

ROY COOPER  
*Governor*

MICHAEL S. REGAN  
*Secretary*

MICHAEL A. ABRACZINSKAS  
*Director*



NORTH CAROLINA  
*Environmental Quality*

January XX, 2021

Mr. Basil Polivka II  
Director of Pyrolysis Program  
International Tie Disposal, LLC - Project Tie  
13700 Providence Rd.  
Suite 200  
Weddington, NC 28104

Subject: Air Permit No. 10676R00  
**International Tie Disposal, LLC - Project Tie**  
Hamlet, Richmond County, North Carolina  
Permit Class: Synthetic Minor  
**Facility ID# 7700101**

Dear Mr. Polivka:

In accordance with your completed application received December 30, 2020, we are forwarding herewith Permit No. 10676R00 to International Tie Disposal, LLC - Project Tie, Hamlet, Richmond County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Additionally, any emissions activities determined from your air permit application as meeting the exemption requirements contained in 15A NCAC 2Q .0102 have been listed for information purposes as an "ATTACHMENT" to the enclosed air permit. Please note the records retention requirements are contained in General Condition 2 of the General Conditions and Limitations.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. Such a request will stay the effectiveness of the entire permit. This hearing request must be in the form of a written petition, conforming to G.S. 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Unless a request for a hearing is made pursuant to G.S. 150B-23, this air permit shall be final and binding.



North Carolina Department of Environmental Quality | Division of Air Quality  
Fayetteville Regional Office | 225 Green Street, Suite 714 | Fayetteville, NC 28301-5094  
910.433.3300 T | 910.485.7467 F

You may request modification of your air permit through informal means pursuant to G.S. 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that the permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under G.S. 150B-23.

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

**Note that initial source testing is required to be conducted no later than 90 days after startup of the biochar kiln operations. See permit Specific Condition and Limitation A.10 for details on the testing and notification requirements.**

**Note that subsequent source testing is required to be conducted no more than 13 months after the previous performance test. See permit Specific Condition and Limitation A.11 for details on the testing and notification requirements.**

**Note also that a notification of biochar kiln operation startup is required. See permit Specific Condition and Limitation A.14 for details.**

This permit shall be effective from January XX, 2021 until December 31, 2028, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

**Changes have been made to the permit stipulations. The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. Should you have any questions concerning this matter, please contact Jeffrey D. Cole at 910-433-3300.**

Sincerely,

Heather Carter, Regional Supervisor  
Division of Air Quality, NC DEQ

JDC  
Enclosures

c: Fayetteville Regional Office

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF AIR QUALITY

**AIR PERMIT NO. 10676R00**

Issue Date: January XX, 2021

Effective Date: January XX, 2021

Expiration Date: December 31, 2028

Replaces Permit: (new)

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To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere in accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

**International Tie Disposal, LLC - Project Tie**

174 Marks Creek Church Road

Hamlet, Richmond County, North Carolina

Permit Class: Unknown

**Facility ID# 7700101**

(the Permittee) is hereby authorized to construct and operate the air emissions sources and/or air cleaning devices and appurtenances described below:

<b>Emission Source ID</b>	<b>Emission Source Description</b>	<b>Control System ID</b>	<b>Control System Description</b>
ES-1	Biochar Kilns (426 Units) each with integral Natural Gas-Fired Kiln Burners (0.0078 mmBtu/hr maximum heat input each)	CD-1	Afterburners (62 units) Natural Gas-Fired (0.125 mmBtu/hr maximum heat input each)

in accordance with the completed application 7700101.20A received December 30, 2020 including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environmental Quality, Division of Air Quality (DAQ) and are incorporated as part of this permit.

This permit is subject to the following specified conditions and limitations including any TESTING, REPORTING, OR MONITORING REQUIREMENTS:

**A. SPECIFIC CONDITIONS AND LIMITATIONS**

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0202, 2D .0515, 2D .0516, 2D .0521, 2D .0535, 2D .0540, 2D .0541, 2D .0611, 2D .1806, 2Q .0309, 2Q .0315 and 2Q .0711.
2. EQUIPMENT LABELING - All on-site permitted equipment shall be labeled with the emission source ID number listed in the Emission Source Table of this permit and a numerical sequence number that differentiates each biochar kiln from the others onsite and each afterburner from the others onsite. This shall be completed upon startup of the sources and control devices.
3. PERMIT RENEWAL AND EMISSION INVENTORY REQUIREMENT - The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with application Form A) should be submitted to the Regional Supervisor, DAQ. Also, at least 90 days prior to the expiration date of this permit, the Permittee shall submit the air pollution emission inventory report (with Certification Sheet) in accordance with 15A NCAC 2D .0202, pursuant to N.C. General Statute 143-215.65. The report shall be submitted to the Regional Supervisor, DAQ and shall document air pollutants emitted for the 2027 calendar year.
4. PARTICULATE CONTROL REQUIREMENT - As required by 15A NCAC 2D .0515 "Particulates from Miscellaneous Industrial Processes," particulate matter emissions from the emission sources shall not exceed allowable emission rates. The allowable emission rates are, as defined in 15A NCAC 2D .0515, a function of the process weight rate and shall be determined by the following equation(s), where P is the process throughput rate in tons per hour (tons/hr) and E is the allowable emission rate in pounds per hour (lbs/hr).  
$$E = 4.10 * (P)^{0.67} \quad \text{for } P \leq 30 \text{ tons/hr, or}$$
$$E = 55 * (P)^{0.11} - 40 \quad \text{for } P > 30 \text{ tons/hr}$$
5. SULFUR DIOXIDE CONTROL REQUIREMENT - As required by 15A NCAC 2D .0516 "Sulfur Dioxide Emissions from Combustion Sources," sulfur dioxide emissions from the combustion sources shall not exceed 2.3 pounds per million Btu heat input.

7. VISIBLE EMISSIONS CONTROL REQUIREMENT - As required by 15A NCAC 2D .0521 "Control of Visible Emissions," visible emissions from the emission sources, manufactured after July 1, 1971, shall not be more than 20 percent opacity when averaged over a six-minute period, except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period. However, sources which must comply with a visible emissions standard in 15A NCAC 2D .0524 "New Source Performance Standards" or .1110 "National Emission Standards for Hazardous Air Pollutants" shall meet that standard instead of the 2D .0521 visible emissions standard.
8. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:
  - a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
    - i. the name and location of the facility,
    - ii. the nature and cause of the malfunction or breakdown,
    - iii. the time when the malfunction or breakdown is first observed,
    - iv. the expected duration, and
    - v. an estimated rate of emissions.
  - b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

9. FUGITIVE DUST CONTROL REQUIREMENT - As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints are received or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 2D .0540(f).

"Fugitive dust emissions" means particulate matter that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

10. INITIAL TESTING REQUIREMENT - Under the provisions of North Carolina General Statute 143-215.108 and in accordance with 15A NCAC 2D .0605, the Permittee shall verify emission factors as submitted in the permit application and establish the minimum operating temperatures of the afterburners by testing the emission sources for the specified pollutant(s) as follows:

Affected Source(s)	Pollutant	Test Method
Biochar Kilns (426 Units) each with integral Natural Gas-Fired Kiln Burners (0.0078 mmBtu/hr maximum heat input each)	PM (Filterable and Condensable Particulate Matter) NOx CO VOC	DAQ Approved Methods
	HAPs/TAPs emitted	Method 320 (FTIR)
	Visible Emissions (VE)	DAQ Approved Method

- a. The Permittee shall conduct the testing within 90 days after startup of the biochar kiln operations for each raw material type.
- b. Testing shall include PM (Filterable and Condensable Particulate Matter), NOx, CO, VOC, Visible Emissions (VE), and HAPs/TAPs emitted.
- c. The source testing shall be conducted on the exhaust stacks of four (4) different kilns and afterburners for each raw material type, creosote treated railroad ties and untreated lumber, for a total of eight (8) different kilns and afterburners being tested.
- d. Unless otherwise specified by federal rules, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600.
- e. The Permittee shall arrange for air emission testing protocols to be provided to the DAQ prior to testing. Testing protocols are not required to be pre-approved by the DAQ prior to testing. The DAQ shall review testing protocols for pre-approval prior to testing if requested by the Permittee at least 45 days before conducting the test.
- f. To afford the Regional Supervisor, DAQ, the opportunity to have an observer present, the Permittee shall PROVIDE the Regional Office, in WRITING, at least 15 days' notice of any required performance test(s).
- g. Two copies of the test results must be submitted to the Regional Supervisor, DAQ, in accordance with the requirements of 15A NCAC 02D .2600 no later than 30 days after the testing is completed. At the same time the two copies of the initial test results are submitted to the Regional Supervisor, DAQ, the Permittee shall submit a

permit revision pursuant to 15A NCAC 02Q .0316 to incorporate the minimum and/or maximum combustion zone temperature into the permit.

- h. The Permittee shall develop, and submit to the DAQ for approval no later than 30 days after the testing is completed, a Continuous Parametric Monitoring Plan establishing the minimum and/or maximum combustion zone operating temperature of the Afterburners (CD-1) with respect to the specific pollutants. The minimum and or maximum combustion zone operating temperature for the afterburners shall be based upon average temperature data over the span of the test runs. Documentation for the minimum and/or maximum combustion zone operating temperature shall be submitted to the DAQ as part of the initial compliance test report.
- i. This permit may be revoked, with proper notice to the Permittee, or enforcement procedures initiated, if the results of the tests indicate that the facility does not meet applicable limitations.
- j. The source shall be responsible for ensuring, within the limits of practicality, that the equipment or process being tested is operated at or near its maximum normal production rate, or at a lesser rate if specified by the Director or his delegate.
- k. All associated testing costs are the responsibility of the Permittee.

11. SUBSEQUENT TESTING REQUIREMENT - Under the provisions of North Carolina General Statute 143-215.108 and in accordance with 15A NCAC 2D .0605, the Permittee shall verify emission factors as submitted in the permit application and confirm or reestablish operating temps of the afterburners by testing the emission sources for the specified pollutant(s) as follows:

Affected Source(s)	Pollutant	Test Method
Biochar Kilns (426 Units) each with integral Natural Gas-Fired Kiln Burners (0.0078 mmBtu/hr maximum heat input each)	PM (Filterable and Condensable Particulate Matter) NOx CO VOC	DAQ Approved Methods
	HAPs/TAPs emitted	Method 320 (FTIR)
	Visible Emissions (VE)	DAQ Approved Method

- a. Testing shall include PM (Filterable and Condensable Particulate Matter), NOx, CO, VOC, Visible Emissions (VE), and all HAPs/TAPs emitted.
- b. Subsequent performance tests must be completed **no more than 13 months after the previous performance test.**

- c. For a given pollutant, if the emission factor obtained during 3 consecutive annual performance tests is less than or equal to the emission factor as submitted in the permit application, the Permittee shall be allowed to reduce testing frequency for that given pollutant to once every three (3) years. The three (3) years testing shall be conducted no later than 37 months after the previously conducted test. For a given pollutant, if the emission factor obtained during the performance testing is greater than the emission factor submitted in the permit application, then annual testing shall resume for that given pollutant.
- d. The source testing shall be conducted on the exhaust stacks of four (4) different kilns and afterburners for each raw material type, creosote treated railroad ties and untreated lumber, for a total of eight (8) different kilns and afterburners that have not been previously tested.
- e. The Permittee may re-establish any parametric operating value during periodic testing. Compliance with previously approved parametric operating values is not required during periodic required testing or other tests undertaken to re-establish parametric operating values by the Permittee. If the new parametric operating values re-established during periodic testing are more stringent, the Permittee shall submit a request to revise the value(s) in the permit at the same time the test report required pursuant to General Condition 17 is submitted. The permit revision will be processed pursuant to 15A NCAC 02Q .0316. If, during performance testing, the new parametric operating values are less stringent, the Permittee may request to revise the value(s) in the permit pursuant to 15A NCAC 02Q .0309.
- f. The Permittee shall comply with applicable emission standards at all times including during periods of testing.
- g. Unless otherwise specified by federal rules, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600.
- h. The Permittee shall arrange for air emission testing protocols to be provided to the DAQ prior to testing. Testing protocols are not required to be pre-approved by the DAQ prior to testing. The DAQ shall review testing protocols for pre-approval prior to testing if requested by the Permittee at least 45 days before conducting the test.
- i. To afford the Regional Supervisor, DAQ, the opportunity to have an observer present, the Permittee shall PROVIDE the Regional Office, in WRITING, at least 15 days' notice of any required performance test(s).
- j. Two copies of the test results must be submitted to the Regional Supervisor, DAQ, in accordance with the requirements of 15A NCAC 02D .2600 no later than 30 days after the testing is completed.
- k. This permit may be revoked, with proper notice to the Permittee, or enforcement procedures initiated, if the results of the tests indicate that the facility does not meet applicable limitations.



l. The source shall be responsible for ensuring, within the limits of practicality, that the equipment or process being tested is operated at or near its maximum normal production rate, or at a lesser rate if specified by the Director or his delegate.

m. All associated testing costs are the responsibility of the Permittee.

12. AFTERBURNER REQUIREMENTS - As required by 15A NCAC 2D .0611, VOC and CO emissions shall be controlled as described in the permitted equipment list.

a. Inspection and Maintenance Requirements - The Permittee shall properly operate, inspect and maintain the control devices at all times. To comply with the provisions of this permit and ensure that emissions do not exceed the regulatory limits, the Permittee shall perform periodic inspections and maintenance (I&M) as recommended by the manufacturer. At a minimum, the Permittee shall perform an annual (for each 12-month period following the initial inspection) internal inspection of each afterburner unit and calibration of continuous monitoring instrumentation.

b. Monitoring Requirements - The Permittee shall ensure the proper performance of each afterburner by monitoring the following operational parameters:

i. The minimum and/or maximum combustion zone operating temperature in the Afterburners (CD-1) shall be maintained at the minimum and/or maximum combustion zone operating temperature established during the initial source test (based on a rolling 3-hour average) during operation. The 3-hour rolling averages for each afterburner shall be calculated using a minimum of one (1) data point every 15-minute period. Each 15-minute data point shall be calculated by averaging all the valid data values recorded by the continuous monitoring system (CMS) for that 15-minute period. CMS downtime shall not exceed 3% of the time the kilns are operational, per semi-annual period.

ii. At the same time the two copies of the initial test results are submitted to the Regional Supervisor, DAQ, pursuant to General Condition 17, the Permittee shall submit a request to incorporate the minimum and/or maximum combustion zone temperature into the permit conditions. The permit revision will be processed pursuant to 15A NCAC 02Q .0316.

iii. These approved parameters shall apply at all times except as noted in the following:

- a. The Permittee may re-establish any parametric operating value during periodic testing. Compliance with previously approved parametric operating values is not required during periodic required testing or other tests undertaken to re-establish parametric operating values by the Permittee. If the new parametric operating values re-established during periodic testing are more stringent, the Permittee shall submit a request to revise the value(s) in the permit at the same time the test report required pursuant to General Condition 17 is submitted. The permit revision will be processed pursuant to 15A NCAC 02Q .0316. If, during performance testing, the new parametric operating values are less stringent, the Permittee may request to revise the value(s) in the permit pursuant to 15A NCAC 02Q .0309.

c. Recordkeeping Requirements

- i. The results of all inspections and any variance from manufacturer's recommendations or from those given in this permit (when applicable) shall be investigated with corrections made and dates of actions recorded in a logbook. Records of all maintenance activities shall be recorded in the logbook.
- ii. The Permittee shall continuously record the record the rolling 3-hour average minimum and/or maximum combustion zone operating temperature in each afterburner.
- iv. The Permittee shall document all periods, including date and duration, during which the recording of minimum and/or maximum combustion zone operating temperature in the Afterburners (CD-1) did not occur.
- iii. The logbook (in written or electronic form) shall be kept on-site and made available to DAQ personnel upon request.

d. Reporting Requirements – The Permittee shall submit to the Regional Supervisor, DAQ, on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June, a summary report of emissions and/or operational data listed below:

- i. Identification of all periods, including date and duration, during which the recording of minimum and/or maximum combustion zone operating temperature in the Afterburners (CD-1) did not meet the CMS downtime requirements in Section 12.B.ii above.

- 13. CONTROL AND PROHIBITION OF ODOROUS EMISSIONS - As required by 15A NCAC 2D .1806 "Control and Prohibition of Odorous Emissions" the Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.
- 14. NOTIFICATION REQUIREMENT - In accordance with 15A NCAC 2Q .0309, this permit may be revoked unless Kilns (ID No. ES-1) and appurtenances are constructed in accordance with the approved plans, specifications, and other supporting data. Within 15 days after start-up of the new or modified facilities, the Permittee shall provide written notice of the start-up to the Regional Supervisor, DAQ.
- 15. LIMITATION TO AVOID 15A NCAC 2Q .0501 - Pursuant to 15A NCAC 2Q .0315 "Synthetic Minor Facilities," to avoid the applicability of 15A NCAC 2Q .0501 "Purpose of Section and Requirement for a Permit," as requested by the Permittee, facility-wide emissions shall be less than the following:

Pollutant	Emission Limit (Tons per consecutive 12-month period)
NO <sub>x</sub>	100
CO	100
VOC	100

- a. Operations Restrictions - To ensure emissions do not exceed the limitations above, the following restrictions shall apply:
  - i. No more than 58,400 kiln operations per 12 consecutive months.
  - ii. No more than 58,400 tons of raw material will be processed in the kilns per 12 consecutive months.
  - iii. The Permittee shall perform inspections and maintenance per the requirements of 15A NCAC 2D .0611 "Afterburner Requirements."
- b. Recordkeeping Requirements
  - i. The Permittee shall record monthly and total annually the following:
    - a. Number of kiln operations per month on each type of raw material.
    - b. The amounts of each raw material processed in the kilns per month, in tons.
    - c. Emissions of NO<sub>x</sub>, CO and VOC, in tons.
  - ii. The Permittee shall comply with the recordkeeping requirements in the 15A NCAC 2D .0611 "Afterburner Requirements" permit condition.

- c. Reporting Requirements – The Permittee shall submit to the Regional Supervisor, DAQ, on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June, a summary report of emissions and/or operational data listed below:
  - i. The data shall include monthly and 12-month rolling totals for the previous 12-month period.
    - a. Number of kiln operations on each type of raw material.
    - b. The amounts of each raw material processed, in tons.
    - c. Emissions of NOx, CO and VOC, in tons.

16. LIMITATION TO AVOID 15A NCAC 2D .0530 "PREVENTION OF SIGNIFICANT DETERIORATION" - In accordance with 15A NCAC 2Q .0317, to comply with this permit and avoid the applicability of 15A NCAC 2D .0530 "Prevention of Significant Deterioration," as requested by the Permittee, emissions shall be limited as follows:

Affected Source(s)	Pollutant	Emission Limit (Tons Per Consecutive 12-month Period)
Facility Wide	NOx	250
Facility Wide	VOC	250

- a. Operations Restrictions, Recordkeeping Requirements, and Reporting Requirements - To ensure emissions do not exceed the limitations above, the following restrictions shall apply:
  - i. By complying with the operations restrictions, recordkeeping requirements, and reporting requirements in the 15A NCAC 2Q .0315 "Synthetic Minor Facilities" permit condition, the Permittee shall have also complied with the operations restrictions, recordkeeping requirements, and reporting requirements for 15A NCAC 2Q .0317, Limitation to Avoid 15A NCAC 2D .0530.

17. TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT - Pursuant to 15A NCAC 2Q .0711 "Emission Rates Requiring a Permit," for each of the below listed toxic air pollutants (TAPs), the Permittee has made a demonstration that facility-wide actual emissions, where one or more emission release points are unobstructed and vertically oriented, do not exceed the Toxic Permit Emission Rates (TPERs) listed in 15A NCAC 2Q .0711(b). The facility shall be operated and maintained in such a manner that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed TPERs listed in 15A NCAC 2Q .0711(b).

- a. A permit to emit any of the below listed TAPs shall be required for this facility if actual emissions from all sources will become greater than the corresponding TPERs.
- b. PRIOR to exceeding any of these listed TPERs, the Permittee shall be responsible for obtaining a permit to emit TAPs and for demonstrating compliance with the requirements of 15A NCAC 2D .1100 "Control of Toxic Air Pollutants".
- c. In accordance with the approved application, the Permittee shall maintain records of operational information demonstrating that the TAP emissions do not exceed the TPERs as listed below:

Pollutant	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Acetaldehyde (75-07-0)				28.43
Acrolein (107-02-8)				0.08
Ammonia (as NH <sub>3</sub> ) (7664-41-7)				2.84
Arsenic & Compounds (total mass of elemental AS, arsine and all inorganic compounds) (ASC (7778394))	0.194			
Benzo(a)pyrene (Component of 83329/POMTV & 56553/7PAH) (50-32-8)	3.044			
Beryllium Metal (unreacted) (Component of BEC) (7440-41-7)	0.378			
Cadmium Metal, elemental, unreacted (Component of CDC) (7440-43-9)	0.507			
Carbon tetrachloride (56-23-5)	618.006			
Chlorine (7782-50-5)		1.6		0.95
Chlorobenzene (108-90-7)		92.7		
Chloroform (67-66-3)	396.631			
Chromium (VI) Non-Specific Compounds, as Chrom(VI) (Component CRC) (NSCR6)	0.008			
Cresol (mixed isomers) (1319-77-3)			2.32	
DEHP (Di(2-ethylhexyl)phthalate) (117-81-7)		1.3		
Dichlorobenzene(p), 1,4- (106-46-7)				69.50
Ethylene dichloride (1,2-dichloroethane) (107-06-2)	350.511			

Formaldehyde (50-00-0)				0.16
Hexane, n- (110-54-3)		46.3		
Hydrogen chloride (hydrochloric acid) (7647-01-0)				0.74
Manganese & compounds (MNC)		1.3		
Mercury, vapor (Component of HGC) (7439-97-6)		0.025		
Methylene chloride (75-09-2)	2213.752		1.79	
Nickel metal (Component of NIC) (7440-02-0)		0.3		
PCB (polychlorinated biphenyls) (1336-36-3)	7.656			
Pentachlorophenol (87-86-5)		0.1	0.03	
Phenol (108-95-2)			1.00	
Styrene (100-42-5)			11.16	
TCE (trichloroethylene) (79-01-6)	5442.140			
Tetrachlorodibenzo-p-dioxin, 2,3,7,8- (Component of CLDC & 83329/POMTV) (1746-01-6)	0.0002767			
Toluene (108-88-3)		197.96		58.97
Vinyl chloride (75-01-4)	35.051			
Xylene (mixed isomers) (1330-20-7)		113.7		68.44

## B. GENERAL CONDITIONS AND LIMITATIONS

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

Regional Supervisor  
North Carolina Division of Air Quality  
Fayetteville Regional Office  
Systel Building  
225 Green Street, Suite 714  
Fayetteville, NC 28301-5094  
910-433-3300

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

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

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

6. In accordance with 15A NCAC 2Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effectuate an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
8. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
9. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
10. In accordance with 15A NCAC 2D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
12. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
13. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
14. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 2Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.



15. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 2D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.
  
16. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**
  
17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval. Additionally, in accordance with 15A NCAC 2D .0605, the Permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the XX of January 2021.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

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Heather Carter  
Regional Supervisor  
By Authority of the Environmental Management Commission

Air Permit No. 10676R00

**Insignificant / Exempt Activities**

<b>Source</b>	<b>Exemption Regulation</b>	<b>Source of TAPs?</b>	<b>Source of Title V Pollutants?</b>
IES-EX-1 Crusher and Kiln Loading	2Q .0102 (h)(5)	Yes	Yes
IES-EX-2 Product Handling and Packaging (System housed in intermodal shipping containers equipped with dust collection vents that vent to one of two external cartridge-type bagfilters [3,048 square feet of filter area, each].)	2Q .0102 (h)(5)	Yes	Yes
IES-EX-3 Haul Roads	2Q .0102 (h)(5)	No	Yes
IES-EX-4 Diesel Storage Tank	2Q .0102 (h)(5)	Yes	Yes
IES-EX-5 Maintenance Welding	2Q .0102 (h)(5)	Yes	Yes
IES-EX-6 Biochar Storage Silos	2Q .0102 (h)(5)	Yes	Yes

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1. Because an activity is exempted from being required to have a permit or permit modification does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
  2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 2D .1100 "Control of Toxic Air Pollutants" or 2Q .0711 "Emission Rates Requiring a Permit."
  3. Sample permit conditions showing the regulatory requirements for exempt sources subject to NESHAP, NSPS, and NCAC rules may be found here:  
<https://deq.nc.gov/aqpermitconditions>