

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Person
NC Facility ID: 7300045
Inspector's Name: Steven Carr
Date of Last Inspection: 03/01/2016
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Duke Energy Progress, LLC - Mayo Facility</p> <p>Facility Address: Duke Energy Progress, LLC - Mayo Facility 10660 Boston Road Roxboro, NC 27574</p> <p>SIC: 4911 / Electric Services NAICS: 221112 / Fossil Fuel Electric Power Generation</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 02D: .0510, .0515, .0516, .0519, .0521, .0524, .0530, .0540, .1100, .1111 02Q: .0308, .0317, .0400 NSPS: Subparts D, Y, OOO, IIII (4I), JJJJ (4J) NESHAP: Subparts ZZZZ (4Z), UUUUU (5U) PSD: NOx, SO2, PM PSD Avoidance: PM2.5 NC Toxics: 02D .1100 112(r): n/a Other: CSAPR</p> <p>Removed: CAIR, 02D .2400, 02D .2500</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	
Herbert Lea, Sr. EHS Professional (336) 597-7309 1700 Dunnaway Road Roxboro, NC 27574	Tom Copolo Station Manager (336) 597-7307 10660 Boston Road Roxboro, NC 27574	Erin Wallace Environmental Specialist II (919) 546-5797 410 South Wilmington Street Raleigh, NC 27601	<p>Application Numbers: 7300045.14C & .15E Date Received: 09/23/2014 Application Type: Renewal/Modification Application Schedule: TV-Renewal (.14C) TIV (.15E)</p> <p>Existing Permit Data Existing Permit Number: 03478/T44 Existing Permit Issue Date: 03/30/2016 Existing Permit Expiration Date: 02/28/2021</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	3490.60	2169.82	35.74	286.79	254.81	5.40	1.48 [Cyanide & compounds (see also)]
2013	4570.21	2648.27	35.78	300.87	252.55	4.78	1.48 [Cyanide & compounds (see also)]
2012	6060.73	2968.76	45.25	387.74	335.02	6.90	2.25 [Hydrogen chloride (hydrochlori)]
2011	7235.33	1510.63	46.90	395.38	352.80	6.23	1.94 [Cyanide & compounds (see also)]
2010	5368.61	1906.45	62.42	525.35	783.60	8.16	2.59 [Cyanide & compounds (see also)]

<p>Review Engineer: Russell Braswell</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p>Comments / Recommendations:</p> <p>Issue 03478/T45 Permit Issue Date: _____ Permit Expiration Date: _____</p>
---	---

1. Purpose of Application:

- .14C

At the time application .14C was received, Duke Energy Progress, LLC - Mayo Facility (Duke – Mayo) was operating under Title V Air Quality Permit 03478T39 (T44 currently). The permit was set to expire on April 31, 2015. Duke – Mayo submitted this application in order to renew the permit. Because the renewal application was received at least nine months before the expiration date, the permit will remain in effect, regardless of expiration date, until this renewal application is approved or denied.

The renewal also requested the addition of ash handling sources, but this was handled during a subsequent permit action.

Additionally, this permit application includes a Title IV renewal application.

- .15E

Duke – Mayo submitted this application in order to renew and modify the Title IV Acid Rain Permit.

2. Facility Description:

"Mayo Plant is a coal-fired electric power plant located on the Mayo Reservoir near the North Carolina/Virginia border. The plant receives low sulfur, high Btu coal via rail cars (approximately 10-12 trains/month, 100 cars/train, 100 tons/car). The coal from the rail cars is dumped into the rotary drum hopper. The coal is then transferred to the crusher house for required crushing (from approximately 2 inches to approximately 1/8-inch). After crushing, the coal is transported to the coal silos. From the silos, the coal passes through a volumetric feeder and into the pulverizers. Finally, the pulverized coal reaches the boiler burners and is mixed with air for combustion.

The Mayo plant, which started operation in 1983, operates 24 hours/day and 365 days/year. The plant typically averages 10-14 days per year of maintenance downtime. Typically, there are approximately 86 full-time employees working at the facility along with the maintenance and contracted staff. The plant operates two boilers with a net generating capacity of 745 megawatts per hour. The electrical output will depend on a variety of elements including the ambient temperature and the humidity."¹

3. History/Background Since the Previous Permit Renewal:

- July 20, 2010 Permit T32 issued. This action renewed the permit, and also added CAIR and 02D .2500 requirements.
- August 10, 2010 Permit T33 issued. This action was an administrative amendment to fix minor issues with the T32 permit.
- October 5, 2010 Application .10C received. This was a TV-Minor application.
- December 17, 2010 Permit T34 issued in response to application .10C. This action added permission to burn fuel additives for pollution control.

1 From Steven Carr's inspection report, March 16, 2016

- June 13, 2011 Application .11A received. This was a 502(b)(10) application.
- August 1, 2011 Permit T35 issued in response to application .11A. This action added the monofill source to the permit and made some changes to the list of insignificant sources.
- October 25, 2011 Application .11F received. This was a TV-Minor application.
- December 22, 2011 Permit T36 issued in response to application .11F. This action added a flyash silo to the permit.
- April 25, 2012 Application .12A received. This was a TV-Significant application.
- August 22, 2012 Permit T37 issued in response to application .12A. This action added several ash handling sources to the permit.
- December 17, 2012 Application .12B received. This was a TV-Minor application.
- February 26, 2013 Permit T38 issued in response to application .12B. This action allowed for a test run of activated carbon injection for mercury control.
- May 22, 2013 Permit T39 issued. This action changed the facility name on the permit.
- March 12, 2014 Application .14A received. This was a TV-Significant modification.
- September 26, 2014 Application .14C received. This was a TV-Renewal application.
- October 29, 2014 Permit T40 issued in response to application .14A. This action added several more ash handling sources to the permit.
- January 9, 2015 Permit T41 issued. This action was an administrative amendment that replaced some permit stipulations removed by T40.
- January 13, 2015 Application .15B received. This was a State-Only application.
- March 24, 2015 Application .15D received. This was a TV-Minor application.
- April 29, 2015 Permit T42 issued in response to application .15B. This action revised the modeling used to determine TAP emission limits.
- March 8, 2016 Permit T43 issued in response to application .15D. This action incorporated the full MACT Subpart UUUUU (aka Mercury and Air Toxics Standards, MATS) into the permit.
- March 30, 2016 Permit T44 issued. This action changed the facility name on the permit.
- June 26, 2015 Application .15E received. This was a TIV renewal and modification application.

4. Application Chronology:

- September 26, 2014 Application .14C received.
- June 1, 2016 Application transferred to Russell Braswell.
- June 26, 2015 Application .15E received.
- June 28, 2016 Initial draft of updated/corrected MACT 5U condition sent to Erin Wallace. She responded with comments on June 29 and July 12.
- July 13, 2016 A second draft of the MACT 5U condition sent to Erin Wallace. She responded with comments on July 14.
- July 25, 2016 An initial draft of the completed permit and review sent to DAQ staff (Mark Cuilla, Tom Anderson, Samir Parekh, Steven Carr, Charles McEachern) and Duke staff (Erin Wallace). For a summary of comments received, see Attachment 2.
- August 19-26, 2016 Email correspondence with Erin Wallace regarding anhydrous ammonia storage and Duke – Mayo's requirements under Section 112(r).
- XXXX Public / EPA Notice.
- XXXXX Permit issued.

5. Permit Modifications/Changes and TVEE Discussion:

- Portable and housekeeping sources have been removed from the Insignificant Source list.
- Insignificant sources no longer at the facility have been removed from the Insignificant Source list.
- Two ammonia storage tanks have been added to the Insignificant Source list.
- CAIR has been replaced by CSAPR. See section 6. for more information.
- References to 02D .2500 have been removed from the permit because this regulation has expired.
- The permit condition for MACT Subpart UUUUU has been slightly updated.
- A permit condition for 02D .2100 has been added to the permit because the facility has a risk management plan under Section 112(r).

See Attachment 1 for the complete list of changes to the permit.

6. Regulatory Review:

Duke – Mayo is subject to the following regulations, in addition to the requirements in the General Conditions:

- 15A NCAC 02D .0510 "Particulates from Sand, Gravel, or Crushed Stone Operations"
- 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
- 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
- 15A NCAC 02D .0519 "Control of Nitrogen Dioxide and Nitrogen Oxides Emissions"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0524 "New Source Performance Standards"

(40 CFR Part 60 Subparts D, Y, OOO, IIII, JJJJ)

- 15A NCAC 02D .0530 "Prevention of Significant Deterioration"
- 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission"
- 15A NCAC 02D .1100 "Control of Toxic Air Pollutants"
- 15A NCAC 02D .1111 "Maximum Achievable Control Technology"
(40 CFR Part 63 Subparts ZZZZ, UUUUU)
- 15A NCAC 02Q .0308 "Final Action on Permit Applications"
- 15A NCAC 02Q .0317 "Avoidance Conditions"
(PSD Avoidance, Recycled Fuel Oil)
- 15A NCAC 02Q .0400 "Acid Rain Procedures"
- 40 CFR Part 97, Subparts AAAAA, BBBB, and CCCCC [Cross State Air Pollution Rule]

An extensive review for each applicable regulation is not included in this document, as the facility's status with respect to these regulations has not changed. The permit will be updated to reflect the most current stipulations for all applicable regulations. Significant changes to regulations are discussed below:

- a. 15A NCAC 02D 2500 "Mercury Rules for Electric Generators"

This rule has expired. Therefore, it has been removed from the permit.

- b. 15A NCAC 02D .2400 "Clean Air Interstate Rules"

This rule was used to implement the federal Clean Air Interstate Rules (CAIR). Both CAIR and 02D .2400 have expired (see 40 CFR 52.35(f) and 52.36(e)), so they have been removed from the permit. Note that CAIR has been replaced by the Cross State Air Pollution Rule, which is not currently mentioned in the NCAC.

- c. Cross State Air Pollution Rule [CSAPR] requirements

CSAPR (specifically, 40 CFR Part 97, Subparts AAAAA, BBBB, and CCCCC) was originally scheduled to take effect on January 1, 2012. This rule was planned as a replacement for CAIR. However, CSAPR was challenged in court and initially vacated by the DC Circuit Court. Legal issues were finally resolved in April 2014, when the US Supreme Court reversed that decision. Because the regulation was delayed by court proceedings, the effective date of the rule was moved to January 1, 2015.

Under this rule, each of the boilers at the facility is considered a "large electric generating unit", per 40 CFR 52.34. This rule and all requirements thereof are considered Federal-enforceable only. Compliance will be determined by the US EPA, not NC DAQ. A reference to this rule has been added to the permit.

7. NSPS, MACT/GACT, PSD/NSR, 112(r), RACT, CAM:

- a. NSPS

1. Subpart D "Fossil-Fuel-Fired Steam Generators"

This regulation applies to boilers with a heat input greater than 250 mmBtu/hr, constructed after 1971, and also not subject to Subpart Da or KKKK.

This regulation has emission limits for NO_x, SO₂, and PM. In general, Duke – Mayo demonstrates compliance with the emission limits by using continuous emission monitoring systems (CEMS) for each pollutant and conducting regular stack testing for PM.

Records of CEMS data must be kept and reported regularly. The report must also note any exceedances recorded.

2. *Subpart Y "Coal Preparation Plants and Processing Plants"*

This regulation applies to coal processing operations that process 200 tons or more of coal per day. All of the coal processing operations at this facility fall under the category of "coal processing and conveying equipment, coal storage systems, transfer and loading systems, and open storage piles" (i.e. 40 CFR 60.254). For such systems that were constructed before April 28, 2008, Duke – Mayo must ensure that visible emissions remain less than 20% opacity.

In order to demonstrate compliance, visible emissions from each of the coal processing units must be regularly monitored and recorded. Records must be reported twice per year.

3. *Subpart OOO "Nonmetallic Mineral Processing Plants"*

This regulation applies to material handling sources involved with mineral processing. At this facility, this applies to all of the limestone handling processes.

The regulation has opacity limits and emission standards for particulate, depending on the specific source. In order to demonstrate initial compliance, Duke – Mayo conducted an initial performance test (tracking number 2009-045ST). Subsequent compliance is demonstrated by performing regular Method 9 and 22 visible emission observations and performing regular maintenance on control devices. Records of maintenance and observations must be kept and reported regularly.

The initial performance test requirement has been removed from the permit because the test has already been completed.

4. *Subpart IIII "Stationary Compression Ignition Internal Combustion Engines"*

This rule applies to all compression ignition stationary engines constructed after 2008. The rule has several different categories of engines, but the only applicable one to this facility is "emergency-use".

In general, emergency-use engines have the following requirements:

- Operate only during periods of emergency or testing/maintenance,
- Install a non-resettable hour meter,
- Burn fuel with a sulfur content 15 ppm or less, and
- Operate and maintain the engine according to the manufacturer's specifications.

The only sources subject to this rule are on the Insignificant Activities List. Therefore, this regulation won't appear in the permit.

5. *Subpart JJJJ "Stationary Spark Ignition Internal Combustion Engines"*

The insignificant emergency generator is subject to NSPS Subpart JJJJ. The rule has several different categories of engines, but the only applicable one to this facility is "emergency-use".

In general, emergency-use engines have the following requirements:

- Operate only during periods of emergency or testing/maintenance,
- Install a non-resettable hour meter,
- Operate and maintain the engine according to the manufacturer's specifications.

The only sources subject to this rule are on the Insignificant Activities List. Therefore, this regulation won't appear in the permit.

b. MACT

1. *Subpart ZZZZ "Stationary Reciprocating Internal Combustion Engines"*

This rule applies to all stationary internal combustion engines. According to 40 CFR 63.6590(c)(1), the only requirements for engines under this rule is to comply with the applicable requirements of 40 CFR Part 60, Subpart IIII and/or JJJJ.

2. *Subpart UUUUU "Coal- and Oil-Fired Electric Utility Steam Generating Units"*

This rule applies to all coal-fired boilers located at major sources of HAPs. Each of the boilers at Duke – Mayo are subject to this rule.

The rule has several sets of emission limits: 1) either a PM limit, a total HAP limit, or metal HAP limit 2) either an HCl limit or an SO₂ limit 3) a mercury limit. The rule requirements change based on the chosen emission limits. Ultimately, Duke has chosen the following compliance options:

- Operate a CEMS for PM,
- Perform quarterly emission testing for HCl, and
- Operate a CEMS for mercury.

The rule specifies operating, monitoring, and recordkeeping requirements for each compliance option.

The permit condition for this rule has been slightly changed to reflect Duke – Mayo's choices of compliance options. The facility does not use an HCl CEMS or a neural network for combustion, so references thereto have been removed.

The rules for "affirmative defense" (40 CFR 63.10001) have been vacated. References to them have been removed from the permit.

c. PSD

Duke – Mayo has previously triggered a PSD review for the following pollutants: SO₂, NO_x, and PM. The limits as determined in the PSD review are the same as in NSPS Subpart D. The compliance requirements for PSD are also the same as in NSPS Subpart D.

In addition to the PSD requirements, Duke – Mayo is avoiding a new PSD review by complying with two separate PM_{2.5} emission limits. The facility is limited to 10 tons per year of PM_{2.5} attributable to sorbent injected into the flue gasses and 10 tons per year attributable to halide salts applied to incoming coal. In order to demonstrate compliance with both limits, Duke must make monthly calculations of PM_{2.5} attributable to both sources.

d. 112(r)

Based on correspondence with Erin Wallace, Duke – Mayo stores anhydrous ammonia above the threshold listed 40 CFR 68.130, and therefore is required to have a risk management plan (RMP).

Under 40 CFR Part 68, the facility is required to update the RMP at least once every five years. The US EPA assesses the RMP, not NC DAQ. However, 15A NCAC 02Q .0805(h) requires that a specific condition for the RMP be placed in the permit. Therefore, failure to appropriately update the RMP can be a violation of the Title V permit.

e. RACT

The facility is not located in an area of ozone nonattainment, therefore RACT does not apply.

f. CAM

CAM applies to a control device if the following criteria are met:

1. The unit being controlled is subject to a non-exempt emission standard (as defined by 02D .0614(b)(1)),
2. The control device is being used to comply with the emission standard, and
3. The unit being controlled has potential emissions of the pollutant subject to the emission standard of greater than major source thresholds.

Duke – Mayo has emission limits and control devices for PM, SO₂, NO_x, and HAPs. Ultimately, CAM does not apply to any of them:

- HAPs are regulated by MACT Subpart UUUUU. This rule is exempt from CAM by 02D .0614(b)(1)(A).
- The facility operates CEMS for PM, SO₂, NO_x. For each emission limit that applies to these pollutants, compliance is tied to the operation of a CEMS. This qualifies as a continuous compliance determination method. Therefore, these are exempt by 02D .0614(b)(1)(F).

8. Toxic Air Pollutants

Duke – Mayo has performed air dispersion modeling for several toxic air pollutants (TAPs) in order to demonstrate compliance with the acceptable ambient limits (AALs) listed in 02D .1104. The modeled emission rates are listed in the permit as emission limits.

In order to demonstrate compliance with the emission limits, the facility must limit the amount of boiler cleaning solution on an annual basis. Records of usage must be kept. No additional monitoring or recordkeeping is required.

9. Title IV Acid Rain Permit

15A NCAC 02Q .0400 applies to all sources subject to Title IV of the Clean Air Act, as applicable in 40 CFR 72.6. Each of the boilers at this facility is subject to the rule.

The rule requires Duke – Mayo to comply with annual SO₂ emission limits, an annual heat input limit, and an average NO_x emission rate.

- SO₂

The SO₂ limit is allocated to individual sources by the US EPA. In previous years, it was 12,807 tons per year per boiler, but that may change in the future based on the way EPA assigns allocations. A change in SO₂ allocations does not require an update to the Title IV permit.

- NO_x

The rule contains NO_x emission limits based on the size and type of boiler. However, a facility may enter into an averaging plan that calculates the average emission rate of several different facilities. Each of the participants in the averaging plan must meet certain NO_x emission rate and heat input limits in order for all of the participants to comply. Duke – Mayo has entered into an averaging plan with several other Duke-owned facilities in NC. Duke – Mayo submitted application .15E to change the averaging plan limits and renew the permit.

The previous acid rain permit includes an averaging plan that covers several Duke facilities in North Carolina, South Carolina, and Florida. The updated plan now only includes facilities in North Carolina. The revised limits are:

Boiler	Old limits	New limits	Normal limit
Boiler No. 1A and Boiler No. 1B	0.15 lb/mmBtu	0.25 lb/mmBtu	0.45 lb/mmBtu
	16,685,025 mmBtu/yr	10,731,000 mmBtu/yr	

Ultimately, SO₂ allocations and overall compliance with the Acid Rain Permit are determined by the US EPA, not NC DAQ. The permit will be updated to reflect the recent changes to the averaging plan. The issue and expiration dates will match the Title V permit such that only one permit application will be necessary to renew them both in the future.

10. Facility Emissions Review

The renewal of the Title IV and V permits is not expected to change potential emissions from the facility.

For a historical review of emissions from this facility, see the table on the first page of this review.

11. Compliance Status

- a. Notices of Violation/Recommendation for Enforcement since the previous renewal

None.

- b. Inspection status

The facility was most recently inspected by Steven Carr on March 16, 2016. Duke – Mayo appeared to be in compliance with the Air Quality Permit at the time of that inspection.

12. Other Regulatory Concerns

A PE seal was not required for this permit renewal.

A zoning consistency form was not required for this permit renewal.

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

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA.

Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above.

14. Recommendations

Issue permit 03478T45.

Change List

Page(s)*	Section*	Description of Changes
Throughout	Throughout	<ul style="list-style-type: none"> Updated permit numbers/dates Fixed formatting Removed references to CAIR
n/a	Insignificant Activities List	<ul style="list-style-type: none"> Removed portable sources Fixed formatting of source descriptions Fixed MACT/NSPS callouts Removed sources no longer at the facility Removed sources that were never installed at the facility Added two ammonia storage tanks based on information submitted by the applicant
3	Permitted Emission Source list	<ul style="list-style-type: none"> Removed minor modification footnote. Added footnote regarding MACT Subpart ZZZZ
	2.1.A.	<ul style="list-style-type: none"> Removed requirement to establish "normal" visible emissions from several emission sources because the facility has completed this requirement.
	2.1.A.2.	<ul style="list-style-type: none"> Removed references to requirements ending on January 1, 2012.
	2.1.A.4.	<ul style="list-style-type: none"> Removed reporting requirement for this condition per DAQ policy.
	2.1.A.5.	<ul style="list-style-type: none"> Moved CSAPR requirements to this section.
	2.1.A.5. (former)	<ul style="list-style-type: none"> Removed 02D .2500 because this rule has expired.
	2.1.A.8.	<ul style="list-style-type: none"> Minor updates/corrections to MACT Subpart UUUUU permit condition. Removed references to affirmative defense because this section has been removed from the regulation.
	2.1.E.2.c.	<ul style="list-style-type: none"> Removed monitoring/recordkeeping/reporting requirements for the emergency generator.
	2.1.F.1.	<ul style="list-style-type: none"> Removed initial testing requirement because the test has already been completed. Added footnote with the stack test tracking number of the initial performance test.
	2.4.	<ul style="list-style-type: none"> Updated the acid rain permit to include the new NOx averaging plan
	2.5. (former)	<ul style="list-style-type: none"> Moved CSAPR requirements to Section 2.1.A.5.
	2.5.	<ul style="list-style-type: none"> Added section for the Section 112(r) Risk Management Plan. Added RMP requirements to this section.

* This refers to the current permit unless otherwise stated.

Comments Received on Initial Draft

- Mark Cuilla, by email on August 3, 2016

1. Mark pointed out that DAQ no longer requires reporting for the use of recycled oil. This requirement should be removed from the permit (paragraph 2.1.A.5.e. in the initial draft).

Response: I have removed this paragraph.

2. Mark pointed out that DAQ generally does not require daily monitoring/recordkeeping/reporting for visible emissions from emergency-use engines. He suggested contacting the Raleigh Regional Office to discuss relaxing this requirement (paragraph 2.1.E.2.c, d, and e. in the initial draft).

Response: After speaking with Charles McEachern, Permits Coordinator for RRO, we have agreed that no monitoring/recordkeeping/reporting is required for visible emissions from the emergency generator. I have therefore removed these paragraphs.

3. Mark asked why MACT 5U was changed in the draft permit when the full permit condition was added at an earlier date.

Response: I have added additional discussion to the review regarding the need to update and correct the permit condition for MACT 5U.

4. Mark pointed out typos throughout the permit and review.

Response: These typos have been fixed.

- Rahul Thaker, in person on August 11, 2016

Rahul pointed out that the section for "affirmative defense" has been removed from MACT Subpart UUUUU (formerly section 63.10001). This section is referenced in permit T44 under paragraph 2.1.A.8.o., and should be removed from the permit.

Response: I have removed this paragraph. I have made minor changes to the paragraph preceding this one such that the subsequent paragraph labels remain unchanged.

- Erin Wallace, by email on August 19 and 23, 2016

1. Erin pointed out that several sources should be removed from the insignificant list, and that the horsepower rating of IS-20 should be updated.

Response: Done.

2. Erin suggested that the word "one" be removed from the description of ES-DFA Load. While there is only one unloading operation, the operation has two loadouts.

Response: Done.

3. Erin pointed out that the draft permit review states that the facility is not subject to increased requirements under Section 112(r) of the Clean Air Act. This is not true. The facility stores

anhydrous ammonia in two 21,890-gallon storage tanks. This is above the threshold and therefore has a required Risk Management Plan. The review should be corrected.

Response: I have added the ammonia storage tanks to the permit. In addition, I have added a permit condition regarding the RMP. This is DAQ's standard procedure for facilities with an RMP. I have also corrected the review.

DRAFT