

Initial  
Permit  
application.



## 1. INTRODUCTION

Enviva manufactures wood pellets for use as a renewable fuel for energy generation and industrial customers. Enviva's customers use wood pellets in place of coal, significantly reducing emissions of pollutants such as carbon dioxide, mercury, arsenic and lead. The company is dedicated to improving the environmental profile of energy generation while promoting sustainable forestry in the southeastern United States. Enviva holds certifications from the Forest Stewardship Council (FSC), Sustainable Forestry Initiative (SFI) and the Programme for the Endorsement of Forest Certifications (PEFC). Enviva requires that all suppliers adhere to state-developed "Best Management Practices" (BMPs) in their activities to protect water quality and sensitive ecosystems. In addition, Enviva is implementing an industry leading "track and trace" system to further ensure that all fiber resources come from responsible harvests. We pay particular attention to: land use change, use and effectiveness of BMPs, wetlands, biodiversity and certification status. All of this combined ensures that Enviva's forestry activities contribute to healthy forests both today and in the future.

This application has been developed for two reasons, to request a construction permit for an eighth dry hammermill and to submit the initial Title V application. Thus, included in this application are three copies of the application for the construction permit component and three copies for the Title V application component. Enviva requests a construction permit be issued for the eighth hammermill as soon as possible. In accordance with the "two-step" Title V application option under 15A NCAC 2Q .0504, Enviva Pellets Northampton, LLC (Enviva) is submitting a Title V application within one year of commencement of operation of the facility. Operation of the facility commenced on **April 22, 2013**.

### 1.1. REGULATORY APPLICABILITY

This application contains regulatory applicability information for SIP, NSPS, NESHAP, and state only regulations. The forms have been developed with the general facility forms followed by source specific forms.

Both the current operating permit and the tabular summary provided after Form E3 identify all Title V applicable requirements. Please note that the 40 CFR Part 64 Compliance Assurance Monitoring (CAM) Regulations apply to the particulate matter and associated pollution control system for the rotary wood dryer; however, because post-control emissions are less than the major source threshold of 100 tpy, the CAM Plan is not required until Title V permit renewal.

Air quality modeling analyses for certain toxic air pollutants (TAPs) are required in accordance with relevant North Carolina Division of Air Quality's (NC DAQ's) regulations. The facility was previously modeled for TAPs from the dryer, emergency generator and fire pump. However, some of the same TAPs are emitted from the hammermills and the pellet coolers. Therefore, the modeling for air toxics (or TAPs) has been updated as a part of this application submittal and is included in Section 4.0

### 1.2. UPDATED EMISSION CALCULATIONS AND REQUEST TO CONSTRUCT EIGHTH HAMMERMILL

Based on testing from other facilities, there have shown to be VOCs, HAPs, and TAPs in downstream processes such as the hammermills and pellet coolers. Therefore, Enviva has updated the potential emissions in Appendix B to account for these downstream emissions. The information in this



application also reflects an increase of the annual production from 475,000 to 537,625 oven dried tons per year.

In addition to updating the calculations, Enviva is also requesting the addition of an eighth hammermill. Enviva request the addition of the eight hammermill be completed as a construction application and issued before the Title V permit.

### **1.3. APPLICATION ORGANIZATION**

Six copies of the application are being submitted to DAQ, three for the construction permit and three for the initial Title V application. Since a permit fee was submitted with the initial application, a fee is not required for the initial Title V application. However, since Enviva is also including in this application a request to construct an eight hammermill, Enviva has included the appropriate \$904 fee for construction application.

This application contains the following information:

- Section 1 provides an introduction,
- Section 2 provides a project description and discusses air emissions,
- Section 3 discusses regulatory applicability,
- Section 4 summarizes the air dispersion modeling analysis,
- Appendix A contains air permit application forms,
- Appendix B presents air emissions calculations,
- Appendix C contains TAP modeling support,
- Appendix D contains the electronic modeling files, and
- Appendix E contains the zoning consistency determination.



## 2. PROCESS DESCRIPTION AND AIR EMISSIONS

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The Northampton wood pellets plant is designed to produce up to 537,625 oven-dried tons (ODT) per year of wood pellets typically consisting of pressed hardwoods, but could contain up to 10% softwoods on a 12-month rolling total basis. This section discusses the Northampton Plant's pelletizing process and associated air emissions for the existing plant, which consists of the following:

- Green wood handling and sizing operations;
- Green wood fuel storage bin;
- Log debarker;
- Log bark hog;
- Log chipper;
- Two (2) rechippers also referred to as green wood hammermills;
- Eight (8) dry wood hammermills controlled by eight cyclones and three fabric filtration systems;
- Hammermill area emissions controlled by a hammermill fabric filter;
- A pellet mill feed silo controlled by bin vent filter;
- Twelve (12) wood pellet presses and six (6) pellet coolers controlled via cyclones;
- One 175.3 MMBtu/hr green wood direct-fired dryer system with pollution control equipment consisting of a three simple cyclones and wet electrostatic precipitator (WESP) for particulate matter abatement,
- Finished product storage and loading controlled by a fabric filter;
- Pellet fines bin controlled via a bin vent filter;
- Dried wood handling operations;
- Two (2) diesel storage tanks;
- Emergency electric generator; and
- Fire water pump.

Detailed air emissions calculations are presented for each source discussed in this section in Appendix B. A process flow diagram is presented in Figure 2-1.





Figure 2-1. Process Flow Diagram

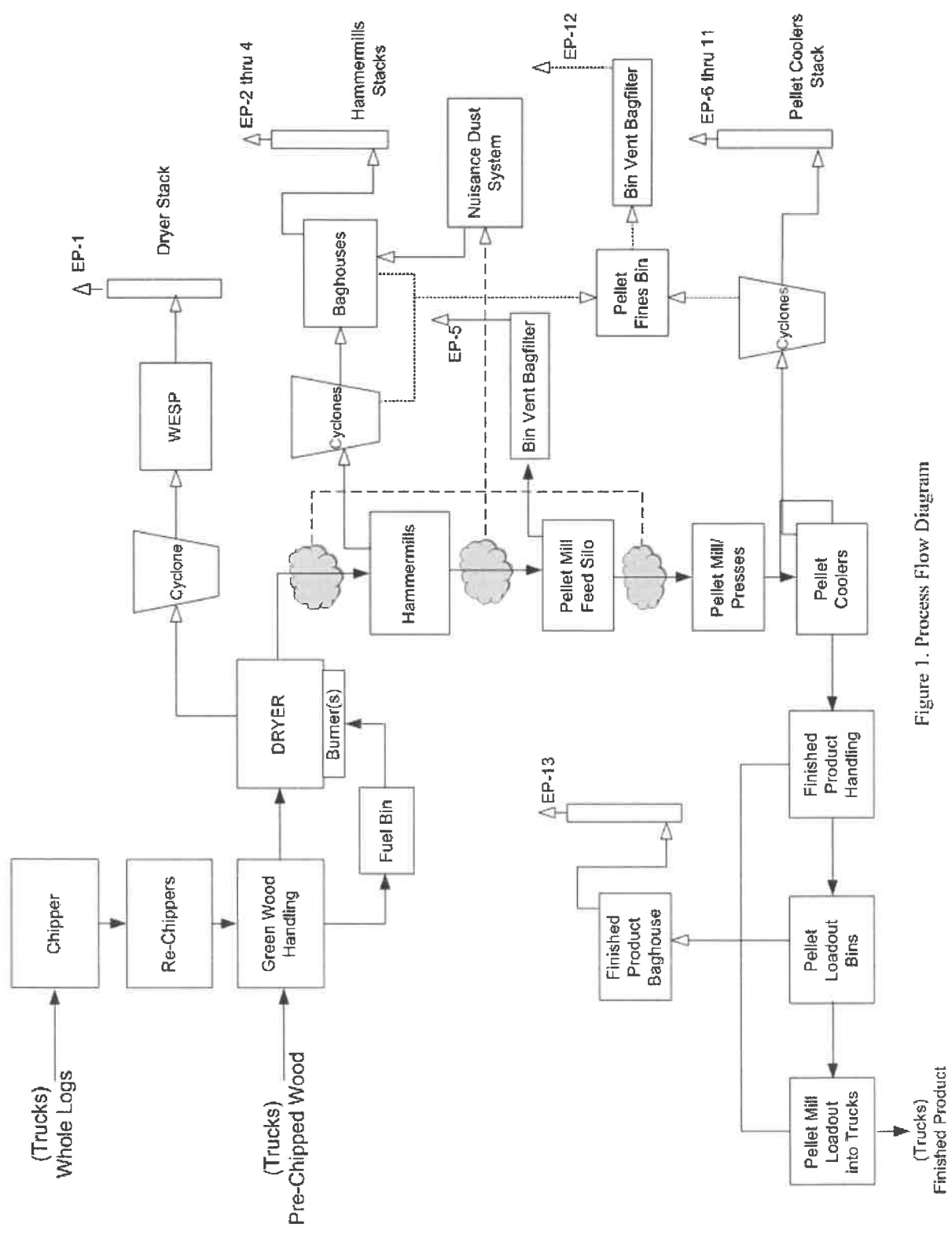


Figure 1. Process Flow Diagram



## 2.1. GREEN WOOD HANDLING AND SIZING, FUEL STORAGE BIN, AND STORAGE PILES

“Green” (i.e., wet) wood will be delivered to the facility via trucks as either pre-chipped wood or unchipped low grade wood fiber, tops, limbs, and logs from commercial thinning for on-site chipping. Pre-chipped wood will be screened and oversized chips will undergo additional chipping. Unchipped wood will be debarked and chipped to specification for drying in the on-site electric-powered debarker (IES-DEBARK-1), chipper (ES-CHIP-1), and two green wood hammermills/ rechippers (ES-RCHP-1, ES-RCHP-2) as required. Chipped wood for drying is conveyed to a chipped wood storage pile while bark is conveyed to a bark fuel storage pile (IES-GWFB).

Green wood and bark contains a high moisture content approaching 50 percent by weight. Therefore, green wood handling and sizing, fuel storage bin, and storage piles have negligible emissions and are included on the insignificant activities list. Representative drop point emission calculations using AP-42 Section 13.2.3 for Aggregate Handling are attached in Appendix B for green wood handling and sizing to demonstrate that these emissions are negligible.

Fugitive particulate emissions from chipped wood storage piles are quantified in Appendix B. Emission factors are developed based on surface area of the piles in accordance with U.S. EPA guidance for active storage pile fugitive emissions.<sup>1</sup> These factors provide estimates of PM emissions due to wind erosion at the surface of each storage pile based on the annual frequency of high wind speeds (> 12 mph).

In addition to particulate matter emissions, volatile organic compounds are also emitted from the storage pile. Emission factors are obtained from a National Council for Air and Stream Improvement (NCASI) document provided by SC DHEC for the calculation of fugitive VOC emissions from woody biomass storage piles. Emission factors ranged from 1.6 to 3.6 lb VOC as carbon/acre-day. Enviva chose to employ the maximum emission factor to be conservative. Emission factors are provided in pounds of carbon per surface area of the pile. Detailed calculations are included in Appendix B.

## 2.2. DEBARKING, CHIPPING, GREEN WOOD HAMMERMILLING, AND BARK HOG

Bark is removed from unchipped wood prior to chipping in rotary drum debarkers. There are no current AP-42 emission factors or other emission factors available for debarkers, and visual observation of these units in operation at other Enviva plants indicate that emissions are negligible due to the high moisture content of bark and the wind break provided by the drums.

Emission estimates for the chipper and bark hog are based on limited emission factors available for wood chipping. As shown in the attached emissions calculations (Appendix B), VOC emissions from these sources are calculated using emission factors from AP-42 Section 10.6.3 emission factors for hardwood chipping emissions. Methanol emissions are also calculated using factors from AP-42 Sections 10.6.3 and 10.6.4. Particulate matter (PM) emissions will be negligible from the green wood chipper (ES-CHIP-1) because the exhaust is directed downward towards the ground.

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<sup>1</sup> U.S. EPA *Control of Open Fugitive Dust Sources*, Research Triangle Park, North Carolina, EPA-450/3-88-008. September 1988.



VOC emission estimates for the rechippers (ES-RCHP-1 and 2) are based on AP-42 Section 10.6.2 emission factors. Particulate emissions are assumed to be small due to the inherently high moisture content of the wood. Any PM emissions would be fugitive and are routed downward to the ground.

### **2.3. WOOD DRYER (ES-DRYER)**

Green wood is conveyed to a single rotary dryer system. Direct contact heat is provided to the system via a 175.3 MMBtu/hr total heat input burner system using bark and wood chips as fuel. Air emissions are controlled by three identical simple cyclones to capture bulk particulate matter. Emissions from each of the cyclones are combined into a common duct and are routed to the wet electrostatic precipitator (WESP) for additional particulate, metallic HAP, and hydrogen chloride removal.

Criteria pollutant emissions are calculated using a combination of AP-42 emission factors, Enviva Northampton October 2013 stack testing results, and specifications from the dryer system vendor. The reader should refer to detailed footnotes in Appendix B for details of the origin of each emission factor.

HAP and TAP emissions are calculated from combustion of wood in the dryer using AP-42 Section 1.6 and control of metallic HAP emissions via the WESP. In addition to HAP and TAP emissions from combustion of wood in the dryer, HAPs and TAPs are also released during the drying of wood. Emission factors for green, direct wood-fired softwood are obtained from AP-42 Section 10.6.2. To account for hardwood HAP and TAP emissions, factors are conservatively calculated by taking the AP-42 HAP factors for 100% hardwood, and multiplying by the ratio of the total listed VOC emission factors for hardwood and softwood (0.24 / 4.7).

### **2.4. DRIED AND SIZED WOOD HANDLING (IES-DWH)**

Dried materials are transferred from the dryer via conveyors to screening operations that remove smaller size wood particles prior to transfer into hammermills for further size reduction prior to pelletization. Smaller particles passing through the screens are diverted to the hammermill discharge conveyor, while oversized wood is diverted to the hammermills. Dust generated from transfer operations around the screening operation is diverted to the hammermill area filtration system, which is described in the following subsection. There are several other transfer points comprising an insignificant emission source designated as "IES-DWH", dried and sized wood handling. IES-DWH is located between the dryer and hammermills, and are completely enclosed with no emissions.

### **2.5. HAMMERMILLS (ES-HM-1 THROUGH 8)**

Prior to pelletization, dried materials are reduced to the appropriate size needed for pelletization using eight hammermills operating in parallel. A conveyor system receives the ground wood from the hammermills and sends it to the pellet mill feed silo.

Particulate emissions from each of the eight hammermills are controlled using cyclones, which are subsequently controlled by fabric filters. The first three cyclones are directed to hammermill filter HM-BF1. The second three cyclones are directed to hammermill filter HM-BF2. The last two cyclones are directed to hammermill filter HM-BF-3. Appendix B summarizes the emissions from each hammermill bagfilter system. Particulate matter emissions from each bagfilter are calculated using a manufacturer guaranteed grain loading factor for the wood particulates and the maximum nominal stack flow rate.



VOC, HAP, and TAP emissions are calculated using Enviva Northampton September 2013 stack testing results as shown in Appendix B.

## **2.6. HAMMERMILL AREA EMISSIONS/ NUISANCE DUST SYSTEM (ES-NDS)**

An induced draft fan is used to transfer dust generated from a number of enclosed transfer/handling sources around the hammermill to one of the three hammermill bagfilters (CD-HM-BF3). The sources controlled by this bagfilter include, but are not limited to, the following:

- Emissions from the seventh and eight hammermill;
- Hammermills infeed and distribution transfer;
- Pellet cooler transfer (particulate emissions from pellet cooler cyclones large enough to drop out of entrainment) & pellet screening;
- Hammermill pre-screen feeder emissions; and
- Pellet screen fines cyclone.

Emissions from this bagfilter are calculated assuming a manufacturer guaranteed grain loading factor for the wood particulates and the maximum nominal stack flow rate.

## **2.7. PELLET MILL FEED SILO (ES-PMFS) AND PELLET MILL FINES BIN (ES-PFB)**

Sized wood from the hammermills is transported on a set of conveyors to the pellet mill feed silo prior to pelletization. Particulate emissions from the pellet mill feed silo bin vent filter are calculated assuming a manufacturer guaranteed grain loading factor and the maximum nominal stack flow rate.

Fine pellet material from the hammermill pollution control system and screening operation is collected in the pellet fines bin which is controlled by a bin vent baghouse. Particulate emissions from the baghouse are calculated assuming a manufacturer guaranteed grain loading factor and the maximum nominal stack flow rate.

## **2.8. PELLET PRESS SYSTEM PELLET COOLERS (ES-CLR-1 THROUGH 6)**

Dried ground wood is mechanically compacted in the presence of water in twelve presses in the Pellet Press System. Exhaust from the Pellet Press and Pellet Coolers are vented through the cooler aspiration cyclones and then to the atmosphere, as shown in Appendix B. No chemical binding agents are required for pelletization.

Formed pellets are discharged into one of six pellet coolers. Cooling air is passed through the pellets. At this point, the pellets contain a small amount of wood fines, which are swept out with the cooling air and are controlled utilizing six cyclones operating in parallel prior to discharge to the atmosphere.

Particulate matter emissions from each cyclone are calculated assuming a maximum grain loading factor for the wood particulates and the maximum nominal stack flow rate. VOC, HAP, and TAP emissions are calculated like the hammermills using Enviva Northampton September 2013 stack test data. Please see Appendix B for a detailed discussion.





## **2.9. FINISHED PRODUCT HANDLING AND LOADOUT**

Final product is conveyed to pellet truck loadout bins that feed two pellet truck loadout operations (ES-PL-1, -2). Emissions from the Pellet Loadout Bins are controlled by a bagfilter. Pellet Loadout is accomplished by gravity feed of the pellets through a covered chute to reduce emissions. Emissions to the atmosphere from conveyance from the Pellet Loadout Bins are minimal because dried wood fines have been removed in the pellet screener, and a slight negative pressure is maintained in the loadout building as a fire prevention measure to prevent any buildup of dust on surfaces within the building. Slight negative pressure is produced via an induced draft fan that exhausts to the same bagfilter (CD-FPH) that controls minor dust emissions from loading of the Pellet Loadout Bins.

Particulate emissions from finished product handling and loadout are calculated assuming a manufacturer guaranteed grain loading factor and the maximum nominal stack flow rate for the bagfilter.

## **2.10. EMERGENCY GENERATOR, FIRE WATER PUMP, AND FUEL OIL STORAGE TANKS**

The plant will utilize a 250 brake horsepower emergency generator for emergency operations and a 250 brake horsepower fire water pump engine. All engines will combust diesel fuel. Aside from maintenance and readiness testing, the generator and fire water pump engines will only be utilized for emergency operations. Diesel for the emergency generator will be stored in a storage tank of up to 2,500 gallons capacity and diesel for the fire water pump will be stored in a storage tank of up to 1,000 gallons capacity. Emissions from all fuel oil storage tanks are insignificant and these units are categorically exempt from construction permitting requirements.



### 3. REGULATORY APPLICABILITY ANALYSIS

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This section summarizes the applicability and requirements of key federal and state regulations.

#### 3.1. FEDERAL REGULATIONS

##### 3.1.1. Prevention of Significant Deterioration (PSD), 40 CFR Part 51.166

North Carolina implements the federal PSD requirements of 40 CFR 51.166 under North Carolina Regulation 15A NCAC 2D .0530. Under the PSD regulations, a major stationary source for PSD is defined as any source in one of the 28 named source categories with the potential to emit 100 tpy or more of any regulated pollutant, or any source not in one of the 28 named source categories with the potential to emit 250 tpy or more of any regulated pollutant other than GHGs.<sup>2</sup> Neither wood pellet production nor operation of associated combustion sources qualifies the facility for classification in one of the 28 listed source categories.

Federal PSD requirements for GHGs have been implemented in North Carolina under 15A NCAC 2D .0544, which essentially adopts the U.S. EPA's "GHG Tailoring Rule." The GHG Tailoring Rule establishes emission rates triggering PSD review for GHGs with the major source threshold being 100,000 tpy of CO<sub>2</sub> equivalent (CO<sub>2e</sub>) and a significant emission rate of 75,000 tpy CO<sub>2e</sub>. As shown in Appendix B, Table B-1 the proposed project does not trigger PSD review for CO<sub>2e</sub>, since the biomass deferral rule is still in effect in North Carolina.

As shown in Appendix B, Table B-1 the Northampton facility is minor for all pollutants.

##### 3.1.2. Title V Operating Permit Program, 40 CFR Part 70

40 CFR Part 70 establishes the federal Title V operating permit program. North Carolina has incorporated the provisions of this federal program in its Title V operating permit program under 15A NCAC 2Q .0500. The major source thresholds with respect to the North Carolina Title V operating permit program regulations are 10 tons per year of a single HAP, 25 tpy of any combination of HAP, 100 tpy of certain other regulated pollutants, and 100,000 tons of GHGs per year (expressed as CO<sub>2e</sub>).

The site is a major Title V source for criteria pollutants as shown in Appendix B, Table B-1. The biomass deferral rule is still in effect as of the submittal of this application. The site is an area source for HAPs (minor). The purpose of this application is to request a Title V permit, which is being submitted within one year after commencement of operation date of, April 22<sup>nd</sup>, 2013.

##### 3.1.3. New Source Performance Standards, 40 CFR Part 60 (15A NCAC 2D .0524 New Source Performance Standards)

New Source Performance Standards (NSPS), located in 40 CFR Part 60 and implemented in North Carolina Regulation 15A NCAC 2D .0524, require certain categories of new, modified, or reconstructed sources to control emissions to specified levels. Three potentially applicable NSPS are addressed below.

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<sup>2</sup> 40 CFR §52.21(b)(1)(i)



Moreover, any source subject to an NSPS is also subject to the general provisions of NSPS Subpart A, unless specifically excluded.

### **3.1.3.1. NSPS Subpart IIII**

NSPS Subpart IIII applies to owners or operators of compression ignition (CI) internal combustion engines (ICE) manufactured after April 1, 2006 that are not fire pump engines, and fire pump engines manufactured after July 1, 2006. As noted in Section 2, the plant will have a 250 hp emergency generator and a 250 hp emergency fire pump. The emergency generator and fire pump are subject to the provisions of NSPS Subpart IIII.

Under NSPS Subpart IIII, owners and operators of emergency generators manufactured in CY 2007 or later with a maximum engine power greater than or equal to 50 hp are required to comply with the emission limits referenced in 40 CFR §60.4205(b). These limits are as follows: 0.20 g/kW for PM, 3.5 g/kW for CO, and 4 g/kW for NO<sub>x</sub> + nonmethane hydrocarbons (NMHC).

Enviva complies with the emission limits by operating the emergency generator and fire water pump as instructed in the manufacturer's operating manual in accordance with 40 CFR §60.4211(a), and purchasing an engine certified to meet the referenced emission limits in accordance with 40 CFR §60.4211(c). The engine is also equipped with a non-resettable hour meter in accordance with 40 CFR §60.4209(a). Emergency and readiness testing of the unit will be limited to 100 hours per year.

In accordance with NSPS Subpart IIII, owners and operators of fire pump engines manufactured after July 1, 2006 must comply with the emission limits in Table 4 of NSPS Subpart IIII, which are organized based on the size of the unit. These limits are as follows: 0.20 g/kW for PM, 3.5 g/kW for CO, and 4 g/kW for NO<sub>x</sub> + nonmethane hydrocarbons (NMHC).

Enviva complies with these emission limits by operating the fire pump as instructed in the manufacturer's operating manual in accordance with 40 CFR §60.4211(a), and purchasing an engine certified to meet the referenced emission limits in accordance with 40 CFR §60.4211(b). The engine is equipped with a non-resettable hour meter in accordance with 40 CFR §60.4209(a). Emergency and readiness testing of the unit will be limited to 100 hours per year.

Both the emergency generator and fire pump comply with the fuel requirements in 40 CFR §60.4175.3, which limit sulfur to a maximum of 15 ppmw and a cetane index of at least 40.

### **3.1.3.2. NSPS Subpart Kb**

NSPS Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels*, regulates storage vessels with a capacity greater than 75 cubic meters (m<sup>3</sup>) (19,813 gallons) that are used to store volatile organic liquids for which construction, reconstruction, or modification is commenced after July 23, 1984.<sup>3</sup>

Diesel fuel oil storage tank capacities are well below the NSPS Subpart Kb storage capacity threshold of 19,813 gallons. Thus, Subpart Kb is not application to any emission source for process heat at the Enviva Northampton facility.

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<sup>3</sup> 40 CFR 60.110b(a)



### 3.1.3.3. NSPS Subpart Db

The plant will utilize direct fired drying of chipped wood and, therefore, does not trigger the NSPS Subpart Db (Industrial-Commercial-Institutional Steam Generating Units) regulations.

### 3.1.4. National Emission Standards for Hazardous Air Pollutants for Regulated Source Categories, 40 CFR Part 63 (15A NCAC 2D .1111 Maximum Achievable Control Technology)

National Emission Standards for Hazardous Air Pollutants (NESHAP) are listed in 40 CFR Part 63 and implemented via North Carolina regulation 15A NCAC 2D .1111. One potentially applicable NESHAP is addressed below.

#### 3.1.4.1. 40 CFR Part 63 Subpart ZZZZ

40 CFR 63 Subpart ZZZZ applies to reciprocating internal combustion engines (RICE) located at a major or area source of HAP emissions. Emergency stationary RICE are defined in 40 CFR 63.6675 as any stationary RICE that operates in an emergency situation. These situations include engines used for power generation when power from the local utility is interrupted, or when engines are used to pump water in the case of fire or flood.

The emergency generator and the emergency fire pump at the site are classified as emergency stationary RICE under the NESHAP and will comply with the requirements listed under this subpart by complying with NSPS IIII, 63.6590(c).

## 3.2. NORTH CAROLINA REGULATIONS

For the sources that are included for review in this application package, the North Carolina State Implementation Plan (SIP) rules and regulations have been evaluated for applicability. Applicable rules are identified below.

### 3.2.1. 15A NCAC 02D .0515 Particulates from Miscellaneous Industrial Processes

Particulate emissions from all emissions sources subject to permitting, including the wood pellet dryer are regulated under 15A NCAC 2D .0515. This regulation limits the particulate emissions based on process throughput using the equation  $E = 4.10 \times P^{0.67}$ , for process rates (P) less than 30 tons per hour (ton/hr) and  $E = 55 \times P^{0.11-40}$  for process rates greater than 30 tons per hour.

All emissions from particulate matter sources at the proposed facility are either negligible or well-controlled. The most significant emission unit at the site, the process dryer operating a 71.71 ODT/hr, has an emission limit of 48 lb/hr. Maximum emissions from the dryer are approximately 5.7 lb/hr, well below the standard.

### 3.2.2. 15A NCAC 02D .0516 Sulfur Dioxide Emissions from Combustion Sources

Under this regulation, emissions of sulfur dioxide from combustion sources cannot exceed 2.3 pounds of sulfur dioxide per million Btu input. Wood is fired in the dryer and low sulfur diesel is combusted in the two emergency engines, resulting in operation well below regulatory limits.





### **3.2.3. 15A NCAC 02D .0521 Control of Visible Emissions**

Under this regulation, for sources manufactured after July 1, 1971, visible emissions cannot be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent opacity under the following conditions:

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

This rule applies to all processes that may have a visible emission, including the dryer, other particulate matter emissions sources controlled by cyclone and/or baghouse, and the diesel-fired engines.

Compliance will be achieved for all sources.

### **3.2.4. 15A NCAC 02Q .0700 Toxic Air Pollutant Procedures**

This regulation requires that certain new and modified sources of toxic air pollutants with emissions exceeding specified de minimis values apply for an air toxics permit. Facility-wide emissions of several compounds emitted from the site exceed the permitting de minimis level. A comparison of emissions to de minimis values are summarized in Appendix B, Table B-3. Air dispersion modeling results for compounds triggering permitting is discussed in Section 4 of this application.

### **3.2.5. 15A NCAC 2D .1100 - Control of Toxic Air Pollutant Emissions**

A toxic air pollutant (TAP) permit application shall include an evaluation of the TAP emissions from facility sources, excluding exempt sources listed under 15A NCAC 2Q .0702(a)(18). This regulation outlines the procedures that must be followed if modeling is required under 15A NCAC 2Q .0700. Air dispersion modeling results for compounds triggering permitting is discussed in Section 4 of this application.



## 4. STATE AIR TOXICS MODELING REQUIREMENTS

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This section presents the methodology and results of the TAP air dispersion modeling conducted for the Enviva Pellets Northampton, LLC (Enviva) plant which is located near Garysburg, NC (Northampton Plant). The modeling methodology used to demonstrate compliance with the NC toxic air pollutant (TAP) acceptable ambient levels (AAL) conforms to the *Guidelines for Evaluating the Air Quality Impacts of Toxic Pollutants in North Carolina* (February 2014). In lieu of a modeling protocol a protocol checklist is provided in Appendix C.

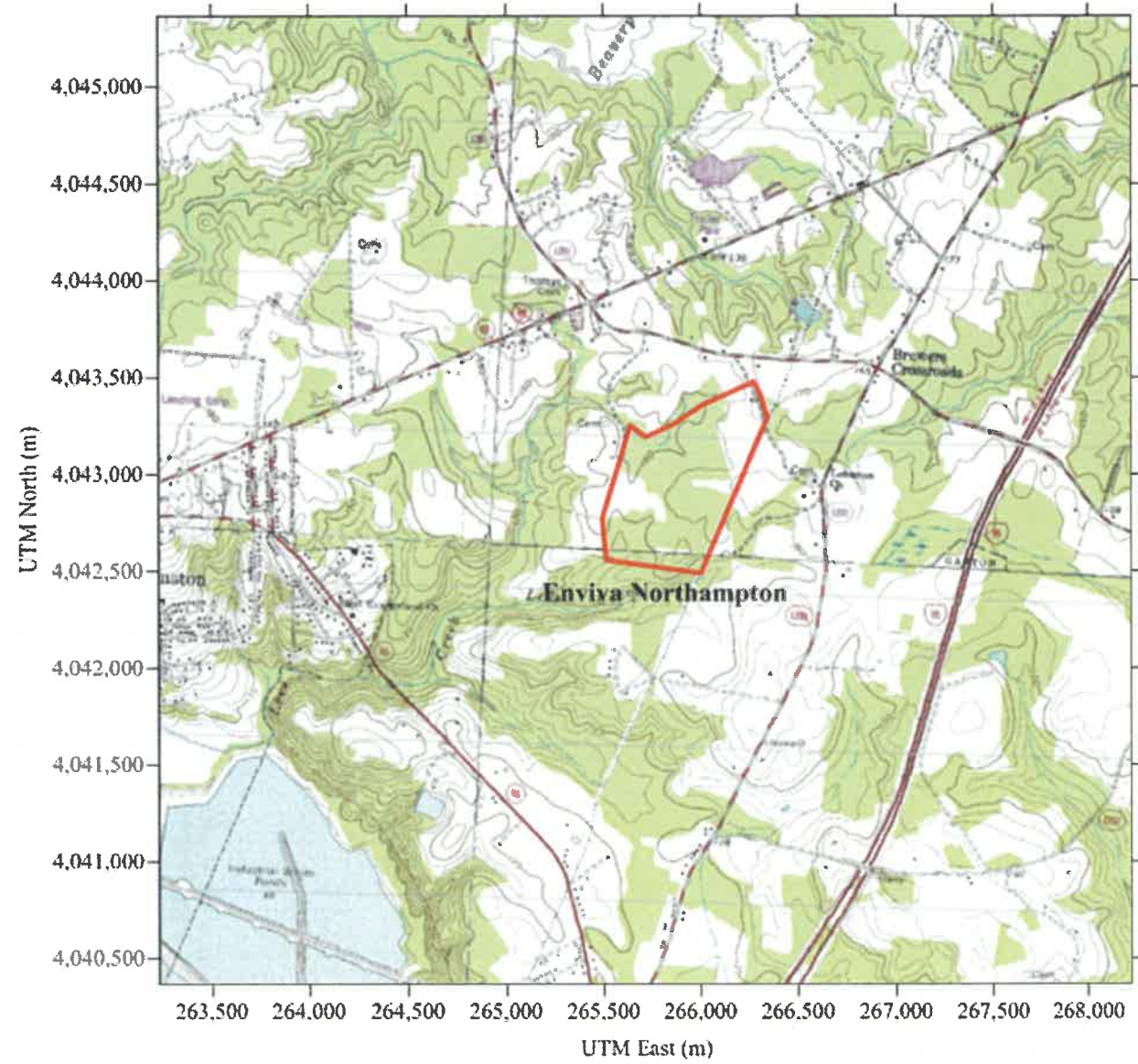
### 4.1. FACILITY LOCATION AND DESCRIPTION

Enviva operates a wood pellets manufacturing plant in Northampton County, near Garysburg, NC. The Northampton plant consists of a wood drying system along with various material handling and emergency equipment.

Figure 4-1 provides a map of the area surrounding the Northampton property. The approximate central Universal Transverse Mercator (UTM) coordinates of the facility are 265.7 kilometers (km) east and 4,042.9 km north in Zone 18 (NAD 83). A signed survey of the property is included in Appendix C.



FIGURE 4-1. TOPOGRAPHIC MAP OF THE ENVIVA NORTHAMPTON AREA



For modeling purposes, the appropriate urban/rural land use classification for the area was determined using the Auer technique, which is recommended in the *Guideline on Air Quality Models*. In accordance with this technique, the area within a 3-km radius of the facility was identified on US Geological Survey (USGS) topographic maps (and was delineated by land use type. More than 50 percent of the surrounding land use can be classified as undeveloped rural (i.e., Auer's A4 classification), therefore the area is classified as rural.

Potential emissions of several compounds regulated under 15A NCAC 2Q .0700 (NC Air Toxics) exceed their toxics permitting emission rates (TPER) and this air dispersion modeling evaluation has been conducted to demonstrate compliance with all applicable AAL.



## 4.2. MODEL SELECTION

The latest version (13350) of the AERMOD modeling system was used to estimate maximum ground-level concentrations in all Class II Area analyses conducted for this application. AERMOD is a refined, steady-state, multiple source, Gaussian dispersion model and was promulgated in December 2005 as the preferred model for use by industrial sources in this type of air quality analysis.<sup>4</sup> The AERMOD model has the Plume Rise Modeling Enhancements (PRIME) incorporated in the regulatory version, so the direction-specific building downwash dimensions used as inputs are determined by the Building Profile Input Program, PRIME version (BPIP PRIME), version 04274.<sup>5</sup> BPIP PRIME is designed to incorporate the concepts and procedures expressed in the GEP Technical Support document, the Building Downwash Guidance document, and other related documents, while incorporating the PRIME enhancements to improve prediction of ambient impacts in building cavities and wake regions.<sup>6</sup>

The AERMOD modeling system is composed of three modular components: AERMAP, the terrain preprocessor; AERMET, the meteorological preprocessor; and AERMOD, the control module and modeling processor. AERMAP is the terrain pre-processor that is used to import terrain elevations for selected model objects and to generate the receptor hill height scale data that are used by AERMOD to drive advanced terrain processing algorithms. National Elevation Dataset (NED) data available from the United States Geological Survey (USGS) were utilized to interpolate surveyed elevations onto user specified receptor grids and buildings and sources in the absence of more accurate site-specific (i.e., site surveys, GPS analyses, etc.) elevation data.

AERMET generates a separate surface file and vertical profile file to pass meteorological observations and turbulence parameters to AERMOD. AERMET meteorological data are refined for a particular analysis based on the choice of micrometeorological parameters that are linked to the land use and land cover (LULC) around the meteorological site shown to be representative of the application site.

Enviva used the most recent versions of AERMOD and AERMAP (version 11103) to estimate ambient impacts from the modeled sources in the Class II area. Per NCDAQ guidelines, AERMOD will be run using all regulatory default options.

## 4.3. SOURCE DESCRIPTION

Table 4-1 presents a table of the modeled sources and their locations at the Northampton plant. All locations are expressed in UTM Zone 18 (NAD83) coordinates.

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<sup>4</sup> 40 CFR Part 51, Appendix W—*Guideline on Air Quality Models*, Appendix A.1—AMS/EPA Regulatory Model (AERMOD).

<sup>5</sup> Earth Tech, Inc., *Addendum to the ISC3 User's Guide, The PRIME Plume Rise and Building Downwash Model*, Concord, MA.

<sup>6</sup> U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, *Guidelines for Determination of Good Engineering Practice Stack Height (Technical Support Document for the Stack Height Regulations) (Revised)*, Research Triangle Park, North Carolina, EPA 450/4-80-023R, June 1985.





**TABLE 4-1. MODELED SOURCE LOCATIONS**

Model ID	Description	UTM-E (m)	UTM-N (m)	Elevation (m)
EP1	Wet ESP Stack	266,018.7	4,042,780.2	48.91
EP2	Hammermill Filter #1	266,040.7	4,042,879.0	49.02
EP3	Hammermill Filter #2	266,040.9	4,042,883.2	49.05
EP4	Hammermill Filter #3	266,041.3	4,042,893.2	49.13
EP7	Pellet Cooler #1 Aspiration Stack	266,109.2	4,042,965.1	50.36
EP8	Pellet Cooler #2 Aspiration Stack	266,104.2	4,042,965.3	50.32
EP9	Pellet Cooler #3 Aspiration Stack	266,099.3	4,042,965.5	50.29
EP10	Pellet Cooler #4 Aspiration Stack	266,093.0	4,042,965.8	50.24
EP11	Pellet Cooler #5 Aspiration Stack	266,087.3	4,042,966.0	50.20
EP12	Pellet Cooler #6 Aspiration Stack	266,082.3	4,042,966.2	50.15
EP14	Emergency Generator	266,061.4	4,042,777.6	48.75
EP15	Diesel Fire Pump	266,054.2	4,043,084.1	46.90

Tables 4-2 and 4-3 present the stack parameters and emission rates input to the model for each of the sources. The hammermill baghouse (EP2-4) and firewater pump (EP15) discharges are oriented horizontally and thus, per NCDAQ guidance, were modeled with an exit velocity of 0.01 m/s. All other emission points at the site are unobstructed, vertical releases.

**TABLE 4-2. MODELED SOURCE PARAMETERS**

Model ID	Stack Height (m)	Stack Temperature (K)	Exit Velocity (m/s)	Stack Diameter (m)
EP1	28.66	352.59	7.58	3.05
EP2	14.78	310.93	0.01	1.62
EP3	14.78	310.93	0.01	1.62
EP4	14.78	310.93	0.01	1.62
EP7	12.19	333.15	17.70	0.76
EP8	12.19	333.15	17.70	0.76
EP9	12.19	333.15	17.70	0.76
EP10	12.19	333.15	17.70	0.76
EP11	12.19	333.15	17.70	0.76
EP12	12.19	333.15	17.70	0.76
EP14	1.77	766.48	78.30	0.10
EP15	3.05	803.15	0.01	0.13



**TABLE 4-3. MODELED EMISSION RATES**

Model ID	Modeled Emission Rates (g/s)									
	ARSENIC	BAP	CADMIUM	CL	FORM	HXCLPDXN	HCL	MERCURY	NICKEL	VNYLCHLR
EP1	3.52E-05	5.74E-05	6.57E-06	1.75E-02	1.85E-01	3.53E-05	4.20E-02	7.73E-05	7.29E-04	3.98E-04
EP2	-	-	-	-	3.09E-02	-	-	-	-	-
EP3	-	-	-	-	3.09E-02	-	-	-	-	-
EP4	-	-	-	-	2.06E-02	-	-	-	-	-
EP7	-	-	-	-	1.99E-03	-	-	-	-	-
EP8	-	-	-	-	1.99E-03	-	-	-	-	-
EP9	-	-	-	-	1.99E-03	-	-	-	-	-
EP10	-	-	-	-	1.99E-03	-	-	-	-	-
EP11	-	-	-	-	1.99E-03	-	-	-	-	-
EP12	-	-	-	-	1.99E-03	-	-	-	-	-
EP14	-	5.80E-08	-	-	3.64E-04	-	-	-	-	-
EP15	-	4.97E-08	-	-	3.12E-04	-	-	-	-	-

#### 4.4. METEOROLOGICAL DATA

The AERMOD modeling results were based on sequential hourly surface observations from Rocky Mount/Wilson, NC and upper air data from Newport, NC. These stations are recommended by NCDAQ for modeling facilities located in Northampton County. The base elevation for the surface station is 46 m.<sup>7</sup>

The five (5) most recent years of meteorological data (2008-2012) were downloaded from NCDAQ's website and input to AERMOD.<sup>8</sup> As shown in Section 4.7, TAP model impacts, with the exception of formaldehyde were less than 50% of the AAL, so only the most recent year (2012) was evaluated. The formaldehyde analysis utilized all 5 years in a single, concatenated file.

#### 4.5. MODELED RECEPTORS

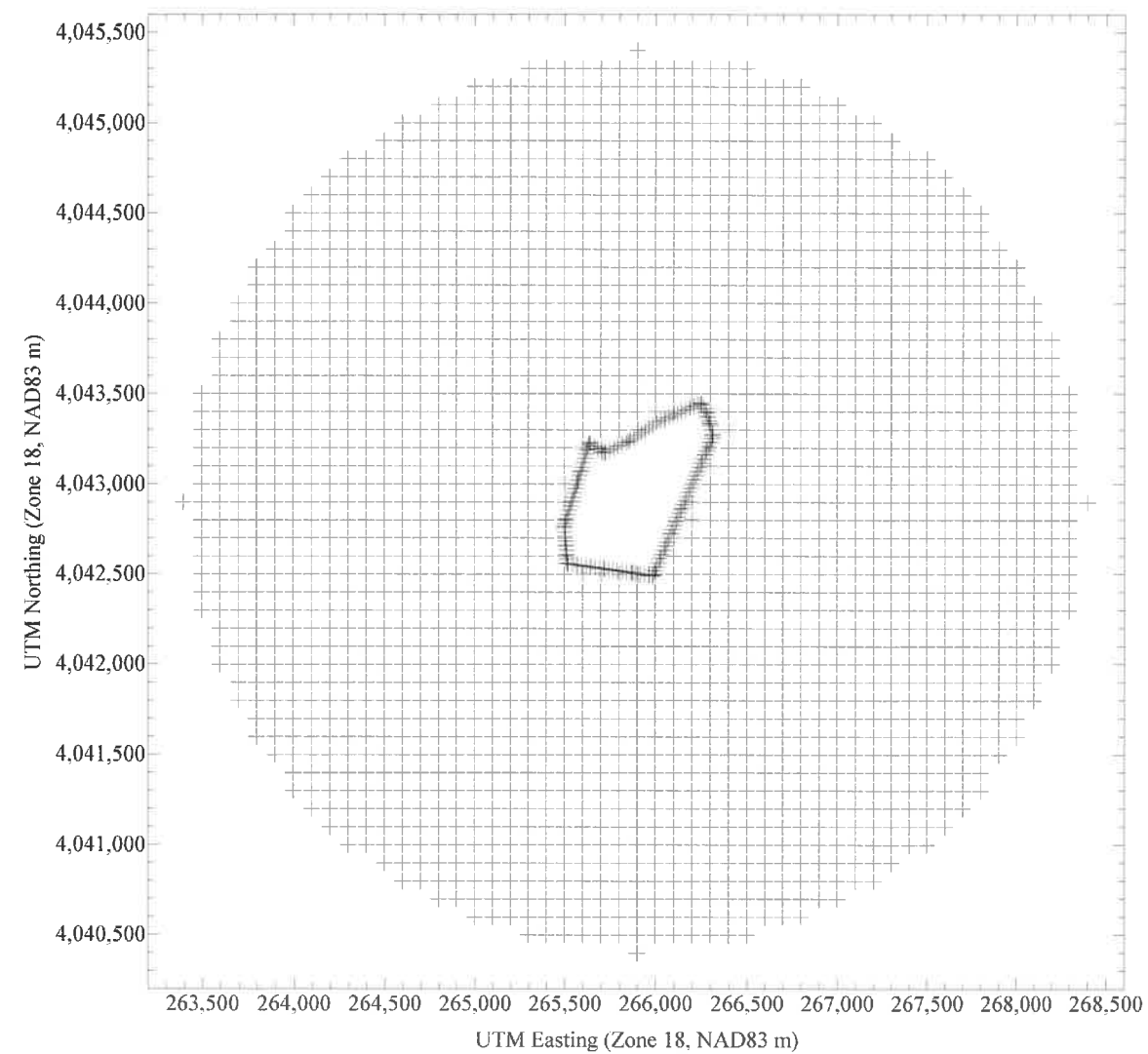
The receptors included in the modeling analysis consisted of property line receptors, spaced 25 meters (m) apart, and Cartesian receptor points spaced every 100 m, extending out 2.5 kilometers (km) from the center of the facility. There are no public right-of-ways (e.g. roads, railways) traversing the property line, so the same receptor grid was modeled for the one-hour (1-hr) and annual TAP analyses. The impacts were reviewed to ensure that the maximum impacts were captured within the 100 m spaced grid. Figure 4-2 shows the receptors included in the modeling analysis.

<sup>7</sup> <http://www.ncair.org/permits/mets/ProfileBaseElevations.pdf>

<sup>8</sup> <http://www.ncair.org/permits/mets/metdata.shtml>



**FIGURE 4-2. MODELED RECEPTOR GRID**



The AERMOD model is capable of handling both simple and complex terrain. Through the use of the AERMOD terrain preprocessor (AERMAP), AERMOD incorporates not only the receptor heights, but also an effective height (hill height scale) that represents the significant terrain features surrounding a given receptor that could lead to plume recirculation and other terrain interaction.<sup>9</sup>

Receptor terrain elevations input to the model were interpolated from National Elevation Database (NED) data obtained from the USGS. NED data consist of arrays of regularly spaced elevations. The array elevations are at a resolution of 1 arcsecond (approximately 30 m intervals) and were interpolated using the latest version of AERMAP (version 11103) to determine elevations at the defined receptor intervals. The data obtained from the NED files were checked for completeness and spot-checked for accuracy against elevations on corresponding USGS 1:24,000 scale topographical quadrangle maps. AERMAP was also used to establish the base elevation of all Enviva structures and emission sources.

<sup>9</sup> US EPA. *Users Guide for the AERMOD Terrain Preprocessor (AERMAP)*, EPA-454/B-03-003, Research Triangle Park, NC.



## 4.6. BUILDING DOWNWASH

AERMOD incorporates the Plume Rise Model Enhancements (PRIME) downwash algorithms. Direction specific building parameters required by AERMOD are calculated using the BPIP-PRIME preprocessor (version 04274).

EPA has promulgated stack height regulations that restrict the use of stack heights in excess of "Good Engineering Practice" (GEP) in air dispersion modeling analyses. Under these regulations, that portion of a stack in excess of the GEP height is generally not creditable when modeling to determine source impacts. This essentially prevents the use of excessively tall stacks to reduce ground-level pollutant concentrations. The minimum stack height not subject to the effects of downwash, called the GEP stack height, is defined by the following formula:

$H_{GEP} = H + 1.5L$ , where:

$H_{GEP}$  = minimum GEP stack height,

H = structure height, and

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

This equation is limited to stacks located within 5L of a structure. Stacks located at a distance greater than 5L are not subject to the wake effects of the structure. The wind direction-specific downwash dimensions and the dominant downwash structures used in this analysis are determined using BPIP. In general, the lowest GEP stack height for any source is 65 meters by default.<sup>10</sup> None of the proposed emission units at the Northampton will exceed GEP height.

Figure 4-3 presents a site layout for the facility that shows the source and building arrangement as modeled.

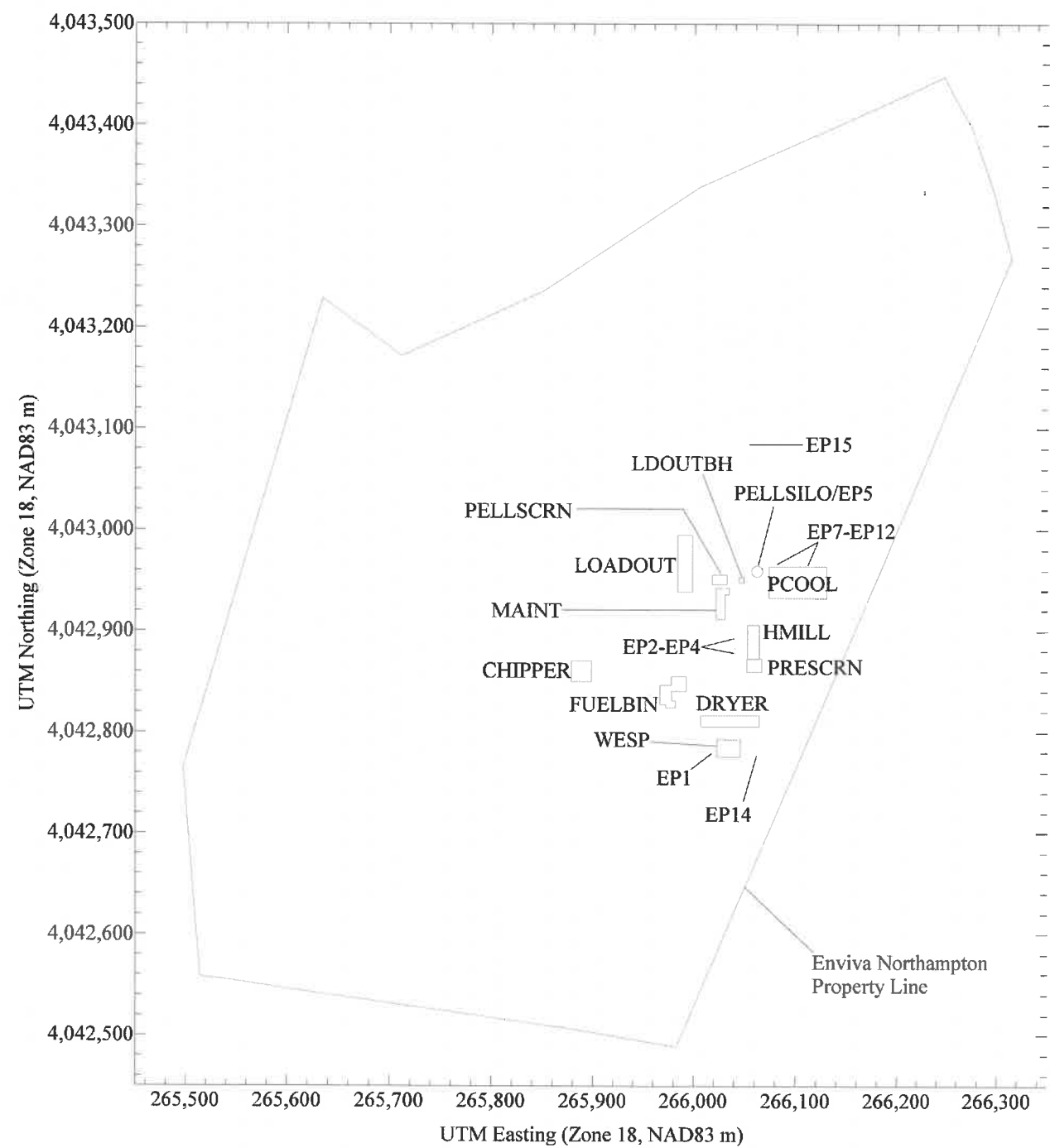
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<sup>10</sup> 40 CFR §51.100(ii)





FIGURE 4-3. ENVIVA NORTHAMPTON MODELED SITE LAYOUT





#### 4.7. TAP MODELING RESULTS

Table 4-4 presents the results for the state toxics modeling that was performed for the proposed Enviva Sampson facility. As shown, the project will not cause an exceedance of any pollutant AAL. With the exception of formaldehyde, all modeled TAP had impacts less than 50% of the AAL, and as such, only the most recent meteorological year (2012) was modeled. The formaldehyde results are based on the full five years of meteorological data. Electronic copies of all modeling input and output files are included on the CD-ROM in Appendix D.

**TABLE 4-4. TAP MODELING RESULTS**

Pollutant	Averaging Period	UTM-E (m)	UTM-N (m)	Date/Time (YYMMDDHH)	Maximum Concentration ( $\mu\text{g}/\text{m}^3$ )	AAL ( $\mu\text{g}/\text{m}^3$ )	% of AAL (%)
Arsenic	Annual	266,220.00	4,043,046.20	2012	1.00E-05	2.30E-04	4.35%
Benzo(a)pyrene	Annual	266,220.00	4,043,046.20	2012	2.00E-05	3.30E-02	0.06%
Cadmium*	Annual	266,220.00	4,043,046.20	2012	2.20E-06	5.50E-03	0.04%
Chlorine	1-Hour	265,872.30	4,042,507.50	12111814	1.79E-01	900	0.02%
	24-Hour	265,939.30	4,042,496.30	12102724	7.54E-02	37.5	0.20%
Formaldehyde	1-hour	266,171.10	4,042,931.10	10083106	114.32	150	76.21%
Hexachlorodibenzo-p-dioxin 1,2,3,6,7,8	Annual	266,220.00	4,043,046.20	2012	1.00E-05	7.60E-05	13.16%
Hydrogen chloride (hydrochloric acid)	1-Hour	265,872.30	4,042,507.50	12111814	0.43	700	0.06%
Mercury	24-Hour	265,939.30	4,042,496.30	12102724	3.30E-04	0.6	0.06%
Nickel	24-Hour	265,939.30	4,042,496.30	12102724	3.15E-03	6	0.05%
Vinyl chloride	Annual	266,220.00	4,043,046.20	2012	1.30E-04	0.38	0.03%

\* Modeled impacts in the AERMOD output file are shown in nanograms per cubic meter in order to capture enough significant figures.







**APPENDIX A - NCDAQ APPLICATION FORMS**

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**FORM A1**  
**FACILITY (General Information)**

REVISED 11/01/02

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

A1

**NOTE- APPLICATION WILL NOT BE PROCESSED WITHOUT THE FOLLOWING:**

- Local Zoning Consistency Determination (if required)     Facility Reduction & Recycling Survey Form (Form A4)  Application Fee  
 Responsible Official/Authorized Contact Signature     Appropriate Number of Copies of Application     P.E. Seal (if required)

**GENERAL INFORMATION**

**Legal Corporate/Owner Name:** Enviva Pellets Northampton, LLC  
**Site Name:** Enviva Pellets Northampton, LLC  
**Site Address (911 Address) Line 1:** 874 Lebanon Church Road  
**Site Address Line 2:**  
**City:** Garysburg    **State:** North Carolina  
**Zip Code:** 27866    **County:** Northampton

**CONTACT INFORMATION**

<b>Permit/Technical Contact:</b>		<b>Facility/Inspection Contact:</b>	
<b>Name/Title:</b> Joe Harrell	<b>City:</b> Ahoskle	<b>Name/Title:</b> Heath Lucy	<b>City:</b> Same as Site Address
<b>Mailing Address Line 1:</b> 142 N.C. Route 561 East	<b>State:</b> NC	<b>Mailing Address Line 1:</b> Same as Site Address	<b>State:</b> Same as Site Address
<b>Mailing Address Line 2:</b>	<b>Zip Code:</b> 27910	<b>Mailing Address Line 2:</b>	<b>Zip Code:</b>
<b>Phone No. (area code):</b> (252) 209-6032	<b>Fax No. (area code):</b>	<b>Phone No. (area code):</b> (910) 318-2743	<b>Fax No. (area code):</b>
<b>Email Address:</b> Joe.Harrell@envivabiomass.com		<b>Email Address:</b>	

<b>Responsible Official/Authorized Contact:</b>		<b>Invoice Contact:</b>	
<b>Name/Title:</b> Michael Doniger, Director Plant Operations	<b>City:</b> Bethesda	<b>Name/Title:</b> Same as permit/technical contact	<b>City:</b>
<b>Mailing Address Line 1:</b> 7200 Wisconsin Avenue	<b>State:</b> MD	<b>Mailing Address Line 1:</b>	<b>State:</b>
<b>Mailing Address Line 2:</b> Suite 1000	<b>Zip Code:</b> 20814	<b>Mailing Address Line 2:</b>	<b>Zip Code:</b>
<b>Phone No. (area code):</b> 804 929 8418	<b>Fax No. (area code):</b>	<b>Phone No. (area code):</b>	<b>Fax No. (area code):</b>
<b>Email Address:</b> Pete.Najera@envivabiomass.com		<b>Email Address:</b>	

**APPLICATION IS BEING MADE FOR**

- New Non-permitted Facility/Greenfield     Modification of Facility (permitted)     Renewal with Modification  
 Renewal (TV Only)

**FACILITY CLASSIFICATION AFTER APPLICATION (Check Only One)**

- General     Small     Prohibitory Small     Synthetic Minor     Title V


**FACILITY (Plant Site) INFORMATION**

**Describe nature of (plant site) operation(s):** Wood pellet manufacturing facility    **Facility ID No.:** 6600167  
**Primary SIC/NAICS Code:** 2499 (Wood Products, Not Elsewhere Classified)    **Current/Previous Air Permit No.:** 10203R02    **Expiration Date:** 2/28/2017  
**Facility Coordinates:**    **Latitude:** 256,700 UTM E    **Longitude:** 4,042,900 UTM N  
**Does this application contain confidential data?**     YES     NO

**PERSON OR FIRM THAT PREPARED APPLICATION**

**Person Name:** Dale Overcash    **Firm Name:** Trinity Consultants, Inc.  
**Mailing Address Line 1:** One Copley Parkway    **Mailing Address Line 2:** Suite 310  
**City:** Morrisville    **State:** North Carolina    **Zip Code:** 27560    **County:** Wake  
**Phone No.:** (919) 462-9693    **Fax No.:** (919) 462-9694    **Email Address:**

**SIGNATURE OF RESPONSIBLE OFFICIAL/AUTHORIZED CONTACT**

**Name (typed):** Michael Doniger    **Title:** Director Plant Operations  
**X Signature (Blue Ink):**     **Date:** 4/15/2014

Attach Additional Sheets As Necessary

**Received**  
**APR 22 2014**  
**Air Permits Section**



**FORMs A2, A3**  
**EMISSION SOURCE LISTING FOR THIS APPLICATION - A2**  
**112r APPLICABILITY INFORMATION - A3**

REVISED 04/10/07

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

**A2**

EMISSION SOURCE LISTING: New, Modified, Previously Unpermitted, Replaced, Deleted			
EMISSION SOURCE ID NO.	EMISSION SOURCE DESCRIPTION	CONTROL DEVICE ID NO.	CONTROL DEVICE DESCRIPTION
<b>Equipment To Be ADDED By This Application (New, Previously Unpermitted, or Replacement)</b>			
ES-CHIP-1	Log Chipping	N/A	N/A
ES-RCHP-1 and 2	Rechippers	N/A	N/A
ES-DRYER	Green Wood Direct-Fired Dryer System	CD-DC	Three (3) Simple Cyclones
		CD-WESP	Wet Electrostatic Precipitator
ES-HM-1, through 8	Eight (8) Hammermills	CD-HM-CYC-1	Simple Cyclone, Bagfilter
		CD-HM-CYC-2	Simple Cyclone, Bagfilter
		CD-HM-CYC-3	Simple Cyclone, Bagfilter
		CD-HM-CYC-4	Simple Cyclone, Bagfilter
		CD-HM-CYC-5	Simple Cyclone, Bagfilter
		CD-HM-CYC-6	Simple Cyclone, Bagfilter
		CD-HM-CYC-7	Simple Cyclone, Bagfilter
		CD-HM-CYC-8	Simple Cyclone, Bagfilter
ES-NDS	Nuisance Dust System	CD-HMA-BF3	Bagfilter
ES-PMFS	Pellet Mill Feed Silo	CD-PMFS-BV	Bin Vent Baghouse
ES-CLR-1 through 6	Six (6) Pellet Coolers	CD-CLR-1 through 6	Six (6) Pellet Cooler Cyclones
ES-PFB	Pellet Fines Bin	CD-PFB-BF	Bin Vent Baghouse
ES-FPH	Finished Product Handling	CD-FPH-BF	Finished Product Handling Bagfilter
ES-PB	Pellet Loadout Bins		
ES-PL	Pellet Mill Loadout 1 and 2		
ES-GN	Emergency Generator (350 bhp)	N/A	N/A
ES-FWP	Fire Water Pump (300 bhp)	N/A	N/A
<b>Existing Permitted Equipment To Be MODIFIED By This Application</b>			
<b>Equipment To Be DELETED By This Application</b>			
ES-CHIP-2	Portable Chipper	N/A	N/A

**112(r) APPLICABILITY INFORMATION**

**A3**

Is your facility subject to 40 CFR Part 68 "Prevention of Accidental Releases" - Section 112(r) of the Federal Clean Air Act? Yes / X No

If No, please specify in detail how your facility avoided applicability: \_\_\_\_\_

If your facility is Subject to 112(r), please complete the following:

A. Have you already submitted a Risk Management Plan (RMP) to EPA Pursuant to 40 CFR Part 68.10 or Part 68.150?  
 Yes  No  Specify required RMP submittal date: \_\_\_\_\_ If submitted, RMP submittal date: \_\_\_\_\_

B. Are you using administrative controls to subject your facility to a lesser 112(r) program standard?  
 Yes  No  If yes, please specify: \_\_\_\_\_

**Attach Additional Sheets As Necessary**



**SURVEY OF AIR EMISSIONS AND FACILITY-WIDE REDUCTION & RECYCLING ACTIVITIES**

DATE: \_\_\_\_\_ Does facility have an environmental management system in place? ( ) YES (X) NO If so, is facility ISO 14000 Certified? ( ) YES (X) NO

Facility Name:	Enviva Pellets Northampton, LLC	Permit Number:	10203R02
Facility ID:	N/A (to be)	County:	Northampton
Environmental Contact:	Joe Harrell		
Mailing Address Line 1:	874 Lebanon Church Road	Phone No. ( )	(252) 209-6032
Mailing Address Line 2:		Fax No. ( )	
City:	Garysburg	State:	North Carolina
Zip Code:	27866	County:	Northampton
Email Address:	Joe.Harrell@envivabiomass.com		

**AIR EMISSIONS SOURCE REDUCTIONS** Any Air Emissions Source Reductions in the past year? ( ) YES (X) NO

Source Description and ID	Air Pollutant	Enter Code for Emission Reduction Option (See Codes)	Date Reduction Option Implemented (mo/yr)	Quantity Emitted from prior annual report to DAQ (lb/yr)	Quantity Emitted from current annual report to DAQ (lb/yr)	Has reduction activity been discontinued? If so, when was it discontinued? (mo/yr)	Addition detail about source
N/A							

Comments: \_\_\_\_\_

**FACILITY-WIDE REDUCTIONS & RECYCLING ACTIVITIES** Any Reductions or Recycling Activities in the past year? ( ) YES (X) NO

Source Description or Activity	Pollutant or Recycled or Reduced Materials	Enter Code for Emission Reduction Option (See Codes)	Date Reduction Option Implemented (mo/yr)	Quantity Emitted from prior annual report	Quantity Emitted from current annual report	Has reduction activity been discontinued? If so, when was it discontinued? (mo/yr)	Addition detail about source
N/A							

Comments: \_\_\_\_\_  
 The requested information above shall be used for fulfilling the requirements of North Carolina General Statute 143-215.108(g). The permit holder shall submit to the Department a written description of current and projected plans to reduce the emissions of air pollutants by source reduction or recycling. The written description shall accompany any application for a new permit, modification of an existing permit and for each annual air quality permit fee payment. Source reduction is defined as reducing the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal. If no activity has taken place since the previous report, simply indicate so by checking the "no" box in that section. Once completed, this form should be submitted along with your fee payment. Examples are listed on the first line of each section of the form for your benefit.











**FORM D**

**TECHNICAL ANALYSIS TO SUPPORT PERMIT APPLICATION**

REVISED: 12/01/01

NC DENR/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) -** 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 TO DOCUMENT COMPLIANCE WITH ANY REGULATIONS. INCLUDE EMISSION RATES CALCULATED IN ITEM "A" ABOVE.

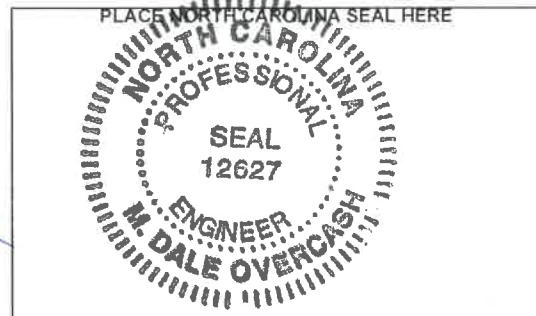
**C CONTROL DEVICE ANALYSIS (FORM C) -** PROVIDE A TECHNICAL EVALUATION WITH SUPPORTING REFERENCES FOR ANY CONTROL EFFICIENCIES LISTED ON SECTION C FORMS, OR USED TO REDUCE EMISSION RATES IN CALCULATIONS UNDER ITEM "A" ABOVE. INCLUDE PERTINENT OPERATING PARAMETERS (e.g. OPERATING CONDITIONS, MANUFACTURING 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, M. Dale Overcash, attest that this application for Enviva Pellets Northampton LLC 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 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. 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: M. Dale Overcash  
 DATE: 4/21/14  
 COMPANY: Trinity Consultants of North Carolina P.C.  
 ADDRESS: One Copley Parkway, Suite 310  
Morrisville, NC 27560  
 TELEPHONE: (919) 462-9693  
 SIGNATURE: [Signature]  
 PAGES CERTIFIED: Entire Application



(IDENTIFY ABOVE EACH PERMIT FORM AND ATTACHMENT THAT IS BEING CERTIFIED BY THIS SEAL)

Attach Additional Sheets As Necessary











**FORM E3  
EMISSION SOURCE COMPLIANCE METHOD**

REVISED 12/01/01 NCDENR/Division Of Air Quality - Application for Air Permit to Construct/Operate

**E3**

Emission Source ID NO. See attached table following Form E3 for a summary of regulatory requirements and associated compliance requirements	Regulated Pollutant _____
Applicable Regulation _____	

Alternative Operating Scenario (AOS) NO: \_\_\_\_\_

*ATTACH A SEPARATE PAGE TO EXPAND ON ANY OF THE BELOW COMMENTS*

**MONITORING REQUIREMENTS**

Is Compliance Assurance Monitoring (CAM) 40 CFR Part 64 Applicable?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, is CAM Plan Attached (if applicable, CAM plan must be attached)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Describe Monitoring Device Type: \_\_\_\_\_

Describe Monitoring Location: \_\_\_\_\_

Other Monitoring Methods (Describe In Detail): \_\_\_\_\_

Describe the frequency and duration of monitoring and how the data will be recorded (i.e., every 15 minutes, 1 minute instantaneous readings taken to produce an hourly average):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**RECORDKEEPING REQUIREMENTS**

Data (Parameter) being recording: \_\_\_\_\_

Frequency of recordkeeping (How often is data recorded?): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**REPORTING REQUIREMENTS**

Generally describe what is being reported: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Frequency:     MONTHLY             QUARTERL             EVERY 6 MONTHS

OTHER (DESCRIBE): \_\_\_\_\_

**TESTING**

Specify proposed reference test method: \_\_\_\_\_

Specify reference test method rule and citation: \_\_\_\_\_

Specify testing frequency: \_\_\_\_\_

**NOTE - Proposed test method subject to approval and possible change during the test protocol process**

**Attach Additional Sheets As Necessary**





**FORM E4**  
**EMISSION SOURCE COMPLIANCE SCHEDULE**

Revised 12/01/01

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

**E4**

COMPLIANCE STATUS WITH RESPECT TO ALL APPLICABLE REQUIREMENTS

Will each emission source at your facility be in compliance with all applicable requirements at the time of permit issuance and continue to comply with these requirements?

Yes     No

If **NO**, complete **A** through **F** below for each requirement for which compliance is not achieved.

Will your facility be in compliance with all applicable requirements taking effect during the term of the permit and meet such requirements on a timely basis?

Yes     No

If **NO**, complete **A** through **F** below for each requirement for which compliance is not achieved.

If this application is for a modification of existing emissions source(s), is each emission source currently in compliance with all applicable requirements?

Yes     No

If **NO**, complete **A** through **F** below for each requirement for which compliance is not achieved.

A. Emission Source Description (Include ID NO.) \_\_\_\_\_

B. Identify applicable requirement for which compliance is not achieved:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. Narrative description of how compliance will be achieved with this applicable requirements:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D. Detailed Schedule of Compliance:

<u>Step(s)</u>	<u>Date Expected</u>
_____	_____
_____	_____
_____	_____
_____	_____

E. Frequency for submittal of progress reports (6 month minimum): \_\_\_\_\_

F. Starting date of submittal of progress reports: \_\_\_\_\_

**Attach Additional Sheets As Necessary**



**FORM E5**

**TITLE V COMPLIANCE CERTIFICATION (Required)**  
NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate

Revised 01/01/07

**E5**

*In accordance with the provisions of Title 15A NCAC 2Q .0520 and .0515(b)(4) the responsible company official of:*

SITE NAME: Enviva Pellets Northampton, LLC  
SITE ADDRESS: 874 Lebanon Church Road  
CITY, NC : Garysburg, NC  
COUNTY: Northampton  
PERMIT NUMBER : N/A

**CERTIFIES THAT (Check the appropriate statement(s):**

- The facility is in compliance with all applicable requirements
- In accordance with the provisions of Title 15A NCAC 2Q .0515(b)(4) the responsible company official certifies that the proposed minor modification meets the criteria for using the procedures set out in 2Q .0515 and requests that these procedures be used to process the permit application.
- The facility is not currently in compliance with all applicable requirements  
*If this box is checked, you must also complete form E4 "Emission Source Compliance Schedule"*

The undersigned certifies under the penalty of law, that all information and statements provided in the application, based on information and belief formed after reasonable inquiry, are true, accurate, and complete.

 Date: 4/16/2014  
Signature of responsible company official (REQUIRED, USE BLUE INK)

Michael Doniger, Director of Operations  
Name, Title of responsible company official (Type or print)

**Attach Additional Sheets As Necessary**



**Summary of Title V Applicable Regulations and Compliance Demonstration Procedures  
Enviva Pellets Northampton, LLC**

Emission Source Description and ID No.	Pollutant	Regulation	Final Control Device	Monitoring Method/Frequency/Duration	Recordkeeping	Reporting
Wood-fired Dryer System ( ES-DRYER)	PM/ PM10/PM2.5	15A NCAC 2D .0515	Cyclones + WESP	PM emissions shall be controlled by a an ESP. To assure compliance, daily verification of power and rapper operations are functioning. Monthly visual inspection of the ductwork and material collection units. Every 24 months internal inspection of the structural integrity	Written or electronic log of date and time of each inspection, results of inspection and maintenance, and variance from manufacturer's recommendation	Any maintenance performed on the scrubber within 30 days of a written request by DAQ. Semi-annual progress report and annual compliance certification
Nuisance Dust System (ES-NDS)			Fabric Filter	Inspections and maintenance, including monthly inspection of ductwork and annual internal inspection of bagfilter integrity	Written or electronic log of date and time of each inspection, results of inspection and maintenance, and variance from manufacturer's recommendation	Semi-annual progress report and annual compliance certification
Coarse Hammermills (ES-HM-1 through 8)						
Pellet Mill Feed Silo (ID No. ES-PMFS)						
Pellet Fines Bin (ES-PFB)						
Finished Product Handling (ES-FPH)						
Pellet Presses & Coolers (ES-CLR-1 through 6)			Cyclones	Inspections and maintenance, including monthly inspection of ductwork and annual internal inspection of cyclone	Written or electronic log of date and time of each inspection, results of inspection and maintenance, and variance from manufacturer's recommendation	Semi-annual progress report and annual compliance certification
Wood-fired Dryer System ( ES-DRYER)	SO2	15A NCAC 2D .0516	WESP	None required because inherently low sulfur content of wood fuel achieves compliance		
Emergency Generator (ID No. ES-EG) and Fire Water Pump (ID No. ES-FWP)	SO2	15A NCAC 2D .0516	N/A	None required because inherently low sulfur content of fuel achieves compliance		
Wood-fired Dryer System ( ES-DRYER)	Opacity	15A NCAC 2D. 0521	Cyclones + WESP	Monthly visible observation for "normal." If above normal, correct action or Method 9 observation required	Written or electronic log of date/time/result of each observation, results of each non-compliant observation and actions taken to correct, and results of the corrective action	Semi-annual progress report and annual compliance certification
Nuisance Dust System (ES-NDS)						
Coarse Hammermills (ES-HM-1 through 7)						
Pellet Mill Feed Silo (ID No. ES-PMFS)						
Pellet Fines Bin (ES-PFB)						
Finished Product Handling (ES-FPH)						
Pellet Presses & Coolers (ES-CLR-1 through 6)	Cyclones					
Emergency Generator (ID No. ES-EG) Fire Water Pump (ID No. ES-FWP)	Opacity	15A NCAC 2D. 0521	N/A	N/A	N/A	N/A
Emergency Generator (ID No. ES-EG) Fire Water Pump (ID No. ES-FWP)	PM, CO, NOx, NMHC, SO2	40 CFR Part 60 Subpart III	N/A	All requirements as outlined in the regulation, including the following: use certified emergency engines, operate according to manufacturers procedures, use fuel oil with fuel content of no more than 15 ppmw sulfur and cetane index of at least 40, install non-resettable hours meter.	Maintain records of engine certification, fuel certifications and hours/year of operation of each engine	Annual Compliance Certification
Emergency Generator (ID No. ES-EG) Fire Water Pump (ID No. ES-FWP)	HAPs	40 CFR Part 63 Subpart ZZZZ	N/A	Comply with the NSPS requirements above and no other requirements apply	Comply with the NSPS requirements above and no other requirements apply	Annual Compliance Certification



TABLE B-3  
DETERMINATION OF POLLUTANTS SUBJECT TO AIR TOXICS PERMITTING  
ENVIVA PELLETS NORTHAMPTON, LLC

TAP Emissions

Description Pollutant	CAS Number	Dryer			Hammermills			Pellet Coolers			Emergency Generator			Fire Water Pump			Total		
		(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)
1,3-Butadiene	106-99-0	-	-	-	-	-	-	-	-	-	0.0001	0.0023	0.0479	0.0001	0.0020	0.0411	1.78E-04	4.27E-03	8.90E-02
Acetaldehyde	75-07-0	7.85E-01	18.840	5.885.28	-	-	-	-	-	-	0.0019	0.0451	0.9396	0.0016	0.0387	0.8054	7.88E-01	1.89E+01	5.89E+03
Acrolein	107-02-8	-	-	-	-	-	-	-	-	-	0.0002	0.0054	0.1133	0.0002	0.0047	0.0971	4.21E-04	1.01E-02	2.10E-01
Arsenic	-	2.80E-04	0.007	2.45	-	-	-	-	-	-	-	-	-	-	-	-	2.80E-04	6.71E-03	2.45E+00
Benzene	71-43-2	-	-	-	-	-	-	-	-	-	0.0023	0.0549	1.1429	0.0020	0.0470	0.9797	4.25E-03	1.02E-01	2.12E+00
Benzo(a)pyrene	50-32-8	4.56E-04	0.011	3.99	-	-	-	-	-	-	0.0000	0.0000	0.0002	0.0000	0.0000	0.0002	4.57E-04	1.10E-02	3.99E+00
Beryllium metal (un-reacted) (Also include in BEC)	-	1.40E-05	0.000	0.12	-	-	-	-	-	-	-	-	-	-	-	-	1.40E-05	3.36E-04	1.22E-01
Cadmium Metal (elemental un-reacted) -(Add w/CDC)	-	5.21E-05	0.001	0.46	-	-	-	-	-	-	-	-	-	-	-	-	5.21E-05	1.25E-03	4.36E+01
Carbon Tetrachloride	-	7.89E-03	0.189	69.10	-	-	-	-	-	-	-	-	-	-	-	-	7.89E-03	1.89E-01	6.91E+01
Chlorine	-	1.38E-01	3.324	1,213.15	-	-	-	-	-	-	-	-	-	-	-	-	1.38E-01	3.32E+00	1.21E+03
Chlorobenzene	-	5.78E-03	0.139	50.68	-	-	-	-	-	-	-	-	-	-	-	-	5.78E-03	1.39E-01	5.07E+01
Chloroform	67-66-3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chromic acid (Chromium VI)	7738-94-5	4.45E-05	0.001	0.39	-	-	-	-	-	-	-	-	-	-	-	-	4.45E-05	1.07E-03	3.90E-01
Di(2-ethylhexyl)phthalate (DEHP)	-	8.24E-06	0.000	0.07	-	-	-	-	-	-	-	-	-	-	-	-	8.24E-06	1.98E-04	7.22E-02
Ethylene dichloride (1,2-dichloroethane)	-	5.08E-03	0.122	44.53	-	-	-	-	-	-	-	-	-	-	-	-	5.08E-03	1.22E-01	4.45E+01
Formaldehyde	50-00-0	1.47E+00	35.168	10,985.85	0.65	15.69	4,902.36	0.09	2.27	709.04	0.0029	0.0694	1.4455	0.0025	0.0595	1.2390	2.22E+00	5.33E+01	1.66E+04
Hexachlorodibenzo-p-dioxin 1,2,3,6,7,8	-	2.80E-04	0.007	2.46	-	-	-	-	-	-	-	-	-	-	-	-	2.80E-04	6.73E-03	2.46E+00
Hydrogen chloride (hydrochloric acid)	-	3.33E-01	7.994	2,917.69	-	-	-	-	-	-	-	-	-	-	-	-	3.33E-01	7.99E+00	2.92E+03
Manganese & compounds	-	2.03E-02	0.488	178.13	-	-	-	-	-	-	-	-	-	-	-	-	2.03E-02	4.88E-01	1.78E+02
Mercury vapor (Include in Mercury&Compds)	-	6.14E-04	0.015	5.37	-	-	-	-	-	-	-	-	-	-	-	-	6.14E-04	1.47E-02	5.37E+00
Methyl chloroform (1,1,1 trichloroethane)	-	5.43E-03	0.130	47.60	-	-	-	-	-	-	-	-	-	-	-	-	5.43E-03	1.30E-01	4.76E+01
Methyl ethyl ketone	-	9.47E-04	0.023	8.29	-	-	-	-	-	-	-	-	-	-	-	-	9.47E-04	2.27E-02	8.29E+00
m,p-Xylene	1330-20-7	-	-	-	-	-	-	-	-	-	0.0007	0.0168	0.3491	0.0006	0.0144	0.2993	1.30E-03	3.11E-02	6.48E-01
Methyl isobutyl ketone	108-10-1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methylene chloride	75-09-2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nickel metal (Component of Nickel & Compounds)	-	5.78E-03	0.139	50.68	-	-	-	-	-	-	-	-	-	-	-	-	5.78E-03	1.39E-01	5.07E+01
Pentachlorophenol	-	8.94E-06	0.000	0.08	-	-	-	-	-	-	-	-	-	-	-	-	8.94E-06	2.15E-04	7.83E-02
Perchloroethylene (tetrachloroethylene)	-	6.66E-03	0.160	58.35	-	-	-	-	-	-	-	-	-	-	-	-	6.66E-03	1.60E-01	5.84E+01
Phenol	108-95-2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Polychlorinated biphenyls	-	1.43E-06	0.000	0.01	-	-	-	-	-	-	-	-	-	-	-	-	1.43E-06	3.43E-05	1.25E-02
Styrene	100-42-5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tetrachlorodibenzo-p-dioxin, 2,3,7,8-	-	1.51E-09	0.000	0.00	-	-	-	-	-	-	-	-	-	-	-	-	1.51E-09	3.62E-08	1.32E-05
Toluene	108-88-3	-	-	-	-	-	-	-	-	-	0.0010	0.0240	0.5010	0.0009	0.0206	0.4295	1.86E-03	4.47E-02	9.30E-01
Trichloroethylene	-	5.26E-03	0.126	46.07	-	-	-	-	-	-	-	-	-	-	-	-	5.26E-03	1.26E-01	4.61E+01
Trichlorofluoromethane (CFC 111)	-	7.19E-03	0.172	62.96	-	-	-	-	-	-	-	-	-	-	-	-	7.19E-03	1.72E-01	6.30E+01
Vinyl chloride	-	3.16E-03	0.076	27.64	-	-	-	-	-	-	-	-	-	-	-	-	3.16E-03	7.57E-02	2.76E+01

TPER Comparison Table

Pollutant	CAS Number	Total		TPER (2Q_0711)		Modeling Required?
		(lb/hr)	(lb/day)	(lb/hr)	(lb/day)	
1,3-Butadiene	106-99-0	-	-	8.90E-02	1.10E+01	No
Acetaldehyde	75-07-0	7.88E-01	-	6.80E+00	-	No
Acrolein	107-02-8	4.21E-04	-	2.00E-02	-	No
Arsenic	-	-	2.45E+00	-	1.60E-02	Yes
Benzene	71-43-2	-	2.12E+00	-	8.10E+00	No
Benzo(a)pyrene	50-32-8	-	3.99E+00	-	2.20E+00	Yes
Beryllium	-	-	1.22E-01	-	2.80E-01	No
Cadmium	-	-	4.56E-01	-	3.70E-01	Yes
Carbon Tetrachloride	-	-	6.91E+01	-	4.60E+02	No
Chlorine	-	1.38E-01	3.32E+00	2.30E-01	7.90E-01	Yes
Chlorobenzene	-	-	1.39E-01	-	4.60E+01	No
Chloroform	67-66-3	-	0.00E+00	-	2.90E+02	No
Chromic acid (Chromium VI)	7738-94-5	-	1.07E-03	-	1.30E-02	No
Di(2-ethylhexyl)phthalate (DEHP)	-	-	1.98E-04	-	6.30E-01	No
Ethylene dichloride (1,2-dichloroethane)	-	-	4.45E+01	-	2.60E+02	No
Formaldehyde	50-00-0	2.22E+00	-	4.00E-02	-	Yes
Hexachlorodibenzo-p-dioxin 1,2,3,6,7,8	-	-	2.46E+00	-	5.10E-03	Yes
Hydrogen chloride (hydrochloric acid)	-	3.33E-01	-	1.80E-01	-	Yes
Manganese & compounds	-	-	4.88E-01	-	6.30E-01	No
Mercury vapor (Include in Mercury&Compds)	-	-	1.47E-02	-	1.30E-02	Yes
Methyl chloroform (1,1,1 trichloroethane)	-	5.43E-03	1.30E-01	6.40E+01	2.50E+02	No
Methyl ethyl ketone	-	9.47E-04	2.27E-02	2.24E+01	7.80E+01	No
Xylene	1330-20-7	1.30E-03	3.11E-02	1.64E+01	5.70E+01	No
Methyl isobutyl ketone	108-10-1	0.00E+00	0.00E+00	7.60E+00	5.20E+01	No
Methylene chloride	75-09-2	0.00E+00	0.00E+00	3.90E-01	1.60E+03	No
Nickel metal (Component of Nickel & Compounds)	-	-	1.39E-01	-	1.30E-01	Yes
Pentachlorophenol	-	8.94E-06	2.15E-04	6.40E-03	6.30E-02	No
Perchloroethylene (tetrachloroethylene)	-	-	5.84E+01	-	1.30E+04	No
Phenol	108-95-2	0.00E+00	-	2.40E-01	-	No
Polychlorinated biphenyls	-	-	1.25E-02	-	5.60E+00	No
Styrene	100-42-5	0.00E+00	-	2.70E+00	-	No
Tetrachlorodibenzo-p-dioxin, 2,3,7,8-	-	-	1.32E-05	-	2.00E-04	No
Toluene	108-88-3	1.86E-03	4.47E-02	1.44E+01	9.80E+01	No
Trichloroethylene	-	-	4.61E+01	-	4.00E+03	No
Trichlorofluoromethane (CFC 111)	-	7.19E-03	-	1.40E+02	-	No
Vinyl chloride	-	-	2.76E+01	-	2.60E+01	Yes





**FORM D4**  
**EXEMPT AND INSIGNIFICANT ACTIVITIES SUMMARY**

REVISED: 12/01/01

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

**D4**

ACTIVITIES EXEMPTED PER 2Q .0102 OR INSIGNIFICANT ACTIVITIES PER 2Q .0503 FOR TITLE V SOURCES		
DESCRIPTION OF EMISSION SOURCE	SIZE OR PRODUCTION RATE	BASIS FOR EXEMPTION OR INSIGNIFICANT ACTIVITY
1. Green Wood Handling and Sizing Operations IES-GWHS	N/A	15A NCAC 02Q .0102 (c)(2)(E) -low emissions, see Appendix B
2. Dried Wood Handling and Sizing Operations IES-DWHS	N/A	15A NCAC 02Q .0102 (c)(2)(E) -negligible emissions, enclosed
3. Emergency Generator Diesel Fuel Storage Tank TK-1	Up to 2,500 gallons	15A NCAC 02Q .0102 (c)(1)(D)
4. Firewater Pump Diesel Fuel Storage Tank TK-2	Up to 500 gallons	15A NCAC 02Q .0102 (c)(1)(D)
5. Green Wood Storage Piles IES-GWSP1 and IES-GWSP2	N/A	15A NCAC 02Q .0102 (c)(2)(E) -low emissions, see Appendix B
6. Debarker IES-DEBARK-1	N/A	15A NCAC 02Q .0102 (c)(2)(E) -negligible emissions
7. Green Wood Fuel Bin IES-GWFB	13.93 ODT/hr	15A NCAC 02Q .0102 (c)(2)(E) -no quantifiable emissions
8.		
9.		
10.		

Attach Additional Sheets As Necessary



**Source Specific Forms - Chipper**

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**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate **B**

EMISSION SOURCE DESCRIPTION: **Chipper** EMISSION SOURCE ID NO: **ES-EPWC**  
 CONTROL DEVICE ID NO(S): **N/A**

OPERATING SCENARIO **1** OF **1** EMISSION POINT (STACK) ID NO(S): **N/A**

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
**Green wood chips are screened and oversized chips will undergo additional chipping as required.**

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)  Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)  Coating/finishing/printing (Form B5)  Incineration (Form B8)  
 Liquid storage tanks (Form B3)  Storage silos/bins (Form B6)  Other (Form B9)

START CONSTRUCTION DATE: OPERATION DATE: **4/22/2013** DATE MANUFACTURED:  
 MANUFACTURER / MODEL NO.: **CEM 112" 15KN SUS Pellet Proc** EXPECTED OP. SCHEDULE: **24** HR/DAY **7** DAY/WK **52** WK/YR

IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): NESHAP (SUBPART?): MACT (SUBPART?):

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

EXPECTED ANNUAL HOURS OF OPERATION **8,760** 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 (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	See Emission Calculations in Appendix B						
PARTICULATE MATTER-10 MICRONS (PM <sub>10</sub> )							
PARTICULATE MATTER-2.5 MICRONS (PM <sub>2.5</sub> )							
SULFUR DIOXIDE (SO <sub>2</sub> )							
NITROGEN OXIDES (NO <sub>x</sub> )							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)							
LEAD							
OTHER							

**HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

HAZARDOUS AIR POLLUTANT AND CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (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**

INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	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: 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B9

EMISSION SOURCE DESCRIPTION:	Chipper	EMISSION SOURCE ID NO:	ES-EPWC
		CONTROL DEVICE ID NO(S):	N/A
OPERATING SCENARIO:	1 OF 1	EMISSION POINT (STACK) ID NO(S):	N/A

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):  
 Green wood chips are screened and oversized chips will undergo additional chipping as required.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Green Wood	ODT	71.71	

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

MAXIMUM DESIGN (BATCHES / HOUR):	(BATCHES/YR):
REQUESTED LIMITATION (BATCHES / HOUR):	
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:

Attach Additional Sheets as Necessary





Source Specific Forms - Green Wood Hammermills

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**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B

EMISSION SOURCE DESCRIPTION: Rechippers/ Green Wood Hammermills	EMISSION SOURCE ID NO: ES-RCHP-1, 2
OPERATING SCENARIO 1 OF 1	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): N/A	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
Green wood chips are screened and oversized chips will undergo additional chipping as required.

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)   
  Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)   
  Coating/finishing/printing (Form B5)   
  Incineration (Form B8)  
 Liquid storage tanks (Form B3)   
  Storage silos/bins (Form B6)   
  Other (Form B9)

START CONSTRUCTION DATE:    OPERATION DATE: 4/22/2013    DATE MANUFACTURED:

MANUFACTURER / MODEL NO.: Williams #490    EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?):    NESHAP (SUBPART?):    MACT (SUBPART?):

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

EXPECTED ANNUAL HOURS OF OPERATION 8,760    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 (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (AFTER CONTROLS / LIMITS)		
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	
PARTICULATE MATTER (PM <sub>10</sub> )	See Emission Calculations in Appendix B							
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )								
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )								
SULFUR DIOXIDE (SO <sub>2</sub> )								
NITROGEN OXIDES (NO <sub>x</sub> )								
CARBON MONOXIDE (CO)								
VOLATILE ORGANIC COMPOUNDS (VOC)								
LEAD								
OTHER								

**HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

HAZARDOUS AIR POLLUTANT AND CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (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**

INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	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







Source Specific Forms - Dryer Source

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**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NC DENR/Division of Air Quality - Application for Air Permit to Construct/Operate **B**

EMISSION SOURCE DESCRIPTION: **Green Wood Direct-Fired Dryer System** EMISSION SOURCE ID NO: **ES-DRYER**  
 CONTROL DEVICE ID NO(S): **CD-DC, CD-WESP**  
 OPERATING SCENARIO **1** OF **1** EMISSION POINT (STACK) ID NO(S): **EP-1**

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
**Green wood is conveyed to a rotary dryer system. Direct contact heat is provided to the system via a 175.3 mmBtu/hr burner system. Air emissions are controlled by cyclones for bulk particulate removal and additional particulate is removed utilizing a wet electrostatic precipitator (WESP) operating after the cyclones.**

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)  Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)  Coating/finishing/printing (Form B5)  Incineration (Form B8)  
 Liquid storage tanks (Form B3)  Storage silos/bins (Form B6)  Other (Form B9)

START CONSTRUCTION DATE: \_\_\_\_\_ OPERATION DATE: **4/22/2013** DATE MANUFACTURED: \_\_\_\_\_  
 MANUFACTURER / MODEL NO.: **Buettner 5X26R** EXPECTED OP. SCHEDULE: **24** HR/DAY **7** DAY/WK **52** WK/YR  
 IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): \_\_\_\_\_ NESHAP (SUBPART?): \_\_\_\_\_ MACT (SUBPART?): \_\_\_\_\_  
 PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB **25%** MAR-MAY **25%** JUN-AUG **25%** SEP-NOV **25%**  
 EXPECTED ANNUAL HOURS OF OPERATION: **8,760** 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)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	See Emission Calculations in Appendix B				
PARTICULATE MATTER<10 MICRONS (PM <sub>10</sub> )					
PARTICULATE MATTER<2.5 MICRONS (PM <sub>2.5</sub> )					
SULFUR DIOXIDE (SO <sub>2</sub> )					
NITROGEN OXIDES (NO <sub>x</sub> )					
CARBON MONOXIDE (CO)					
VOLATILE ORGANIC COMPOUNDS (VOC)					
LEAD					
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)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
	See Emission Calculations in Appendix B				

**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
	See Emission Calculations in Appendix B			

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 B1**  
**EMISSION SOURCE (WOOD, COAL, OIL, GAS, OTHER FUEL-FIRED BURNER)**

REVISED 12/01/01		NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate		<b>B1</b>	
EMISSION SOURCE DESCRIPTION: Green Wood Direct-Fired Dryer System			EMISSION SOURCE ID NO: ES-DRYER		
OPERATING SCENARIO: 1 OF 1			CONTROL DEVICE ID NO(S): CD-DC, CD-WESP		
DESCRIBE USE: <input checked="" type="checkbox"/> PROCESS HEAT <input type="checkbox"/> SPACE HEAT <input type="checkbox"/> ELECTRICAL GENERATION <input type="checkbox"/> CONTINUOUS USE <input type="checkbox"/> STAND BY/EMERGENCY <input type="checkbox"/> OTHER (DESCRIBE):			EMISSION POINT (STACK) ID NO(S): EP-1		
HEATING MECHANISM: <input type="checkbox"/> INDIRECT <input checked="" type="checkbox"/> DIRECT					
MAX. FIRING RATE (MMBTU/HOUR): 175.3					
<b>WOOD-FIRED BURNER</b>					
WOOD TYPE: <input type="checkbox"/> BARK <input checked="" type="checkbox"/> WOOD/BARK <input type="checkbox"/> WET WOOD <input type="checkbox"/> DRY WOOD <input type="checkbox"/> OTHER (DESCRIBE):					
PERCENT MOISTURE OF FUEL: 20 to 50% <input type="checkbox"/> UNCONTROLLED <input type="checkbox"/> CONTROLLED WITH FLYASH REINJECTION <input checked="" type="checkbox"/> CONTROLLED W/O REINJECTION					
FUEL FEED METHOD:		HEAT TRANSFER MEDIA: <input type="checkbox"/> STEAM <input checked="" type="checkbox"/> AIR <input type="checkbox"/> OTHER			
METHOD OF TUBE CLEANING: N/A					
<b>COAL-FIRED BURNER</b>					
TYPE OF BOILER:		IF OTHER DESCRIBE:			
<input type="checkbox"/> PULVERIZED	<input type="checkbox"/> OVERFEED STOKER	<input type="checkbox"/> UNDERFEED STOKER	<input type="checkbox"/> SPREADER STOKER	<input type="checkbox"/> FLUIDIZED BED	
<input type="checkbox"/> WET BED	<input checked="" type="checkbox"/> UNCONTROLLED	<input type="checkbox"/> UNCONTROLLED	<input type="checkbox"/> UNCONTROLLED	<input type="checkbox"/> CIRCULATING	
<input type="checkbox"/> DRY BED	<input checked="" type="checkbox"/> CONTROLLED	<input type="checkbox"/> CONTROLLED	<input type="checkbox"/> FLYASH REINJECTION	<input type="checkbox"/> RECIRCULATING	
		<input type="checkbox"/> NO FLYASH REINJECTION			
METHOD OF LOADING: <input type="checkbox"/> CYCLONE <input type="checkbox"/> HANDFIRED <input type="checkbox"/> TRAVELING GRATE <input type="checkbox"/> OTHER (DESCRIBE):					
METHOD OF TUBE CLEANING: CLEANING SCHEDULE:					
<b>OIL/GAS-FIRED BURNER</b>					
TYPE OF BOILER: <input type="checkbox"/> UTILITY <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> RESIDENTIAL					
TYPE OF FIRING: <input type="checkbox"/> NORMAL <input type="checkbox"/> TANGENTIAL <input type="checkbox"/> LOW NOX BURNERS <input type="checkbox"/> NO LOW NOX BURNER					
METHOD OF TUBE CLEANING: CLEANING SCHEDULE:					
<b>OTHER FUEL-FIRED BURNER</b>					
TYPE OF FUEL: PERCENT MOISTURE:					
TYPE OF BOILER: <input type="checkbox"/> UTILITY <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> RESIDENTIAL					
TYPE OF FIRING: TYPE OF CONTROL (IF ANY): FUEL FEED METHOD:					
METHOD OF TUBE CLEANING: CLEANING SCHEDULE:					
<b>FUEL USAGE (INCLUDE STARTUP/BACKUP FUELS)</b>					
FUEL TYPE	UNITS	MAXIMUM DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)		
Bark/Wet Wood	ton	20.8			
<b>FUEL CHARACTERISTICS (COMPLETE ALL THAT ARE APPLICABLE)</b>					
FUEL TYPE	SPECIFIC BTU CONTENT	SULFUR CONTENT (% BY WEIGHT)	ASH CONTENT (% BY WEIGHT)		
Bark/Wet Wood	Nominal 4,200 BTU/lb	0.011			
SAMPLING PORTS, COMPLIANT WITH EPA METHOD 1 WILL BE INSTALLED ON THE STACKS: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
COMMENTS:					

Attach Additional Sheets As Necessary



<b>FORM C4</b>			
<b>CONTROL DEVICE (CYCLONE, MULTICYCLONE, OR OTHER MECHANICAL)</b>			
REVISED 12/01/01		NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate	
CONTROL DEVICE ID NO: <b>CD-DC</b>		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): <b>ES-DRYER</b>	
EMISSION POINT (STACK) ID NO(S): <b>EP-1</b>		POSITION IN SERIES OF CONTROLS NO. <b>1</b> OF <b>2</b> UNITS	
MANUFACTURE <b>Lundberg E-Tube 115719</b>		MODEL NO:	
DATE MANUFACTURED:		PROPOSED OPERATION DATE:	
<b>OPERATING SCENARIO:</b>		PROPOSED START CONSTRUCTION DATE:	
1 OF 1		P.E. SEAL REQUIRED (PER 2Q .0112)? <input type="checkbox"/> YES <input type="checkbox"/> NO	
DESCRIBE CONTROL SYSTEM:			
Three identical simple cyclones are equipped to the discharge of the rotary dryer system to capture bulk PM emissions. Emissions from each the cyclones are combined into a common duct and are routed to the WESP. The parameters presented here are per each cyclone:			
POLLUTANT(S) COLLECTED:	<u>PM</u>	<u>PM<sub>10</sub></u>	<u>PM<sub>2.5</sub></u>
BEFORE CONTROL EMISSION RATE (LB/HR):			
CAPTURE EFFICIENCY:	98.5 %	98.5 %	98.5 %
CONTROL DEVICE EFFICIENCY:	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%
EFFICIENCY DETERMINATION CODE:			
TOTAL EMISSION RATE (LB/HR):			
PRESSURE DROP (IN. H <sub>2</sub> O): MIN MAX <b>6.0"</b>	WARNING ALARM? <input type="checkbox"/> YES <input type="checkbox"/> NO		
INLET TEMPERATURE (°F): MIN MAX <b>Nominal 400</b>	OUTLET TEMPERATURE (°F): MIN MAX <b>Nominal 400</b>		
INLET AIR FLOW RATE (ACFM): <b>117,000</b>	BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): <b>3.43E-05</b>		
POLLUTANT LOADING RATE (GR/FT <sup>3</sup> ) <b>0.24</b>			
<b>SETTLING CHAMBER</b>	<b>CYCLONE</b>		<b>MULTICYCLONE</b>
LENGTH (INCHES):	INLET VELOCITY (FT/SEC): <b>95</b> <input type="checkbox"/> CIRCULAR <input checked="" type="checkbox"/> RECTANGLE		NO. TUBES:
WIDTH (INCHES):	DIMENSIONS (INCHES) See instructions IF WET SPRAY UTILIZED		DIAMETER OF TUBES:
HEIGHT (INCHES):	H:	Dd:	LIQUID USED:
VELOCITY (FT/SEC.):	W:	Lb: <b>156"</b>	FLOW RATE (GPM):
NO. TRAYS:	De: <b>79"</b>	Lc: <b>312"</b>	MAKE UP RATE (GPM):
NO. BAFFLES:	D: <b>156"</b>	S:	
	TYPE OF CYCLONE <input checked="" type="checkbox"/> CONVENTIONAL <input type="checkbox"/> HIGH EFFICIENCY <input type="checkbox"/> OTHER		HOPPER ASPIRATION SYSTEM? <input type="checkbox"/> YES <input type="checkbox"/> NO
DESCRIBE MAINTENANCE PROCEDURES:	<b>PARTICLE SIZE DISTRIBUTION</b>		
Periodic inspection of mechanical integrity during plant outages as specified by manufacturer	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %
	0-1	Unknown	
DESCRIBE INCOMING AIR STREAM: The flue gas from the dryer will be split and distributed through a set of three cyclones before entering the WESP. After the cyclones, the gas stream will be combined into a single duct and directed to the WESP inlet point.	1-10		
	10-25		
	25-50		
	50-100		
	>100		
	TOTAL = 100		
DESCRIBE ANY MONITORING DEVICES, GAUGES, TEST PORTS, ETC: <b>None</b>			
ON A SEPARATE PAGE, ATTACH A DIAGRAM OF THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S): <b>Attach Additional Sheets As Necessary</b>			

<sup>1</sup>Final equipment selection has not yet occurred but will be similar in design to specifications shown.



**FORM C2**

**CONTROL DEVICE (Electrostatic Precipitator)**

REVISED 12/01/01		NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate		<b>C2</b>
CONTROL DEVICE ID NO: <b>CD-WESP</b>		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO: <b>ES-DRYER</b>		
EMISSION POINT (STACK) ID NO(S): <b>EP-1</b>		POSITION IN SERIES OF CONTROLS: NO. <b>2</b> OF <b>2</b> UNITS		
MANUFACTURER: <b>Lundberg E-Tube 115719</b>		MODEL NO. <b>Lundberg E-Tube 115719</b>		
MANUFACTURE DATE:		PROPOSED OPERATION DATE: <b>TBD</b>		
<b>OPERATING SCENARIO:</b>		PROPOSED START CONSTRUCTION DATE: <b>TBD</b>		
OF		P.E. SEAL REQUIRED (PER 2Q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
<b>EQUIPMENT SPECIFICATIONS</b>		GAS DISTRIBUTION GRIDS: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
TYPE: <input checked="" type="checkbox"/> WET <input type="checkbox"/> DRY <input type="checkbox"/> SINGLE-STAGE <input type="checkbox"/> TWO-STAGE				
TOTAL COLLECTION PLATE AREA (FT <sup>2</sup> ): <b>29,904</b>		NO. FIELDS: <b>2</b> NO. COLLECTOR PLATE PER FIELD: <b>567 tubes</b>		
COLLECTOR PLATES SIZE (FT): LENGTH: WIDTH:		SPACING BETWEEN COLLECTOR PLATES (INCHES): <b>12" hextube</b>		
TOTAL DISCHARGE ELECTRODE LENGTH(FT): <b>19'-0"</b>		GAS VISCOSITY (POISE): <b>2.054E-04 Poise</b>		
NUMBER OF DISCHARGE ELECTRODES: <b>567</b>		NUMBER OF COLLECTING ELECTRODE RAPPERS: <b>none</b>		
MAXIMUM INLET AIR FLOW RATE (ACFM): <b>117,000</b>		PARTICLE MIGRATION VELOCITY (FT/SEC): <b>0.234</b>		
MINIMUM GAS TREATMENT TIME (SEC): <b>2.3</b>		BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): <b>45 lb/cu. ft.</b>		
FIELD STRENGTH (VOLTS) CHARGING: <b>83 kVA</b> COLLECTING: <b>N/A</b>		CORONA POWER (WATTS/1000 CFM): <b>4000</b>		
ELECTRICAL USAGE (kw/HOUR): <b>141.5</b>				
CLEANING PROCEDURES: <input type="checkbox"/> RAPPING <input type="checkbox"/> PLATE VIBRATING <input checked="" type="checkbox"/> WASHING <input type="checkbox"/> OTHER				
<b>OPERATING PARAMETERS</b> PRESSURE DROP (IN. H2O): MIN <b>2"</b> MAX <b>2"</b> WARNING ALARM? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
RESISTIVITY OF POLLUTANT (OHM-CM): <b>N/A</b>		GAS CONDITIONING: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO TYPE OF AGENT (IF YES):		
INLET GAS TEMPERATURE (°F): <b>240 °F nominal</b>		OUTLET GAS TEMPERATURE (°F): <b>180 °F nominal</b>		
VOLUME OF GAS HANDLED (ACFM): <b>117,000</b>		INLET MOISTURE PERCENT: MIN <b>40%</b> MAX <b>50%</b>		
<b>POWER REQUIREMENTS</b> IS AN ENERGY MANAGEMENT SYSTEM USED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
<b>FIELD NO.</b>	<b>NO. OF SETS</b>	<b>CHARGING</b>	<b>EACH TRANSFORMER (kVA)</b>	<b>EACH RECTIFIER Kv Ave/Peak Ma Dc</b>
<b>1</b>	<b>1</b>		<b>118</b>	<b>83 / 1265</b>
<b>2</b>	<b>1</b>		<b>118</b>	<b>83 / 1265</b>
POLLUTANT(S) COLLECTED: <b>PM / PM<sub>10</sub> / PM<sub>2.5</sub></b>				
BEFORE CONTROL EMISSION RATE (LB/HR): <b>150.00</b>				
CAPTURE EFFICIENCY: _____ %				
CONTROL DEVICE EFFICIENCY: _____ %				
CORRESPONDING OVERALL EFFICIENCY: _____ %				
EFFICIENCY DETERMINATION CODE: _____				
TOTAL EMISSION RATE (LB/HR): <b>See calculations in Appendix B</b>				
<b>PARTICLE SIZE DISTRIBUTION</b>			DESCRIBE STARTUP PROCEDURES:	
SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %	See attached	
0-1	Unknown		DESCRIBE MAINTENANCE PROCEDURES:	
1-10			See attached	
10-25			DESCRIBE ANY AUXILIARY MATERIALS INTRODUCED INTO THE CONTROL SYSTEM:	
25-50			NOAH	
50-100				
>100			TOTAL = 100	
DESCRIBE ANY MONITORING DEVICES, GAUGES, OR TEST PORTS AS ATTACHMENTS:				
<b>PLC</b>				
ATTACH A DIAGRAM OF THE TOP VIEW OF THE ESP WITH DIMENSIONS (include at a minimum the plate spacing and wire spacing and indicate the electrode type), AND THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S)				
<b>Attach Additional Sheets As Necessary</b>				





**Source Specific Forms - Hammermills & Hammermill Area**

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**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B

EMISSION SOURCE DESCRIPTION: Eight (8) Hammermills	EMISSION SOURCE ID NO: ES-HM-1 thru 8	CONTROL DEVICE ID NO(S): CD-HM-CYC-1 through 8 CD-HM-BF1 through 3
OPERATING SCENARIO: 1 OF 1	EMISSION POINT (STACK) ID NO(S): EP-2	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
Dried materials are reduced to the appropriate size needed for pelletization using eight hammermills.

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 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:      OPERATION DATE: 4/22/2013      DATE MANUFACTURED:        
 MANUFACTURER / MODEL NO.: Bliss Hammermill ERD-44      EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?):      NESHAP (SUBPART?):      MACT (SUBPART?):        
 PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25%      MAR-MAY 25%      JUN-AUG 25%      SEP-NOV 25%

EXPECTED ANNUAL HOURS OF OPERATION: 8,760      VISIBLE STACK EMISSIONS UNDER NORMAL OPERATION: <20 % OPACITY

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS	
		(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)					
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )					
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )					
SULFUR DIOXIDE (SO <sub>2</sub> )					
NITROGEN OXIDES (NO <sub>x</sub> )					
CARBON MONOXIDE (CO)					
VOLATILE ORGANIC COMPOUNDS (VOC)					
LEAD					
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)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
N/A					

**TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS	
		lb/hr	lb/day
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: 12/01/01      NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate      **B9**

EMISSION SOURCE DESCRIPTION: <b>Eight (8) Hammermills</b>	EMISSION SOURCE ID NO: <b>ES-HM-1 thru 8</b>
	CONTROL DEVICE ID NO(S): <b>CD-HM-CYC-1 through 8</b>
	<b>CD-HM-BF1 through 3</b>
OPERATING SCENARIO: <b>1</b> OF <b>1</b>	EMISSION POINT (STACK) ID NO(S): <b>EP-2 through 4</b>

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):  
**Dried materials are reduced to the appropriate size needed for pelletization using eight hammermills.**

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
Dried Wood	ODT	71.71	

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:

**Attach Additional Sheets as Necessary**



**FORM C4**  
**CONTROL DEVICE (CYCLONE, MULTICYCLONE, OR OTHER MECHANICAL)**

**C4**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate

CONTROL DEVICE ID NO: <b>CD-HM-CYC-1 thru -8</b>	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): <b>ES-HM-1 through-8</b>
EMISSION POINT (STACK) ID NO(S): <b>EP-2</b>	POSITION IN SERIES OF CONTROLS NO. <b>1</b> OF <b>2</b> UNITS
MANUFACTURER: <b>Aircon AC-96</b>	MODEL NO: <b>AC-96</b>
DATE MANUFACTURED:	PROPOSED OPERATION DATE: <b>1Q2014</b>
<b>OPERATING SCENARIO:</b>	PROPOSED START CONSTRUCTION I TBD
<b>1</b> OF <b>1</b>	P.E. SEAL REQUIRED (PER 2Q .0112)? <input checked="" type="radio"/> YES <input type="radio"/> NO

DESCRIBE CONTROL SYSTEM:  
**One cyclone is equipped for each hammermill to capture bulk PM emissions. The emissions from the cyclone are then routed to one of three bagfilters.**

POLLUTANT(S) COLLECTED:	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
BEFORE CONTROL EMISSION RATE (LB/HR):	See calculations in Appendix B		
CAPTURE EFFICIENCY:	98.0% %	98.0% %	98.0% %
CONTROL DEVICE EFFICIENCY:	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%
EFFICIENCY DETERMINATION CODE:			
TOTAL EMISSION RATE (LB/HR):	See calculations in Appendix B		

PRESSURE DROP (IN. H <sub>2</sub> O): MIN MAX <b>6.0"</b> WARNING ALARM? <input checked="" type="radio"/> YES <input type="radio"/> NO
INLET TEMPERATURE (°F): MIN MAX <b>Ambient</b> OUTLET TEMPERATURE (°F): MIN MAX <b>Ambient</b>
INLET AIR FLOW RATE (ACFM): <b>15,000 each cyclone</b> BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): <b>1.43E-03</b>
POLLUTANT LOADING RATE (GR/FT <sup>3</sup> ): <b>10 gr/cf inlet</b>

SETTLING CHAMBER	CYCLONE	MULTICYCLONE
LENGTH (INCHES):	INLET VELOCITY (FT/SEC): <b>114.65</b> <input checked="" type="radio"/> CIRCULAR <input type="radio"/> RECTANGLE	NO. TUBES:
WIDTH (INCHES):	<i>DIMENSIONS (INCHES) See instructions</i> <input type="radio"/> IF WET SPRAY UTILIZED	DIAMETER OF TUBES:
HEIGHT (INCHES):	H: <b>60</b> Dd: <b>20</b> LIQUID USED:	HOPPER ASPIRATION SYSTEM?
VELOCITY (FT/SEC.):	W: <b>32.25</b> Lb: <b>60</b> FLOW RATE (GPM):	<input type="radio"/> YES <input checked="" type="radio"/> NO
NO. TRAYS:	De: <b>45</b> Lc: <b>120</b> MAKE UP RATE (GPM):	LOUVERS?
NO. BAFFLES:	D: <b>96</b> S: <b>64.75</b>	<input type="radio"/> YES <input checked="" type="radio"/> NO
	TYPE OF CYCLONE: <input checked="" type="radio"/> CONVENTIONAL <input type="radio"/> HIGH EFFICIENCY <input type="radio"/> OTHER	

DESCRIBE MAINTENANCE PROCEDURES: Periodic inspection of mechanical integrity during plant outages as specified by manufacturer	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %
DESCRIBE INCOMING AIR STREAM: The material will be pulled through the cyclone under negative pressure. The cyclone will separate the material from the air stream and the air will discharge to an associated bag filter prior to being discharge to atmosphere via a discharge stack common to all fitlers in this area.	0-1	Unknown	
	1-10		
	10-25		
	25-50		
	50-100		
	>100		
	TOTAL = 100		

DESCRIBE ANY MONITORING DEVICES, GAUGES, TEST PORTS, ETC.  
**None**

ON A SEPARATE PAGE, ATTACH A DIAGRAM OF THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):  
**Attach Additional Sheets As Necessary**





**FORM C1  
CONTROL DEVICE (FABRIC FILTER)**

REVISID 12/01/01	NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate	C1
CONTROL DEVICE ID NO: CD-HM-BF-1 and 2	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-HM-1 through 6	
EMISSION POINT (STACK) ID NO(S): EP-2	POSITION IN SERIES OF CONTROLS NO. 2 OF 2 UNITS	
MANUFACTURER: Aircon	MODEL NO: Aircon 16 RAB 412-10	
DATE MANUFACTURED:	PROPOSED OPERATION DATE: 1Q2014	
OPERATING SCENARIO:	PROPOSED START CONSTRUCTION DATE: TBD	
1 OF 1	P.E. SEAL REQUIRED (PER 2Q.0112)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

DESCRIBE CONTROL SYSTEM:  
Three (3) bagfilters will be utilized for emission control on eight hammermill cyclones. HMs 1 - 3 vent through bagfilter 1, HMs 4-6 vent through bagfilter 2 and the 7 and 8 cyclones will be routed to the third bagfilter along with hammermill area emissions.

POLLUTANT(S) COLLECTED:	PM	PM-10	PM-2.5	
BEFORE CONTROL EMISSION RATE (LB/HR):	See calculations in Appendix B			
CAPTURE EFFICIENCY:	~99.9 %	~99.9 %	~99.9 %	%
CONTROL DEVICE EFFICIENCY:	%	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%	%
EFFICIENCY DETERMINATION CODE:				
TOTAL EMISSION RATE (LB/HR):	See calculations in Appendix B			

PRESSURE DROP (IN. H <sub>2</sub> O):	MIN: MAX: 6"	GAUGE?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WARNING ALARM?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ):	1.43E-05	INLET TEMPERATURE (°F):	120		
POLLUTANT LOADING RATE:	0.1 gr/cf inlet <input type="checkbox"/> LB/HR <input checked="" type="checkbox"/> GR/FT <sup>3</sup>	OUTLET TEMPERATURE (°F):	100		
INLET AIR FLOW RATE (ACFM):	45,000	FILTER MAX OPERATING TEMP. (°F):	N/A		
NO. OF COMPARTMENTS:	1	NO. OF BAGS PER COMPARTMENT:	412	LENGTH OF BAG (IN.):	144
DIAMETER OF BAG (IN.):	5.75	DRAFT:	<input type="checkbox"/> INDUCED/NEG. <input checked="" type="checkbox"/> FORCED/POS	FILTER SURFACE AREA (FT <sup>2</sup> ):	6,250
AIR TO CLOTH RATIO:	7.20	FILTER MATERIAL: Polyester or equivalent	<input type="checkbox"/> WOVEN <input checked="" type="checkbox"/> FELTED		

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

DESCRIBE INCOMING AIR STREAM:  
The air stream will contain wood dust particles. Larger particles will have been removed by the upstream cyclone.

METHOD FOR DETERMINING WHEN TO CLEAN:  
 AUTOMATIC  TIMED  MANUAL

METHOD FOR DETERMINING WHEN TO REPLACE THE BAGS:  
 ALARM  INTERNAL INSPECTION  VISIBLE EMISSION  OTHER

SPECIAL CONDITIONS: None  
 MOISTURE BLINDING  CHEMICAL RESISTIVITY  OTHER

EXPLAIN:

DESCRIBE MAINTENANCE PROCEDURES: Per manufacturer recommendations

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

Attach Additional Sheets As Necessary

<sup>1</sup>Final equipment selection has not yet occurred but will be similar in design to specifications shown.



**FORM C1**  
**CONTROL DEVICE (FABRIC FILTER)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate C1

CONTROL DEVICE ID NO: CD-HM-BF-3		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-HM-7, HM-8, and ES-NDS	
EMISSION POINT (STACK) ID NO(S): EP-2		POSITION IN SERIES OF CONTROLS NO. 2 OF 2 UNITS	
MANUFACTURER: Aircon	MODEL NO: 16 RAB 412-10		
DATE MANUFACTURED:	PROPOSED OPERATION DATE: 1Q2014		
OPERATING SCENARIO: 1 OF 1		PROPOSED START CONSTRUCTION DATE: TBD	
P.E. SEAL REQUIRED (PER 2Q.0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			

DESCRIBE CONTROL SYSTEM:  
Three (3) bagfilters will be utilized for emission control on seven of the hammermill cyclones. HMs 1 - 3 vent through bagfilter 1, HMs 4-6 vent through bagfilter 2 and the 7 and 8 cyclones will be routed to the third bagfilter along with hammermill area emissions.

POLLUTANT(S) COLLECTED:	PM	PM-10	PM-2.5	
BEFORE CONTROL EMISSION RATE (LB/HR):	See calculations in Appendix B			
CAPTURE EFFICIENCY:	~99.9 %	~99.9 %	~99.9 %	%
CONTROL DEVICE EFFICIENCY:	%	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%	%
EFFICIENCY DETERMINATION CODE:				
TOTAL EMISSION RATE (LB/HR):	See calculations in Appendix B			

PRESSURE DROP (IN. H <sub>2</sub> O): MIN: MAX: 6"	GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WARNING ALARM? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): 1.43E-05	INLET TEMPERATURE (°F): 120	
POLLUTANT LOADING RATE: 0.1 gr/cf inlet <input type="checkbox"/> LB/HR <input checked="" type="checkbox"/> GR/FT <sup>3</sup>	OUTLET TEMPERATURE (°F): 100	
INLET AIR FLOW RATE (ACFM): 45,000	FILTER MAX OPERATING TEMP. (°F): N/A	
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT: 412	LENGTH OF BAG (IN.): 144
DIAMETER OF BAG (IN.): 5.75	DRAFT: <input type="checkbox"/> INDUCED/NEG. <input checked="" type="checkbox"/> FORCED/POS	FILTER SURFACE AREA (FT <sup>2</sup> ): 6,250
AIR TO CLOTH RATIO: 7.20	FILTER MATERIAL: Polyester or equivalent <input type="checkbox"/> WOVEN <input checked="" type="checkbox"/> FELTED	

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

DESCRIBE INCOMING AIR STREAM:  
The air stream will contain wood dust particles. Larger particles will have been removed by the upstream cyclone. The filters will discharge to a common stack. This stack will also accept the discharge air flow from a third bag filter (CD-HMA-BF) (located in this area.)

METHOD FOR DETERMINING WHEN TO CLEAN:  AUTOMATIC  TIMED  MANUAL

METHOD FOR DETERMINING WHEN TO REPLACE THE BAGS:  ALARM  INTERNAL INSPECTION  VISIBLE EMISSION  OTHER

SPECIAL CONDITIONS: None  
 MOISTURE BLINDING  CHEMICAL RESISTIVITY  OTHER

EXPLAIN:

DESCRIBE MAINTENANCE PROCEDURES: Per manufacturer recommendations

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

**Attach Additional Sheets As Necessary**

<sup>1</sup>Final equipment selection has not yet occurred but will be similar in design to specifications shown.



**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B

EMISSION SOURCE DESCRIPTION: **Nuisance Dust System/ Hammermill Area** EMISSION SOURCE ID NO: **ES-NDS**  
 CONTROL DEVICE ID NO(S): **CD-HM-BF-3**  
 OPERATING SCENARIO **1** OF **1** EMISSION POINT (STACK) ID NO(S): **EP-2**

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
**Hammermill area dust from the hammermill and screening operations will be vented to the hammermill bagfilter No. 3 (CD-HM-BF-3) to control particulate matter emissions.**

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)  Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)  Coating/finishing/printing (Form B5)  Incineration (Form B8)  
 Liquid storage tanks (Form B3)  Storage silos/bins (Form B6)  Other (Form B9)

START CONSTRUCTION DATE: OPERATION DATE: **4/22/2013** DATE MANUFACTURED:  
 MANUFACTURER / MODEL NO.: EXPECTED OP. SCHEDULE: **24** HR/DAY **7** DAY/WK **52** WK/YR

IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): NESHAP (SUBPART?): MACT (SUBPART?):  
 PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25% MAR-MAY 25% JUN-AUG 25% SEP-NOV 25%  
 EXPECTED ANNUAL HOURS OF OPERATION **8,760** 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)	(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
See Emission Calculations in Appendix B							
PARTICULATE MATTER (PM)							
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )							
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )							
SULFUR DIOXIDE (SO <sub>2</sub> )							
NITROGEN OXIDES (NO <sub>x</sub> )							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)							
LEAD							
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)	(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER 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**

INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	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: 12/01/01      NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate      **B9**

EMISSION SOURCE DESCRIPTION: <b>Nuisance Dust System/ Hammermill Area</b>	EMISSION SOURCE ID NO: <b>ES-NDS</b>
OPERATING SCENARIO: <b>1</b> OF <b>1</b>	CONTROL DEVICE ID NO(S): <b>CD-HM-BF3</b>
	EMISSION POINT (STACK) ID NO(S): <b>EP-2</b>

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):  
**Hammermill area dust from the hammermill and screening operations will be vented to the hammermill bagfilter No. 3 (CD-HM-BF-3) to control particulate matter emissions.**

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY	REQUESTED CAPACITY LIMITATION (UNIT/HR)
TYPE	UNITS		
Dried Wood	ODT	71.71	

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

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

COMMENTS:

Attach Additional Sheets as Necessary





**Source Specific Forms - Pellet Presses & Coolers**

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**FORM B**  
**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NC DENR/Division of Air Quality - Application for Air Permit to Construct/Operate B

EMISSION SOURCE DESCRIPTION: Pellet Coolers  
 EMISSION SOURCE ID NO: ES-CLR1 through 6  
 CONTROL DEVICE ID NO(S): CD-CLR-1 through 6  
 OPERATING SCENARIO 1 OF 1  
 EMISSION POINT (STACK) ID NO(S): EP-10 through 15

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
 Six (6) Pellet Coolers follow the pellet presses to cool the newly formed pellets down to an acceptable storage temperature.

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)     Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)     Coating/finishing/printing (Form B5)     Incineration (Form B8)  
 Liquid storage tanks (Form B3)     Storage silos/bins (Form B6)     Other (Form B9)

START CONSTRUCTION DATE:    OPERATION DATE: 4/22/2013    DATE MANUFACTURED:  
 MANUFACTURER / MODEL NO.: Kahl Press 60-1250    EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR  
 IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?); NESHAP (SUBPART?); MACT (SUBPART?);  
 PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25%    MAR-MAY 25%    JUN-AUG 25%    SEP-NOV 25%  
 EXPECTED ANNUAL HOURS OF OPERATION 8,760    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)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	See Emission Calculations in Appendix B				
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )					
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )					
SULFUR DIOXIDE (SO <sub>2</sub> )					
NITROGEN OXIDES (NO <sub>x</sub> )					
CARBON MONOXIDE (CO)					
VOLATILE ORGANIC COMPOUNDS (VOC)					
LEAD					
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)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
N/A					

**TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	EXPECTED ACTUAL	
		lb/hr	lb/day
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: 12/01/01      NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate      **B9**

EMISSION SOURCE DESCRIPTION: <b>Pellet Coolers</b>	EMISSION SOURCE ID NO: <b>ES-CLR1 through 6</b>
OPERATING SCENARIO: <u>1</u> OF <u>1</u>	CONTROL DEVICE ID NO(S): <b>CD-CLR-1 through 6</b>
	EMISSION POINT (STACK) ID NO(S): <b>EP-10 through 15</b>

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):  
**Six (6) Pellet Coolers follow the pellet presses to cool the newly formed pellets down to an acceptable storage temperature.**

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION(UNIT/HR)
TYPE	UNITS		
<b>Dried Wood</b>	<b>ODT</b>	<b>76.07</b>	

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

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

COMMENTS:

**Attach Additional Sheets as Necessary**



**FORM C4**  
**CONTROL DEVICE (CYCLONE, MULTICYCLONE, OR OTHER MECHANICAL)**

**C4**

REVISION: 12/01/01	NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate
CONTROL DEVICE ID NO: <b>CD-CLR-1 through 6</b>	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): <b>ES-CLR1 through 6</b>
EMISSION POINT (STACK) ID NO(S): <b>EP-10 through 15</b>	POSITION IN SERIES OF CONTROLS NO. <b>1</b> OF <b>1</b> UNITS
MANUFACTURER: <b>Aircon HE54</b>	MODEL NO: <b>Aircon HE54</b>
DATE MANUFACTURED:	PROPOSED OPERATION DATE: <b>4/22/2013</b>
<b>OPERATING SCENARIO:</b>	PROPOSED START CONSTRUCTION DATE:
<b>1</b> OF <b>1</b>	P.E. SEAL REQUIRED (PER 2Q. 0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

DESCRIBE CONTROL SYSTEM:  
 Six (6) identical high efficiency cyclones are to be used to capture bulk PM emissions from six (6) pellet coolers. Each cooler vents to one dedicated cyclone. The cyclones will operate under negative pressure.

POLLUTANT(S) COLLECTED:	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
BEFORE CONTROL EMISSION RATE (LB/HR):	See Emissions Calculations in Appendix B		
CAPTURE EFFICIENCY:	90+ %	90+ %	90+ %
CONTROL DEVICE EFFICIENCY:	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%
EFFICIENCY DETERMINATION CODE:			
TOTAL EMISSION RATE (LB/HR):	See Emissions Calculations in Appendix B		

PRESSURE DROP (IN. H <sub>2</sub> O): MIN MAX <b>6.0"</b>	WARNING ALARM? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
INLET TEMPERATURE (°F): MIN MAX <b>Ambient</b>	OUTLET TEMPERATURE (°F): MIN MAX <b>Ambient</b>	
INLET AIR FLOW RATE (ACFM): <b>21,000 each</b>	BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): <b>2.86E-05</b>	
POLLUTANT LOADING RATE (GR/FT <sup>3</sup> ): <b>0.2</b>		
<b>SETTLING CHAMBER</b>	<b>CYCLONE</b>	<b>MULTICYCLONE</b>
LENGTH (INCHES):	INLET VELOCITY (FT/SEC): <b>94.75</b> <input type="checkbox"/> CIRCULAR <input checked="" type="checkbox"/> RECTANGLE	NO. TUBES:
WIDTH (INCHES):	<i>DIMENSIONS (INCHES) See instructions</i> <input type="checkbox"/> IF WET SPRAY UTILIZED	DIAMETER OF TUBES:
HEIGHT (INCHES):	H: <b>38</b> Dd: <b>22</b> LIQUID USED:	HOPPER ASPIRATION SYSTEM?
VELOCITY (FT/SEC.):	W: <b>25</b> Lb: <b>74.25</b> FLOW RATE (GPM):	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NO. TRAYS:	De: <b>32</b> Lc: <b>84.5</b> MAKE UP RATE (GPM):	LOUVERS?
NO. BAFFLES:	D: <b>54</b> S: <b>44.38</b>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	TYPE OF CYCLONE: <input type="checkbox"/> CONVENTIONAL <input checked="" type="checkbox"/> HIGH EFFICIENCY <input type="checkbox"/> OTHER	

DESCRIBE MAINTENANCE PROCEDURES: Periodic inspection of mechanical integrity during plant outages as specified by manufacturer	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %
DESCRIBE INCOMING AIR STREAM: The cyclones used for particulate capture the pellet coolers will be ducted to a discharge stack. The stack will be common to all cooler aspiration systems.	0-1		Unknown
	1-10		
	10-25		
	25-50		
	50-100		
	>100		
	TOTAL = 100		

DESCRIBE ANY MONITORING DEVICES, GAUGES, TEST PORTS, ETC.  
 None

ON A SEPARATE PAGE, ATTACH A DIAGRAM OF THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S).  
**Attach Additional Sheets As Necessary**  
 \*Final equipment selection has not yet occurred but will be similar in design to specifications shown.





Source Specific Forms - Pellet Mill Feed Silo

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**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B

EMISSION SOURCE DESCRIPTION: Pellet Mill Feed Silo EMISSION SOURCE ID NO.: ES-PMFS  
 CONTROL DEVICE ID NO(S): CD-PMFS-BV  
 OPERATING SCENARIO 1 OF 1 EMISSION POINT (STACK) ID NO(S): EP-3

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
 A pellet press silo stores dried ground wood prior to transport to the pellet presses.

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)  Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)  Coating/finishing/printing (Form B5)  Incineration (Form B8)  
 Liquid storage tanks (Form B3)  Storage silos/bins (Form B6)  Other (Form B9)

START CONSTRUCTION DATE: OPERATION DATE: 4/22/2013 DATE MANUFACTURED:  
 MANUFACTURER / MODEL NO.: Laidig 533 EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR  
 IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): NESHAP (SUBPART?): MACT (SUBPART?):  
 PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25% MAR-MAY 25% JUN-AUG 25% SEP-NOV 25%  
 EXPECTED ANNUAL HOURS OF OPERATION: 8,760 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)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
See Emission Calculations in Appendix B							
PARTICULATE MATTER (PM)							
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )							
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )							
SULFUR DIOXIDE (SO <sub>2</sub> )							
NITROGEN OXIDES (NO <sub>x</sub> )							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)							
LEAD							
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)	(BEFORE CONTROLS / LIMITS)	(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**

INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	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 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B6

EMISSION SOURCE DESCRIPTION: Pellet Mill Feed Silo	EMISSION SOURCE ID NO: ES-PMFS
OPERATING SCENARIO: OF	CONTROL DEVICE ID NO(S): CD-PMFS-BV
	EMISSION POINT(STACK) ID NO(S): EP-3

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):  
**A pellet press silo stores dried ground wood prior to transport to the pellet presses.**

MATERIAL STORED:	DENSITY OF MATERIAL (LB/FT <sup>3</sup> ): 40
<b>CAPACITY</b>	TONS:
<b>DIMENSIONS (FEET)</b>	HEIGHT:      DIAMETER:      (OR)      LENGTH:      WIDTH:      HEIGHT:

<b>ANNUAL PRODUCT THROUGHPUT (TONS)</b>	ACTUAL:	MAXIMUM DESIGN CAPACITY:
<b>PNEUMATICALLY FILLED</b>	<b>MECHANICALLY FILLED</b>	<b>FILLED FROM</b>
<input type="checkbox"/> BLOWER	<input type="checkbox"/> SCREW CONVEYOR	<input type="checkbox"/> RAILCAR
<input type="checkbox"/> COMPRESSOR	<input checked="" type="checkbox"/> BELT CONVEYOR	<input type="checkbox"/> TRUCK
<input type="checkbox"/> OTHER:	<input type="checkbox"/> BUCKET ELEVATOR	<input type="checkbox"/> STORAGE PILE
	MOTOR HP: <input type="text"/>	<input checked="" type="checkbox"/> OTHER: Conveyor

NO. FILL TUBES:

MAXIMUM ACFM:

MATERIAL IS FILLED TO:

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?

MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR): 105

MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR): 105

COMMENTS:

Attach Additional Sheets As Necessary



**FORM C1  
CONTROL DEVICE (FABRIC FILTER)**

REVISED 12/01/01

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

**C1**

CONTROL DEVICE ID NO: <b>CD-PMFS-BV</b>		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): <b>ES-PMFS</b>	
EMISSION POINT (STACK) ID NO(S): <b>EP-3</b>		POSITION IN SERIES OF CONTROLS NO. <b>1</b> OF <b>1</b> UNITS	
MANUFACTURER: <b>Aircon BV25-6</b>	MODEL NO: <b>Aircon BV25-6</b>		
DATE MANUFACTURED:	PROPOSED OPERATION DATE: <b>4/22/2013</b>		
OPERATING SCENARIO: <b>1</b> OF <b>1</b>		PROPOSED START CONSTRUCTION DATE:	
		P.E. SEAL REQUIRED (PER 2Q. 0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
DESCRIBE CONTROL SYSTEM: <b>A bin vent filter is used to create a slight negative pressure on the Pellet Mill Feed Silo. The bin vent collects dust from the air volume present in the silo. The bin vent is sized to offset the air displacement created by the material feed to the silo.</b>			
POLLUTANT(S) COLLECTED:	<u>PM</u>	<u>PM-10</u>	<u>PM-2.5</u>
BEFORE CONTROL EMISSION RATE (LB/HR):	_____	_____	_____
CAPTURE EFFICIENCY:	_____ %	_____ %	_____ %
CONTROL DEVICE EFFICIENCY:	<b>~99.9</b> %	<b>~99.9</b> %	<b>~99.9</b> %
CORRESPONDING OVERALL EFFICIENCY:	_____ %	_____ %	_____ %
EFFICIENCY DETERMINATION CODE:	_____	_____	_____
TOTAL EMISSION RATE (LB/HR):	<b>See calculations in Appendix B</b>		
PRESSURE DROP (IN. H <sub>2</sub> O): MIN: _____ MAX: <b>4"</b>	GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WARNING ALARM? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): <b>1.43E-06</b>	INLET TEMPERATURE (°F): <b>Ambient</b>		
POLLUTANT LOADING RATE: <b>0.1</b> # LB/HR <input checked="" type="checkbox"/> GR/FT <sup>3</sup>	OUTLET TEMPERATURE (°F): <b>Ambient</b>		
INLET AIR FLOW RATE (ACFM): _____	FILTER MAX OPERATING TEMP. (°F): <b>N/A</b>		
NO. OF COMPARTMENTS: <b>1</b>	NO. OF BAGS PER COMPARTMENT: <b>1</b>	LENGTH OF BAG (IN.): <b>120</b>	
DIAMETER OF BAG (IN.): <b>5.875</b>	DRAFT: <input checked="" type="checkbox"/> INDUCED/NEG. <input checked="" type="checkbox"/> FORCED/POS.	FILTER SURFACE AREA (FT <sup>2</sup> ): <b>377</b>	
AIR TO CLOTH RATIO: <b>6</b>	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	<b>Unknown</b>
		1-10	
		10-25	
		25-50	
		50-100	
		>100	
		TOTAL = 100	
DESCRIBE INCOMING AIR STREAM: <b>The air stream will contain wood dust particulate emissions</b>			
METHOD FOR DETERMINING WHEN TO CLEAN: <input type="checkbox"/> AUTOMATIC <input checked="" type="checkbox"/> <b>TIMED</b> <input type="checkbox"/> MANUAL			
METHOD FOR DETERMINING WHEN TO REPLACE THE BAGS: <input type="checkbox"/> ALARM <input checked="" type="checkbox"/> <b>INTERNAL INSPECTION</b> <input type="checkbox"/> VISIBLE EMISSION <input type="checkbox"/> OTHER			
SPECIAL CONDITIONS: <b>None</b> <input type="checkbox"/> MOISTURE BLINDING <input type="checkbox"/> CHEMICAL RESISTIVITY <input type="checkbox"/> OTHER			
EXPLAIN: DESCRIBE MAINTENANCE PROCEDURES: <b>Per manufacturer recommendations</b>			
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S): <b>Attach Additional Sheets As Necessary</b>			

<sup>1</sup>Final equipment selection has not yet occurred but will be similar in design to specifications shown.





Source Specific Forms - Pellet Fines Bin

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**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B

EMISSION SOURCE DESCRIPTION: Pellet Fines Bin EMISSION SOURCE ID NO: ES-PFB  
 CONTROL DEVICE ID NO(S): CD-PFB-BV  
 OPERATING SCENARIO 1 OF 1 EMISSION POINT (STACK) ID NO(S): EP-7

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
 Fine pellet material from hammermill pollution control system and screening operation is collected in the pellet fines bin which is controlled by a bin vent filter.

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)  Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)  Coating/finishing/printing (Form B5)  Incineration (Form B8)  
 Liquid storage tanks (Form B3)  Storage silos/bins (Form B6)  Other (Form B9)

START CONSTRUCTION DATE: OPERATION DATE: 4/22/2013 DATE MANUFACTURED:  
 MANUFACTURER / MODEL NO.: Aircon EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?); NESHAP (SUBPART?); MACT (SUBPART?);

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

EXPECTED ANNUAL HOURS OF OPERATION 8,760 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 (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	See Emission Calculations in Appendix B						
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )							
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )							
SULFUR DIOXIDE (SO <sub>2</sub> )							
NITROGEN OXIDES (NO <sub>x</sub> )							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)							
LEAD							
OTHER							

**HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

HAZARDOUS AIR POLLUTANT AND CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (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**

INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	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 12/01/01

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

**B6**

EMISSION SOURCE DESCRIPTION: Pellet Fines Bin	EMISSION SOURCE ID NO: ES-PFB
OPERATING SCENARIO: 1 OF 1	CONTROL DEVICE ID NO(S): CD-PFB-BV
	EMISSION POINT(STACK) ID NO(S): EP-7

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):

Fine pellet material from hammermill pollution control system and screening operation is collected in the pellet fines bin which is controlled by a bin vent filter.

MATERIAL STORED: Fine pellet material	DENSITY OF MATERIAL (LB/FT <sup>3</sup> ): 40
CAPACITY	CUBIC FEET: 2200
TONS:	
DIMENSIONS (FEET)	HEIGHT: DIAMETER: 12 (OR) LENGTH: WIDTH: HEIGHT:
ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: MAXIMUM DESIGN CAPACITY: 6 tph

PNEUMATICALLY FILLED	MECHANICALLY FILLED	FILLED FROM
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input checked="" 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: Conveyor
MOTOR HP:		

NO. FILL TUBES:

MAXIMUM ACFM:

MATERIAL IS FILLED TO:

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?

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

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

COMMENTS:

Attach Additional Sheets As Necessary



**FORM C1**  
**CONTROL DEVICE (FABRIC FILTER)**

REVISED 12/01/01

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

**C1**

CONTROL DEVICE ID NO: <b>CD-PFB-BV</b>		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): <b>ES-PFB</b>																									
EMISSION POINT (STACK) ID NO(S): <b>EP-7</b>		POSITION IN SERIES OF CONTROLS: <b>NO. 1 OF 1 UNITS</b>																									
MANUFACTURER: <b>Aircon</b>	MODEL NO: <b>36-6</b>																										
DATE MANUFACTURED:	PROPOSED OPERATION DATE: <b>4/22/2013</b>																										
<b>OPERATING SCENARIO:</b>		PROPOSED START CONSTRUCTION DATE:																									
<b>1 OF 1</b>		P.E. SEAL REQUIRED (PER 2Q .0112)? <input checked="" type="radio"/> YES <input type="radio"/> NO																									
DESCRIBE CONTROL SYSTEM: <b>A bin vent baghouse collects dust from when wood enters or exits the silo and displaces air.</b>																											
POLLUTANT(S) COLLECTED: <b>PM PM<sub>10</sub> PM<sub>2.5</sub></b>																											
BEFORE CONTROL EMISSION RATE (LB/HR): <b>See calculations in Appendix B</b>																											
CAPTURE EFFICIENCY: <b>~99 % ~99 % ~99 %</b>																											
CONTROL DEVICE EFFICIENCY: <b>% % %</b>																											
CORRESPONDING OVERALL EFFICIENCY: <b>% % %</b>																											
EFFICIENCY DETERMINATION CODE: <b></b>																											
TOTAL EMISSION RATE (LB/HR): <b>See calculations in Appendix B</b>																											
PRESSURE DROP (IN. H <sub>2</sub> O): MIN: <b>TBD</b> MAX: <b>TBD</b>		GAUGE? <input checked="" type="radio"/> YES <input type="radio"/> NO																									
BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): <b>1.43E-05</b>		INLET TEMPERATURE (°F): <b>Ambient</b>																									
POLLUTANT LOADING RATE: <b>0.1</b> # LB/HR <input checked="" type="radio"/> GR/ft <sup>3</sup>		OUTLET TEMPERATURE (°F): <b>Ambient</b>																									
INLET AIR FLOW RATE (ACFM): <b>3,600</b>		FILTER MAX OPERATING TEMP. (°F): <b>N/A</b>																									
NO. OF COMPARTMENT: <b>TBD</b>	NO. OF BAGS PER COMPARTMENT: <b>TBD</b>	LENGTH OF BAG (IN.): <b>TBD</b>																									
DIAMETER OF BAG (IN.): <b></b>	DRAFT: <input checked="" type="radio"/> INDUCED/NEG. <input type="radio"/> FORCED/POS.	FILTER SURFACE AREA (FT <sup>2</sup> ): <b>325</b>																									
AIR TO CLOTH RATIO: <b>11.08</b>	FILTER MATERIAL: <input type="radio"/> WOVEN <input type="radio"/> FELTED																										
DESCRIBE CLEANING PROCEDURES:		<b>PARTICLE SIZE DISTRIBUTION</b>																									
<input 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 checked="" type="checkbox"/> OTHER		<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>SIZE (MICRONS)</th> <th>WEIGHT % OF TOTAL</th> <th>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>&gt;100</td><td></td><td></td></tr> <tr><td align="right" colspan="3">TOTAL = 100</td></tr> </tbody> </table>		SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %	0-1			1-10			10-25			25-50			50-100			>100			TOTAL = 100		
SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %																									
0-1																											
1-10																											
10-25																											
25-50																											
50-100																											
>100																											
TOTAL = 100																											
DESCRIBE INCOMING AIR STREAM: <b>The air stream will contain wood dust particles</b>																											
METHOD FOR DETERMINING WHEN TO CLEAN: <input checked="" type="radio"/> AUTOMATIC <input type="radio"/> TIMED <input type="radio"/> MANUAL																											
METHOD FOR DETERMINING WHEN TO REPLACE THE BAGS: <input type="radio"/> ALARM <input checked="" type="radio"/> INTERNAL INSPECTION <input type="radio"/> VISIBLE EMISSION <input type="radio"/> OTHER																											
SPECIAL CONDITIONS: <input type="checkbox"/> MOISTURE BLINDING <input type="checkbox"/> CHEMICAL RESISTIVITY <input type="checkbox"/> OTHER																											
EXPLAIN: DESCRIBE MAINTENANCE PROCEDURES: <b>Per manufacturer recommendations or common industry practices.</b>																											
ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S) <b>Attach Additional Sheets As Necessary</b>																											





**Specific Forms - Final Product Handling**





**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01	NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate	<b>B</b>
EMISSION SOURCE DESCRIPTION: Finished Product Handling/ Pellet Loadout Bins / Pellet Loadout	EMISSION SOURCE ID NO: and 2	ES-FPH, ES-PB, ES-PL1
OPERATING SCENARIO: 1 OF 1	CONTROL DEVICE ID NO(S): CD-FPH-BF	
	EMISSION POINT (STACK) ID NO(S): EP-8	

**DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):**  
 Pelletized product is conveyed to pellet loadout bins that feed two pellet loadout operations (ES-PL-1, -2). Emissions from the Pellet Loadout Bins are controlled by a bagfilter. Pellet Loadout is accomplished by gravity feed of the pellets into trucks through a covered shoot that automatically telescopes upward during the loadout process to maintain constant contact with product as it is loaded to prevent emissions. Although emissions to the atmosphere from conveyance from the storage bins are minimal because of dried wood fines have been removed in the pellet coolers, a slight negative pressure is maintained in the loadout building a fire prevention measure to prevent any buildup of dust on surfaces within the building. The slight negative pressure is produced via an induced draft fan that exhausts to the same bagfilter that controls minor dust emissions from loading of the pellet press silo. Trucks are covered immediately after loading.

**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)   
  Manufact. of chemicals/coatings/inks (Form B7)  
 Int. combustion engine/generator (Form B2)   
  Coating/finishing/printing (Form B5)   
  Incineration (Form B8)  
 Liquid storage tanks (Form B3)   
 Storage silos/bins (Form B6)   
 Other (Form B9)

START CONSTRUCTION DATE:    OPERATION DATE: 4/22/2013    DATE MANUFACTURED:

MANUFACTURER / MODEL NO.: Agra 1200 Pellet Storage    EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?):    NESHAP (SUBPART?):    MACT (SUBPART?):

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

EXPECTED ANNUAL HOURS OF OPERATION: 8,760    VISIBLE STACK EMISSIONS UNDER NORMAL OPERATION: <20 % OPACITY

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS	
		(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	See Emission Calculations in Appendix B				
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )					
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )					
SULFUR DIOXIDE (SO <sub>2</sub> )					
NITROGEN OXIDES (NO <sub>x</sub> )					
CARBON MONOXIDE (CO)					
VOLATILE ORGANIC COMPOUNDS (VOC)					
LEAD					
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)	(BEFORE CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr
N/A					

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
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: 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B9

EMISSION SOURCE DESCRIPTION:	Finished Product Handling	EMISSION SOURCE ID NO:	ES-FPH
OPERATING SCENARIO:	1 OF 1	CONTROL DEVICE ID NO(S):	CD-FPH-BF
		EMISSION POINT (STACK) ID NO(S):	EP-8

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):  
**Collection of transfer points, pellet screening operations, and pellet conveying.**

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
TYPE	UNITS		
Dried Wood	ODT	74.94	

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

MAXIMUM DESIGN (BATCHES / HOUR):	(BATCHES/YR):
REQUESTED LIMITATION (BATCHES / HOUR):	
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:

**Attach Additional Sheets as Necessary**



**FORM B6**  
**EMISSION SOURCE (STORAGE SILO/BINS)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B6

EMISSION SOURCE DESCRIPTION: Pellet Loadout Bins	EMISSION SOURCE ID NO: ES-PB
OPERATING SCENARIO: 1 OF 1	CONTROL DEVICE ID NO(S): CD-FPH-BF
EMISSION POINT(STACK) ID NO(S): EP-8	

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):

Pellet loadout bins are used to store pellets for shipping. Pellets are then loaded from the bins into trucks/train in either of the two pellet loadout areas.

MATERIAL STORED: Pellet Product	DENSITY OF MATERIAL (LB/FT <sup>3</sup> ): 40
CAPACITY	CUBIC FEET
TONS:	
DIMENSIONS (FEET)	HEIGHT: DIAMETER: 12 (OR) LENGTH: WIDTH: HEIGHT:
ANNUAL PRODUCT THROUGHPUT (TONS)	ACTUAL: MAXIMUM DESIGN CAPACITY: 71.19 ODT/hr

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

NO. FILL TUBES:

MAXIMUM ACFM: 750 each

MATERIAL IS FILLED TO:

BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?

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

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

COMMENTS:

Attach Additional Sheets As Necessary





**FORM B9  
EMISSION SOURCE (OTHER)**

REVISED: 12/01/01      NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate      **B9**

EMISSION SOURCE DESCRIPTION: Pellet Loadout 1 and 2	EMISSION SOURCE ID NO: ES-PL-1 and PL-2
OPERATING SCENARIO: 1 OF 1	CONTROL DEVICE ID NO(S): CD-FPH-BF
	EMISSION POINT (STACK) ID NO(S): EP-8

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):  
Final product is loaded into trucks in either of the two (2) pellet loadout areas.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (ODT)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
TYPE	UNITS		
Dried Wood	ODT	70.83	

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

MAXIMUM DESIGN (BATCHES / HOUR):	(BATCHES/YR):
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:

Attach Additional Sheets as Necessary



**FORM C1  
CONTROL DEVICE (FABRIC FILTER)**

REVISED 12/01/01

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

C1

CONTROL DEVICE ID NO: CD-FBH-BF	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-FPH, ES-PB-1 through 12, ES-PL1 and 2
EMISSION POINT (STACK) ID NO(S): EP-8	POSITION IN SERIES OF CONTROLS NO. 1 OF 1 UNITS
MANUFACTURER: Aircon	MODEL NO: Aircon 13.5 RAW 268-10
DATE MANUFACTURED:	PROPOSED OPERATION DATE: 4/22/2013
OPERATING SCENARIO: 1 OF 1	PROPOSED START CONSTRUCTION DATE:
	P.E. SEAL REQUIRED (PER 2Q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

DESCRIBE CONTROL SYSTEM:  
  
This bagfilter will be utilized to control particulate from the finished product handling pellet conveyers and screens, as well as the pellet load out operation consisting of loading finished product from the bins into the trucks.

POLLUTANT(S) COLLECTED:	PM	PM-10	PM-2.5	
BEFORE CONTROL EMISSION RATE (LB/HR):	See calculations in Appendix B			
CAPTURE EFFICIENCY:	~99.9 %	~99.9 %	~99.9 %	%
CONTROL DEVICE EFFICIENCY:	%	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%	%
EFFICIENCY DETERMINATION CODE:				
TOTAL EMISSION RATE (LB/HR):	See calculations in Appendix B			

PRESSURE DROP (IN. H <sub>2</sub> O): MIN: MAX: 6"	GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WARNING ALARM? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
BULK PARTICLE DENSITY (LB/FT <sup>3</sup> ): 1.43E-05	INLET TEMPERATURE (°F): 120	
POLLUTANT LOADING RATE: 0.10 LB/HR <input checked="" type="checkbox"/> GRAF <sup>1</sup>	OUTLET TEMPERATURE (°F): 100	
INLET AIR FLOW RATE (ACFM): 35,500	FILTER MAX OPERATING TEMP. (°F): N/A	
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT:	LENGTH OF BAG (IN.): 144
DIAMETER OF BAG (IN.): 5.75	DRAFT: <input checked="" type="checkbox"/> INDUCED/NEG. <input checked="" type="checkbox"/> FORCED/POS	FILTER SURFACE AREA (FT <sup>2</sup> ): 4,842
AIR TO CLOTH RATIO: 7.30	FILTER MATERIAL: Polyester or equivalent <input type="checkbox"/> WOVEN <input checked="" type="checkbox"/> FELTED	

DESCRIBE CLEANING PROCEDURES: <input checked="" type="checkbox"/> AIR PULSE <input checked="" type="checkbox"/> REVERSE FLOW <input type="checkbox"/> MECHANICAL/SHAKER <input type="checkbox"/> OTHER  <input type="checkbox"/> SONIC <input type="checkbox"/> SIMPLE BAG COLLAPSE <input type="checkbox"/> RING BAG COLLAPSE	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %
DESCRIBE INCOMING AIR STREAM: The air stream will contain wood dust particles.	0-1	Unknown	
	1-10		
	10-25		
	25-50		
	50-100		
	>100		
	TOTAL = 100		

METHOD FOR DETERMINING WHEN TO CLEAN: <input checked="" type="checkbox"/> AUTOMATIC <input type="checkbox"/> TIMED <input type="checkbox"/> MANUAL
METHOD FOR DETERMINING WHEN TO REPLACE THE BAGS: <input type="checkbox"/> ALARM <input checked="" type="checkbox"/> INTERNAL INSPECTION <input type="checkbox"/> VISIBLE EMISSION <input type="checkbox"/> OTHER
SPECIAL CONDITIONS: None <input type="checkbox"/> MOISTURE BLINDING <input type="checkbox"/> CHEMICAL RESISTIVITY <input type="checkbox"/> OTHER
EXPLAIN:
DESCRIBE MAINTENANCE PROCEDURES: Per manufacturer recommendations

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

**Attach Additional Sheets As Necessary**

<sup>1</sup>Final equipment selection has not yet occurred but will be similar in design to specifications shown.



Source Specific Forms - Emergency Generator & Fire pump



**FORM B**

**SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B

EMISSION SOURCE DESCRIPTION: <b>Emergency Generator (350 bhp)</b>	EMISSION SOURCE ID NO.: ES-EG
OPERATING SCENARIO: 1 OF 1	CONTROL DEVICE ID NO(S): N/A
EMISSION POINT (STACK) ID NO(S): EP-4	

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
Diesel-fired internal combustion generator to provide power in the case of an emergency.

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:	OPERATION DATE: 4/22/2013	DATE MANUFACTURED:
MANUFACTURER / MODEL NO.: Generac SD200	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK	52 WK/YR
IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): IIII	NESHAP (SUBPART?):	MACT (SUBPART?): ZZZZ
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25%	MAR-MAY 25%	JUN-AUG 25%
SEP-NOV 25%		
EXPECTED ANNUAL HOURS OF OPERATION: 600	VISIBLE STACK EMISSIONS UNDER NORMAL OPERATION: <20 % OPACITY	

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	See Emission Calculations in Appendix B						
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )							
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )							
SULFUR DIOXIDE (SO <sub>2</sub> )							
NITROGEN OXIDES (NO <sub>x</sub> )							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)							
LEAD							
OTHER							

HAZARDOUS AIR POLLUTANT AND CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)	(BEFORE CONTROLS / LIMITS)	(AFTER CONTROLS / LIMITS)
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
	See Emission Calculations in Appendix B						

TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS		
		lb/hr	lb/day	lb/yr
	See Emission Calculations in Appendix B			

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/GENERATORS)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B2

EMISSION SOURCE DESCRIPTION: Emergency Generator EMISSION SOURCE ID NO: ES-GN

OPERATING SCENARIO: 1 OF 1 CONTROL DEVICE ID NO(S): N/A

EMISSION POINT (STACK) ID NO(S): EP-4

CHECK ALL THAT APPLY  EMERGENCY  SPACE HEAT  ELECTRICAL GENERATION  
 PEAK SHAVER  OTHER (DESCRIBE):

GENERATOR OUTPUT (KW): ANTICIPATED ACTUAL HOURS OF OPERATION AS PEAK SHAVER (HRS/YR):

ENGINE OUTPUT (HP):

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  N/A

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

CYCLE:  COGENERATION  SIMPLE CONTROLS:  COMBUSTION MODIFICATIONS (DESCRIBE):  
 REGENERATIVE  COMBINED  NONSELECTIVE CATALYTIC REDUCTION  SELECTIVE CATALYTIC REDUCTION

CONTROLS:  WATER-STEAM INJECTION  CLEAN BURN AND PRECOMBUSTION CHAMBER  UNCONTROLLED  
 UNCONTROLLED  LEAN-PREMIX

**FUEL USAGE (INCLUDE STARTUP/BACKUP FUEL)**

FUEL TYPE	UNITS	MAXIMUM DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
No. 2 Fuel Oil	gal	6.55	6.55

**FUEL CHARACTERISTICS (COMPLETE ALL THAT ARE APPLICABLE)**

FUEL TYPE	BTU/UNIT	UNITS	SULFUR CONTENT (% BY WEIGHT)
No. 2 Fuel Oil	19,300	lb	<15 ppmw

**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:

Periodic equipment maintenance will minimize opacity by following manufacturers specification or common industry practices.

COMMENTS:

Attach Additional Sheets As Necessary







**FORM B2**  
**EMISSION SOURCE (INTERNAL COMBUSTION ENGINES/GENERATORS)**

REVISED 12/01/01 NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate B2

EMISSION SOURCE DESCRIPTION: Fire Water Pump EMISSION SOURCE ID NO: ES-FWP

OPERATING SCENARIO: 1 OF 1 CONTROL DEVICE ID NO(S): N/A

CHECK ALL THAT APPLY  EMERGENCY  SPACE HEAT  ELECTRICAL GENERATION

PEAK SHAVER  OTHER (DESCRIBE):

GENERATOR OUTPUT (KW): ANTICIPATED ACTUAL HOURS OF OPERATION AS PEAK SHAVER (HRS/YR):

ENGINE OUTPUT (HP):

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  N/A

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):

ENGINE TYPE:  2-CYCLE LEAN BURN  4-CYCLE LEAN  TURBINE

4-CYCLE RICH BURN  OTHER (DESCRIBE):

CYCLE:  COGENERATION  SIMPLE  REGENERATIVE  COMBINED

CONTROLS:  NONSELECTIVE CATALYTIC REDUCTION  SELECTIVE CATALYTIC REDUCTION

WATER-STEAM INJECTION  CLEAN BURN AND PRECOMBUSTION CHAMBER  UNCONTROLLED

UNCONTROLLED  LEAN-PREMIX

**FUEL USAGE (INCLUDE STARTUP/BACKUP FUEL)**

FUEL TYPE	UNITS	MAXIMUM DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
No. 2 Fuel Oil	gal	6.55	6.55

**FUEL CHARACTERISTICS (COMPLETE ALL THAT ARE APPLICABLE)**

FUEL TYPE	BTU/UNIT	UNITS	SULFUR CONTENT (% BY WEIGHT)
No. 2 Fuel Oil	19,300	lb	<15 ppmw

**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:

Periodic equipment maintenance will minimize opacity by following manufacturers specification or common industry practices.

COMMENTS:

Attach Additional Sheets As Necessary









## APPENDIX B - EMISSIONS CALCULATIONS

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TABLE B-2  
FACILITYWIDE HAP EMISSIONS SUMMARY  
ENVIVA PELLETS NORTHAMPTON, LLC

Description	ES-DRYER (tpy)	ES-HMI thru 7 (tpy)	ES-CLRI thru 6 (tpy)	ES-EG (tpy)	ES-FWP (tpy)	ES-CHIP-1 (tpy)	ES-RCHP-1, -2 (tpy)	Total (tpy)
1,3-Butadiene	-	-	-	2.39E-05	2.05E-05	-	-	4.43E-05
Acetaldehyde	2.94E+00	0.00E+00	0.00E+00	-	-	-	-	2.94E+00
Acetophenone	2.46E-06	-	-	4.70E-04	4.03E-04	-	-	2.46E-06
Acrolein	0.00E+00	0.00E+00	0.00E+00	5.67E-05	4.86E-05	-	-	1.05E-04
Antimony & Compounds	4.40E-04	-	-	-	-	-	-	4.40E-04
Arsenic & Compounds	1.22E-03	-	-	5.71E-04	4.90E-04	-	-	1.22E-03
Benzene	-	-	-	-	-	-	-	1.06E-03
Beryllium metal (un-reacted) (Also include in BEC)	6.12E-05	-	-	-	-	-	-	6.12E-05
Beryllium Metal (elemental un-reacted) - (Add w/CDC)	2.28E-04	-	-	-	-	-	-	2.28E-04
Cadmium Metal (elemental un-reacted)	3.46E-02	-	-	-	-	-	-	3.46E-02
Carbon tetrachloride	6.07E-01	-	-	-	-	-	-	6.07E-01
Chlorine	2.53E-02	-	-	-	-	-	-	2.53E-02
Chlorobenzene	9.74E-04	-	-	-	-	-	-	9.74E-04
Chromium-Other compds (add w/chrom acid to get CRC)	3.62E-04	-	-	-	-	-	-	3.62E-04
Cobalt compounds	-	-	-	-	-	-	-	0.00E+00
Chloroform	-	-	-	-	-	-	-	1.38E-04
Cumene	1.38E-04	-	-	-	-	-	-	1.38E-04
Dinitrophenol, 2,4-	3.61E-05	-	-	-	-	-	-	3.61E-05
Di(2-ethylhexyl)phthalate (DEHP)	2.38E-02	-	-	-	-	-	-	2.38E-02
Ethyl benzene	2.23E-02	-	-	-	-	-	-	2.23E-02
Ethylene dichloride (1,2-dichloroethane)	5.49E+00	2.45E+00	3.55E-01	7.23E-04	6.20E-04	-	-	8.30E+00
Formaldehyde	1.46E+00	-	-	-	-	-	-	1.46E+00
Hydrogen chloride (hydrochloric acid)	2.67E-03	-	-	1.75E-04	1.50E-04	-	-	2.67E-03
Lead and Lead compounds	-	-	-	-	-	-	-	2.69E-03
m-,p-Xylene	8.91E-02	-	-	-	-	-	-	8.91E-02
Manganese & compounds	2.69E-03	-	-	-	-	0.16	0.29	6.95E+00
Mercury vapor (Include in Mercury & Compds)	4.52E+00	1.48E+00	7.09E-01	-	-	-	-	1.15E-02
Methanol	1.15E-02	-	-	-	-	-	-	1.77E-02
Methyl bromide (bromomethane)	1.77E-02	-	-	-	-	-	-	2.38E-02
Methyl chloride (chloromethane)	2.38E-02	-	-	-	-	-	-	0.00E+00
Methyl chloroform (1,1,1 trichloroethane)	-	-	-	-	-	-	-	0.00E+00
Methyl isobutyl ketone	-	-	-	-	-	-	-	7.45E-02
Methylene chloride	7.45E-02	-	-	-	-	-	-	2.53E-02
Naphthalene	2.53E-02	-	-	-	-	-	-	8.45E-05
Nickel metal (Component of Nickel & Compounds)	8.45E-05	-	-	-	-	-	-	0.00E+00
Nitrophenol, 4-	-	-	-	-	-	-	-	3.92E-05
o-Xylene	3.92E-05	-	-	-	-	-	-	2.92E-02
Pentachlorophenol	2.92E-02	-	-	-	-	-	-	0.00E+00
Perchloroethylene (tetrachloroethylene)	0.00E+00	0.00E+00	0.00E+00	-	-	-	-	2.07E-02
Phenol	2.07E-02	-	-	-	-	-	-	6.26E-06
Phosphorus Metal, Yellow or White	6.26E-06	-	-	-	-	-	-	5.10E-01
Polychlorinated biphenyls	5.10E-01	0.00E+00	0.00E+00	-	-	-	-	2.53E-02
Propionaldehyde	2.53E-02	-	-	-	-	-	-	2.15E-03
Propylene dichloride (1,2 dichloropropane)	2.15E-03	-	-	-	-	-	-	0.00E+00
Selenium compounds	-	-	-	-	-	-	-	6.60E-09
Styrene	6.60E-09	-	-	-	-	-	-	4.65E-04
Tetrachlorodibenzo-p-dioxin, 2,3,7,8-	-	-	-	2.51E-04	2.15E-04	-	-	9.62E-02
Toluene	-	-	-	1.03E-04	8.82E-05	-	-	2.30E-02
Total PAH (POM)	9.60E-02	-	-	-	-	-	-	1.69E-05
Trichloroethylene	1.69E-05	-	-	-	-	-	-	1.38E-02
Trichlorophenol, 2,4,6-	1.38E-02	-	-	-	-	-	-	-
Vinyl chloride	-	3.93	1.06	0.002	0.002	0.16	0.29	21.34
<b>TOTAL HAP</b>	<b>15.89</b>							



**TABLE B-4  
ROTARY DRYER -CRITERIA POLLUTANT EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC**

**Dryer Inputs**

Dryer Throughput (@ Dryer Exit)	575,000 tons/year @ 6.5% moisture	Do we want to increase production
Annual Dried Wood Throughput of Dryer	537,625 ODT/year	
Max. Hourly Dried Wood Throughput of Dryer	71.71 ODT/hr	ODT/hr increase as well?
Burner Heat Input	175.3 MMBtu/hr	
Percent Hardwood	90%	
Percent Softwood	10%	
Potential Operation	8,760 hr/yr	

**Criteria Pollutant Calculations:**

Pollutant	Biomass Emission Factor (lb/ODT)	Units	Emission Factor Source	Total Potential Emissions	
				(lb/hr)	(tpy)
CO	0.23	lb/ODT	Calculated from NOR October 18, 2013 Stack Test <sup>2</sup>	16.26	60.9
NO <sub>x</sub>	0.47	lb/ODT	Calculated from NOR October 18, 2013 Stack Test <sup>2</sup>	33.48	125.5
PM/PM <sub>10</sub> /PM <sub>2.5</sub> Condensable Fraction	0.017	lb/MMBtu	AP-42, Section 1.6 <sup>3</sup>	1.22	5.3
TSP (Filterable)	0.062	lb/ODT	Calculated from Guaranteed WESP Specifications <sup>1</sup>	4.48	16.8
Total TSP (Filterable + Condensable)				5.70	22.1
PM <sub>10</sub> (Filterable)	0.062	lb/ODT	TSP=PM10=PM2.5	4.48	16.8
Total PM <sub>10</sub> (Filterable + Condensable)				5.70	22.1
PM <sub>2.5</sub> (Filterable)	0.062	lb/ODT	TSP=PM10=PM2.5	4.48	16.8
Total PM <sub>2.5</sub> (Filterable + Condensable)				5.70	22.1
SO <sub>2</sub>	0.025	lb/MMBtu	AP-42, Section 1.6 <sup>3</sup>	4.38	19.2
VOC as alpha-pinene	0.67	lb/ODT	Calculated from NOR October 18, 2013 Stack Test <sup>2</sup>	48.33	181.2
Total VOC	0.71	lb/ODT	Derived from NOR October 18, 2013 Stack Test and OTM 26 <sup>2</sup>	50.63	189.8
Lead	0.00	N/A	N/A	0.00	0.0

**Note:**

<sup>1</sup> Filterable PM/PM<sub>10</sub> emission factors were provided by the dryer system vendor. The PM<sub>2.5</sub> filterable emission factor is assumed to be the same as PM and PM<sub>10</sub>.

<sup>2</sup> CO, NO<sub>x</sub>, and VOC emission factors are calculated from the Northampton October 2013 stack test.

<sup>3</sup> No emission factor is provided in AP-42, Section 10.6.2 for SO<sub>2</sub> for rotary dryers. Enviva has conservatively calculated SO<sub>2</sub> emissions based upon the heat input of the dryer burners using an emission factor for wood combustion from AP-42, Section 1.6.



**TABLE B-5  
ROTARY DRYER -HAP AND TAP WOOD COMBUSTION EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC**

Calculation Inputs:

Annual Composition and Throughput	
Throughput ODT/yr	537.625
Hardwood Composition	90%
Softwood Composition	10%

Short Term Composition and Throughput	
ODT/hr	71.71
Hardwood Composition	90%
Softwood Composition	10%

Emission Calculations:

Pollutant	CAS Number	HAP (Yes/No)	NC TAP (Yes/No)	VOC (Yes/No)	Emission Factor Comparison				Weighted Emission Factor			Potential Emissions <sup>3</sup>	
					AP-42 Calculated Direct wood-fired, hardwood factors		AP-42 Green, Direct wood-fired softwood factors		Short-term EF (lb/ODT)	Annual EF (lb/ODT)	EF Source	(lb/hr)	(tpy)
					Emission Factor (lb/ODT)	Reference	Emission Factor (lb/ODT)	Reference					
Acetaldehyde	75-07-0	Yes	Yes	Yes	3.83E-03	2	7.50E-02	1	1.09E-02	AP-42	7.85E-01	2.94E+00	
Acrolein	107-02-8	Yes	Yes	Yes	0.00E+00	4	0.00E+00	4	0.00E+00	AP-42	0.00E+00	0.00E+00	
Formaldehyde	50-00-0	Yes	Yes	Yes	7.15E-03	2	1.40E-01	1	2.04E-02	AP-42	1.47E+00	5.49E+00	
Methanol	67-56-1	Yes	No	Yes	5.62E-03	2	1.10E-01	1	1.61E-02	AP-42	1.15E+00	4.32E+00	
Phenol	108-95-2	Yes	Yes	Yes	0.00E+00	4	0.00E+00	4	0.00E+00	AP-42	0.00E+00	0.00E+00	
Propionaldehyde	123-38-6	Yes	No	Yes	6.64E-04	2	1.30E-02	1	1.90E-03	AP-42	1.36E-01	5.10E-01	
<b>Total HAPs</b>											<b>3.54</b>	<b>13.26</b>	

Notes:

- <sup>1</sup> HAP & TAP emission factors for "Rotary Dryer, green, direct wood-fired, (inlet moisture content >50%, dry basis) softwood were obtained from AP-42, Section 10.6.2, Table 10.6.2-3.
- <sup>2</sup> To account for hardwood emissions since no HAP/TAP emission factors are given for direct hardwood-fired, factors were conservatively calculated by multiplying AP-42, Section 10.6.2-3 HAP factors for green, direct softwood fired by the ratio of the VOC emission factors for hardwood to softwood drying (0.24/4.7).
- <sup>3</sup> Short-term emissions were calculated based upon a worst-case scenario of 25% softwood firing on an hourly basis.
- <sup>4</sup> Annual emissions were calculated based on the Annual average % Hardwood and Softwood Composition of 90% hardwood to 10% softwood.
- <sup>4</sup> Through testing at other Enviva facilities Acrolein and Phenol are typically not evident in the emissions stream.





TABLE B-6  
ROTARY DRYER-HAP AND TAP WOOD COMBUSTION EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC

Calculation Inputs:  
Heat Input (MMBtu/hr) 175.30  
Operating Schedule (hrs/yr) 8,760  
Heat Input (MMBtu/yr) 1,535,628  
WESP Metal HAP Control Efficiency<sup>2</sup> 92.75%  
HCl Control Efficiency<sup>3</sup> 90.00%

HAP & TAP Emission Calculations:

Pollutant	Pollutant Type	Emission Factors			Emissions			Maximum Controlled Total			
		Biomass		Ref.	Biomass		tpy	lb/yr	lb/yr	tpy	
		lb/mmBtu Uncontrolled	lb/mmBtu Controlled		Uncontrolled	Controlled					
Acetophenone	HAP	3.20E-09	3.20E-09	1	5.61E-07	5.61E-07	4.91E-03	5.61E-07	2.46E-06	4.91E-03	2.46E-06
Antimony & Compounds	HAP	7.90E-06	5.73E-07	1,2	1.38E-03	1.00E-04	1.21E+01	1.00E-04	6.07E-03	8.80E-01	4.40E-04
Arsenic	TAP/HAP	2.20E-05	1.60E-06	1,2	3.86E-03	2.80E-04	3.38E+01	2.80E-04	1.69E-02	2.45E+00	1.22E-03
Benz(a)pyrene	TAP/HAP	2.60E-06	2.60E-06	1	4.56E-04	4.56E-04	3.99E+00	4.56E-04	2.00E-03	3.99E+00	2.00E-03
Beryllium metal (un-reacted) (Also include in BEC)	TAP/HAP	1.10E-06	7.98E-08	1,2	1.93E-04	1.40E-05	1.69E+00	1.40E-05	8.45E-04	1.22E-01	6.12E-05
Cadmium Metal (elemental un-reacted) (Add w/CDC)	TAP/HAP	4.10E-06	2.97E-07	1,2	7.19E-04	5.21E-05	6.30E+00	5.21E-05	3.15E-03	4.56E-01	2.28E-04
Carbon tetrachloride	TAP/HAP	4.90E-05	4.90E-05	1	7.89E-03	7.89E-03	6.91E+01	7.89E-03	3.46E-02	6.91E+01	3.46E-02
Chlorine	TAP/HAP	7.90E-04	7.90E-04	1	1.38E-01	1.38E-01	1.21E+03	1.38E-01	6.07E-01	1.21E+03	6.07E-01
Chlorobenzene	TAP/HAP	3.30E-05	3.30E-05	1	5.78E-03	5.78E-03	5.07E+01	5.78E-03	2.53E-02	5.07E+01	2.53E-02
Chromic acid (Chromium VI)	TAP <sup>1</sup>	3.50E-06	2.54E-07	1,2	6.14E-04	4.45E-05	5.71E+00	4.45E-05	2.69E-03	3.90E-01	1.95E-04
Chromium-Other compounds (add w/chrom acid to get CRC)	HAP	1.75E-05	1.27E-06	1,2	3.07E-03	2.22E-04	2.69E+01	2.22E-04	1.34E-02	1.95E+00	9.74E-04
Cobalt compounds	HAP	6.30E-06	4.71E-07	1,2	1.14E-03	8.26E-05	9.98E+00	8.26E-05	4.99E-03	7.24E-01	3.62E-04
Dinitrophenol, 2,4-	HAP	1.80E-07	1.80E-07	1	3.16E-05	3.16E-05	2.76E-01	3.16E-05	1.38E-04	2.76E-01	1.38E-04
Di(2-ethylhexyl)phthalate (DEHP)	TAP/HAP	4.70E-08	4.70E-08	1	8.24E-06	8.24E-06	7.22E-02	8.24E-06	3.61E-05	8.24E-06	3.61E-05
Ethyl benzene	HAP	3.10E-05	3.10E-05	1	5.43E-03	5.43E-03	4.76E+01	5.43E-03	2.38E-02	4.76E+01	2.38E-02
Ethylene dichloride (1,2-dichloroethane)	TAP/HAP	2.90E-05	2.90E-05	1	5.08E-03	5.08E-03	4.45E+01	5.08E-03	2.23E-02	4.45E+01	2.23E-02
Hexachlorobenzene-p-dioxin (1,2,3,6,7,8)	TAP	1.60E-06	1.60E-06	1	2.80E-04	2.80E-04	2.46E+00	2.80E-04	1.23E-03	2.46E+00	1.23E-03
Hydrogen chloride (hydrochloric acid)	TAP/HAP	1.90E-02	1.90E-02	1,3	3.33E+00	3.33E+00	2.92E+04	3.33E+00	1.46E+01	2.92E+04	1.46E+01
Lead and Lead compounds	HAP	4.80E-05	3.48E-06	1,2	8.41E-03	6.10E-04	8.41E-03	6.10E-04	3.69E-02	5.34E+00	2.67E-03
Manganese & compounds	TAP/HAP	1.60E-03	1.16E-04	1,2	2.80E-01	2.03E-02	2.46E+01	2.03E-02	1.13E+00	1.78E+02	8.91E-02
Mercury vapor (includes in Mercury&Compds)	HAP	3.50E-06	2.54E-07	1,2	6.14E-04	4.45E-05	5.71E+00	4.45E-05	2.69E-03	3.90E-01	1.95E-04
Methyl bromide (bromomethane)	HAP	1.50E-05	1.50E-05	1	2.63E-03	2.63E-03	2.30E+01	2.63E-03	1.15E-02	2.30E+01	1.15E-02
Methyl chloroform (1,1,1 trichloroethane)	HAP	3.10E-05	2.30E-05	1	4.03E-03	4.03E-03	3.53E+01	4.03E-03	1.77E-02	3.53E+01	1.77E-02
Methyl chloroform (1,1,1 trichloroethane)	TAP	5.40E-06	5.40E-06	1	9.47E-04	9.47E-04	8.29E+00	9.47E-04	4.15E-03	8.29E+00	4.15E-03
Methyl ethyl ketone	HAP	9.70E-05	9.70E-05	1	1.70E-02	1.70E-02	1.49E+02	1.70E-02	7.45E-02	1.49E+02	7.45E-02
Naphthalene	TAP/HAP	3.30E-05	2.39E-06	1,2	1.93E-03	1.93E-03	1.69E-01	1.93E-03	8.94E-05	1.69E-01	8.94E-05
Nickel metal (Component of Nickel & Compounds)	HAP	1.10E-07	1.10E-07	1	8.94E-06	8.94E-06	7.83E-02	8.94E-06	3.92E-02	7.83E-02	3.92E-02
Nitrochlorophenol	TAP/HAP	5.10E-08	3.80E-05	1	6.68E-03	6.68E-03	5.84E+01	6.68E-03	2.92E-02	5.84E+01	2.92E-02
Perchloroethylene (tetrachloroethylene)	HAP	3.80E-05	1.96E-06	1,2	4.73E-03	3.43E-04	4.13E+01	3.43E-04	2.07E-02	4.13E+01	2.07E-02
Phosphorus Metal, Yellow or White	TAP/HAP	2.70E-05	8.15E-09	1,2	1.43E-06	1.43E-06	1.43E-06	1.43E-06	6.26E-06	1.43E-06	6.26E-06
Polychlorinated biphenyls	HAP	8.15E-09	1.25E-04	1	2.19E-02	2.19E-02	1.92E+02	2.19E-02	9.60E-06	1.92E+02	9.60E-06
Polycyclic Organic Matter	HAP	3.30E-05	3.30E-05	1	5.78E-03	5.78E-03	5.07E+01	5.78E-03	2.53E-02	5.07E+01	2.53E-02
Propylene dichloride (1,2 dichloropropane)	HAP	2.80E-06	2.03E-07	1,2	4.91E-04	3.56E-05	4.30E+00	3.56E-05	2.15E-03	4.30E+00	2.15E-03
Selenium compounds	TAP/HAP	8.60E-12	8.60E-12	1	1.51E-09	1.51E-09	1.32E-05	1.51E-09	6.60E-09	1.32E-05	6.60E-09
Tetrachloroethane-p-dioxin, 2,3,7,8-	TAP/HAP	3.00E-05	3.00E-05	1	5.26E-03	5.26E-03	4.61E+01	5.26E-03	2.30E-02	4.61E+01	2.30E-02
Trichloroethylene	TAP	4.10E-05	4.10E-05	1	7.19E-03	7.19E-03	6.30E+01	7.19E-03	3.15E-02	6.30E+01	3.15E-02
Trichloroethane (CFC 111)	HAP	2.20E-08	2.20E-08	1	3.86E-06	3.86E-06	3.38E-02	3.86E-06	1.69E-05	3.38E-02	1.69E-05
Trichlorophenol, 2,4,6-	TAP/HAP	1.80E-05	1.80E-05	1	3.16E-03	3.16E-03	2.76E+01	3.16E-03	1.38E-02	2.76E+01	1.38E-02
Vinyl chloride	TAP/HAP	1.80E-05	1.80E-05	1	3.16E-03	3.16E-03	2.76E+01	3.16E-03	1.38E-02	2.76E+01	1.38E-02
<b>Total HAPs</b>					<b>3.88E+00</b>	<b>5.91E-01</b>	<b>3.40E+04</b>	<b>3.88E+00</b>	<b>16.98</b>	<b>6.01E-01</b>	<b>5.27E+03</b>
<b>Total TAPs</b>											<b>2.63</b>

<sup>1</sup> Uncontrolled and controlled emission factors (criteria and HAP/TAP) for wood combustion in a stoker boiler from NCDQA Wood waste Combustion Spreadsheets/AP-42; Compilation of Air Pollutant Emission Factors Vol. 1 - Stationary Sources

USEPA, 5th ed. Section 1.6, 9/15

<sup>2</sup> The control efficiency of the wet electrostatic precipitator (WESP) for filterable particulate matter (88.9%) is applied to all metal hazardous and toxic pollutants.

<sup>3</sup> The WESP employs a caustic solution in its operation in which hydrochloric acid will have high water solubility. This caustic solution will neutralize the acid and effectively control it by 90%, per conversation on 10/18/2011

<sup>4</sup> Chromic acid is a subset of chromic compounds, which is accounted for separately as a HAP. As such, chromic acid is only calculated as a TAP



**TABLE B-7  
HAMMERMILLS - VOC, HAP, AND TAP EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC**

**Calculation Inputs:**

Total Plant Throughput ODT/yr	537,625
% of Total Throughput to the Hammermills	53%

via NOR test for Dry Hammermill pre-screener bypass

**Annual Composition and Throughput**

Hammermills Throughput ODT/yr	286,554
Hardwood Composition	90%
Softwood Composition	10%

**Short Term Composition and Throughput**

ODT/hr	38.22
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**Emission Calculations:**

Pollutant	CAS Number	HAP (Yes/No)	NC TAP (Yes/No)	VOC (Yes/No)	Emission Factor Comparison		Weighted Emission Factor			Potential Emissions	
					Emission Factor (lb/ODT)	Reference	Short-term EF (lb/ODT)	Annual EF (lb/ODT)	EF Source	(lb/hr)	(tpy)
VOC as alpha-pinene	N/A	N/A	N/A	N/A	0.12	2	0.12	0.12	stack test	4.52	16.93
Total VOC	N/A	N/A	N/A	N/A	0.14	2	0.14	0.14	stack test	5.46	20.45
Acetaldehyde	75-07-0	Yes	Yes	Yes	0.00E+00	3	0.0000	0.0000	stack test	0.00E+00	0.00E+00
Acrolein	107-02-8	Yes	Yes	Yes	0.00E+00	3	0.0000	0.0000	stack test	0.00E+00	0.00E+00
Formaldehyde	50-00-0	Yes	Yes	Yes	1.71E-02	3	0.0171	0.0171	stack test	6.54E-01	2.45E+00
Methanol	67-56-1	Yes	No	Yes	1.03E-02	3	0.0103	0.0103	stack test	3.95E-01	1.48E+00
Phenol	108-95-2	Yes	Yes	Yes	0.00E+00	3	0.0000	0.0000	stack test	0.00E+00	0.00E+00
Propionaldehyde	123-38-6	Yes	No	Yes	0.00E+00	3	0.0000	0.0000	stack test	0.00E+00	0.00E+00
<b>Total VOC</b>										<b>5.46</b>	<b>20.45</b>
<b>Total HAPs</b>										<b>1.05</b>	<b>3.93</b>

**Notes:**

- Annual emissions were calculated based on the Annual average % Hardwood and Softwood Composition of 90% hardwood to 10% softwood.
- VOC emissions from Enviva Northampton September 2013 Engineering Tests with a mixture of 6% softwood. VOC calculated on an alpha-pinene basis, and total VOC was derived using OTM 26.
- HAP emissions from Enviva Northampton September 2013 Stack Testing with a throughput of 6% softwood.



TABLE B-8  
 PELLET PRESSES AND COOLERS - VOC, HAP, AND TAP EMISSIONS  
 ENVIVA PELLET NORTHAMPTON, LLC

Calculation Inputs:

Annual Composition and Throughput	
Throughput ODT/yr	537,625
Hardwood Composition	90%
Softwood Composition	10%

Short Term Composition and Throughput	
ODT/hr	71.71

Emission Calculations:

Pollutant	CAS Number	HAP (Yes/No)	NC TAP (Yes/No)	VOC (Yes/No)	Emission Factor Comparison		Selected Emission Factor			Potential Emissions	
					Stack Tests		Short-term EF (lb/ODT)	Annual EF (lb/ODT)	EF Source	(lb/hr)	(ppm)
					Emission Factor (lb/ODT)	Reference					
VOC as alpha-pinene	N/A	N/A	N/A	N/A	0.03	2	0.03	0.03	stack test	2.30	8.63
Total VOC	N/A	N/A	N/A	N/A	0.07	2	0.07	0.07	stack test	4.79	17.96
Acetaldehyde	75-07-0	Yes	Yes	Yes	0.00E+00	3	0.00E+00	0.00E+00	stack test	0.00E+00	0.00E+00
Acrolein	107-02-8	Yes	Yes	Yes	0.00E+00	3	0.00E+00	0.00E+00	stack test	0.00E+00	0.00E+00
Formaldehyde	50-00-0	Yes	Yes	Yes	1.32E-03	3	1.32E-03	1.32E-03	stack test	9.46E-02	3.55E-01
Methanol	67-56-1	Yes	No	Yes	2.64E-03	3	2.64E-03	2.64E-03	stack test	1.89E-01	7.09E-01
Phenol	108-95-2	Yes	Yes	Yes	0.00E+00	3	0.00E+00	0.00E+00	stack test	0.00E+00	0.00E+00
Propionaldehyde	123-38-6	Yes	No	Yes	0.00E+00	3	0.00E+00	0.00E+00	stack test	0.00E+00	0.00E+00
<b>Total VOC</b>										<b>4.79</b>	<b>17.96</b>
<b>Total HAPs</b>										<b>0.28</b>	<b>1.06</b>

Notes:

- <sup>1</sup> Annual emissions were calculated based on the Annual average % Hardwood and Softwood Composition of 90% hardwood to 10% softwood.
- <sup>2</sup> VOC emissions from Enviva Northampton September 2013 Engineering Tests with a mixture of 6% softwood. VOC calculated on an alpha-pinene basis, and total VOC was derived using OTM 26.
- <sup>3</sup> HAP emissions from Enviva Northampton September 2013 Stack Testing with a throughput of 6% softwood.



**TABLE B-9  
ELECTRIC POWERED CHIPPER EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC**

Annual Throughput of Chipper	314,090	tons/year (dry wood) <sup>1</sup>
Dryer Throughput	71.71	tons/hr (dry wood) <sup>1</sup>
Chipper Only processes 50% of dryer throughput	35.86	tons/hr Other 50% comes in chip form
Maximum Annual Operation	8,760	hours

Pollutant	Emission Factors (lb/dry wood tons)	Emissions <sup>6</sup>	
		(lb/hr)	(tpy)
THC as Carbon <sup>2</sup>	0.0041	2.940E-01	0.64
THC as alpha-Pinene <sup>3</sup>	0.0047	3.337E-01	0.73
PM <sup>4</sup>	N/A	N/A	N/A
Methanol <sup>2</sup>	0.0010	7.171E-02	0.16

<sup>1</sup> It is assumed that the wood received at the facility has a nominal water content of 50%.

The annual throughput used for the chipper is 50% of the annual throughput of the dryer; while the short-term throughput is based upon the maximum hourly throughput of the dryer.

<sup>2</sup> Emission factor obtained from available emissions factors for chippers in AP-42 Section 10.6.3, Table 7 and Section 10.6.4, Tables 7 and 9. Emission factors for THC and Methanol are the same across all three tables.

<sup>3</sup> The THC/VOC makeup of wood is primarily composed of terpenes (C<sub>3</sub>H<sub>8</sub>)<sub>n</sub> [where n = 2, 3, or 4 typically] but to convert from carbon to the equivalent weight in THC/VOC, the assumption was that alpha-pinene (AP) would be the representative THC/VOC (molecular weight = 136.2 lb/lb-mol). The following equation shows the conversion:

$$lb\ VOC/ODT = lb\ C/ODT * (136.2\ lb/mol\ AP / 12\ lb/mol\ C) * (1\ mol\ AP / 10\ mol\ C)$$

<sup>4</sup> PM emission factor is not applicable as the chipper emissions are routed downward to the ground.





**TABLE B-10  
HAMMERMILLS - VOC, HAP, AND TAP EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC**

Annual Throughput of Each Rechipper	575,000	tons/year (dry wood) <sup>1</sup>
Short-term Throughput of Each Rechipper	70.83	tons/hr (dry wood) <sup>1</sup>
Maximum Annual Operation	8,760	hours

Pollutant	Emission Factors (lb/dry wood tons)	Emissions <sup>5</sup>	
		(lb/hr)	(tpy)
THC as Carbon <sup>2</sup>	0.0041	2.904E-01	1.27
THC as alpha-Pinene <sup>3</sup>	0.0047	3.296E-01	1.44
PM <sup>4</sup>	N/A	N/A	N/A
Methanol <sup>2</sup>	0.0010	7.083E-02	0.29

<sup>1</sup> It is assumed that the wood received at the facility has a nominal water content of 50%.

The annual throughput used for the rechippers are the same as the annual throughput of the dryer; while the short-term throughput is based upon the maximum hourly throughput of the dryer.

<sup>2</sup> Emission factor obtained from available emissions factors for rechippers in AP-42 Section 10.6.3, Table 7 and Section 10.6.4, Tables 7 and 9. Emission factors for THC and Methanol are the same across all three tables.

<sup>3</sup> The THC/VOC makeup of wood is primarily composed of terpenes (C<sub>3</sub>H<sub>8</sub>)<sub>n</sub> [where n = 2, 3, or 4 typically] but to convert from carbon to the equivalent weight in THC/VOC, the assumption was that alpha-pinene (AP) would be the representative THC/VOC (molecular weight = 136.2 lb/lb-mol).

The following equation shows the conversion:

$$lb\ VOC/ODT = lb\ C/ODT * (136.2\ lb/mol\ AP / 12\ lb/mol\ C) * (1\ mol\ AP / 10\ mol\ C)$$

<sup>4</sup> PM emission factor is not applicable as rechipper emissions are routed downward to the ground.

<sup>5</sup> Short term emissions were based upon the max short term capacity of the rechippers.

Emissions are representative of the total combined emissions for both rechippers.



**TABLE B-11  
BAGFILTER AND CYCLONE EMISSIONS  
ENVIVA PELLETS NORTHAMPTON, LLC**

Emission Unit	Emission Source ID	Filter, Vent-or-Cyclone ID	Flowrate <sup>1</sup> (cfm)	Pollutant Loading <sup>2</sup> (gr/cf)	Annual Operation (hours)	% PM that is PM <sub>10</sub>	PM <sub>2.5</sub> (lb/hr)	Potential Emissions					
								PM (tpy)	PM <sub>10</sub> <sup>3</sup> (tpy)	PM <sub>2.5</sub> <sup>3</sup> (tpy)			
Hammemills Bagfilter 1	ES-HM-1 through 3	CD-HM-BF1	45,000	0.004	8,760	100%	1.54	6.76	1.54	6.76	1.54	6.76	
Hammemills Bagfilter 2	ES-HM-4 through 6	CD-HM-BF2	45,000	0.004	8,760	100%	1.54	6.76	1.54	6.76	1.54	6.76	
Hammemills Bagfilter 3	ES-HM-7 and 8; ES-NDS	CD-HM-BF3	45,000	0.004	8,760	100%	1.54	6.76	1.54	6.76	1.54	6.76	
Pellet Mill Feed Silo Bin Vent Filter	ES-PMFS	CD-PMFS-BV	2,500	0.004	8,760	100%	0.09	0.38	0.09	0.38	0.09	0.38	
Pellet Mill Fines Bin Vent Filter	ES-PPFB	CD-PPFB-BV	3,600	0.004	8,760	100%	0.12	0.54	0.12	0.54	0.12	0.54	
Pellet Coolers Cyclone 1	ES-CLR-1	CD-CLR-1	17,100	0.01	8,760	91%	1.47	6.42	1.33	5.84	0.81	3.53	
Pellet Coolers Cyclone 2	ES-CLR-2	CD-CLR-2	17,100	0.01	8,760	91%	1.47	6.42	1.33	5.84	0.81	3.53	
Pellet Coolers Cyclone 3	ES-CLR-3	CD-CLR-3	17,100	0.01	8,760	91%	1.47	6.42	1.33	5.84	0.81	3.53	
Pellet Coolers Cyclone 4	ES-CLR-4	CD-CLR-4	17,100	0.01	8,760	91%	1.47	6.42	1.33	5.84	0.81	3.53	
Pellet Coolers Cyclone 5	ES-CLR-5	CD-CLR-5	17,100	0.01	8,760	91%	1.47	6.42	1.33	5.84	0.81	3.53	
Pellet Coolers Cyclone 6	ES-CLR-6	CD-CLR-6	17,100	0.01	8,760	91%	1.47	6.42	1.33	5.84	0.81	3.53	
Finished Product Handling Bagfilter	ES-FPH; ES-PL1 & 2; ES-PB-1 thru 12	CD-FPH-BF	35,500	0.004	8,760	91%	1.22	5.33	1.11	4.85	0.67	2.93	
<b>TOTAL</b>								<b>14.85</b>	<b>65.04</b>	<b>13.95</b>	<b>61.09</b>	<b>10.34</b>	<b>45.31</b>

**Note:**

- <sup>1</sup> Filter, Vent, and Cyclone inlet flow rate (cfm) provided by design engineering firm (Mid-South Engineering Co.). The exit flowrate was conservatively assumed to be the same as the inlet flowrate.
- <sup>2</sup> Pollutant Loading (gr/cf) provided by Aircon.
- <sup>3</sup> Pellet cooler cyclone and finished product handling bagfilter specification based on AP-42 factors for wet wood combustion (Section 1.6) controlled by a mechanical separator. Since the particle size of particle size of particulate matter from a pellet cooler is anticipated to be larger than flyash, this factor is believed to be a conservative indicator of speciation.



**TABLE B-12  
EMERGENCY GENERATOR AND FIRE PUMP  
ENVIVA PELLET NORTHAMPTON, LLC**

**Emergency Generator Emissions (ES-EG)**

**Equipment and Fuel Characteristics**

Engine Output	0.26	MW
Engine Power	350	hp (brake)
Hours of Operation	500	hr/yr <sup>1</sup>
Heating Value of Diesel	19,300	Btu/lb
Power Conversion	2,545	Btu/hr/hp

**Criteria Pollutant Emissions**

Pollutant	Category	Emission Factor	Units	Potential Emissions	
				lb/hr	tpy
TSP	PSD	4.41E-04	lb/kW-hr (2)	0.12	2.88E-02
PM <sub>10</sub>	PSD	4.41E-04	lb/kW-hr (2)	0.12	2.88E-02
PM <sub>2.5</sub>	PSD	4.41E-04	lb/kW-hr (2)	0.12	2.88E-02
NO <sub>x</sub>	PSD	8.82E-03	lb/kW-hr (5)	2.30	5.75E-01
SO <sub>2</sub>	PSD	15	ppmw (3)	1.38E-03	3.46E-04
CO	PSD	7.72E-03	lb/kW-hr (2)	2.01	5.03E-01
VOC (NMHC)	PSD	2.51E-03	lb/MMBtu (4)	2.24E-03	5.59E-04

**Toxic/Hazardous Air Pollutant Emissions**

Acetaldehyde	HAP/TAP	5.37E-06	lb/hp-hr (4)	1.88E-03	4.70E-04
Acrolein	HAP/TAP	6.48E-07	lb/hp-hr (4)	2.27E-04	5.67E-05
Benzene	HAP/TAP	6.53E-06	lb/hp-hr (4)	2.29E-03	5.71E-04
Benzo(a)pyrene <sup>6</sup>	HAP/TAP	1.32E-09	lb/hp-hr (4)	4.61E-07	1.15E-07
1,3-Butadiene	HAP/TAP	2.74E-07	lb/hp-hr (4)	9.58E-05	2.39E-05
Formaldehyde	HAP/TAP	8.26E-06	lb/hp-hr (4)	2.89E-03	7.23E-04
Total PAH (POM)	HAP	1.18E-06	lb/hp-hr (4)	4.12E-04	1.03E-04
Toluene	HAP/TAP	2.86E-06	lb/hp-hr (4)	1.00E-03	2.51E-04
m-p-Xylene	HAP/TAP	2.00E-06	lb/hp-hr (4)	6.98E-04	1.75E-04
Highest HAP (Formaldehyde)		8.26E-06	lb/hp-hr (4)	2.89E-03	7.23E-04
Total HAPs				9.49E-03	2.37E-03

**Note:**

- <sup>1</sup> NSPS allows for only 100 hrs/yr of non-emergency operation of these engines (not the 500 hours shown). The PTE for the emergency generator is based on 500 hr/yr, though, because the regs allow non-emergency operation and EPA guidance is 500 hr/yr for emergency generators.
- <sup>2</sup> Emissions factors from NSPS Subpart IIII (or 40 CFR 89.112 where applicable) in compliance with post-2009 construction.
- <sup>3</sup> Sulfur content in accordance with Year 2010 standards of 40 CFR 80.510(a) as required by NSPS Subpart IIII.
- <sup>4</sup> Emission factor obtained from AP-42 Section 3.3, Tables 3.3-1 Table 3.3-2.
- <sup>5</sup> Emission factor for NO<sub>x</sub> is listed as NO<sub>x</sub> and NMHC (Non-Methane Hydrocarbons or VOC) in Table 4 of NSPS Subpart IIII. Conservatively assumed entire limit attributable to NO<sub>x</sub>.
- <sup>6</sup> Benzo(a)pyrene is included as a HAP in Total PAH.



**Firewater Pump Emissions (ES-FWP)**

**Equipment and Fuel Characteristics**

Engine Output	0.22	MW
Engine Power	300	hp
Hours of Operation	500	hr/yr <sup>1</sup>
Heating Value of Diesel	19,300	Btu/lb
Power Conversion	2,545	Btu/hr/hp

**Criteria Pollutant Emissions**

Pollutant	Category	Emission Factor	Units	Potential Emissions	
				lb/hr	tpy
TSP	PSD	4.41E-04	lb/kW-hr (2)	0.10	2.47E-02
PM <sub>10</sub>	PSD	4.41E-04	lb/kW-hr (2)	0.10	2.47E-02
PM <sub>2.5</sub>	PSD	4.41E-04	lb/kW-hr (2)	0.10	2.47E-02
NO <sub>x</sub>	PSD	8.82E-03	lb/kW-hr (5)	1.97	4.93E-01
SO <sub>2</sub>	PSD	15	ppmw (3)	1.19E-03	2.97E-04
CO	PSD	7.72E-03	lb/kW-hr (2)	1.73	4.32E-01
VOC (NMHC)	PSD	2.51E-03	lb/MMBtu (4)	1.92E-03	4.79E-04

**Toxic/Hazardous Air Pollutant Emissions**

Acetaldehyde	HAP/TAP	5.37E-06	lb/hp-hr (4)	1.61E-03	4.03E-04
Acrolein	HAP/TAP	6.48E-07	lb/hp-hr (4)	1.94E-04	4.86E-05
Benzene	HAP/TAP	6.53E-06	lb/hp-hr (4)	1.96E-03	4.90E-04
Benzo(a)pyrene <sup>6</sup>	HAP/TAP	1.32E-09	lb/hp-hr (4)	3.95E-07	9.87E-08
1,3-Butadiene	HAP/TAP	2.74E-07	lb/hp-hr (4)	8.21E-05	2.05E-05
Formaldehyde	HAP/TAP	8.26E-06	lb/hp-hr (4)	2.48E-03	6.20E-04
Total PAH (POM)	HAP	1.18E-06	lb/hp-hr (4)	3.53E-04	8.82E-05
Toluene	HAP/TAP	2.86E-06	lb/hp-hr (4)	8.59E-04	2.15E-04
m-,p-Xylene	HAP/TAP	2.00E-06	lb/hp-hr (4)	5.99E-04	1.50E-04
Highest HAP (Formaldehyde)		8.26E-06	lb/hp-hr (4)	2.48E-03	6.20E-04
Total HAPs				8.13E-03	2.03E-03

**Note:**

- <sup>1</sup> NSPS allows for only 100 hrs/yr of non-emergency operation of these engines (not the 500 hours shown). The PTE for the emergency generator is based on 500 hr/yr, though, because the regs allow non-emergency operation and EPA guidance is 500 hr/yr for emergency generators.
- <sup>2</sup> Emissions factors from NSPS Subpart IIII (or 40 CFR 89.112 where applicable) in compliance with post-2009 construction.
- <sup>3</sup> Sulfur content in accordance with Year 2010 standards of 40 CFR 80.510(a) as required by NSPS Subpart IIII.
- <sup>4</sup> Emission factor obtained from AP-42 Section 3.3, Tables 3.3-1 Table 3.3-2.
- <sup>5</sup> Emission factor for NO<sub>x</sub> is listed as NO<sub>x</sub> and NMHC (Non-Methane Hydrocarbons or VOC) in Table 4 of NSPS Subpart IIII. Conservatively assumed entire limit attributable to NO<sub>x</sub>.
- <sup>6</sup> Benzo(a)pyrene is included as a HAP in Total PAH.





TABLE B-13  
DRIED WOOD HANDLING DROP POINT EXAMPLE EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC

Max Annual Throughput (tons/yr) 575,000  
 Max Short-Term Throughput (tons/yr) 70,650  
 Amount of Fines Diverted from Hammermills 46.7% via NOR test for Dry Hammermill pre-screener bypass

ID	Emission Source Group	Description	Control	Control Description	Throughput		Potential Uncontrolled Emissions for PM <sub>10</sub> <sup>3</sup> (lb/hr)	Potential Uncontrolled Emissions for PM <sub>2.5</sub> <sup>3</sup> (tpy)	Potential Uncontrolled Emissions for PM <sub>10</sub> <sup>3</sup> (tpy)	Potential Uncontrolled Emissions for PM <sub>2.5</sub> <sup>3</sup> (tpy)		
					Max. Hourly <sup>2</sup> (tpb)	Max. Annual (tpy)						
DP1	ES-DWH	Dryer Discharger to Dryer Collection Conveyor Belt	Enclosed	Reduction to 2 mph mean wind speed	70.65	575,000	5.3E-03	2.2E-02	2.5E-03	1.0E-02	3.8E-04	1.6E-03
DP2	ES-DWH	Pre-screen Feeder Fines Overs to Hammermills Infeed and Distribution	Enclosed	Reduction to 2 mph mean wind speed	32.99	268,525	2.5E-03	1.0E-02	1.2E-03	4.8E-03	1.8E-04	7.3E-04
DP3	ES-DWH	Hammermills Cyclone Diverter Gates to Hammermills System Discharge Collection Conveyor Belt	Enclosed	Reduction to 2 mph mean wind speed	37.66	306,475	2.8E-03	1.2E-02	1.3E-03	5.5E-03	2.0E-04	8.3E-04
DP4	ES-DWH	Hammermills System Discharge Collection Conveyor Belt to Pellet Mill Infeed Silo Infeed Screw	Enclosed	Reduction to 2 mph mean wind speed	70.65	575,000	5.3E-03	2.2E-02	2.5E-03	1.0E-02	3.8E-04	1.6E-03
<b>TOTAL</b>							<b>1.6E-02</b>	<b>6.5E-02</b>	<b>7.6E-03</b>	<b>3.1E-02</b>	<b>1.1E-03</b>	<b>4.7E-03</b>

Note:

- <sup>1</sup> Fugitive emissions are not included in facility-wide PTE because the Northampton Pellet Mill does not belong to one of the listed 28 source categories.
- <sup>2</sup> Max hourly rates based upon maximum calculated throughput rates provided in mass balance provided by Mid-South Engineering Company, June 17, 2011; updated for 13% moisture content on December 29, 2011
- <sup>3</sup> Based emission factors calculated per AP-42 Section 13.2.4, September 2006.

where:  
 E = emission factor (lb/ton)  
 k = particle size multiplier (dimensionless) for PM 0.74  
 k = particle size multiplier (dimensionless) for PM<sub>10</sub> 0.35  
 k = particle size multiplier (dimensionless) for PM<sub>2.5</sub> 0.053  
 U = mean wind speed (mph) 2.00  
 M = material moisture content (%) 10  
 E for PM (lb/ton) = 7.6E-05  
 E for PM<sub>10</sub> (lb/ton) = 3.6E-05  
 E for PM<sub>2.5</sub> (lb/ton) = 5.4E-06

ES-DLB  
 BLC-1  
 BSC-2  
 BSC-3  
 BSB-1  
 BSB-2



TABLE B-14  
GREEN WOOD HANDLING DROP POINT EXAMPLE EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC

ID	Emission Source Group	Transfer Activity	Type of Operation	Number of Drop Points	PM <sub>10</sub> Particle Size Multiplier (dimensionless)	PM <sub>10</sub> Particle Size Multiplier (dimensionless)	PM <sub>10</sub> Particle Size Multiplier (dimensionless)	PM <sub>10</sub> Particle Size Multiplier (dimensionless)	Mean Wind Speed (ft/min)	Material Moisture Content (%)	PM <sub>10</sub> Emission Factor <sup>1</sup> (lb/ton)	PM <sub>10</sub> Emission Factor <sup>2</sup> (lb/ton)	PM <sub>10</sub> Emission Factor <sup>3</sup> (lb/ton)	Potential Throughput (tpy)	Potential PM <sub>10</sub> Emissions (tpy)	Potential PM <sub>2.5</sub> Emissions (tpy)	
GDP1	ES-GWH	Discharged Bark Transfer to Outdoor Storage Area	Batch Drop	1	0.74	0.35	0.053	0.053	6.3	48%	3.71E-05	1.76E-05	2.67E-06	13,733	6.48E-05	3.06E-05	4.61E-06
GDP1	ES-GWH	Drop Points via Conveying from Bulk Pile to Driver	Batch Drop	4	0.74	0.35	0.053	0.053	6.3	42%	4.44E-05	2.10E-05	3.18E-06	13,733	3.09E-04	1.46E-04	2.21E-05
GDP2	ES-GWH	Transfer Purchased Wood Chips/Water to Outdoor Storage	Batch Drop	1	0.74	0.35	0.053	0.053	6.3	49%	3.98E-05	1.69E-05	2.57E-06	140,600	6.37E-04	3.01E-04	4.57E-05
GDP2	ES-GWH	Drop Points via Conveying from Chipping to Driver	Batch Drop	5	0.74	0.35	0.053	0.053	6.0	41%	4.36E-05	2.10E-05	3.12E-06	530,451	1.46E-02	6.91E-03	1.05E-03
<b>Total Emissions</b>															<b>1.46E-02</b>	<b>7.39E-03</b>	<b>1.12E-03</b>

1. Average moisture content for logs, bark, and wood chips (wet) based on material balance provided by design engineering firm (St. Louis Engineering).  
2. Emission factor calculation based on formula from 40-CFR, Section 13.2.1 - Aggregate Handling and Storage Piles, Equation 13.2.1, (11/66), where:  
E = emission factor (lb/ton)  
C = particle size multiplier (dimensionless) for PM<sub>10</sub>  
M = particle size multiplier (dimensionless) for PM<sub>2.5</sub>  
K = particle size multiplier (dimensionless) for PM<sub>10</sub>  
L = particle size multiplier (dimensionless) for PM<sub>2.5</sub>

3. PM<sub>10</sub> emission efficiency of 74.7% applied for discharged crushed structure with 50% porosity per Sierra Research "Procedural Control Technology Analysis" report prepared for the Sierra Ingot Valley Cellulose Air Pollution Control District (SIVAC). The control efficiency is assumed equal/year for PM<sub>10</sub> and PM<sub>2.5</sub> emissions.  
4. These green wood handling emissions are representative of the typical emissions at the site. Note there may be multiple drop points for each type but as shown these emissions will be negligible.

includes ES-DLB, DEC-1, BSC-2, BSC-3, BSB-1, BSB-2



TABLE B-15  
GREEN WOOD STORAGE PILES FUGITIVE EMISSIONS  
ENVIVA PELLET NORTHAMPTON, LLC

Emission Unit ID	Description	TSP Emission Factor <sup>1</sup> (lb/day/acre)	VOC Emission Factor <sup>3</sup> (lb/day/acre)	Width (ft)	Length (ft)	Height (ft)	Outer Surface Area of Storage Pile (ft <sup>2</sup> )	PM Emissions (lb/hr)	PM <sub>10</sub> Emissions (tpy)	PM <sub>2.5</sub> Emissions (lb/hr)	VOC as Carbon Emissions (lb/hr)	VOC as alpha-Pinene Emissions <sup>4</sup> (lb/hr)
GWSP1	Green Wood Pile No. 1	3.71	3.55E-06	100	400	10	60,000	0.213	0.933	0.107	0.467	0.21
GWSP2	Green Wood Pile No. 2	3.71	3.55E-06	200	400	10	110,400	0.392	1.717	0.196	0.859	0.38
<b>Total</b>								<b>0.605</b>	<b>2.651</b>	<b>0.303</b>	<b>1.325</b>	<b>0.59</b>
												<b>2.57</b>
												<b>0.67</b>
												<b>1.90</b>
												<b>1.03</b>

1. TSP emission factor based on U.S. EPA Control of Open Pile/Storage Source. Research Triangle Park, North Carolina. EPA-450/3-88-008. September 1988. Page 4-17.

$$E = 1.7 \left( \frac{s}{1.5} \right)^{0.75} \left( \frac{365-p}{235} \right)^{0.75} \left( \frac{C}{15} \right) \left( \frac{A}{15} \right) \left( \frac{L}{15} \right) \left( \frac{W}{15} \right) \left( \frac{H}{15} \right) \left( \frac{V}{15} \right)$$

where:

s = silt content of wood chips (%)

p = number of days with rainfall greater than 0.01 inch

C = time that wind exceeds 3.26 m/s (12 mph) (%)

A = length of pile (m)

L = length of pile (m)

W = width of pile (m)

H = height of pile (m)

V = volume of pile (m<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)

E = TSP emissions (lb/day)

C = TSP concentration (lb/ft<sup>3</sup>)

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A = TSP area (ft<sup>2</sup>)

L = TSP length (ft)

W = TSP width (ft)

H = TSP height (ft)

V = TSP volume (ft<sup>3</sup>)



**TABLE B-16**  
**TANKS EMISSIONS**  
**ENVIVA PELLETT NORTHAMPTON, LLC**

Tank ID	Tank Description	Volume <sup>1</sup> (gal)	Tank Dimensions		Orientation	Throughput (gal/yr)	Turnovers	TANKS 4.0	
			Diameter (ft)	Height/Length (ft)				VOC Emissions (lb/yr)	VOC Emissions (tpy)
TK01	Emergency Generator Fuel Oil Tank <sup>2</sup>	2,500	6	12	Vertical	12,000	4.80	0.37	3.57E-03
TK02	Fire Water Pump Fuel Oil Tank <sup>2</sup>	500	3	10	Horizontal	10,300	20.60	0.43	2.15E-04
<b>TOTAL</b>								<b>0.80</b>	<b>3.79E-03</b>

**Note:**

<sup>1</sup> Conservative design specifications.

<sup>2</sup> Throughput based on fuel consumption and 500 hours of operation per year. Fuel consumption data provided by pump engine vendors.





**TABLE B-17  
POTENTIAL GHG EMISSIONS FROM COMBUSTION SOURCES  
ENVIVA PELLET NORTHAMPTON, LLC**

**Operating Data:**

Dryer Heat Input  
Operating Schedule 175.30 MMBtu/hr  
8,760 hrs/yr

Emergency Generator Output  
Operating Schedule 350 bhp  
500 hrs/yr  
No. 2 Fuel Input 16.7 gal/hr<sup>1</sup>  
Energy Input 2,282 MMBtu/hr<sup>2</sup>

Fire Water Pump Output  
Operating Schedule 300 bhp  
500 hrs/yr  
No. 2 Fuel Input 14.3 gal/hr<sup>1</sup>  
Energy Input 1,956 MMBtu/hr<sup>2</sup>

Portable Chipper Output  
Operating Schedule 1,300 bhp  
1,000 hrs/yr  
No. 2 Fuel Input 61.9 gal/hr<sup>1</sup>  
Energy Input 8,478 MMBtu/hr<sup>2</sup>

Truck Tipper/Output  
Operating Schedule 170 bhp  
1,000 hrs/yr  
No. 2 Fuel Input 8.1 gal/hr<sup>1</sup>  
Energy Input 1,109 MMBtu/hr<sup>2</sup>

Emission Unit ID	Fuel Type	Emission Factors from Table C-1 (kg/MMBtu) <sup>3</sup>				Tier 1 Emissions (metric tons)			
		CO2	CH4	N2O	CO2	CH4	N2O	Total CO2e biomass deferral <sup>4</sup>	Total CO2e
ES-DRYER	Wood and Wood Residuals	9.38E+01	3.20E-02	4.20E-03	158,777	54	7	3,341	162,119
ES-CN	No. 2 Fuel Oil (Distillate)	7.40E+01	3.00E-03	6.00E-04	93	3.77E-03	7.55E-04	93	93
ES-FWP	No. 2 Fuel Oil (Distillate)	7.40E+01	3.00E-03	6.00E-04	80	3.23E-03	6.47E-04	80	80
ES-CHIP-2	No. 2 Fuel Oil (Distillate)	7.40E+01	3.00E-03	6.00E-04	691	2.80E-02	5.61E-03	693	693
ES-TT	No. 2 Fuel Oil (Distillate)	7.40E+01	3.00E-03	6.00E-04	90	3.67E-03	7.33E-04	91	91

<sup>1</sup> Fuel consumption calculated using a factor of 0.0476 gal/hr-hp. Advanced Environmental Interface, Inc. (1998).

<sup>2</sup> General Permits for Emergency Engines. INSIGHTS, 98-2, 3.

<sup>3</sup> Energy calculated on a fuel consumption basis, using an energy factor of 0.137 MMBtu/gal.

<sup>4</sup> Emission factors from Table C-1 and C-2 of GHG Reporting Rule. Emission factors for methane and N2O already multiplied by their respective GWPs of 21 and 310.

<sup>5</sup> As per NC DAQ Biomass Deferral Rule 15A NCAC 02D .0544, CO2 emissions from bioenergy and other biogenic sources are not applicable towards PSD and Title V permitting. Therefore CO2 emissions from the dryer are not included in the Total CO2e biomass deferral column.



**APPENDIX C - TAP MODELING SUPPORT**

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**A.1**  
**North Carolina Modeling Protocol Checklist**

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.

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 guidelines referenced above. References to sections, tables, figures, appendices, etc., in the protocol checklist are found in the toxics modeling guidelines.

**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	
<b>Name:</b> Enviva Pellets Northampton, LLC  <b>Facility ID:</b> 6600167  <b>Address:</b> 874 Lebanon Church Rd. Garysburg, NC 27866	<b>Consultant (if applicable):</b> Trinity Consultants 1 Copley Parkway Suite 310 Morrisville, NC 27560
<b>Contact Name:</b> Joe Harrell	<b>Contact Name:</b> Jonathan Hill
<b>Phone Number:</b> 252-209-6032 <b>Email:</b> joe.harrell@envivabiomass.com	<b>Phone Number:</b> 919-462-9693 <b>Email:</b> jhill@trinityconsultants.com

**GENERAL**

<b>Description of New Source or Source / Process Modification:</b> 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.	<b>X</b>
<b>Source / Pollutant Identification:</b> 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).	<b>X</b>
<b>Pollutant Emission Rate Calculations:</b> indicate how the pollutant emission rates were derived (e.g., AP-42, mass balance, etc.) and where applicable, provide the calculations.	<b>X</b>
<b>Site / Facility Diagram:</b> 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.	<b>X</b>
<b>Certified Plat or Signed Survey:</b> a certified plat (map) from the County Register of Deeds or a signed survey must be submitted to validate property boundaries modeled.	<b>SS</b>
<b>Topographic Map:</b> A topographic map covering approximately 5km around the facility must be submitted. The facility boundaries should be annotated on the map as accurately as possible.	<b>X</b>
<b>Cavity Impact Analysis:</b> No cavity analysis is required if using AERMOD. See Section 4.2	<b>NA</b>



<b>Background Concentrations</b> (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.	NA
<b>Offsite Source Inventories</b> (criteria pollutant analyses only): Offsite source inventories must be developed and modeled for all pollutants for which onsite sources 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.	NA

#### SCREEN LEVEL MODELING

<b>Model:</b> 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.	NA
<b>Source / Source emission parameters:</b> Provide a table listing the sources modeled and the applicable source emission parameters. See NC Form 3 – Appendix A.	NA
<b>Merged Sources:</b> Identify merged sources and show all appropriate calculations. See Section 3.3	NA
<b>GEP Analysis:</b> See Section 3.2 and NC Form 1 – Appendix A	NA
<b>Terrain:</b> 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.  Simple: _____ Complex: _____	NA
<b>Meteorology:</b> Refer to Section 4.1 for AERSCREEN inputs.	NA
<b>Receptors:</b> 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
<b>Modeling Results:</b> 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
<b>Modeling Files:</b> Either electronic or hard copies of AERSCREEN output must be submitted.	NA

#### REFINED LEVEL MODELING

<b>Model:</b> The latest version of AERMOD should be used, and may be found at <a href="http://www.epa.gov/scram001/dispersion_prefrec.htm">http://www.epa.gov/scram001/dispersion_prefrec.htm</a> . The use of other refined models must be approved by NCDAQ prior to submitting the modeling report.	AERMOD 13350
<b>Source / Source emission parameters:</b> Provide a table listing the sources modeled and the applicable source emission parameters. See NC Form 3 - Appendix A.	X
<b>GEP Analysis:</b> Use BPIP-Prime with AERMOD.	X
<b>Cavity Impact Analysis:</b> 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
<b>Terrain:</b> Use digital elevation data from the USGS NED database ( <a href="http://seamless.usgs.gov/index.php">http://seamless.usgs.gov/index.php</a> ). Use of other sources of terrain elevations or the non-regulatory Flat Terrain option will require prior approval from DAQ AQAB.	X
<b>Coordinate System:</b> 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.	NAD83
<b>Receptors:</b> The receptor grid should be of sufficient size and resolution to identify the maximum pollutant impact. See Section 5.3.	X





<p><b>Meteorology:</b> Indicate the AQAB, pre-processed, 5-year data set used in the modeling demonstration: (See Section 5.5 and Appendix B)</p> <p>AERMOD_RWI 2008-2012 _____</p> <p>If processing your own raw meteorology, then pre-approval from AQAB is required. Additional documentation files (e.g. AERMET stage 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).</p>	X
<p><b>Modeling Results:</b> 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.</p>	X
<p><b>Modeling Files:</b> 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.</p>	X



**NOTES**

- THE SURVEYED PROPERTY DELINEATED HEREON IS LOCATED ON NORTHAMPTON COUNTY TAX ASSESSMENT MAP 01-09993 AND IS ZONED LI (LIGHT INDUSTRIAL DISTRICT).  
 SETBACKS:  
 FRONT: 100 FEET  
 REAR: 75 FEET  
 SIDE: 25 FEET
- THE SURVEYED PROPERTY CURRENTLY STANDS IN THE NAME OF ENVIVA PELLETS NORTHAMPTON, LLC AS RECORDED IN DEED BOOK 961 AT PAGE 81 AND MAP BOOK 42 AT PAGE 125 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA.
- NORTH MERIDIAN INFORMATION AS SHOWN HEREON IS BASED ON NORTH CAROLINA STATE PLANE COORDINATE SYSTEM, NORTH ZONE NAD 83 (94 HARN) AND IS TIED TO NORTHAMPTON COUNTY, NORTH CAROLINA GEODETIC CONTROL NETWORK.
- THE SURVEYED PROPERTY AS SHOWN HEREON IS SUBJECT TO ALL COVENANTS AND RESTRICTIONS OF RECORD AND THOSE RECORDED HEREWITH. BOWMAN CONSULTING GROUP, LTD. HAS PROVIDED A COMMITMENT FOR TITLE INSURANCE FROM FIDELITY NATIONAL TITLE INSURANCE COMPANY, AND SCHEDULE B - PART II IS ADDRESSED IN THE TITLE COMMITMENT REVIEW.
- THE SURVEYED PROPERTY SHOWN HEREON IS NOT IN A 100-YEAR FLOODPLAIN, IT LIES IN ZONE "X" (DETERMINED TO BE 0.2% ANNUAL CHANCE FLOODPLAIN) AS SHOWN ON FEMA FLOOD INSURANCE RATE MAP FOR NORTHAMPTON COUNTY, NORTH CAROLINA, COMMUNITY-PANEL NUMBER 3721400000 J, EFFECTIVE DATE FEBRUARY 4, 2009.
- THE LOCATION OF ALL VISIBLE BUILDINGS, STRUCTURES AND OTHER IMPROVEMENTS SITUATED ON THE SURVEYED PROPERTY, WHICH HAS BEEN CAREFULLY ESTABLISHED BY THE CLASSIFICATION AND SPECIFICATIONS FOR CADASTRAL SURVEYS ARE CORRECTLY SHOWN.
- ALL EASEMENTS AND RIGHTS-OF-WAY APPARENT FROM A CAREFUL PHYSICAL INSPECTION OF THE SURVEYED PROPERTY, OR AS IDENTIFIED IN SCHEDULE B - PART II OF THE COMMITMENT FOR TITLE ARE CORRECTLY SHOWN UNLESS OTHERWISE NOTED.
- THERE ARE NO VISIBLE ENCROACHMENTS ON ADJOINING PREMISES, STREETS OR EASEMENTS, BY VISIBLE BUILDINGS, STRUCTURES OR OTHER IMPROVEMENTS, NOR VISIBLE ENCROACHMENTS ON SAID PROPERTY BY VISIBLE STRUCTURES OR OTHER IMPROVEMENTS SITUATED ON ADJOINING PREMISES EXCEPT AS SHOWN.
- THERE ARE 0 REGULAR PARKING SPACES AND 0 HANDICAP PARKING SPACES ON THE PREMISES.
- AS OF THE DATE OF THE SURVEY, THERE WAS NO OBSERVED EVIDENCE OF CURRENT EARTH MOVING WORK, BUILDING CONSTRUCTION OR BUILDING ADDITIONS ON THE SUBJECT PROPERTY.
- AS OF THE DATE OF THE SURVEY, THERE WAS NO OBSERVED EVIDENCE OF SITE USE AS A SOLID WASTE DUMP, SUMP OR SANITARY LANDFILL.
- PROPERTY LINE AS SHOWN ON PLAT "SURVEYED FOR NORTHAMPTON COUNTY MID-ATLANTIC INDUSTRIAL PARK, GASTON TOWNSHIP, NORTHAMPTON COUNTY, NORTH CAROLINA, JULY 22, 2004" PREPARED BY JASPER ELEY LAND SURVEYING AND RECORDED IN PLAT BOOK 37 AT PAGE 42 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA.

**TITLE COMMITMENT SCHEDULE B-PART II REVIEW**

I FURTHER CERTIFY THAT (I) I HAVE EXAMINED TITLE DOCUMENTS FOR THE PROPERTY HEREIN DESCRIBED PROVIDED BY FIDELITY NATIONAL TITLE INSURANCE COMPANY FOR TITLE NUMBER 38511, EFFECTIVE DATE APRIL 27, 2012 AT 8:00AM AND (II) WITH RESPECT TO THE ITEMS IDENTIFIED IN SCHEDULE B-PART II WITH RESPECT TO THE PROPERTY.

THE FOLLOWING ITEMS OF SCHEDULE B-PART II PERTAIN TO THE PROPERTY BUT ARE EITHER STANDARD TITLE EXCEPTIONS OR NOT SURVEY RELATED ITEMS: EXCEPTION ITEMS 1, 2 AND 5.

- EXCEPTION 1: DEFECTS, LIENS, ENCUMBRANCES, ADVERSE CLAIMS OR OTHER MATTERS, IF ANY CREATED, FIRST APPEARING IN THE PUBLIC RECORDS OR ATTACHING SUBSEQUENT TO THE EFFECTIVE DATE HEREOF BUT PRIOR TO THE DATE THE PROPOSED INSURED ACQUIRES FOR VALUE OF RECORD THE ESTATE OR INTEREST OR MORTGAGE THEREON COVERED BY THIS COMMITMENT.
- EXCEPTION 2: THE LIEN OF ALL TAXES FOR THE YEAR 2012 AND THEREAFTER, WHICH ARE NOT YET DUE AND PAYABLE.
- EXCEPTION 3: BUILDING RESTRICTION LINES, EASEMENTS, AND ANY OTHER MATTERS SHOWN ON MAP OR PLAT RECORDED IN MAP BOOK 14, PAGE 25; MAP BOOK 37, PAGES 41 AND 42; MAP BOOK 42, PAGE 125 AND MAP BOOK 42, PAGE 58.  
 M.B. 14, PG. 25 IS NOT LOCATED NEAR OR ADJACENT TO SUBJECT PROPERTY  
 M.B. 37, PGS. 41 & 42 DOES NOT CONTAIN ANY OF THE ABOVE MATTERS  
 M.B. 42, PG. 125 SHOWS:  
 80' TRANSMISSION LINE EASEMENT - AFFECTS SUBJECT PROPERTY AND IS SHOWN HEREON  
 100' & 150' BUILDING SETBACKS/BUFFERS - AFFECTS SUBJECT PROPERTY AND IS SHOWN HEREON  
 30' SEWER EASEMENT - AFFECTS SUBJECT PROPERTY AND IS SHOWN HEREON  
 20' DRAINAGE EASEMENT - AFFECTS SUBJECT PROPERTY AND IS SHOWN HEREON  
 60' FUTURE PUBLIC ROAD - ADJOINS SUBJECT PROPERTY AND IS SHOWN HEREON  
 20' UTILITY EASEMENT - ADJOINS SUBJECT PROPERTY AND IS SHOWN HEREON  
 M.B. 42, PG. 58 IS AN ADJACENT PROPERTY AND SHOWS:  
 OVERHEAD ELECTRIC LINE (TRANSMISSION POWER LINE) FROM SUBJECT PROPERTY ACROSS ADJACENT PROPERTY - DOES NOT AFFECT SUBJECT PROPERTY  
 BUILDING SETBACK LINES - DOES NOT AFFECT SUBJECT PROPERTY
- EXCEPTION 4: EASEMENT(S) AND RIGHT(S)-OF-WAY FOR ROADS OR PUBLIC/PRIVATE UTILITIES.  
 EXCEPTION 5: STATUTORY LIENS OF MECHANICS, LABORERS AND MATERIALMEN THAT HAVE PERFORMED OR FURNISHED LABOR, PROFESSIONAL DESIGN OR SURVEYING SERVICES, OR FURNISHED MATERIALS OR RENTAL EQUIPMENT OF WHICH NO NOTICE APPEARS OF RECORD. (NOTE: THIS EXCEPTION WILL BE DELETED ONLY UPON RECEIPT OF DOCUMENTATION SATISFACTORY TO THE COMPANY SATISFYING THE MATERIAL AND LABOR LIENS REQUIREMENT SET OUT IN SCHEDULE B-1 OF THIS COMMITMENT.)
- EXCEPTION 6: ANY ENCROACHMENT, ENCUMBRANCE, VIOLATION, OR ADVERSE CIRCUMSTANCE AFFECTING THE TITLE THAT WOULD BE DISCLOSED BY AN ACCURATE AND COMPLETE LAND SURVEY OF THE LAND.
- EXCEPTION 7: DISCREPANCIES, VARIANCES, SHORTAGES OR OVERAGES IN THE ACREAGE OF THE LAND.
- EXCEPTION 8: RIGHTS OR CLAIMS OF PARTIES IN POSSESSION AS TENANTS UNDER UNRECORDED LEASES.
- EXCEPTION 9: TIMBER DEED IN FAVOR OF GEORGIA PACIFIC CORPORATION RECORDED IN BOOK 811, PAGE 399. NOT PROVIDED BY TITLE COMPANY.
- EXCEPTION 10: EASEMENT(S) OR RIGHT(S)-OF-WAY IN FAVOR OF VIRGINIA ELECTRIC AND POWER COMPANY RECORDED IN BOOK 342, PAGE 88; BOOK 401, PAGE 332; BOOK 492, PAGE 67; BOOK 524, PAGE 138; BOOK 570, PAGE 350; BOOK 962, PAGE 919.  
 D.B. 342, PG. 88 - UNABLE TO DETERMINE LOCATION WITH INFORMATION PROVIDED  
 D.B. 401, PG. 332 - UNABLE TO DETERMINE LOCATION WITH INFORMATION PROVIDED  
 D.B. 492, PG. 67 - DOES NOT AFFECT SUBJECT PROPERTY  
 D.B. 524, PG. 138 - DOES NOT AFFECT SUBJECT PROPERTY  
 D.B. 570, PG. 350 - DOES NOT AFFECT SUBJECT PROPERTY  
 D.B. 962, PG. 919 - 30' EASEMENT LOCATED PARALLEL TO THE NORTHERN SIDE OF 80' PROPOSED ROAD. SAID EASEMENT IS SHOWN FROM LEBANON CHURCH ROAD INTO THE SUBJECT PROPERTY BUT DOES NOT DEPICT A TERMINATION POINT AND IS SHOWN HEREON.
- EXCEPTION 11: EASEMENT(S) OR RIGHT(S)-OF-WAY IN FAVOR OF CAROLINA TELEPHONE AND TELEGRAPH COMPANY RECORDED IN BOOK 433, PAGE 23. UNABLE TO DETERMINE LOCATION WITH INFORMATION PROVIDED
- EXCEPTION 12: EASEMENT(S) OR RIGHT(S)-OF-WAY IN FAVOR OF STATE HIGHWAY COMMISSION RECORDED IN BOOK 472, PAGE 44. UNABLE TO DETERMINE LOCATION WITH INFORMATION PROVIDED
- EXCEPTION 13: INTENTIONALLY DELETED.
- EXCEPTION 14: INTENTIONALLY DELETED.
- EXCEPTION 15: COVENANTS, CONDITIONS, RESTRICTIONS, RESERVATIONS, POSSIBILITY AND/OR RIGHT OF REVERTER, AND EASEMENTS CONTAINED IN DEED RECORDED IN BOOK 961, PAGE 81.  
 D.B. 961, PG. 81 UJTS:  
 20' PERPETUAL, NON-EXCLUSIVE UTILITY EASEMENT AFFECTS ADJACENT PROPERTY AND IS SHOWN HEREON  
 30' SEWER EASEMENT AFFECTS SUBJECT PROPERTY AND IS SHOWN HEREON  
 20' DRAINAGE EASEMENT AFFECTS SUBJECT PROPERTY AND IS SHOWN HEREON
- EXCEPTION 16: TERMS AND CONDITIONS OF, AND RIGHTS OF OTHERS IN AND TO THE USE OF THE PROPERTY SUBJECT TO, THE APPURTENANT EASEMENT(S) MORE PARTICULARLY DESCRIBED IN EXHIBIT A AS FURTHER SET FORTH IN BOOK 961 - PAGE 88.  
 80' NON-EXCLUSIVE EASEMENT OF RIGHT-OF-WAY TO BE TERMINATED AND EXPIRE UPON COMPLETION OF 100' PUBLIC RIGHT-OF-WAY (ACCESS ROAD) TO BE CONVEYED TO THE NORTH CAROLINA DEPARTMENT OF TRANSPORTATION. AFFECTS ADJACENT PROPERTY AND IS SHOWN HEREON

**CURRENT LEGAL DESCRIPTION FROM TITLE COMMITMENT**

FEE TRACT:  
 ALL THAT CERTAIN TRACT OF LAND CONTAINING 120.17 ACRES, MORE OR LESS, AND BEING A PORTION OF THE MID-ATLANTIC INDUSTRIAL PARK PROPERTY, AND BEING LOCATED IN GASTON TOWNSHIP, NORTHAMPTON COUNTY, NORTH CAROLINA, AND BEING BOUNDED NOW OR FORMERLY BY NATURAL BOUNDARIES AND/OR LAND OWNED BY AND/OR IN THE POSSESSION OF PERSONS AS FOLLOWS: ON THE SOUTH BY S10 REPP ONE, LLC, C.A. THOMAS ESTATE AND WILLIAM W. GRANT; ON THE WEST BY WILLIAM W. GRANT, S.L. NEWSOME AND C.R. CLEMENTS; ON THE NORTH BY J.E. DICKENS, L.E. JOHNSON AND J.T. HARGRAVE; ON THE EAST BY J.T. HARGRAVE AND OTHER LANDS OF NORTHAMPTON COUNTY; SAID TRACT LYING APPROXIMATELY 1,600 FEET WEST OF N.C. STATE ROAD 1200 KNOWN AS LEBANON CHURCH ROAD.

SAID TRACT BEING MORE PARTICULARLY SHOWN ON THAT CERTAIN MAP TITLED, "NON-RESIDENTIAL SUBDIVISION PORTION OF MID-ATLANTIC INDUSTRIAL PARK" PREPARED BY CHARLES W. RUSHTON, REGISTERED SURVEYOR, DATED 16 NOVEMBER 2011, WHICH PLAT RECORDED IN MAP BOOK 42 AT PAGE 125 (THE "PLAT"), PUBLIC RECORDS OF NORTHAMPTON COUNTY, IS BY REFERENCE INCORPORATED HEREIN AS PART OF THIS DESCRIPTION (THE "PROPERTY").

TOGETHER WITH A PERPETUAL, NON-EXCLUSIVE, UTILITY EASEMENT 20 FEET WIDTH INCLUDING THE RIGHT TO CONSTRUCT, MAINTAIN, INSPECT, OPERATE, PROTECT, REPAIR, REPLACE, CHANGE THE SIZE OF, AND/OR REMOVE UTILITIES, INCLUDING BUT NOT LIMITED TO, WATER AND ELECTRIC, WITH APPURTENANCES, TOGETHER WITH THE RIGHT OF INGRESS AND EGRESS OVER, UNDER, THROUGH AND ACROSS SAID EASEMENT SITUATED IN GASTON TOWNSHIP, NORTHAMPTON COUNTY, NORTH CAROLINA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

SAID EASEMENT BEING MORE PARTICULARLY DESCRIBED AS A 20-FOOT WIDE UTILITY EASEMENT LOCATED ON THE SOUTHERN BOUNDARY OF THE FUTURE "PUBLIC ROAD" SHOWN AND DEPICTED UPON THE PLAT LEADING FROM THE WESTERN RIGHT-OF-WAY BOUNDARY OF N.C. STATE ROAD 1200, LEBANON CHURCH ROAD, TO THE EASTERN BOUNDARY OF THE PROPERTY HEREIN CONVEYED TO PARTY OF THE SECOND PART.

SAVE AND EXCEPT: NORTHAMPTON COUNTY, PARTY OF THE FIRST PART, RESERVES UNTO ITSELF, ITS SUCCESSORS AND ASSIGNS, A PERPETUAL, NON-EXCLUSIVE, SEWER EASEMENT 30 FEET IN WIDTH INCLUDING THE RIGHT TO CONSTRUCT, MAINTAIN, INSPECT, OPERATE, PROTECT, REPAIR, REPLACE, CHANGE THE SIZE OF, AND/OR REMOVE A SEWER LINE AND APPURTENANCES, TOGETHER WITH THE RIGHT OF INGRESS AND EGRESS OVER, UNDER, THROUGH AND ACROSS SAID EASEMENT, SITUATED IN GASTON TOWNSHIP, NORTHAMPTON COUNTY, NORTH CAROLINA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

SAID EASEMENT BEING MORE PARTICULARLY DESCRIBED AS A 30-FOOT SEWER EASEMENT LOCATED ON THE SOUTHERN BOUNDARY ON PROPERTY HEREIN CONVEYED ACCORDING TO THE PLAT, IS BY REFERENCE INCORPORATED HEREIN AS PART OF THIS DESCRIPTION.

SAVE AND EXCEPT ALSO A 20-FOOT WIDE DRAINAGE EASEMENT LOCATED WITHIN THE BOUNDARIES OF THE 30-FOOT WIDE SEWER EASEMENT ON THE SOUTHERN BOUNDARY AND WITHIN THE 80-FOOT WIDE TRANSMISSION LINE RIGHT-OF-WAY ON THE EASTERN BOUNDARY AND THENCE CONTINUING ALONG THE OUTER BOUNDARY OF THE ABOVE DESCRIBED 120.17 ACRE TRACT ON THE NORTH AND WEST BOUNDARIES OF THE PROPERTY ALL IN ACCORDANCE WITH THE PLAT.

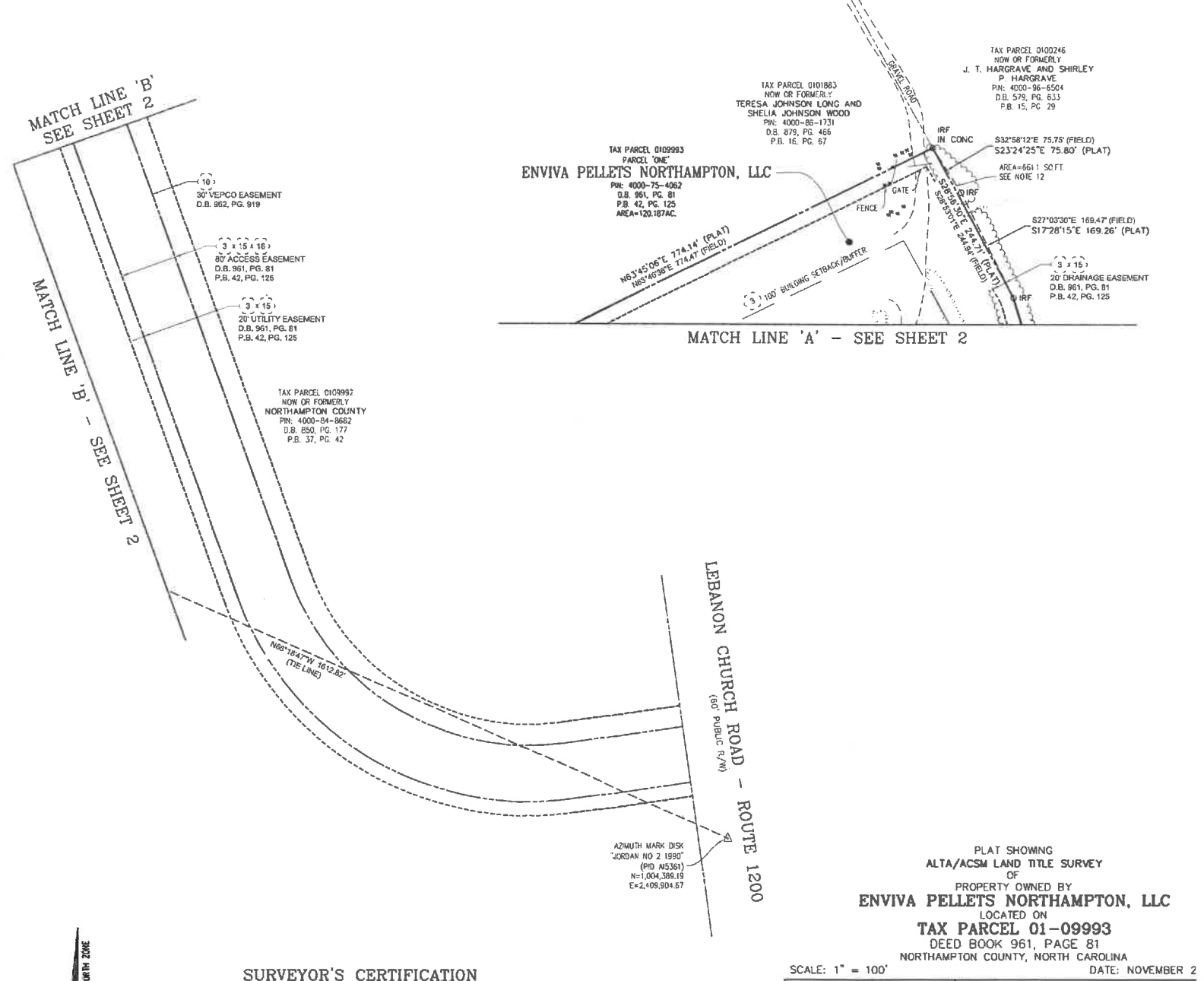
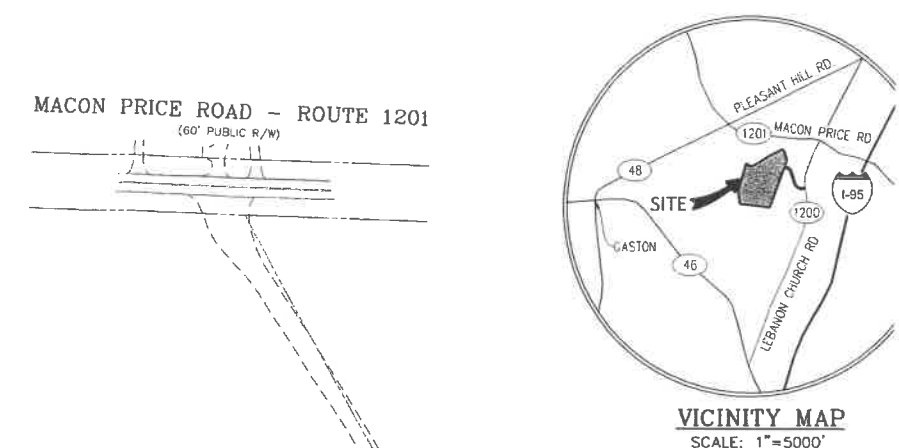
APPURTENANT EASEMENT:  
 A TEMPORARY 80' FOOT WIDE NON-EXCLUSIVE EASEMENT OF RIGHT-OF-WAY LEADING FROM THE WESTERN RIGHT-OF-WAY OF NORTH CAROLINA STATE ROAD 1200 IN A WESTERLY DIRECTION TO THE EASTERN BOUNDARY OF THE ABOVE-DESCRIBED FEE TRACT, SAID EASEMENT BEING MORE PARTICULARLY SHOWN AND DEPICTED AS "FUTURE PUBLIC ROAD", ACCORDING TO A MAP PREPARED BY CHARLES W. RUSHTON, REGISTERED SURVEYOR, DATED 16 NOVEMBER 2011, WHICH PLAT, RECORDED IN MAP BOOK 42 AT PAGE 125, PUBLIC RECORDS OF NORTHAMPTON COUNTY, IS BY REFERENCE INCORPORATED HEREIN AS PART OF THIS DESCRIPTION.

**AS SURVEYED METES AND BOUNDS DESCRIPTION**

COMMENCING AT A NATIONAL GEODETIC SURVEY MARKER DISK, DESIGNATION "JORDAN NO 2 1990" (PID A15361), AND TIED TO NAD 83 (2011) HORIZONTAL COORDINATE WITH A NORTHERING OF 1,004,389.19 AND A EASTING OF 2,409,904.67. SAID DISK IS LOCATED 13.7 FEET EAST FROM THE CENTERLINE OF LEBANON CHURCH ROAD, STATE ROUTE 1200, 60 FOOT RIGHT-OF-WAY AND ROUGHLY 43 FEET FROM THE EASTERLY LINE OF THE LANDS OF NORTHAMPTON COUNTY AS RECORDED IN DEED BOOK 850 AT PAGE 177 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA; THENCE DEPARTING SAID DISK AND LEBANON CHURCH ROAD AND CONTINUING THROUGH SAID LANDS OF NORTHAMPTON COUNTY THE FOLLOWING COURSE:  
 N 66°18'47" W 1612.82 FEET TO AN IRON PIPE FOUND  
 SAID PIPE BEING THE TRUE POINT OF BEGINNING, THENCE CONTINUING WITH SAID LANDS OF NORTHAMPTON COUNTY THE FOLLOWING (4) COURSES:  
 S 2°01'28" W 500.79 FEET TO AN IRON PIPE FOUND; THENCE  
 S 19°59'22" W 450.36 FEET TO AN IRON ROD SET; THENCE  
 S 20°06'59" W 588.77 FEET TO AN IRON ROD SET; THENCE  
 S 20°00'00" W 153.31 FEET TO AN IRON PIPE FOUND  
 SAID PIPE BEING ON THE NORTHERLY LINE OF THE LANDS OF S10 REPP ONE, LLC RECORDED IN DEED BOOK 954 AT PAGE 581 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA; THENCE DEPARTING SAID LANDS OF NORTHAMPTON COUNTY AND CONTINUING WITH SAID LANDS OF S10 REPP ONE, LLC THE FOLLOWING COURSE:  
 N 82°34'07" W 444.79 FEET TO AN IRON PIPE FOUND  
 SAID PIPE BEING ON THE NORTHEAST CORNER OF THE LANDS OF C.A. THOMAS ESTATE RECORDED IN DEED BOOK 496 AT PAGE 587 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA; THENCE DEPARTING SAID LANDS OF S10 REPP ONE, LLC AND CONTINUING WITH SAID LANDS OF C.A. THOMAS ESTATE THE FOLLOWING COURSE:  
 N 83°32'25" W 1180.09 FEET TO AN AXLE FOUND  
 SAID AXLE BEING ON THE EASTERLY LINE OF THE LANDS OF DAVID M. GRANT AND CAROL B. GRANT RECORDED IN DEED BOOK 934 AT PAGE 243; THENCE DEPARTING SAID LANDS OF C.A. THOMAS ESTATE AND CONTINUING WITH SAID LANDS OF DAVID M. GRANT AND CAROL B. GRANT IN PART, THE LANDS OF SARAH L. NEWSOME RECORDED IN DEED BOOK 731 AT PAGE 72 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA AND THE LANDS OF VIRGINIA C. CLEMENTS RECORDED IN DEED BOOK 733 AT PAGE 887 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA THE FOLLOWING (4) COURSES:  
 N 06°47'36" W 691.23 FEET TO AN IRON PIPE FOUND; THENCE  
 N 15°08'46" E 730.52 FEET TO AN IRON ROD FOUND; THENCE  
 N 14°54'52" E 160.09 FEET TO AN IRON PIPE FOUND; THENCE  
 N 15°04'53" E 692.75 FEET TO AN IRON PIPE FOUND  
 SAID PIPE BEING ON THE SOUTHERLY LINE OF THE LANDS OF TOMMIE A. DICKENS RECORDED IN DEED BOOK 761 AT PAGE 17 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA; THENCE DEPARTING SAID LANDS OF VIRGINIA C. CLEMENTS AND CONTINUING WITH SAID LANDS OF TOMMIE A. DICKENS THE FOLLOWING (3) COURSES:  
 S 54°06'59" E 312.50 FEET TO AN IRON ROD FOUND; THENCE  
 N 63°55'29" E 484.94 FEET TO AN IRON ROD FOUND; THENCE  
 N 54°33'13" E 497.77 FEET TO AN IRON PIPE FOUND  
 SAID PIPE BEING THE SOUTHWEST CORNER OF THE LANDS OF TERESA JOHNSON LONG AND SHELIA JOHNSON WOOD RECORDED IN DEED BOOK 879 AT PAGE 468 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA; THENCE DEPARTING SAID LANDS OF TOMMIE A. DICKENS AND CONTINUING WITH SAID LANDS OF TERESA JOHNSON LONG AND SHELIA JOHNSON WOOD THE FOLLOWING (3) COURSES:  
 N 54°35'04" E 128.84 FEET TO AN AXLE FOUND; THENCE  
 N 70°23'46" E 99.36 FEET TO A OAK STUMP FOUND; THENCE  
 N 63°46'36" E 774.47 FEET TO AN IRON ROD FOUND IN CONCRETE  
 SAID ROD BEING ON THE WESTERLY LINE OF THE LANDS OF J.T. HARGROVE AND SHIRLEY P. HARGROVE RECORDED IN DEED BOOK 579 AT PAGE 633 AMONG THE LAND RECORDS OF NORTHAMPTON COUNTY, NORTH CAROLINA; THENCE DEPARTING SAID LANDS OF TERESA JOHNSON LONG AND SHELIA JOHNSON WOOD AND CONTINUING WITH SAID LANDS OF J.T. HARGROVE AND SHIRLEY P. HARGROVE THE FOLLOWING (3) COURSES:  
 S 28°53'01" E 244.94 FEET TO AN IRON ROD FOUND; THENCE  
 S 16°57'01" E 273.33 FEET TO AN IRON ROD FOUND; THENCE  
 S 22°57'51" E 111.68 FEET TO AN IRON PIPE FOUND  
 SAID PIPE BEING ON THE NORTHWEST CORNER OF THE AFORESAID LANDS OF NORTHAMPTON COUNTY; THENCE DEPARTING SAID LANDS OF J.T. HARGROVE AND SHIRLEY P. HARGROVE AND CONTINUING WITH SAID LANDS OF NORTHAMPTON COUNTY THE FOLLOWING (2) COURSES:  
 S 22°02'13" W 618.03 FEET TO AN IRON PIPE FOUND; THENCE  
 S 20°07'51" W 446.23 FEET TO THE POINT OF BEGINNING, CONTAINING AN AREA OF 120.187 ACRES, MORE OR LESS.

**LEGEND**

- SIGN
- LAMP
- POWER POLE
- GUY WIRE
- POST
- RAILROAD SIGNAL
- FLAG
- PEDESTAL
- FIRE HYDRANT
- VALVE
- UTILITY MANHOLE
- BUSH
- TREE
- STORM DRAIN INLET
- IRP ○ IRON PIPE FOUND
- IRP ○ IRON ROD FOUND
- IRP ○ IRON ROD SET
- CLF ○ CHAIN LINK FENCE
- CONC ○ CONCRETE
- ELEC ○ ELECTRIC
- HW ○ HEADWALL
- P.O.B. ○ POINT OF BEGINNING
- TRANS ○ TRANSFORMER
- FENCE LINE
- EDGE OF WATER/DITCH
- 100' RPA BUFFER
- TREE LINE
- BRUSH LINE
- MECHANICAL EQUIPMENT
- /CONVEYOR SYSTEM
- EQUIPMENT AREA FOUNDATION
- CONCRETE
- RP-RAP



**SURVEYOR'S CERTIFICATION**

TO ENVIVA PELLETS NORTHAMPTON, LLC, FIDELITY NATIONAL TITLE INSURANCE COMPANY AND BARCLAYS BANK PLC, ITS SUCCESSORS AND/OR ASSIGNS AS THEIR INTERESTS MAY APPEAR: THIS IS TO CERTIFY THAT THIS MAP OR PLAT AND THE SURVEY ON WHICH IT IS BASED WERE

SCALE: 1" = 100'  
 DATE: NOVEMBER 2

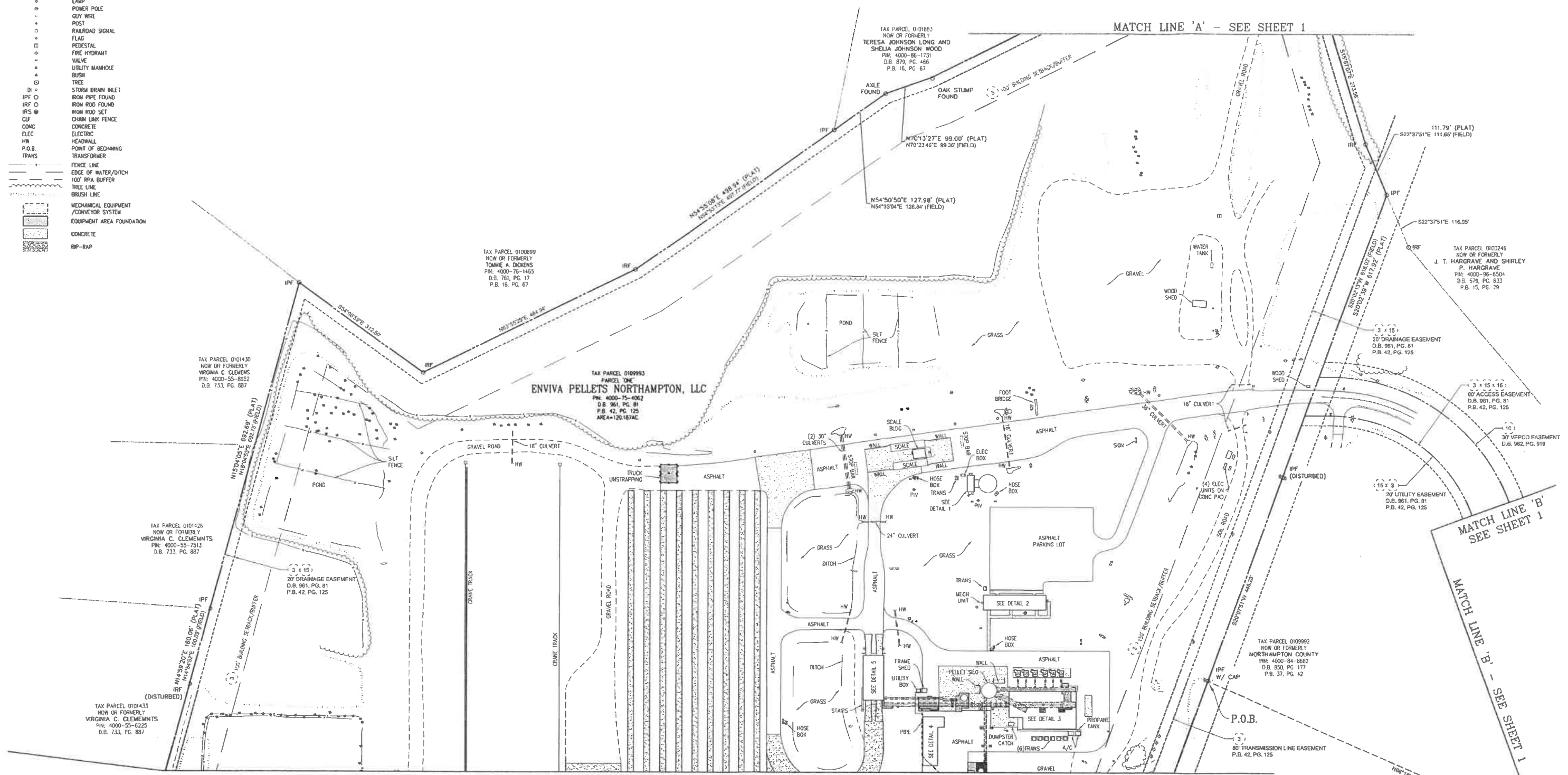
REVISION





**LEGEND**

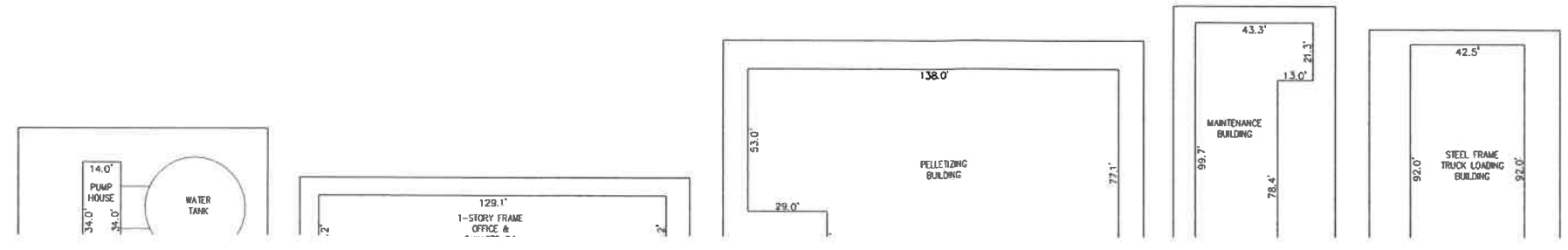
- SIGN
- LAMP
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- GUY WIRE
- POST
- RAILROAD SIGNAL
- FLAG
- PEDESTAL
- FIRE HYDRANT
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- UTILITY MANHOLE
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- IRP ○ IRON ROD SET
- CLF CHAIN LINK FENCE
- CONC CONCRETE
- ELEC ELECTRIC
- HW HEADWALL
- P.O.B. POINT OF BEGINNING
- TRANS TRANSFORMER
- FENCE LINE
- EDGE OF WATER/DITCH
- 100' RPA BUFFER
- TREE LINE
- BRUSH LINE
- MECHANICAL EQUIPMENT / CONVEYOR SYSTEM
- EQUIPMENT AREA FOUNDATION
- CONCRETE
- RIP-RAP



MATCH LINE - SEE SHEET 3

MATCH LINE 'A' - SEE SHEET 1

MATCH LINE 'B' - SEE SHEET 1



PLAT SHOWING  
ALTA/ACSM LAND TITLE SURVEY  
OF  
PROPERTY OWNED BY  
**ENVIVA PELLETS NORTHAMPTON, LLC**  
LOCATED ON  
**TAX PARCEL 01-09993**  
DEED BOOK 961, PAGE 81  
NORTHAMPTON COUNTY, NORTH CAROLINA  
DATE: NOVEMBER 2,

SCALE: 1" = 100'

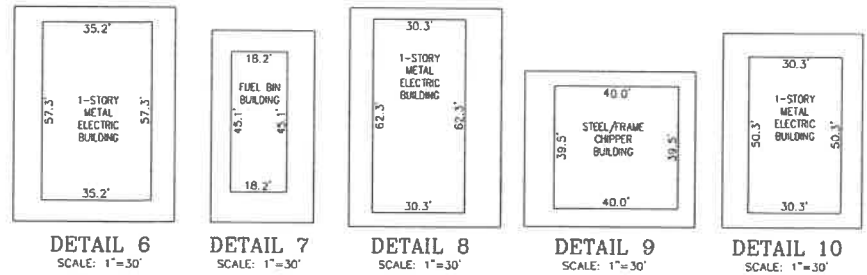
REVISION



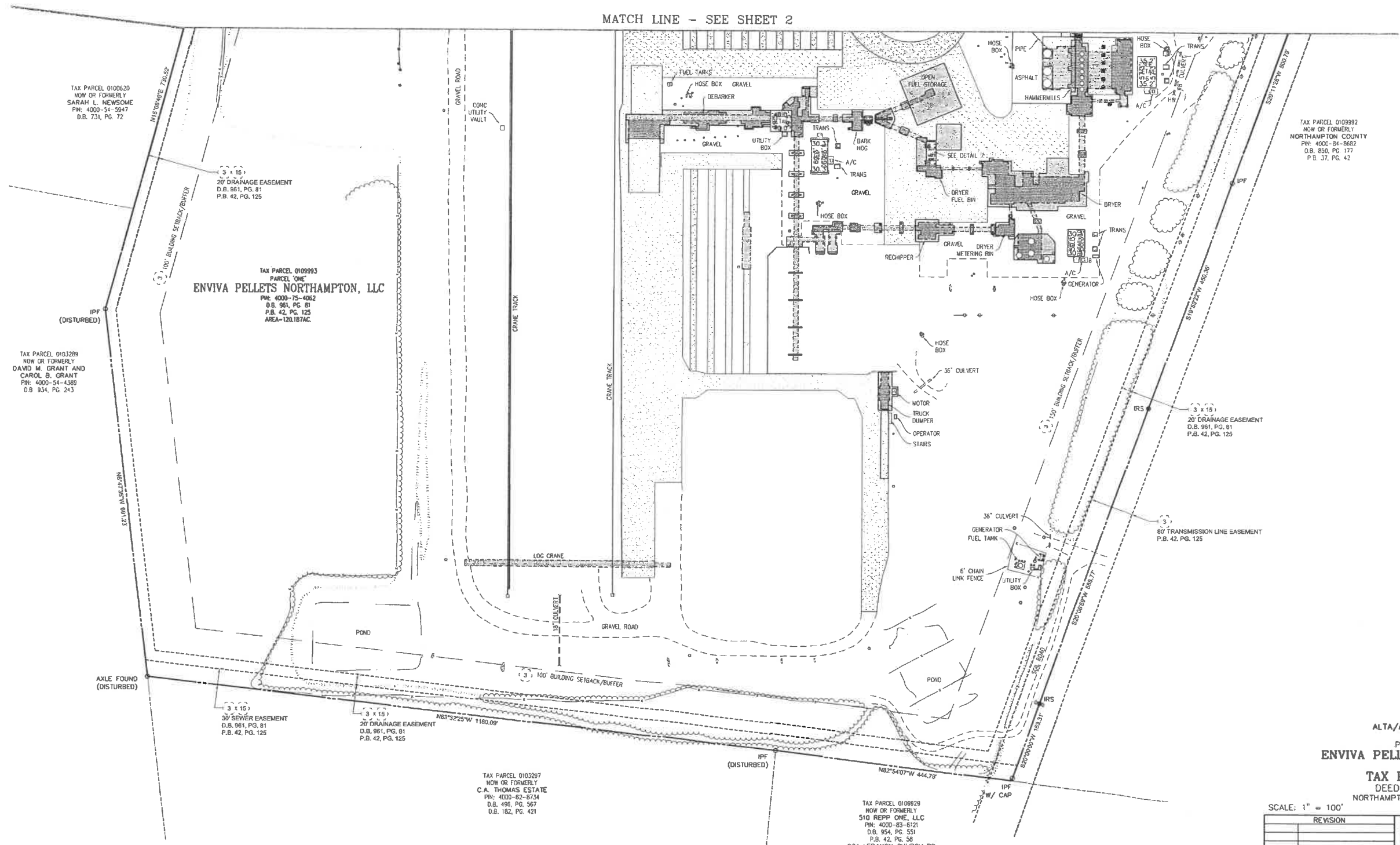


**LEGEND**

- SIGN
- LAMP
- POWER POLE
- CITY WIRE
- POST
- RAILROAD SIGNAL
- FLAG
- PEDESTAL
- FIRE HYDRANT
- VALVE
- UTILITY MANHOLE
- BUSH
- TREE
- STORM DRAIN INLET
- IRN PIPE FOUND
- IRN PIPE FOUND
- IRN ROD FOUND
- IRN ROD SET
- CHAIN LINK FENCE
- CONC
- CONC
- ELEC
- HW
- P.D.B.
- TRANS
- FENCE LINE
- EDGE OF WATER/DITCH
- 100' RPA BUFFER
- TREE LINE
- BRUSH LINE
- MECHANICAL EQUIPMENT /CONCRETE SYSTEM
- EQUIPMENT AREA FOUNDATION
- CONCRETE
- RIP-RAP



MATCH LINE - SEE SHEET 2



TAX PARCEL 0100620  
NOW OR FORMERLY  
SARAH L. NEWSOME  
PIN: 4000-54-5947  
D.B. 731, PG. 72

3' x 15'  
20' DRAINAGE EASEMENT  
D.B. 961, PG. 81  
P.B. 42, PG. 125

TAX PARCEL 0109993  
PARCEL 'ONE'  
ENVIVA PELLETS NORTHAMPTON, LLC  
PIN: 4000-75-4062  
D.B. 961, PG. 81  
P.B. 42, PG. 125  
AREA=120,187AC

TAX PARCEL 0103289  
NOW OR FORMERLY  
DAVID M. GRANT AND  
CAROL B. GRANT  
PIN: 4000-54-4389  
D.B. 934, PG. 243

TAX PARCEL 0109992  
NOW OR FORMERLY  
NORTHAMPTON COUNTY  
PIN: 4000-84-8662  
D.B. 850, PG. 177  
P.B. 37, PG. 42

3' x 15'  
20' DRAINAGE EASEMENT  
D.B. 961, PG. 81  
P.B. 42, PG. 125

80' TRANSMISSION LINE EASEMENT  
P.B. 42, PG. 125

3' x 15'  
30' SEWER EASEMENT  
D.B. 961, PG. 81  
P.B. 42, PG. 125

3' x 15'  
20' DRAINAGE EASEMENT  
D.B. 961, PG. 81  
P.B. 42, PG. 125

TAX PARCEL 0103297  
NOW OR FORMERLY  
C.A. THOMAS ESTATE  
PIN: 4000-87-8734  
D.B. 496, PG. 567  
D.B. 182, PG. 421

TAX PARCEL 0109929  
NOW OR FORMERLY  
SHO REPP ONE, LLC  
PIN: 4000-83-6121  
D.B. 954, PG. 551  
P.B. 42, PG. 58  
964 LEBANON CHURCH RD

PLAT SHOWING  
ALTA/ACSM LAND TITLE SURVEY  
OF  
PROPERTY OWNED BY  
**ENVIVA PELLETS NORTHAMPTON, LLC**  
LOCATED ON  
**TAX PARCEL 01-09993**  
DEED BOOK 961, PAGE 81  
NORTHAMPTON COUNTY, NORTH CAROLINA

SCALE: 1" = 100' DATE: NOVEMBER 27

REVISION







APPENDIX D - ELECTRONIC MODELING FILES

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One Copley Parkway, Suite 310, Morrisville, North Carolina 27560 U.S.A. ■ (919) 462-9693 ■ Fax (919) 462-9694

April 15, 2014

William Flynn  
Planning and Zoning Director  
Northampton County Planning and Zoning  
102 West Jefferson Street  
Jackson, NC 27845

**Subject: Air Permit Application Zoning Consistency Determination Request  
Enviva Pellets Northampton, LLC**

Dear Mr. William Flynn,

This letter is a request for a determination of whether planned installation of an eight hammermill located at Lebanon Church Road in Gaston, NC is consistent with current local zoning requirements. A copy of the air permit application being submitted to the North Carolina Division of Air Quality (NCDAQ) is attached.

Your confirmation of zoning consistency is needed by the NCDAQ prior to issuance of the air quality construction permit. Please complete the attached form and send to the address shown on the form as soon as possible. In the interim, we would appreciate it if you would stamp this cover letter with your department's seal, sign and date next to your seal and return the sealed cover letter via FAX to my attention at (919) 462-9694. This stamp is needed to be considered administratively complete by the NC Division of Air Quality. Should you require additional information to complete your review, please do not hesitate to contact me at (919) 462-9693.

Sincerely,

A handwritten signature in cursive script that reads "Gina Hicks".

Gina Hicks  
Senior Consultant

Attachment



## Zoning Consistency Determination

Facility Name Enviva Pellets Northampton, LLC

Facility Street Address 874 Lebanon Church Road

Facility City Gaston

Description of Process Wood pellet manufacturing facility

SIC Code/NAICS SIC - 2499 ; NAICS - 321999

Facility Contact Joe Harrell

Phone Number (252) 209-6032

Mailing Address 142 N.C. Route 561 East

Mailing City, State Zip Ahoskie, NC 27910

Based on the information given above:

- I have received a copy of the air permit application (draft or final) AND...
- There are no applicable zoning and subdivision ordinances for this facility at this time
- The proposed operation IS consistent with applicable zoning and subdivision ordinances
- The proposed operation IS NOT consistent with applicable zoning and subdivision ordinances  
(please include a copy of the rules in the package sent to the air quality office)
- The determination is pending further information and can not be made at this time
- Other: \_\_\_\_\_

Agency \_\_\_\_\_

Name of Designated Official \_\_\_\_\_

Title of Designated Official \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

Please forward to the mailing address listed above and the air quality office at the appropriate address as checked on the back of this form.

Courtesy of the Small Business Assistance Program  
toll free at 1-877-623-6748 or on the web at [www.envhelp.org/sb](http://www.envhelp.org/sb)



**All PSD and Title V Applications**

X Attn: Dr. Donald van der Vaart, PE  
DAQ – Permitting Section  
1641 Mail Service Center  
Raleigh, NC 27699-1641

**Local Programs**

- Attn: David Brigman  
Western NC Regional Air Quality Agency  
49 Mount Carmel Road  
Asheville, NC 28806  
(828) 250-6777
- Attn: Robert R. Fulp  
Forsyth County  
Environmental Affairs Department  
537 N. Spruce Street  
Winston-Salem, NC 27101-1362  
(336) 703-2440
- Attn: Donald R. Willard  
Mecklenburg County Air Quality  
700 N. Tryon Street, Suite 205  
Charlotte, NC 28202-2236  
(704) 336-5500

**Division of Air Quality Regional Offices**

- Attn: Paul Muller  
Asheville Regional Office  
2090 U.S. Highway 70  
Swannanoa, NC 28778  
(828) 296-4500
- Attn: Robert Fisher  
Washington Regional Office  
943 Washington Square Mall  
Washington, NC 27889  
(252) 946-6481
- Attn: Steven Vozzo  
Fayetteville Regional Office  
225 Green Street Suite 714  
Fayetteville, NC 28301  
(910) 433-3300
- Attn: Wayne Cook  
Wilmington Regional Office  
127 Cardinal Drive Extension  
Wilmington, NC 28405  
(910) 796-7215
- Attn: Ron Slack  
 Mooresville Regional Office  
610 East Center Avenue, Suite 301  
 Mooresville, NC 28115  
(704) 663-1699
- Attn: Margaret Love, PE  
Winston-Salem Regional Office  
585 Waughtown Street  
Winston-Salem, NC 27107  
(336) 771-5000
- Attn: Patrick Butler, PE  
Raleigh Regional Office  
1628 Mail Service Center  
Raleigh, NC 27699-1628  
(919) 791-4200





APPENDIX E - ZONING CONSISTENCY DETERMINATION

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