

**NORTH CAROLINA DIVISION OF
AIR QUALITY**
Application Review

Issue Date: TBD

Region: Fayetteville Regional Office
County: Robeson
NC Facility ID: 7800147
Inspector's Name: Evangelyn Lowery-Jacobs
Date of Last Inspection: 08/27/2020
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Duke Energy Progress, LLC - W. H. Weatherspoon Plant</p> <p>Facility Address: Duke Energy Progress, LLC - W. H. Weatherspoon Plant 491 Power Plant Road Lumberton, NC 28358</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 style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 02D: .0516, .0521, .0524, .1100, .1111 NSPS: 40 CFR Part 60, Subpart IIII, JJJJ NESHAP: 40 CFR Part 63, Subpart ZZZZ PSD: n/a PSD Avoidance: n/a NC Toxics: 02D .1100 112(r): No RMP required Other: CSAPR</p>
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Contact Data	Application Data						
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; text-align: center; padding: 5px;">Facility Contact</td> <td style="width: 33%; text-align: center; padding: 5px;">Authorized Contact</td> <td style="width: 33%; text-align: center; padding: 5px;">Technical Contact</td> </tr> <tr> <td style="padding: 5px;">Kent Tyndall Lead Environmental Professional (910) 341-4775 801 Sutton Steam Plant Road Wilmington, NC 28401</td> <td style="padding: 5px;">Antonio Price General Manager III (910) 205-2101 198 Energy Way Hamlet, NC 28345</td> <td style="padding: 5px;">Erin Wallace Lead Environmental Specialist (919) 546-5797 410 South Wilmington Street Raleigh, NC 27601</td> </tr> </table>	Facility Contact	Authorized Contact	Technical Contact	Kent Tyndall Lead Environmental Professional (910) 341-4775 801 Sutton Steam Plant Road Wilmington, NC 28401	Antonio Price General Manager III (910) 205-2101 198 Energy Way Hamlet, NC 28345	Erin Wallace Lead Environmental Specialist (919) 546-5797 410 South Wilmington Street Raleigh, NC 27601	<p>Application Number: 7800147.21A Date Received: 06/21/2021 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 06094/T21 Existing Permit Issue Date: 04/04/2017 Existing Permit Expiration Date: 03/31/2022</p>
Facility Contact	Authorized Contact	Technical Contact					
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Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2019	6.98	15.83	0.5700	0.9100	3.25	0.0354	0.0099 [Manganese & compounds]
2018	18.10	43.94	---	0.0900	0.2900	0.0296	0.0187 [Manganese & compounds]
2017	4.20	10.30	---	0.0300	0.0700	0.0049	0.0048 [Isophorone]
2016	15.80	38.80	---	0.0500	0.1900	0.0197	0.0127 [Manganese & compounds]
2015	26.40	64.00	---	0.1020	0.3650	0.0379	0.0245 [Manganese & compounds]

<p>Review Engineer: Russell Braswell</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 06094/T22 Permit Issue Date: TBD Permit Expiration Date: TBD+5 years</p>
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1. Purpose of Applications:

Duke Energy Progress, LLC - W. H. Weatherspoon Plant (DEP) currently operates a power plant in Robeson County under Title V air quality permit number 06094T21 (the existing permit). The existing permit is set to expire on March 31, 2022. DEP submitted this application in order to renew the Title V permit as required by General Condition K of the existing permit.

Because the renewal application was received at least six months before the expiration date, the existing permit will remain in effect, regardless of expiration date, until this application is completed.

In addition to renewing the permit, DEP requested several updates to the list of insignificant activities.

2. Facility Description:

This facility consists of four simple-cycle combustion turbines that produce electricity for sale. The turbines are primarily fired with No. 2 fuel oil, but also have the option for natural gas. According to the most recent inspection report (filed August 27, 2020), these turbines were constructed in 1970 and 1971 and have a capacity of approximately 40 megawatts. DEP uses them for occasional peak-power demand.

This facility previously operated coal-fired electric utility boilers, but those boilers have been removed from the facility. References to these boilers were removed with the T19 permit revision (issued May 26, 2015).

This facility also includes several miscellaneous emission sources that support activities at the facility (e.g., fuel oil storage tanks and emergency generators).

3. Title V Permit Modifications Following the Previous Permit Renewal:

This facility renewed the existing permit on April 4, 2017. No modifications to the permit have been made since that date.

4. Application Chronology:

- June 21, 2021 Application received.
- June 28, 2021 Email to Erin Wallace requesting additional information regarding the new insignificant activities.
- July 13, 2021 Response received to the above request.
- July 19, 2021 An initial draft of the permit and application review were sent to RCO staff (Heather Sands). Comments were received on this initial draft on July 30, 2021.
- August 6, 2021 A draft of the permit and application review were sent to SSCB staff (Samir Parekh), FRO staff (Evangelyn Lowery-Jacobs, Heather Carter) and DEP staff Erin Wallace, Jeffrey Flanagan). See Section 9 for a discussion of comments and corrections regarding this draft.
- XXXX The Public Notice and EPA review periods began.
- XXXX The Public Notice period ended.
- XXXX The EPA Review period ended.

- XXXX Permit issued.

5. Changes to the Existing Permit:

a. Changes requested by DEP:

DEP requested the following changes to the list of insignificant activities:

i. Add:

Each of these sources are insignificant based on potential emissions as allowed by 15A NCAC 02Q .0503(8).

I.D. No.	Emission Source Description	Notes
IS-15	Fugitive Emissions from Ash Handling	1
IS-26 (GACT, ZZZZ; NSPS, IIII)	Air compressor (328 kilowatt diesel-fired engine)	2
IS-29 (GACT, ZZZZ; NSPS, IIII)	Diesel-fired water pump (30 horsepower maximum capacity)	3
IS-30 (GACT, ZZZZ; NSPS, IIII)	Diesel-fired generator at Ash Basin (127 kilowatts maximum capacity)	3
IS-27 (GACT, ZZZZ; NSPS, IIII)	Diesel-fired water pump for Ash Basin (55 kilowatts maximum capacity)	3
IS-31	Propane storage tank for Microwave Tower Engine (500 gallons maximum capacity)	4
IS-32 (GACT, ZZZZ; NSPS, JJJJ)	One propane-fired emergency generator for Microwave Tower (50 kilowatts maximum capacity)	2
IS-33	Diesel storage tank (1,000 gallons maximum capacity)	5

Notes:

1. This source was previously included on the insignificant activities list. It was removed from the permit with the T19 permit revision (issued May 26, 2015). DEP has requested that it be re-added to the list of insignificant activities.
2. Emergency-use engine. Based on a potential of 500 hours operation, potential emissions from these engines will be less than the non-emergency engines discussed in Note 3.
3. Each of these new, non-emergency engines are subject to the New Source Performance Standards (NSPS) under 40 CFR Part 60, Subpart IIII. Based on 40 CFR 60.4201(a) and 40 CFR 89.112(a), the highest individual emission factor for new engines of these sizes is 4 grams of nitrogen oxides (NOx) per kilowatt-hour (g/kW-hr). The largest non-emergency engine has a capacity of 127 kilowatts (kW). Therefore, the maximum potential emissions from one of these engines can be calculated:

$$\left(127 \text{ kW} \right) \times \left(4 \frac{\text{g}}{\text{kW-hr}} \right) \times \left(\frac{2.2 \text{ lb}}{1,000 \text{ g}} \right) \times \left(8,760 \frac{\text{hr}}{\text{yr}} \right) \times \left(\frac{1 \text{ ton}}{2,000 \text{ lb}} \right) = 4.90 \frac{\text{ton}}{\text{yr}}$$

The insignificant threshold in 02Q .0503(8) is 5 tons per year (tpy). Therefore, each new non-emergency engine has potential emissions less than the threshold.

4. Emissions from this source are expected to be negligible due to the small size of the storage tank and low annual throughput.
5. Emissions from this source are expected to be negligible due to the low volatility of diesel fuel.

ii. Remove

I.D. No.	Emission Source Description
IS-21	No. 2 oil storage tank (4,000 gallons maximum capacity)
IS-24 (MACT, ZZZZ)	One propane-fired emergency generator (spark ignition, 19 kilowatts maximum capacity)
IS-25	Propane storage tank

b. Summary of Changes:

Page(s)*	Section*	Description of Change(s)
Throughout	Throughout	<ul style="list-style-type: none"> Updated dates/permit numbers Fixed formatting
n/a	Insignificant Activities	<ul style="list-style-type: none"> Added the following sources at Permittee's request: <ul style="list-style-type: none"> ○ IS-15, ○ IS-26, ○ IS-27, ○ IS-29, ○ IS-30, ○ IS-31, ○ IS-32, and ○ IS-33 Removed the following sources at Permittee's request: <ul style="list-style-type: none"> ○ IS-21, ○ IS-24, and ○ IS-25
4	2.1 A.1.b	<ul style="list-style-type: none"> Added general testing language to match DAQ template.
5	2.1 A.4	<ul style="list-style-type: none"> Removed references to "Federal-enforceable only"
6	3.	<ul style="list-style-type: none"> Updated General Conditions to v5.5.

* This refers to the new permit unless otherwise stated.

6. Regulatory Overview and Rules Review:

Under the existing permit, DEP is subject to the following State Implementation Plan (SIP) rules:

- 15A NCAC 02D .0516 "Sulfur Dioxide Emissions from Combustion Sources"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60, Subparts IIII and JJJJ)
- 15A NCAC 02D .1100 "Control of Toxic Air Pollutants"
- 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (40 CFR Part 63, Subpart ZZZZ)

In addition to the above SIP rules, DEP is also subject to the Cross State Air Pollution Rule. This rule is not included in North Carolina's SIP. DEP's requirements under each of these rules are discussed below. In addition, a discussion of several non-applicable rules is also included below.

a. 15A NCAC 02D .0516 "Sulfur Dioxide Emissions from Combustion Sources"

This rule limits sulfur dioxide (SO₂) emissions from combustion sources for which there are no other SO₂ emission standards. In all cases, the limit is 2.3 pounds of SO₂ per million Btu of heat input (lb/MMBtu). Each turbine at this facility is subject to this rule.

The turbines burn natural gas and No. 2 fuel oil. US EPA provides SO₂ emission factors for combustion turbines in footnote h to AP-42 Table 3.1-2a:

- Natural gas: 3.4 E-03 lb/MMBtu
- Distillate oil: 3.3 E-02 lb/MMBtu

Based on these emission factors, each combustion turbine at this facility is expected to comply with this rule by default. Therefore, no monitoring, recordkeeping, or reporting is required to demonstrate compliance with this rule. DAQ has reviewed this analysis and agrees with this analysis, and continued compliance is expected.

b. 15A NCAC 02D .0521 "Control of Visible Emissions"

This rule limits the opacity of non-fugitive visible emissions (VE) from emission sources that do not have a specific VE limit under other 02D .0500 rules. For sources constructed before 1971 (i.e., each source at this facility), the rule limits opacity in most cases to 40 percent. Each turbine at this facility is subject to this rule.

In general, burning natural gas in a combustion turbine is not expected to produce VE in excess of 40 percent under normal operations. When burning natural gas in these turbines, compliance with this rule is assumed by default and there are no further requirements.

In order to demonstrate compliance with VE from the turbines while burning No. 2 fuel oil, DEP must perform a Method 9 observation after 1,000 hours of operation on No. 2 fuel oil. DEP must keep records of all Method 9 observations and submit a report within 30 days of the completion of any Method 9 observation. Note that this approach is more conservative than DAQ's default monitoring for combustion of No. 2 fuel oil. This requirement is similar to the VE monitoring approaches found in other permits issued to combustion turbines operated by Duke Energy.¹

Based on the most recent inspection report, DEP appears to be in compliance with this rule. Continued compliance will be determined with subsequent inspections and reports.

c. 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60)

This rule incorporates the NSPS rules issued under 40 CFR Part 60 into North Carolina's SIP. The only NSPS rules that apply to this facility are Subpart IIII "Standards of Performance for New Stationary Compression Ignition Internal Combustion Engines" and Subpart JJJJ "Standards of Performance for New Stationary Spark Ignition Internal Combustion Engines". See Section 6.g.vi, below, for a discussion of NSPS rules that do not apply to this facility.

¹ For example, see Title V permit 08731T16 issued to Duke Energy Carolinas, LLC – Rockingham Co Combustion Turbines (facility ID 7900156) and Title V permit 07171T13, issued to Duke Energy Corporation LCTS (facility ID 5500082).

Note that the NSPS rules only apply to insignificant activities at this facility. Therefore, the body of the Title V permit does not include a specific condition for any NSPS rule. DEP must still comply with the applicable requirements of these rules.

i. NSPS Subpart IIII "Standards of Performance for New Stationary Compression Ignition Internal Combustion Engines"

This rule applies to stationary compression ignition engines constructed after July 11, 2005 (40 CFR 60.4200(a)). The emergency generator IS-18 was constructed before the applicability date and therefore is exempt from Subpart IIII. Each of the other compression ignition engines (IS-26, IS-27, IS-29, and IS-30) are subject to this rule.

In general, the requirements of this rule differ based on the capacity and use of the engine (e.g., emergency-use). Broadly, there are two categories of engines at this facility: emergency-use (IS-26) and non-emergency-use (IS-27, IS-29, and IS-30). The general requirements are to

- perform regular maintenance,
- operate according to the manufacturer's specifications,
- use low-sulfur fuel, install a non-resettable hour meter, and
- ensure the engine is certified to the emission standards (40 CFR 60.4204(b) for non-emergency, 40 CFR 60.4205(b) for emergency).

For engines of the size used at this facility, there are no specific reporting requirements.

Based on the most recent inspection report, DEP appears to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

ii. NSPS Subpart JJJJ "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines"

This rule applies to stationary spark ignition engines constructed after June 12, 2006 (40 CFR 60.4230(a)). The emergency generator IS-24 was constructed before the applicability date and therefore is exempt. The only other spark ignition engine is IS-32, which is subject to this rule.

For the purposes of this rule, IS-32 is a propane-fired emergency use engine with a capacity less than 100 horsepower. The general requirements for such an engine are:

- perform regular maintenance,
- operate according to the manufacturer's specifications,
- install a non-resettable hour meter,
- ensure the engine is certified to the emission standards in 40 CFR 60.4233(c), and
- keep records of maintenance performed on the engine and a copy of the NSPS certification.

Based on the most recent inspection report, DEP appears to be in compliance with this rule. Continued compliance will be determined during subsequent inspections.

d. 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" [State-enforceable Only] and 15A NCAC 02Q .0700 "Toxic Air Pollutant Procedures" [State-enforceable Only]

This rule applies to facilities that emit a toxic air pollutant (TAP) and that are required to have a permit pursuant to 15A NCAC 02Q .0700. Facilities subject to this rule must limit TAP emissions such that there

are no adverse human health effects as determined by the acceptable ambient limits (AALs) listed in 15A NCAC 02D .1104.

This facility has previously demonstrated compliance with the AALs by performing air dispersion modeling. The TAP emission rates used in the modeling are included in the existing permit as emission limits. Note that the most recent modeling demonstration for this facility was submitted before the year 2000, which is when DAQ's electronic record of this facility begins. Therefore, DAQ's memo approving the modeling demonstration is no longer available.

In the time after the initial modeling demonstration, this facility has not been modified such that a new modeling demonstration would be required per 15A NCAC 02Q .0706, and the TAP emission limits have not been changed.²

At the time the modeling demonstration was approved, DAQ determined that no additional monitoring, recordkeeping, or reporting would be required to demonstrate compliance with the AALs or modeled emission rates.

For comparison, the following table compares the actual emissions reported in the most recent Emission Inventory to the TAP emission limits in the existing permit:

Pollutant	Limit, per unit	Annual Emissions Unit				Compliance?
		IC1	IC2	IC3	IC4	
arsenic	49.9 lb/yr	0.031	0.050	0.044	0.040	Yes
cadmium	14,191 lb/yr	0.013	0.022	0.016	0.018	Yes
chromium VI	82.2 lb/yr	0.031	0.050	0.044	0.040	Yes
mercury	3.84 lb/dy	0.003	0.005	0.005	0.004	Yes*
nickel	1,978 lb/dy	0.013	0.021	0.018	0.017	Yes*
HCl	20.4 lb/hr	below <i>de minimus</i>				Yes

* Although the emission limits are on a daily basis and the reported emissions are on a yearly basis, compliance can be assumed because the annual emission rate is less than the daily emission limit.

Note that emission sources subject to a rule under 40 CFR Part 63 are exempt from TAP emission limits provided that there is no unacceptable risk to human health. Each reciprocating combustion engine being added to the list of insignificant activities (see Section 5.a.i above) is subject to 40 CFR Part 63, Subpart ZZZZ. Given that this facility has previously modeled compliance with TAP AALs when three coal-fired boilers were operating at the facility, and the extremely wide margin of compliance between actual emissions and emission limits (see the table above), the inclusion of these relatively small engines is not expected to cause an exceedance of any AAL and therefore are not expected to pose an unacceptable risk to human health.

² The T19 permit revision (issued May 26, 2015) removed all references to coal-fired boilers from the permit. As a result, TAP limits that applied exclusively to the coal-fired boilers were removed from the permit. All limits that applied to the four remaining combustion turbines were not changed.

e. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (40 CFR Part 63)

This rule incorporates the MACT standards under 40 CFR Part 63 into North Carolina's SIP. For the purposes of MACT applicability, this facility is an area source of hazardous air pollutants (HAP) because it emits less than 10 tons per year (tpy) of any individual HAP and 25 tpy of total combined HAP.³ As such, rules that apply to major sources (e.g., the MACT standards for combustion turbines under 40 CFR Part 63, Subpart YYYY) do not apply to this facility.

The only MACT that applies to this facility is 40 CFR Part 63, Subpart ZZZZ "National Emissions Standards for HAP (NESHAP) from Stationary Reciprocating Internal Combustion Engines (RICE)." This rule applies to stationary RICE located at major and area sources of HAP. Therefore, each RICE at this facility is subject to this rule.

In general, RICE that are subject to NSPS Subparts IIII or JJJJ (i.e., each engine except I-18 and I-24) demonstrate compliance with Subpart ZZZZ by complying with the applicable NSPS. The requirements of NSPS Subparts IIII and JJJJ are discussed in Section 6.c, above.

For engines not subject to an NSPS, the requirements of the rule differ based on several facts about the engine. For the purposes of this rule, both I-18 and I-24 are considered an existing, emergency-use engine located at an area source of HAP. In general, the requirements for such sources are:

- Change oil, belts, and filters on a regular schedule;
- Operate with good work practices according to manufacturer specifications;
- Keep records of maintenance activities and hours of operation; and
- Install a non-resettable hour meter.

Based on the most recent inspection report, DEP appears to be in compliance with this rule. Continued compliance will be determined with subsequent inspections.

Note that the MACT rules only apply to insignificant activities at this facility. Therefore, the body of the Title V permit does not include a specific condition for any MACT rule. DEP must still comply with the applicable requirements of these rules.

f. Cross State Air Pollution Rule (CSAPR; 40 CFR Part 97, Subparts AAAAA, BBBBB, and CCCCC)

This group of rules applies to fossil-fuel-fired combustion sources that 1) produce electricity for sale, and 2) have a generator capacity greater than 25 megawatts. Each turbine at this facility has a capacity of approximately 40 megawatts (see Section 2, above), so each turbine is subject to CSAPR.

CSAPR limits NO_x and SO₂ emissions. In general, CSAPR requires tracking and trading emission credits across multiple facilities, including facilities not within the state of North Carolina. Therefore, compliance with CSAPR is generally determined by US EPA.

Note that the CSAPR rules are not currently included in North Carolina's SIP. The Title V permit contains a reference to CSAPR and the relevant portions of 40 CFR Part 97, but no specific compliance requirements.

³ Note that this facility was previously a major source of HAP due to emissions from three coal-fired electric utility boilers. All coal-fired boilers were removed from this facility as of the T19 permit revision (issued May 26, 2015). Based on the emissions from the remaining sources at this facility, the facility now qualifies as an area source of HAP.

g. Nonapplicable Rules:

There are several SIP and Federal rules that could potentially apply at this renewal, but ultimately do not. The following discussion addresses the applicability of these rules.

i. 15A NCAC 02D .0530 "Prevention of Significant Deterioration" (PSD)

This facility is a major source for PSD because of emissions from the coal-fired boilers previously operated at this facility exceeded the PSD threshold of 250 tpy for a major source. Although those sources have been removed as of the T19 permit revision, this facility is still considered a major source with regards to PSD.

Regardless of the classification, this facility has no requirements under PSD because all sources that were previously subject to specific requirements under PSD have been removed from the facility. The combustion turbines at this facility have never triggered a PSD review, and therefore have no requirements under PSD.

ii. 15A NCAC 02D .0614 "Compliance Assurance Monitoring" (CAM; 40 CFR Part 64)

The compliance assurance monitoring (CAM) rule requires owners and operators to conduct monitoring to provide a reasonable assurance of compliance with applicable requirements under the act. Monitoring focuses on emissions units that rely on pollution control device equipment to achieve compliance with applicable standards. An emission unit is subject to CAM, under 40 CFR Part 64, if all of the following three conditions are met:

- I. The unit is subject to any (non-exempt, e.g., pre-November 15, 1990, Section 111 or 112 standard) emission limitation or standard for the applicable regulated pollutant.
- II. The unit uses any control device to achieve compliance with any such emission limitation or standard.
- III. The unit's pre-control potential emission rate exceeds 100 percent of the amount required for a source to be classified as a major source; i.e., either 100 tpy (for criteria pollutants) or 10 tpy of any individual/25 tpy of any combination of HAP.

This facility does not operate any control devices. Therefore, per item II above, CAM does not apply to this facility.

iii. 15A NCAC 02D .0900 "Volatile Organic Compounds" and 02D .1400 "Nitrogen Oxides" (a.k.a. RACT)

These rules were established for reasonably available control technology (RACT) standards. In general, the RACT rules apply to facilities located in areas designated as "nonattainment" with the National Ambient Air Quality Standards. Robeson County is not such an area, so these rules do not apply.

iv. 15A NCAC 02D .2100 "Risk Management Program" (a.k.a. §112(r), Section 112(r) of the Clean Air Act)

In the renewal application, DEP indicated on form A3 that no Risk Management Plan (RMP) is required for this facility. The application states that there are no threshold quantities of any §112(r) material at this facility.

This facility does not appear to store any materials above their respective thresholds in 40 CFR 68.130. Therefore, this facility is not required to submit an RMP and has no specific requirements under 02D .2100. Note that other requirements under §112(r) (such as the General Duty clause, which is included in the Title V permit under General Condition EE) may apply to this facility.

v. 15A NCAC 02Q .0400 "Acid Rain Procedures"

This rule incorporates the acid rain program (40 CFR Part 72) into North Carolina's SIP.

Per 40 CFR 72.6(b)(1), simple-cycle turbines constructed before November 15, 1990, are not affected sources under the acid rain program. Each turbine at this facility was constructed before this date and have not been reconstructed after this date. Therefore, this facility has no requirements under the acid rain program.

Note that this facility has previously held a Title IV acid rain permit because of the coal-fired boilers that were previously operated at this facility. Those have been removed, and therefore there are no further requirements under this rule.

vi. 40 CFR Part 60, Subpart GG "Standards of Performance for Stationary Gas Turbines"
40 CFR Part 60, Subpart KKKK "Standards of Performance for Stationary Combustion Turbines"
and 40 CFR Part 60, Subpart TTTT "Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units"

These rules apply to combustion turbines based on the construction and reconstruction date of the specific turbine. Each turbine at this facility was constructed in 1970 and 1971, which is well before any applicability date in 40 CFR Part 60. Furthermore, the turbines have not been reconstructed in a way that meets the definition of "reconstruction" in 40 CFR 60.2. Therefore, these rules do not apply.

7. Compliance Status and Other Regulatory Concerns:

- Compliance status: This facility was most recently inspected on August 27, 2020, by Evangelyn Lowery-Jacobs. DEP appeared to be in compliance with the Title V permit during that inspection.
- Compliance history: There have been no Notices of Violation issued to this facility since the previous Title V permit renewal.
- Application fee: There is no application fee required for Title V permit renewals.
- PE Seal: Pursuant to 15A NCAC 02Q .0112 "Application requiring a Professional Engineering Seal," a professional engineer's seal (PE Seal) is required to seal technical portions of air permit applications for new sources and modifications of existing sources as defined in Rule .0103 of this Section that involve:
 - (1) design;
 - (2) determination of applicability and appropriateness; or
 - (3) determination and interpretation of performance; of air pollution capture and control systems.

A PE Seal was **NOT** required for this Title V permit renewal.

- Zoning: A Zoning Consistency Determination per 15A NCAC 02Q .0304(b) was **NOT** required for this Title V permit renewal.

8. Facility Emissions Review

The table on the first page of this permit review presents the criteria pollutant (plus total HAP) from the latest available approved facility emissions inventory (2019). The HAP emitted in the largest quantity from the facility is manganese. This renewal does not change the potential to emit any emissions from this facility.

9. Draft Permit Review Summary

Draft to Fayetteville Regional Office (FRO) on August 6, 2021. FRO responded on August 12, 2021. FRO's response indicated typos in the draft application review. The indicated typos were corrected before the Public Notice period began.

Draft to DEP on August 6, 2021. DEP responded on August 26, 2021. DEP requested the following changes to the draft:

- Change the authorized official to Antonio Price.
- Re-add IS-15.
- Remove IS-24 and IS-25.
- Correct the application review:
 - The turbines were constructed in 1970 and 1971, not 1949 as stated in the draft.
 - The turbines are primarily fired with No. 2 oil, not natural gas as stated in the draft.

The indicated corrections were made before the Public Notice period began.

10. Public Notice, EPA Review, 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 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. South Carolina is an affected state.

- The Public Notice and EPA Review periods began on XXXX.
- The Public Notice period ended on XXXX.
- The EPA Review period ended on XXXX.

11. Recommendations

This permit application has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Recommend Issuance of Permit No. 06094T22. FRO has received a copy of this permit and submitted comments that were incorporated as described in Section 9.