices on these sources to ensure compliance. To ensure PM emissions meet this standard, monitoring, recordkeeping, and reporting requirements apply to the planer and trimmer/hog operation.

Continued compliance is anticipated.

- 15A NCAC 02D .0515, Particulates from Miscellaneous Industrial Processes – This condition is applied to the two direct wood-fired double track lumber kilns (ID No. ES-DK). The allowable emission rate is calculated by the following equations:

$$E = 4.10(P)^{0.67} \quad \text{For process weight rates less than or equal to 30 tons/hr}$$

$$E = 55.0(P)^{0.11} - 40 \quad \text{For process weight rates greater than 30 tons/hr}$$

For both equations:

E = allowable emission limit for particulate matter in lb/hr; and

P = process weight rate in tons/hr.

Each of the kilns has a process rate greater than 30 tph (11.4 MBF/hr or 47.6 tons per hour each). So, the allowable emission limit is $55.0 \times (47.60 \text{ tpy})^{0.11} - 40 = 44.12$ pounds per hour each. Therefore, the allowable emission limit for particulate matter from this source is 44.12 per hour from each kiln.

As reported in the permit review for the addition of the kilns¹, potential PM emissions from each of the kilns are as follows:

$$\frac{0.30 \text{ pounds PM}}{1000 \text{ board feet}} \times \frac{10E + 06 \text{ board feet}}{\text{year}} \times \frac{1 \text{ year}}{8760 \text{ hours}} \times 2 \text{ kilns} = \frac{6.85 \text{ pounds PM}}{\text{hour}}$$

The emission factor of 0.30 pounds of PM/1,000 board feet was based on unpublished NCASI data provided by Dr. David Word.² Using the more conventional emission factor of 0.14 pounds of PM/1,000 board feet from DAQ’s “Wood Kiln Emissions Calculator Revision C” (July 2007) for a “gasifier” kiln results in a PM emission rate of 3.2 pounds of PM/hour.

Either approach, results in emissions that are well below the allowable emissions. Thus, compliance is indicated, and no monitoring, recordkeeping, or reporting is required.

- 15A NCAC 02D .0516, Sulfur Dioxide Emission from Combustion Sources - This condition is applied to the two-wood fired continuous lumber kilns (ID Nos. ES-DK). Sulfur dioxide emissions from these kilns shall not exceed 2.3 pounds per million Btu heat input. The emission factor provided for the SO₂ emissions for the kilns when initially permitted in 2005 is 0.025 lb/MMBtu. This value is well below the allowable emission rate. Therefore, no further monitoring, recordkeeping or reporting is required for this source. Continued compliance is anticipated.
- 15A NCAC 02D .0521, Control of Visible Emissions – This regulation is applied to the planer and trimmer/hog operation (ID Nos ES-P1 and ES-P2) and two lumber kilns (ID Nos. ES-DK). In order to comply with 2D .0521, the visible emission rate from the planer and trimmer/hog operation shall not be more than 20 percent opacity, when average 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.

¹ Gautam Patnaik (08/05/15).

² Jenny Kelvington (05/22/2010).

Monitoring, recordkeeping or reporting is not required for the particulate emissions from the firing of wood in the lumber kilns, but the planer and trimmer/hog operation shall go under monitoring, recordkeeping and reporting as per 15A NCAC 02Q .0508(f). Compliance with this stipulation is expected.

- 15A NCAC 02D .1806, Control and Prohibition of Odorous Emissions
The owner or operator of a facility subject to this Rule shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. The owner or operator of a facility subject to this Rule shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary. This regulation is state enforceable only. Continued compliance is anticipated.
- 15A NCAC 02D .0540, Fugitive Emission Controls – One sawmill operation (includes debarking and sawing) ID No. F-log Sawing is subject to this rule. According to the General Condition MM, no fugitive emissions should leave the property and cause substantive complaints or cause an excess visible emission problem. Continued compliance is expected.

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

NSPS

The only source subject to New Source Performance Standards at the West Fraser Lumber Mill is the new 305 hp fire pump. NSPS Subpart IIII applies to owners or operators of compression ignitions internal combustion engines manufactured after July 1, 2006. The new fire pump engine is a 2018 fire engine hence is subject to NSPS Subpart IIII and must comply with the following requirements:

- Engines manufactured in 2007 or later must comply with the emission limits referenced in 40 CFR 60.4205 (b). Compliance is achieved by purchasing a Tier 3 engine certified to meet the referenced emission limits in accordance with 40 CFR 60.4211(c) and maintaining corresponding records of the certification.
- The engine must be configured according to the manufacturer's recommendations [60.4211(c)].
- Fuel oil must contain a maximum of 15 ppmw sulfur (60.4207).
- A non-resettable hours meter must be installed and non-emergency operation of the engine is limited to 100 hr/yr [60.4209(a) and 60.4211(e)]
- A record of annual hours of operation must be maintained [60.4214(b)]

NESHAP/MACT

West Fraser is a major source of HAPs because emissions of methanol exceed 10 tpy and total HAP emission exceeds 25 tpy. Hence West Fraser is subject to the following MACT standards.

MACT Subpart DDDD

The two direct wood-fired continuous double track kilns (ID No. ES-DK) are subject to the "NESHAP for Plywood and Composite Wood Products," 40 CFR Part 63 Subpart DDDD.

MACT Subpart ZZZZ

The diesel-fired emergency fire pump (ID No. IS-FP) is subject to the "NESHAP for Stationary

Reciprocating Internal Combustion Engines,” 40 CFR Part 63 Subpart ZZZZ. This engine is a compression ignition and was installed in 2018 replacing the previous 210 horsepower diesel-fired emergency fire pump. It is less than 500 HP and is located at a major source of HAPs. The following is a summary of the requirements for this engine.

- Install a non-resettable hour meter on the engine,
- Change oil and filter every 500 hours of operation or annually,
- Inspect all hoses and belts every 500 hours of operation or annually and replace, if necessary,
- Inspect air cleaner every 1,000 hours of operation or annually,
- Operate no more than 100 hours for maintenance and readiness testing, and
- Recordkeeping and reporting requirements.

This emergency fire-pump meets the definition of insignificant activities under 15A NCAC 02Q .0503(8) and is included on the insignificant activity list. Continued compliance with the MACT Subpart ZZZZ is anticipated.

PSD

West Fraser is a PSD major source for VOC, with actual emissions greater than 250 tons per consecutive 12-month period. The two kilns (ID No. ES-DK) are subject to a BACT limit of 3.76 pounds VOC (as total VOC) per thousand board feet. The production of the kilns is also limited under BACT to less than 200 million total board feet per consecutive 12-month period. These conditions were placed into the permit as part of a PSD modification to add the new kilns under Air Permit No. 03937T22 issued on August 5, 2015. No change to the BACT emission limit for VOC or the production limit of lumber is required under this permit renewal.

No testing was required to confirm the BACT limit due to the configuration of the kiln, as discussed in the Preliminary PSD permit review for Air Permit No. 03937T22. The continuous kilns have no stacks, but rather, pollutants are emitted through the open doors at both ends of the kilns. Others have also reported difficulty in testing continuous kilns. A South Carolina PDS determination reports the following:

Although testing has occurred in a limited number of units in SC, GA, and AR, the stack test does not capture total VOC emissions from these sources. There has been a wide variability in the results state to state. Lumber kilns are not well suited for stack testing. The design of a lumber drying kiln makes it extremely difficult and costly to perform stack testing. Batch lumber drying kilns have multiple vents that open and close at different times throughout the batch cycle. The flow and composition of vent gases leaving each vent change over the course of the drying cycle, and batch time can be 24 hours or more in duration. The variability with time is much lower with a continuous kiln; however, capturing the exhaust stream is even more challenging. The exhaust gases from continuous kilns leave the kiln through gaps between the lumber being dried and the openings on either end of the kiln through which the lumber passes. In some cases, it is possible to build a hood-type structure on either end of the kiln to direct a portion of the exhaust gas to a stack or stacks. The stack can be designed to meet EPA Method 1 sampling criteria and accommodate sampling ports. However, capturing 100% of the kiln exhaust through such a hood structure is virtually impossible due to the size of the opening required for the lumber to enter/exit the kiln and the need to avoid generating a vacuum inside the kiln itself. The large lumber pass-through openings also prohibit

*accurate measurement of the total exhaust flow leaving the kiln. Flow measurements can be collected from the hood/stack, but no accurate measurements are possible of the exhaust not captured by the hood.*³

For these reasons, testing for the VOC BACT limit was not required for Air Permit No. 03937T26 and will not be required as part of this TV permit renewal.

112(r)

The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the 112(r) thresholds. No change with respect to 112(r) is anticipated under this permit renewal.

CAM

The CAM rule (40 CFR 64; 15A NCAC 02D .0614) applies to each pollutant specific emissions unit (PSEU) at major TV facilities that meets all three following criteria:

- the unit is subject to any (non-exempt: e.g. pre November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source (i.e., 100 tons per year for criteria pollutants or 10/25 tons per year for HAPs).

West Fraser has two planer operations that use control devices (simple cyclones). The existing planer operation (ID No. ES-P1) is not subject to CAM because it does not use the control device to achieve compliance with an emission limitation or standard (02D .0515); and the potential pre-control device emissions are less than 100 tons per year of PM/PM10.

Planer ES-P2 has not commenced operation yet, but it will not be subject to CAM for the same reasons as stated above for Planer ES-P1.

7. Facility Wide Air Toxics

All sources of toxic air pollutants (TAPs) from Parker are subject to MACT Subpart DDDD. North Carolina G.S. 143-215.107(a) exempts emission sources subject to MACT standards from NC Air. When direct wood-fired gasifier, continuous kilns (ID No. ES-DK) were permitted under Air Permit No. 0393T22, West Fraser conducted an air toxics analysis showing these kilns did not pose an unacceptable risk to human health. This permit renewal does not affect the status of NC Air Toxics for these kilns, and continued compliance is anticipated.

8. Facility Emissions Review

³ SC Department of Health and Environmental Control (December 23, 2015) Preliminary PSD Determination for New South Lumber Company – Darlington, Darlington, Darlington County, SC.

Potential emissions in the table below were provided in Permit Application No. 6600041.21A to add the new 305 hp fire pump (ID No. IS-FP). Actual emissions for criteria pollutants and HAPs are provided in the header of this permit review.

Pollutants	Potential Emissions (tons/year)				
	Kilns (ID ES-DK)	Fire Pump (IS-FP)	Planer (ID No. ES-P2)	Fugitive Emissions from Sawmill Operations (ID No. IF-Log Sawing)	Total
PM	30	0.04	17.0	14.35	61.39
PM10	18	0.04	14.45	0.27	32.766
PM2.5	15	0.04	8.50	0.27	23.81
NO _x	28	0.50	--	--	28.50
CO	73	0.44	--	--	73.44
SO ₂	7.67	0.16	--	--	7.83
VOC	376.16	0.132	--	--	376.29
CO _{2e}	65,345	--	--	--	65,345
<u>Notes:</u>					
<ul style="list-style-type: none"> All emissions above were provided in Appendix A to Permit Application No. 6600041.21A. 					

9. Other Regulatory Requirements

EPA has promulgated a rule (88 FR 47029, July 21, 2023), with an effective date of August 21, 2023, removing the emergency affirmative defense provisions in operating permits programs, codified in both 40 CFR 70.6(g) and 71.6(g). EPA has concluded that these provisions are inconsistent with the EPA's current interpretation of the enforcement structure of the CAA, in light of prior court decisions⁴. Moreover, per EPA, the removal of these provisions is also consistent with other recent EPA actions involving affirmative defenses⁵ and will harmonize the EPA's treatment of affirmative defenses across different CAA programs.

As a consequence of this EPA action to remove these provisions from 40 CFR 70.6(g), it will be necessary for states and local agencies that have adopted similar affirmative defense provisions in their Part 70 operating permit programs to revise their Part 70 programs (regulations) to remove these provisions. In addition, individual operating permits that contain Title V affirmative defenses based on 40 CFR 70.6(g) or similar state regulations will need to be revised.

⁴ NRDC v. EPA, 749 F.3d 1055 (D.C. Cir. 2014).

⁵ In newly issued and revised New Source Performance Standards (NSPS), emission guidelines for existing sources, and NESHAP regulations, the EPA has either omitted new affirmative defense provisions or removed existing affirmative defense provisions. See, e.g., National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants; Final Rule, 80 FR 44771 (July 27, 2015); National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters; Final Rule, 80 FR 72789 (November 20, 2015); Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units; Final Rule, 81 FR 40956 (June 23, 2016).

Regarding NCDAQ, it has not adopted these discretionary affirmative defense provisions in its Title V regulations (15A NCAC 02Q .0500). Instead, DAQ has chosen to include them directly in individual Title V permits as General Condition (GC) J.

Per EPA, DAQ is required to promptly remove such impermissible provisions, as stated above, from individual Title V permits, after August 21, 2023, through normal course of permit issuance.

10. Compliance Status

The most recent inspection was conducted on August 23, 2023, by Dawn Reddix of the RRO. The facility appeared to operate in compliance with all applicable air quality regulations and permit conditions at the time of inspection. Additionally, a signed Title V Compliance Certification (Form E5) indicating the facility was in compliance with all applicable requirements was included with the permit renewal.

11. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period.

Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State (Virginia) or local agencies are within 50 miles of this facility at or before the time notice provided to the public under 02Q .0521 above.

12. Other Regulatory Considerations

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is NOT required for this renewal application.
- A permit fee is NOT required for this renewal application.

13. Recommendations

The permit renewal application for West Fraser – Seaboard Lumber Mill in Seaboard, Northampton County, NC has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 03937T27.