
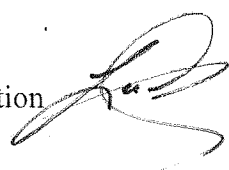



July 2, 2009

Memorandum

To: D.R. van der Vaart, Chief, Permit Section

From: Dennis Igboko 

Through: Lee Daniel, Chief, Technical Services Section 
Michael Pjetraj, Supervisor, SSCB 

SUBJECT: Legal Authority For Requiring Quarterly Excess Emission Reporting
For CEM Affected Facilities Under NSPS Subpart A

Monitoring and reporting of emissions is an integral part of our State compliance program. Sources are required to monitor and report their emissions based on applicable regulations. Air permits incorporate such regulations and specify the frequency of report submittals. In response to a congressional mandate for paper reduction, federal regulations on the reporting frequency were changed, especially those found in 40 CFR Part 60, 61, 63 and 64. However, our state rules and statutes have not moved in the same direction as the federal. There is interpretational latitude in our statute regarding what a specific reporting frequency requirement means, and attempts to reconcile that with the adopted federal requirements have been unsuccessful.

Under the authority of 40 CFR Part 60, Section 60.7(c), we are requesting that source units identified in the attached list be required to report excess emissions and monitoring system performance activities on a quarterly rather than on a semi-annual basis. The increased reporting frequency is necessary to ensure the sources' compliance assessment is carried out efficiently. Apart from being more environmentally responsible in assessing compliance on a quarterly basis, quarterly reporting is also consistent with reporting frequencies currently in place for deviation reporting under NCAC 2Q .0508.

We request that permits issued to sources on the attached list include the recordkeeping and reporting discussed above.

Although this memorandum addresses only NSPS CEM affected facilities, we intend to request similar actions for SIP, NESHAP, MACT sources under different regulatory authority.

Thank you.

Attachment

Cc: Keith Overcash, Director
✓ Samir Parekh w/o attachment
Richard Simpson w/o attachment
Alan Drake w/o attachment
Joseph Voelker

List of NSPS Sources with CEM Installations in North Carolina
Revised 6/30/2009

Source Name	Type of CEMS*	No. of CEMs Installations	NSPS Subpart(s)
3M Pittsboro 4191 Highway 87 South Moncure, NC 27559 Facility ID: 1900104 Permit No. 09006T01 Contact: William S. Bond (919) 642-0006x4013	Opacity	3	A UUU
Blue Ridge Paper Products Canton Mill P.O. Box 4000 Canton, NC 28716 Facility ID: 4400159 Permit No. 08961T10 Contact: Paul S. Dickens (828) 646-6141	NOx/O ₂ , TRS/O ₂ , Opacity	9	A, D
Carolina Stalite P.O. Box 1037 Salisbury, NC 28145 Facility ID: 8400013 ; Norwood Permit No. 03225T34 Facility ID: 8000003 ; Gold Hill Permit No. 03059T37 Contact: Joseph P. Konzelmann (704) 474-3165	SO ₂ /O ₂ Opacity	7	A UUU, O
Craven County Wood Plant Energy 201 Executive Parkway Industrial Park New Bern, NC 28562 Facility ID: 2500158 Permit No. 06419T19 Contact: Ray Bonner (252) 633-9525	Opacity	1	A, Db
Domtar Paper Company, LLC P.O. Box 787 Highway 149 North Plymouth, NC 27962 Facility ID: 5900069 Permit No. 04291R34 Contact: Don Wynne (252) 793-8984	CO/O ₂ , NOx/O ₂ , SO ₂ /O ₂ , TRS/O ₂ , Flow, Opacity	12	A, BB, D, Db
Edgecombe Genco, LLC P.O. Box 370 Battleboro, N.C. 27809 Facility ID: 3300146 Permit No. 06563T10 Contact: Richard S. Frymyer (252) 442-0805	CO ₂ /O ₂ , NOx/O ₂ , SO ₂ /O ₂ , Flow, Opacity	14	A, Da
EPCOR USA Ventures, LLC PO Box 1153 Roxboro, N.C. 27573-1153 Facility ID: 7300056 Permit No. 05856T10	CO ₂ /O ₂ , NOx/O ₂ , Flow, Opacity	4	A, Db

Contact: Terry McDaniel (336) 597-4798			
EPCOR USA Ventures, LLC PO Box 10836 Southport, N.C. 28461 Facility ID: 1000067 Permit No. 05884T08 Contact: Paul E. Stubbs (910) 457-5056	CO ₂ /O ₂ , NOx/O ₂ , Flow, Opacity	8	A, Db
GlaxoSmithKline PO Box 13398 Mail Code 5.4826 RTP, North Carolina 27709 Facility ID: 3200017 Permit No. 04612T29 Contact: Lindsay Walata (919) 483-4640	CO	1	A
International Paper 895 John L. Riegel Road Riegelwood, NC 28456 Facility ID: 2400036 Permit No. 03138R33 Contact: Gary Morrow (910) 362-3309	TRS/O ₂ Opacity	3	A, BB
KapStone Kraft Paper Corporation 100 Gaston Road Roanoke Rapids, NC 27870 Facility ID: 4200007 Permit No. 01649T43 Contact: Mike Knudson (252) 533-6280	NOx/O ₂ , SO ₂ /O ₂ , TRS/O ₂ , Opacity	5	A, BB
Louisiana Pacific Corporation 10475 Boston Road Roxboro, NC 27573 Facility ID: 7300061 Permit No. 07760T15 Contact: Wayne Young (336) 599-8080x201	Opacity	2	A Dc
New South Lumber Company, Inc. Graham Plant 4408 Mt. Hermon-Rock Creek Road Graham, NC 27253 Facility ID: 0100237 Permit No. 06740T14 Contact: Donald E. Olson or Terry Bishop (336) 236-8418	Opacity	1	A, Dc
Nucor Steel P.O. Box 279 Winton, NC 27986 Facility ID: 4600099 Permit No. 08680T11 Contact: Robert McCracken (252) 356-3707	Opacity	1	A, AAa
PCS Phosphate Company, Inc.	SO ₂ /O ₂	4	A, H

Phosphate Division P.O. Box 48 Aurora, NC 27806 Facility ID: 0700071 Permit No. 04176T42 Contact: Pete Wind (252) 322-8125			
Plant Rowan County Southern Power Company 5755 North Carolina 801 Highway Salisbury, NC 28147 Facility ID: 8000163 Permit No. 08758T12 Contact: Kevin Simmons (832) 681-3389	NOx/O ₂	5	A GG
PPG Industries Inc 940 Washburn Switch Road Shelby, NC 28150-9089 Facility ID: 2300153 Permit No. 01958T49 Contact: Richard Young (704) 334-2281	Opacity	3	A,CC
Progress Energy Carolinas, Inc. P.O. Box 1551 Raleigh, NC 27602 Facility ID: 1900063 ; Cape Fear Permit No. 01057T28 Facility ID: 9600017 ; H. F. Lee Permit No. 01812T33 Facility ID: 7300045 ; Mayo Permit No. 03478T29 Facility ID: 7700070 ; Richmond Permit No. 08759T10 Facility ID: 7300029 ; Roxboro Permit No. 01001T44 Facility ID: 6500036 ; Sutton Permit No. 01318T23 Facility ID: 7800147 ; Weatherspoon Permit No. 06094T15 Contact: Steve Boone (919) 546-4798	CO ₂ /O ₂ , NOx/O ₂ , SO ₂ /O ₂ , Flow, Opacity	149 (includes backup system)	A,D (Rox 4, Mayo)
Rosemary Power Station Virginia Electric and Power Company 120 West 12th Street Roanoke Rapids, NC 27870 Facility ID: 4200170 Permit No. 06586T14 Contact: Joe Leslie (804) 273-3081	NOx/O ₂	2	A GG
Saint-Gobain Containers, Inc. 620 Facet Road Henderson, NC 27537-0887 Facility ID: 9100069 Permit No. 02834T18 Contact: Richard Buzalka (252) 430-3649	Opacity	1	A, CC
Saint-Gobain Containers, Inc. P.O. Box 1757 Wilson, NC 27893 Facility ID: 9800155 Permit No. 03713T21 Contact: Ross C. Houser (252) 291-1500 or (252) 234-5212	Opacity	2	A CC

<p>T.Z. Osborne Waste Water Treatment Plant City of Greensboro P.O. Box 3136 Greensboro, NC 27402-2192 Facility ID: 4100923 Permit No. 04489R19 Contact: Wally Kling (336) 433-7224</p>	THC/O ₂	1	A O
<p>Unilin Flooring N.V. 149 Homanit USA Road Mount Gilead, North Carolina 27306 Facility ID: 6200061 Permit No. 08803T12 Contact: Bob Pierce (910) 439-6959 x233</p>	Opacity	1	A
<p>Universal Leaf North America, Inc. P.O. Box 519 Nashville, NC 27856 Facility ID: 6400287 Permit No. 09135R09 Contact: John Sabatini (252) 462-4300</p>	Opacity	4	A Dc
<p>University of North Carolina at Chapel Hill 730 Airport Road, Campus Box 1855 Chapel Hill, NC 27599-1855 Facility ID: 6800043 Permit No. 03069T22 Contact: Timothy L. Aucoin (919) 962-1309</p>	NOx/O ₂ , SO ₂ /O ₂ , Opacity	12	A, Db
<p>West Fraser Lumber Co. Ltd. P.O. Box 459 Seaboard, NC 27876 Facility ID: 6600041 Permit No. 03937T18 Contact: Brian Parker (252) 589-8265</p>	Opacity	1	A, Dc
<p>Westmoreland Partners, LLC Roanoke Valley Energy Facility P.O Box 351, Weldon, NC 27890 Facility ID: 4200174 Permit No. 06964T17 Contact: Chris Hews (919) 536-3200</p>	CO ₂ /O ₂ , NOx/O ₂ , SO ₂ /O ₂ , Flow, Opacity	10	A, Da
<p>Weyerhaeuser Company Greenville Lumber Facility P.O. Box 280 Ayden, NC 28513 Facility ID: 7400252 Permit No. 06270T19 Contact: Jack Godwin (252) 746-7217</p>	Opacity	1	A, Dc
<p>Woodgrain Millwork [former Suez Biopower] P.O. Box 612 Lenoir, NC 28645 Facility ID: 1400167</p>	Opacity	2	A Dc

Permit No. 07568T10 Contact: David Burns (828) 754-0320			
WSA Rocky River Regional WWTP P.O. Box 428 Concord, NC 28026-0428 Facility ID: 1300002 Permit No. 04475R16 Contact: Timothy H. Mauldin (704) 788-4164x14	CO/O ₂ , THC	2	A, O
CO=Carbon Monoxide; Flow=Volumetric Flowrate; Hg=Mercury; NH ₃ =Ammonia; NO _x =Nitrogen Oxides; O ₂ =Oxygen diluent; SO ₂ =Sulfur Dioxide; THC=Total Hydrocarbons; TRS=Total Reduced Sulfides			
<i>For more information contact the source at address shown or DAQ CEM Coordinator, Dennis Igboko at (919) 733-1467, Dennis.Igboko@ncdenr.gov</i>			