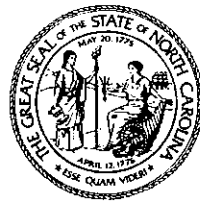


ROY COOPER  
*Governor*

MICHAEL S. REGAN  
*Secretary*

MICHAEL A. ABRACZINSKAS  
*Director*



NORTH CAROLINA  
*Environmental Quality*

December 8, 2020

Mr. Kraig Westerbeek  
VP, Environmental and Manufacturing  
BF Grady Road (Align RNG LLC)  
PO Box 856  
Warsaw, NC 28398

Subject: Additional Information Request  
proposed Air Permit 10644R00  
BF Grady Road (Align RNG LLC)  
Warsaw, Duplin County, North Carolina  
Permit Class: Synthetic Minor  
Facility ID# 3100179

Dear Mr. Westerbeek:

Reference is made to your Air Quality Permit Application No. 3100179.19A received on December 10, 2019 for the above subject facility.

During the public comment period that ended on November 20, 2020, the Division received comments regarding the potential air emissions from the 19 animal operations that will supply biogas to the above subject facility. The Division is currently developing responses to those comments and has determined that additional information from the facility is necessary to evaluate the issues raised in the comments. The information will be used to determine whether the emissions from the animal operations related to production of biogas: (a) may be subject to DAQ permitting requirements or other regulations; (b) may cause community impacts such as odor; and (c) should be aggregated with the emissions from the BF Grady Road facility in identifying the permitted source. The Division requests that Align provide the additional information listed below:

1. Provide the location of the 19 animal operations that will supply gas to the subject BF Grady Road facility. Please provide the physical addresses, coordinates, and a map. DAQ notes that Align has provided a representation of where the animal operations that will supply gas are located in a flyer distributed to the public earlier this year. For each animal operation, identify whether a covered lagoon or digester will be used for the production of biogas. Also, please provide the technical specifications on the type of digester that will be used at each site.
2. In your July 24, 2020 response to the Division's July 2, 2020 additional information request,



North Carolina Department of Environmental Quality | Division of Air Quality  
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910.796.7215 T | 910.350.2004 F

you represented there will be no "excess gas" and thus no flaring or venting at the animal operations. However, the animal operations will be equipped with emergency flares and emergency vents on the digesters for safety purposes. Please provide emission estimates from the animal operation flares and vents and include the technical specifications for the animal operation flares. Please provide detailed calculations on the emission estimates.

3. Provide emission estimates of methane, ammonia, and hydrogen sulfide from the animal operation digesters and covered lagoons including leaks and fugitives on a site-by-site basis.
4. Provide current (pre-project) emission estimates of methane, ammonia, and hydrogen sulfide from each of the existing 19 animal operations that will supply gas to the subject BF Grady Road facility. Provide future (post-project) emission estimates of methane, ammonia, and hydrogen sulfide (after installation of digesters and/or lagoon covers; flares; vents) from each of the 19 animal operations.
5. Provide information and details on how and where Align has secured or will secure property rights such as easements to transport gas from the 19 animal operations to the subject BF Grady Road facility.

The application process time clock will be put on hold during this time for you to respond to this request.

Should you have any questions with reference to the above matter, please do not hesitate to contact Dean Carroll at 910-796-7242.

Sincerely,



Brad Newland, Wilmington Regional Supervisor  
Division of Air Quality, NC DEQ

c: Wilmington Regional Office

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