

Application Review

Issue Date:

Region: Raleigh Regional Office
County: Northampton
NC Facility ID: 6600167
Inspector's Name: Will Wike
Date of Last Inspection: 08/09/2016
Compliance Code: 3 / Compliance - inspection

Facility Data	Permit Applicability (this application only)
<p>Applicant (Facility's Name): Enviva Pellets Northampton, LLC</p> <p>Facility Address: Enviva Pellets Northampton, LLC 874 Lebanon Church Road Garysburg, NC 27831</p> <p>SIC: 2499 / Wood Products, Nec NAICS: 321999 / All Other Miscellaneous Wood Product Manufacturing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p>SIP: 02Q.0504, 02D.0515, 02D.0516,02D.0521 NSPS: Subpart IIII NESHAP: GACT ZZZZ PSD: N/A PSD Avoidance: 02Q.0317, 02D.0530 NC Toxics: 02D.1100 112(r): N/A Other: N/A</p>

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	
Heath Lucy EH&S Manager (910) 318-2743 874 Lebanon Church Road Garysburg, NC 27831	Royal Smith Executive VP-Operations (301) 657-5560 7200 Wisconsin Avenue, Suite 1000 Bethesda, MD 20814	Joe Harrell Corporate EHS Manager (252) 209-6032 142 NC Route 561 East Ahoskie, NC 27910	<p>Application Number: 6600167.14B Date Received: 04/22/2014 Application Type: Modification Application Schedule: TV-1st Time</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 10203/R05 Existing Permit Issue Date: 03/03/2017 Existing Permit Expiration Date: 02/28/2025</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2015	17.68	126.53	337.00	61.47	71.52	18.61	8.43 [Methanol (methyl alcohol)]
2014	19.20	107.54	213.08	52.23	89.86	17.22	7.33 [Methanol (methyl alcohol)]
2013	10.80	60.32	113.88	29.51	53.49	9.32	3.31 [Formaldehyde]

<p>Review Engineer: Yukiko (Yuki) Puram</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 10203/T06 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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I. Purpose of Application

Enviva Pellets Northampton, LLC (Enviva) currently holds Air Permit 10203R05. Per 15A NCAC 02Q .0504, the facility is allowed to construct and operate under 15A NCAC 02Q .0300 when a Title V permit application is submitted within one year from the date of beginning of operation. Operation of the facility commenced on

April 22, 2013 and the first time Title V application (4600107.14B) was received on April 22, 2014, which was within the time period allowed. The facility's operation and their emission sources were modified several times since the initial first time Title V application was submitted on April 22, 2014. An amended first time Title V application that represents the current operation was filed on August 9, 2016.

II. Facility Description

Enviva is a wood pellets manufacturing plant located in Garysburg, Northampton County in NC. The wood pellets are used as a renewable fuel for energy generation in place of coal. Most of their products are shipped to Europe. Green wood consisting of whole logs and/or chipped wood, is delivered by truck. Logs are debarked and chipped. The bark fuels the dryer system which dries chipped wood to a 13% moisture content. Dry wood is then transferred to hammermills for further size reduction and then collected in the in-feed screw pellet mill feed silo prior to pelletization. Screw presses compact the wood into pellets. Finally, pellets are conveyed to one of six pellet coolers and then to storage and load-out. At the time of the application, the wood mixture that goes into the dryer is consisting of 70% hardwood and 30% softwood.

III. History/Background/Application Chronology

March 9, 2012	The R00 permit was issued with a requirement to submit a First Time Title V application within a year of startup.
April 22, 2013	Operation of the Enviva Northampton site was commenced.
February 26, 2013	Permit R01 was issued. The facility added some equipment to the newly issued permit.
September 9, 2013	Permit R02 was issued. During this modification, Enviva replaced a pellet fines bin (ID No. ES-PFB) and associated fabric filter (ID No. CD-PFB-BV).
October 3, 2013	A stack test was conducted. The facility tested PM, VOC, CO and NOx emissions from the dryer. (ID No. ES-DRYER)
October 17, 2013	A dispersion model analysis was reviewed. Acrolein and Formaldehyde emissions were modeled from the emission sources including two combustion sources.
May 8, 2014	Because the facility added an eighth hammermill, a dispersion model analysis was updated to include the new emission sources. Ten toxic emissions were analyzed on a source-by-source basis.
May 13, 2014	Permit R03 was issued adding an eighth hammermill (ID No. ES-HM-8) with associated simple cyclone (120 inches in diameter).
June 15, 2015	A modeling analysis was conducted due to request to modify the dryer and the material handling system. Acrolin and Formaldehyde emissions were optimized to measure the maximum emissions of the toxics.
October 12, 2015	Permit R04 was issued with modified dryer and the material handling system.
August 9, 2016	An amended first time Title V permit application was submitted.

November 29, 2016 Additional Information Request was sent to the facility.

December 7, 2016 A Notice of Deficiency for a late renewal application was issued.

December 21, 2016 Response to the Additional Information Request was received.

February 28, 2017 Permit R04 was expired.

March 3, 2017 Permit R05 was issued.

April 17, 2017 Draft permit was sent to the following individuals for review: Royal Smith, Vice President of Operations and Responsible Official of Enviva, Joe Harrell, Corporate Environmental Health & Safety Manager of Enviva, Jeff Twisdale of DAQ, Charles McEachern of DAQ, Raleigh Regional Office.

April 20, 2017 Mr. Twisdale reviewed the draft permit and responded with comments.

April 21, 2017 Mr. McEachern reviewed the draft permit with no comments. RRO recommends issuance of the permit.

May 9, 2017 Mr. Harrell review the permit and responded with comments. The facility was concerned with the monitoring/recordkeeping requirements with the WESP. Also, Mr. Harrell informed me that Enviva is not going to install the bagging system.

May 15, 2017 Received a letter from Mr. Steve A. Jaasund, P.E., a vender for the WESP. DAQ inquired additional information as it did not fully support omitting monitoring current of the WESP.

June 1, 2017 Have not received additional information from Mr. Jassund. Mr. Harrell agreed to resume the permitting process as it's written in the draft.

June, 2, 2017 Mr. Joseph Voelker of DAQ review the draft permit. His comments included his concern with proposed WESP monitoring parameters not related to any performance testing.

June 12, 2017 Sent an email to Mr. Harrell regarding WESP operating parameters from the stack test conducted on October 3, 2013. The issue with operating WESP at a lower voltage than it was tested was raised. CAM applicability was also addressed. In order to establish reliable WESP monitoring parameters, a performance test requirement was proposed.

June 30, 2017 Received an email from Mr. Harrell responding to the email sent on June 12, 2017. The facility did not agree with the testing requirement as they believe that the dryer may not even need a control device to meet the 02D .0515 condition based on the estimated calculation submitted with this email.

July 7, 2017 Sent an email to Mr. Harrell indicating that the DAQ still believes a performance test needs to be conducted to establish the WESP operation parameters to ensure the dryer is compliant with all applicable regulations.

July 11, 2017 Received an email from Mr. Harrell agreeing with the DAQ that a performance test needs to be conducted.

July 25, 2017 Sent a revised draft permit and permit review to Mr. Cuilla for review.

August 18, 2017 Received comments from Mr. Cuilla for the draft permit and the permit review.

August 25, 2017 Sent a draft permit and permit review to Mr. Royal Smith and Joe Harrell for review.

September 5, 2017 Sent a revised draft permit and permit review to Mr. Charles McEachern, Ms. Dena Pittman and Mr. Will Wike of RRO.

September 6, 2017 Received comments from Mr. Wike for the draft permit and the permit review.

September 15, 2017 Received comments from Mr. Harrell.

September 18, 2017 Sent an email to Mr. Harrell responding to one of his comments regarding the maximum softwood content for Hammermills (Section 2.2.A.1.d). The purpose of the requirement was to establish a new VOC emission factor if the facility operates materials that has more softwood content than specified in the permit, but not to limit the softwood content. The requirement was edited to make the requirement clearer.

September 18, 2017 Published the draft permit and the permit review for public comments. A copy of the draft permit and the permit review was also sent to EPA for review.

IV. Changes to Existing Air Permit

The following table provides a summary of the changes in Permit No. 10203T06:

Page No.	Section	Description of Changes
Global	Global	<ul style="list-style-type: none"> • Changed the application number and complete date. • Changed permit revision number to T06 • Changed the issuance/effective dates of the permit. • Changed from the state permit format to the Title V permit format. • Added noncompliance language to federally enforceable testing, monitoring and recordkeeping requirements.
Cover Page	Cover Page	<ul style="list-style-type: none"> • Updated the header and the footer. • Corrected the name of the city to Garysburg.
3	1. Emission source table	<ul style="list-style-type: none"> • Changed ES-DLH to ES-DLB and changed the description to “Dry line bin.” • Removed the bagging systems (ID Nos. ES-BSC-1, ES-BSS-1, ES-BSS-2, ES-BSC-2, ES-BSC-3, ES-BSB-1 and ES-BSB-2).
4	2.1.A	<ul style="list-style-type: none"> • Removed the bagging system from the descriptions (ID Nos. ES-BSC-1, ES-BSS-1, ES-BSS-2, ES-BSC-2, ES-BSC-3, ES-BSB-1 and ES-BSB-2). • Updated the VOC emission limit in the table.

Page No.	Section	Description of Changes
5	2.1.A.1.b.	Added a testing requirement for the dryer (ID No. ES-Dryer) with the cyclone (ID No. CD-DC) and the wet electrostatic precipitator (ID No. CD-WESP).
5	2.1.A.1.c	<ul style="list-style-type: none"> • Changed the format of the monitoring/recordkeeping sections. • Added a condition to operate the wet electrostatic precipitator (ID No. CD-WESP) with all three fields. • Removed the PM control requirements for the bagging systems (ID Nos. ES-BSC-1, ES-BSS-1, ES-BSS-2, ES-BSC-2, ES-BSC-3, ES-BSB-1 and ES-BSB-2).
5-6	2.1.A.1.d through h	Separated the recordkeeping requirements from the monitoring requirements.
6	2.1.A.1.g	Changed the inspections and maintenance requirements to be more specific.
6	2.1.A.1.j	Added a semi-annual reporting requirement.
7	2.1.A.3.b	Added a testing requirement for the dryer (ID No. ES-Dryer) with the cyclone (ID No. CD-DC) and the wet electrostatic precipitator (ID No. CD-WESP).
8	2.1.A.3.f	Added a semi-annual reporting requirement.
8	2.2.A.1.b	Added a testing condition to establish a VOC emission factor when the facility operates at a higher softwood content.
8-9	2.2.A.1.d	<ul style="list-style-type: none"> • Reworded the monitoring/recordkeeping requirements. • Inserted a table specifying emission factors and the maximum softwood content.
9	2.2.A.1.e	Reworded the reporting requirements.
10	2.2.A.2.c.	Added monitoring/recordkeeping requirements.
10	2.2.A.3	Added permit language to be consistent with other TV permits under this regulation.
12-22	3	Updated to the most recent version of general conditions (version 5.1 08/03/2017)

V. Statement of Compliance

The facility was most recently inspected on July 9, 2016 by Mr. Will Wike, Raleigh Regional Office (RRO). According to the Inspection Report, the facility was found to be in apparent compliance during this inspection.

On December 7, 2016, a Notice of Deficiency was sent for not submitting a permit renewal application on time. An application was received on December 19, 2016, and the facility was back in compliance.

On August 22, 2014, the facility was issued a Notice of Deficiency for not submitting a semi-annual report.

VI. Regulatory Review – Specific Emission Source Limitations

Enviva did not add any sources or change their operation since the last permit issued (R05). Previously, the bagging systems (ID Nos. ES-BSC-1, ES-BSS-1, ES-BSS-2, ES-BSC-2, ES-BSC-3, ES-BSB-1 and ES-BSB-2) were added to the permit for future installation. However, according to Mr. Harrell, Enviva decided not to install the bagging systems and they requested to remove them from the permit.

A.1.15A NCAC 02D .0515 “Particulates from Miscellaneous Industrial Processes”

This regulation establishes an allowable emission rate for particulate matter from any stack, vent, or outlet resulting from any industrial process for which no other emission control standards are applicable. The regulation applies to Total Suspended Particulate (TSP) or PM less than 100 micrometers (μm). The allowable emission rate is calculated using the following equations:

$$\begin{aligned} E &= 4.10 \times P^{0.67} && \text{for } P < 30 \text{ tph} \\ E &= 55 \times P^{0.11} - 40 && \text{for } P \geq 30 \text{ tph} \end{aligned}$$

where, E = allowable emission rate (lb/hr)
P = process weight rate (tph)

Per the application, the maximum dryer system operation rate is 71.71 ODT/hr. Using the equation above, the allowable emission rate is calculated to be 48.0 lb/hr. The maximum PM emission rate is 4.48 lb/hr as controlled based on the wet electrostatic precipitator (WESP) specifications. A stack test conducted on March 20, 2014 showed PM emissions of 3.07 lb/hr. However, the WESP was operated at an average input ranging from 58 to 67.7 kVA of secondary voltage and from 944 to 1012 amps of current. The facility is proposing to operate the WESP with minimum 24 hour average of 20 kVa and 200 amp, averaging all three fields. Even though they provided some calculations to justify their proposal, there was no data to demonstrate compliance at the voltage and the current they are proposing. In order for them to establish WESP operating parameters that meet the applicable emission standards, the DAQ is requesting a performance test to meet the 15A NCAC 02D .0515 and 02D .0521 standards at the parameters they wish to operate. To ensure the performance test being representative of the WESP operation, the DAQ requested a testing protocol being reviewed by the permitting section in addition to the stationary source compliance branch (SSCB). Thirty days after the performance test report being submitted, the facility shall establish minimum operating parameters (i.e. primary voltage, secondary voltage, current and numbers of fields being operated) using the test results, and operate the WESP above the minimum parameters. Once the test results are approved by the DAQ’s Stationary Source Compliance Branch, the facility must submit a permit modification application to insert WESP operation parameters within 30 days.

Based on the available data, it is assumed that a control device is required to remain below the particulate emissions limit. Monitoring, recordkeeping and reporting requirements for the cyclone and WESP are included in the permit to ensure compliance. Similarly, PM controls are required for the following emission sources: the hammermills (ID Nos. ES-HM-1 through ES-HM-6), the pellet mill feed silo (ID No. ES-PMFS), the pellet coolers (ID Nos. ES-CLR-1 through ES-CLR-6), the finished product handling (ID No. ES-FPH), the pellet load-out bins (ID Nos. ES-PB-1 through ES-PB-12) and the pellet mill load-outs (ID Nos. ES-PL-1 and ES-PL-2).

Monitoring requirements for the wet electrostatic precipitator (ID No. CD-WESP) were slightly modified, but they need to be updated once performance test results are available. The inspection and maintenance requirements were expanded to include more detailed minimum requirements. A semiannual reporting requirement was added to be consistent with other Enviva facilities.

A.2. 15A NCAC 02D .0516 “Sulfur Dioxide Emissions from Combustion Sources”

No change was made.

A.3. 15A NCAC 02D .0521 “Control of Visible Emissions”

This regulation establishes a visible emission standard for sources based on the manufacture date. For sources manufactured after July 1, 1971, the standard is 20% opacity when averaged over a 6-minute period. To demonstrate compliance, the Permittee will be required to observe actual visible emissions on a monthly basis for comparison to ‘normal’. If emissions are observed outside of ‘normal’, the Permittee shall take corrective action.

A performance test condition as added under this requirement. This test shall be combined with the performance test required under Section 2.1 A.1.b. This test requirement will ensure the facility being compliant with the visible emissions requirement when they establish WESP operating parameters. Also, a semiannual reporting requirement was added to this regulation.

VII. Regulatory Review – Multiple Emission Source Limitations

A.1. 15A NCAC 02Q .0317 for Avoidance of Prevention of Significant Deterioration – The current permit includes a limitation for VOC emissions of 456.4 tons per consecutive 12-month period. This is because the facility took a limit of baseline emissions plus 249 tpy at Permit Revision R04. Compliance will be demonstrated by calculating 12-month rolling total VOC emissions.

On December 28, 2016, the facility requested to operate the hammermills at a higher softwood content. Current VOC emissions are based on the performance test conducted at the Ahoskie facility in June 2014 with 30% softwood. The facility requested an approval to operate the hammermills with 45% softwood wood mixture with a condition of conducting a performance test within 180 days. On June 30, 2017, however, the facility requested an extension to the performance testing because they have never reached the higher softwood content. Based on their data, average monthly softwood content of the last 12 months (June 2016 to May 2017) ranged from 0.03% to 38.11%. Because VOC emissions increase as softwood content increases, the VOC emission factor must be established when the facility operates the emission sources with higher softwood content. Therefore, a performance test condition was added so they can establish a new VOC emission factor when the facility exceeds the softwood content that was previously tested. This requirement will give them flexibility of operating at higher softwood content mixture without modifying the permit, and will require them to use an appropriate VOC emission factor at specified softwood content. The following table was created based on the performance test conducted at the Enviva Ahoskie facility in June and July, 2014.

Source	Emission ID	Maximum Softwood Content	VOC Emission Factor
Dryer	ES-Dryer	30%	0.093 lb/ODT
Hammermill	ES-HM-1 through 8	33%	0.457 lb/ODT
Pellet Cooler	ES-CLR-1 through 6	45%	0.784 lb/ODT

The emission factors in the table above are verified by the SSCB for the operations at the softwood content described above. If the facility wishes to operate these emission sources at a higher softwood content, they must conduct a performance test to establish a new VOC emissions factor for each source in order to calculate 12-month rolling total VOC emissions under this regulation.

For the reporting requirements, the facility no longer has to report 30 day rolling average product moisture because it is not relevant to this regulation. The facility, however, must report softwood content of wood mixture processed in each of the dryer system, the hammermills and the pellet coolers separately. This is because the softwood content of wood mixture varies based on the source.

A.2 15A NCAC 02D .1100 “Control of Toxic Air Pollutants”

Enviva, Northampton previously submitted an air dispersion modeling demonstration showing compliance with North Carolina Toxic Air Pollutant (TAP) rules. The compliance was demonstrated during the modification R04. Because there is no increase in toxics pollutant emissions during this modification, toxic review was not triggered at this time. Testing, monitoring and recordkeeping requirements were added to be consistent with other Title V permits.

A.3 15A NCAC 02Q .0711 “Toxic Air Pollutant Emission Rates Requirement a Permit

The conditions under this regulation were incomplete. The permit conditions were updated to be consistent with other Title V permits.

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

New Source Performance Standards (NSPS)

The facility is subject to 40 CFR Subpart IIII for their emergency engine (ID No. IES-GN) and the fire water pump (ID No. IES-FWP). They are listed in the insignificant source list. No other NSPS conditions apply.

NESHAP/MACT

The facility is an area source of HAPs, and is subject to GACT 4Z for their emergency engine and fire pump. As long as they are in compliance with NSPS Subpart IIII, they will be in compliance with GACT 4Z as well. No other NESHAP/MACT conditions apply.

Prevention of Significant Deterioration (PSD)

This facility has requested limits to be considered a minor source with respect to PSD. See the regulatory review above.

112(r)

The facility does not store any regulated materials in quantities for which Section 112(r) of the Clean Air Act applies.

Compliance Assurance Monitoring (CAM)

It is unclear if the facility is subject to CAM. Because of the complexity of the WESP operation, there is not enough data to demonstrate the dryer (ID No. ES-DRYER) is not subject to CAM. The three criteria to be subject to CAM are:

1. be subject to an emission limitation or standard, and
2. use a control device to achieve compliance, and
3. have potential pre-control emissions that exceed 100 tpy.

The dryer is subject to 15A NCAC 02D .0515 and 02D .0521, but it is unclear if the emissions from the dryer meets the limit without a control device. In addition, potential pre-control PM emissions are unknown. According to the application, before control PM emission rate is 150 lbs/hr, which equals to 657 tpy. A letter from Lundberg indicated that the input rate to the WESP was 54.9 lb/hr, which is equivalent to 236 tpy. Another letter submitted on July 3, 2018 indicated that the inlet rate to the WESP was 35.47 lb/hr, which can be calculated to be 155 tpy. Because the facility cannot determine non-applicability to CAM, the DAQ assumes that the dryer is subject to CAM.

Also, the dryer’s control device’s (ID No. CD-WESP) controlled emissions determine whether the dryer is a large PSEU or small PSEU. If potential post-control PM10 emissions exceed 100 tpy, the dryer is a large PSEU and CAM has to be addressed at this modification. If the emissions are less than 100 tpy, the permit does not have to include CAM until next renewal. Because of the nature of WESP operations, post-control emissions vary based on input voltage and current. Therefore, WESP operation parameters

have to be established before identifying the dryer as a large/small PSEU. If potential post-control emissions exceed 100 tpy as determined by a stack test required in Section 2.1.A.1.b, the Permittee must include CAM when they submit an application to revise the permit to include WESP operating parameters required in 2.1.A.1.f.

IX. Facility Emissions Review

The following table is a summary of facility-wide potential emissions after control based on the application.

ID No.	CO (tpy)	NO_x (tpy)	TSP (tpy)	PM-10 (tpy)	PM-2.5 (tpy)	SO₂ (tpy)	Total VOC (tpy)	CO₂e (tpy)
ES-DRYER	60.95	125.50	29.84	29.84	29.8	19.2	209.9	162,118.83
ES-EG	0.50	0.58	0.03	0.03	0.03	0.001	0.0015	93.35
ES-FWP	0.43	0.49	0.02	0.02	0.02	0.001	0.0013	80.02
ES-HM-1 thru 8 /ES- NDS	-	-	20.27	20.27	20.27	-	24.71	-
ES-PMFS	-	-	0.38	0.38	0.38	-	-	-
ES-PFB-1	-	-	0.54	0.54	0.54	-	-	-
ES-CLR1 thru 6	2.12-	-	38.52	35.05	21.19	-	142.86	-
ES-FPH, PL1,2 PB1-12	-	-	5.33	4.85	2.93	-	-	-
IES-DWH*, IES-PP	-	-	0.12	0.06	0.01	-	-	-
IS-TK1 and 2	-	-	-	-	-	-	9.10E-04	-
Total PSD Emissions	61.88	126.57	95.05	91.04	75.21	19.20	377.46	162,292.20
Fugitive Emissions (Non-PSD Emissions)								
ES-BARK	-	-	-	-	-	-	0.30	-
IES-EPWC	-	-	-	-	-	-	1.25	-
IES-RCHIP- 1 and 2	-	-	-	-	-	-	1.25	-
ES-GWHS	-	-	0.03	0.01	0.00	-	-	-
ES-GWSPS	-	-	2.65	1.33	0.20	-	2.93	-
Total Facility-wide Emissions	61.88	126.57	97.73	92.38	75.41	19.20	382.89	162,292.20

Notes: CO dryer emission factor (0.23 lb/ODT) from Northampton October 2013 stack test.
 NO_x dryer emission factor (0.47 lb/ODT) from Northampton October 2013 stack test.
 VOC dryer emission factor (0.781 lb/ODT) from Northampton October 2013 stack test.
 Filterable TSP/PM-10/PM-2.5 dryer emission factor (0.062 lb/ODT) provided by dryer system vendor.
 Condensable PM dryer emission factor (0.017 lb/MMBtu) obtained from AP-42, Section 1.6.
 DWH includes several miscellaneous dried wood transfer sources.

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

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. Virginia is an affected state program within 50 miles of the facility.

XI. Other Regulatory Requirements

- The appropriate number of application copies was received on April 22, 2014.
- Amended application was received on August 9, 2016.
- A Professional Engineer's Seal is included with this application (ref. Rusty Field, P.E. Seal #040609).
- Receipt of the request for a zoning consistency determination was acknowledged by Mr. William Flynn, Director, Northampton County Planning and Zoning Department on September 9, 2015.
- According to the application, the facility does not handle any of the substances subject to 112(r).
- The application was signed by Mr. Royal Smith, Vice President of Operations, on August 4, 2016.

XII. Recommendations

TBD