

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Region: Washington Regional Office
County: Martin
NC Facility ID: 5900069
Inspector's Name: Betsy Huddleston
Date of Last Inspection: 08/18/2015
Compliance Code: B / Violation - emissions

Permit Issue Date:

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Domtar Paper Company, LLC</p> <p>Facility Address: Domtar Paper Company, LLC NC Highway 149 North Plymouth, NC 27962</p> <p>SIC: 2611 / Pulp Mills NAICS: 322121 / Paper (except Newsprint) Mills</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: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Diane Hardison Environmental Manager (252) 793-8611 PO Box 747 Plymouth, NC 27962</p>	<p style="text-align: center;">Authorized Contact</p> <p>Allan Bohn Vice President/Mill Manager (252) 793-8111 PO Box 747 Plymouth, NC 27962</p>	<p style="text-align: center;">Technical Contact</p> <p>Diane Hardison Environmental Manager (252) 793-8611 PO Box 747 Plymouth, NC 27962</p>	<p>Application Number: 5900069.14G Date Received: 12/29/2014 Application Type: Modification Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 04291/T42 Existing Permit Issue Date: 07/10/2015 Existing Permit Expiration Date: 04/30/2017</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	664.83	2029.18	756.56	5434.00	577.58	425.40	321.19 [Methanol (methyl alcohol)]
2013	715.41	1998.32	646.18	4201.37	617.74	376.63	270.62 [Methanol (methyl alcohol)]
2012	684.06	1974.11	582.85	2424.90	868.32	370.29	270.54 [Methanol (methyl alcohol)]
2011	710.90	2013.72	622.45	2691.25	899.26	414.50	315.42 [Methanol (methyl alcohol)]
2010	931.01	2268.76	516.22	2959.86	358.90	324.81	220.60 [Methanol (methyl alcohol)]

<p>Review Engineer: Heather Sands</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 04291/T43 Permit Issue Date: Permit Expiration Date:</p>
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I. Purpose of Application

Domtar Paper Company, LLC (Domtar) currently holds Title V Permit No. 04291T42, with an expiration date of April 30, 2017, for a Kraft pulp mill located in Plymouth, Martin County, North Carolina. On December 29, 2014, Domtar submitted a permit application (No. 5900069.14G) for a significant modification to their permit for revisions to their 112(j) emission limits for their hog fuel boilers.

II. Project Description

Domtar is requesting to change the current 112(j) metallic hazardous air pollutant (HAP) emissions limits for the two hog fuel boilers in their Title V Air Permit. Specifically, Domtar is requesting to remove the arsenic, beryllium, cadmium, chromium VI, lead, manganese, nickel, and selenium emission limits and replace them with a filterable particulate matter (PM) limit of 0.44 pounds per million British thermal units (lb/million Btu). They are also requesting that the hourly mercury limits in their permit be replaced with a mercury limit of 5.7×10^{-6} lb/million Btu for both boilers. These PM and mercury limits are the limits for biomass boilers that are considered hybrid suspension grate (HSG) units as defined in the maximum achievable control technology (MACT) standards contained in the National Emission Standards for HAP (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters in 40 CFR Part 63, Subpart DDDDD (Boiler MACT or Subpart DDDDD).

This request is based on a determination that the hog fuel boilers meet the definition of an HSG unit. According to Subpart DDDDD,¹ an HSG boiler is defined as follows:

Hybrid suspension grate boiler means a boiler designed with air distributors to spread the fuel material over the entire width and depth of the boiler combustion zone. The biomass fuel combusted in these units exceeds a moisture content of 40 percent on an as-fired annual heat input basis as demonstrated by monthly fuel analysis. The drying and much of the combustion of the fuel takes place in suspension, and the combustion is completed on the grate or floor of the boiler. Fluidized bed, dutch oven, and pile burner designs are not part of the hybrid suspension grate boiler design category. [40 CFR 63.7575]

In a February 15, 2012, applicability determination request (Permit Applicability Determination No. 1935), Domtar provided the following information to show that the Hog Fuel Boilers Nos. 1 and 2 meet the definition of a HSG boiler under Subpart DDDDD:

- The biomass combusted by the Hog Fuel Boilers typically contains between 40 and 50 percent moisture by weight, and higher moisture content is possible during periods of heavy rainfall.
- To burn the higher moisture content fuel, the boilers are equipped with air-swept suspension feeders to distribute the bark over the width and depth of the boiler. Fuel drying begins in suspension, and combustion is completed on the grate below. Additional suspension is provided by under grate air (UGA) that flows upward through the furnace section of the boiler.

In a February 21, 2012, letter NC DAQ approved the approach of defining the Hog Fuel Boilers Nos. 1 and 2 as HSG biomass boilers.

The existing permit limits for individual metal HAP were based on a health-based risk approach, which was allowed under Case-by-Case MACT. According to Domtar, the derivation of these limits was based on a worst-case fuel mix which, at the time, included coal. However, coal is no longer permitted to burn in these boilers and natural gas is burned in place of the coal. The removal of coal combustion from the

¹ EPA finalized amendments to the Boiler MACT on November 20, 2015 (80 FR 72817). Further discussion related to Boiler MACT will refer to the November 2015 amendments.

hog fuel boilers changes the metals contents of the fuel fired and subsequently the metals emissions profile from these units.

III. Application History

The following provides a summary of the history leading up to the application, as well as communications since the application.

February 15, 2012	Domtar submitted request for an applicability determination for classification of the Nos. 1 and 2 Hog Fuel Boilers as hybrid suspension grate boilers.
February 21, 2012	NC DAQ responded with a letter concurring that the Nos. 1 and 2 Hog Fuel Boilers meet the definition of hybrid suspension grate boilers.
December 19, 2014	Domtar submitted Permit Application No. 5900069.14G to revise the 112(j) emission limits for metallic HAP for the Nos. 1 and 2 Hog Fuel Boilers.
January 20, 2015	Betsy Huddleston of the Washington Regional Office (WaRO) submitted recommendations and comments on the December 19, 2014, permit application.
July 29, 2015	Domtar met with DAQ to discuss outstanding issues with their permit.
March 18, 2016	Draft permit was submitted to facility and regional office for review.
March 21, 2016	Comments on draft permit from WaRO were received.
March 28, 2016	Comments on draft permit from Domtar were received.
March 31, 2016	Revised draft permit was submitted to facility for a brief review. Revisions were made to incorporate comments from WaRO and Domtar.
XXXX YY, 2016	Draft permit sent to public notice.
XXXX YY, 2016	Public comment period ends. <i>Enter info on comments received</i>
XXXX YY, 2016	EPA comment period ends. <i>Enter info on comments received.</i>
XXXX YY, 2016	Permit issued.

IV. Permit Modifications

A. Summary of Changes to Permit

Table 1 describes the changes to the current permit as part of this modification.

Table 1. Summary of Changes to Permit

Pages	Section	Description of Changes
Cover letter	NA	<ul style="list-style-type: none"> Updated permit revision and dates Updated to new NC DEQ letterhead

Pages	Section	Description of Changes
Cover Letter Attachment	Insignificant Activities list and Summary of changes to permit	<ul style="list-style-type: none"> • Added footnotes to insignificant activities table to reflect current permit shell; • Deleted the inorganic liquid (ClO₂) storage tanks from the insignificant activities table. These tanks were also on the Section 1 equipment table. • Added natural gas-fired emergency lime kiln backup engine (ID No. IES-14-60-3013) to the insignificant activities table; and • Updated summary of changes to permit.
Permit Cover	NA	<ul style="list-style-type: none"> • Revised permit application number and dates • Updated to new NC DAQ letterhead
8	Section 1 Table	<ul style="list-style-type: none"> • Replaced “clean cellulosic biomass” with “biomass fuel” in the list of permitted fuels for the Nos. 1 and 2 Hog Fuel Boilers. A “biomass fuel” must meet the requirements in the footnotes to the table in Section 1; • Merged cells for the control device (ID No. CD-07-36-8000), installed on ES-07-33-3080, ES-07-35-5060, ES-07-35-5080, ES-07-33-Blendbox to show that it controls all four emissions sources.
17	Section 2.1 A	<ul style="list-style-type: none"> • Replaced “clean cellulosic biomass” with “biomass fuel” in the list of permitted fuels for the Nos. 1 and 2 Hog Fuel Boilers.
20	Section 2.1 A.3	<ul style="list-style-type: none"> • Removed the initial compliance date of March 9, 2015 and revised the condition to reflect ongoing compliance requirements.
24	Section 2.1 A.6	<ul style="list-style-type: none"> • Added 40 CFR 64.9(a) reporting requirements to A.6.e.
26	Section 2.1 A.7	<ul style="list-style-type: none"> • Replaced limits for individual metals (arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium) with PM and mercury limits for hybrid suspension grate boiler subcategory as defined in Boiler MACT; • Added PM limit for No. 6 fuel oil firing in hog fuel boilers; • Updated emission limit calculations to include prorated equation; • Made equations for PM, HCl, and CO subparagraphs (i) through (iii) of condition A.7.b instead of footnotes to table; • Replaced hourly mercury limit with the mercury limit (in terms of pounds per million Btu) from the Boiler MACT; • Revised condition A.7.c to remove initial compliance date sentence. • Added condition A.7.d (and renumbered subsequent paragraphs) requiring the Permittee to fire only biomass with a moisture content greater than 40 percent in order for the boilers to be considered hybrid suspension grate boilers; • Corrected cross referencing errors in conditions A.7.e and A.7.f. • Revised conditions A.7.g, A.7.h, A.7.i, to reflect the initial compliance requirements that are related to the new permit conditions being added in T43. Also removed reference to periodic compliance requirements, which are in later conditions. • Revised initial compliance demonstration in condition A.7.h to require a new performance test and new monthly fuel analyses; • Changed compliance condition A.7.j from 12-month average to a 12-month rolling average calculated monthly; • Revised conditions A.7.l to require a new fuel analysis plan to take into account that the fuel analyses for moisture and mercury compliance demonstration will be required monthly; • Revised conditions A.7.m and A.7.n to reflect ongoing compliance.

Pages	Section	Description of Changes
		<ul style="list-style-type: none"> Added a requirement in condition A.7.p.vii to keep records of fuel moisture content.
47	Section 2.1 F.2	<ul style="list-style-type: none"> Removed reference to the No. 10 paper sheeting trim collection system from F.2.d. This equipment was removed from Permit T42 and these references were inadvertently left in the permit.
48	Section 2.1 F.3	<ul style="list-style-type: none"> Revised CAM language to remove visible emissions as an applicable regulation (VE is not a regulated pollutant); Updated monitoring approach based on comments from SSCB; and Added reporting requirements for 40 CFR 64.9(a).
96 - 97	Section 2.2 E.2	<ul style="list-style-type: none"> Revised Total Facility Emissions Limits in Table 2.2 E.2.a.
1 – 110	All	<ul style="list-style-type: none"> Updated Permit Revision Number in header Updated permit language to match permit shell.

B. Other Changes to Permit

On July 29, 2015, Domtar met with DAQ to discuss some outstanding issues that they would like to resolve in the permit and that could be consolidated into this significant modification. These issues were as follows:

- Request to burn creosote treated railroad ties (CTRT) in the hog fuel boilers as non-hazardous secondary materials (NHSM);
- Revising the State 112(j) Boiler MACT emission limits for the Nos. 1 and 2 HFBs to those now federally promulgated for hybrid suspension grate fired boilers under the Boiler MACT;
- Comments from SSCB concerning the CAM provisions; and
- Final clean-up of the TAP tables. Some of the revisions were included in revision T42 of the air permit, but some there were some that still need to be modified.

During this meeting, DAQ and Domtar agreed that the comments from SSCB concerning CAM and the TAP table cleanup could be incorporated into the 112j Boiler MACT emission limits revisions, which is the permit application in house (Permit Application No. 5900069.14G).

Prior to the July 2015 meeting, Domtar submitted a request to DAQ to approve CTRT as NHSM, which had not yet been approved. As a result, during the July 2015, Domtar and DAQ agreed that the resolution of this matter would be resolved after the request was approved. However, EPA has since promulgated the final amendments to Part 241 (February 8, 2016, 81 FR 6687), which now include CTRT as a categorical exemption of non-waste fuels. Therefore, this approval of CTRT as a NHSM is no longer required.

In their March 28th comments, Domtar again requested approval to burn CTRT in the hog fuel boilers. The Nos. 1 and 2 Hog Fuel Boilers are currently permitted to burn “clean cellulosic biomass,” which is footnoted in the Section 1 equipment list as follows:

“Clean cellulosic biomass fuel must meet the definition as provided in 40 CFR 241.2, or it must be approved as a non- hazardous secondary material (NHSM), biomass fuel by EPA (40CFR 241.2 and 241.3). The Permittee must notify the Division of Air Quality in writing within 30 days of beginning use of a new clean cellulosic biomass fuel. For any fuel that is not clearly defined as clean cellulosic biomass in 40 CFR 241 or separately approved as a non-hazardous secondary material (NHSM), biomass fuel by the Environmental Protection Agency, the Permittee must first submit a NHSM determination request to the Division of Air Quality.”

Based on the definition above, the CTRT would be considered a fuel that is “separately approved as a non-hazardous secondary material,” biomass fuel by the EPA due to the February amendment and is therefore allowed to be burned without a permit modification. However, Part 241 also contains a definition of “clean cellulosic biomass,” which does not include CTRT. Therefore, to clarify the types of biomass fuels allowed to be burned in the Nos. 1 and 2 Hog Fuel Boilers, the permit has been amended to allow the combustion of “biomass fuel,” as follows:

“Biomass fuel must meet the clean cellulosic biomass definition as provided in 40 CFR 241.2 or the specific non-hazardous secondary material (NHSM) categories in 40 CFR 241.4. The Permittee must notify the Division of Air Quality in writing within 30 days of beginning use of any new biomass fuel. For any fuel that is not clearly defined by 40 CFR 241.1 or 241.4, the Permittee must first submit a NHSM determination request to the Division of Air Quality under 40 CFR 241.2 and 241.3. A biomass fuel may also be approved as a NHSM by EPA.”

In addition, on March 28th, Domtar provided several other comments on the draft permit. These changes were made where appropriate and the following discussion describes these comments in more detail. Minor changes and editorial changes will not be discussed.

- Three inorganic liquid (ClO₂) storage tanks are listed on the insignificant activities list and on the equipment table in Section 1. The mill confirmed with the WaRO that these are the same tanks. Therefore, they were removed from the insignificant activities list.
- Domtar requested that DAQ add a natural gas-fired emergency lime kiln backup engine to their permit (ID No. IES-14-60-3013). They also submitted emissions calculations for this natural gas fired engine that demonstrate that, at 500 hr/yr of operation, the engine emits less than 5 tpy of criteria pollutants and 1,000 lb/year of HAP. Therefore, the engine is an insignificant activity and was added to the insignificant activities list.
- In the boiler condition (Section 2.1 A), there were several dates specified for initial compliance demonstrations that have passed. These were removed and replaced with language requiring ongoing compliance.
 - The initial demonstration of compliance with the PM emissions standards under the NSPS (Subpart D), was required in Section 2.1 A.3.d to be conducted no later than March 9, 2015. Domtar indicated in their March 28th comments that this requirement was satisfied for the No. 1 Hog Fuel Boiler on March 3, 2015 and for the No. 2 Hog Fuel Boiler on February 24, 2015.
 - The initial compliance date for the Case-by-Case MACT under 112(j) was February 23, 2014. Domtar submitted the required notification of compliance status (NOCS) for the 112(j) conditions on September 16, 2014.²
 - Initial compliance testing, in Section 2.1 A.7, was required to be completed no later than August 21, 2014. Initial CO testing for both boilers was conducted February 18 and 19, 2014. Domtar satisfied this requirement for No. 2 HFB using a past performance test conducted July 10, 2012, and initial compliance testing of No. 1 HFB was completed August 7, 2014.³
- In April 2015, Domtar received comments from the SSCB on their CAM conditions for PM emissions in Section 2.1 A.6 and F.3. In their March 28th comments, Domtar asked whether the CAM updates had been resolved. DAQ has reviewed the suggested updates and agrees with the SSCB comments. SSCB comments have been incorporated into the permit.
- During the process of issuing the latest permit (T42), Domtar requested that the No. 10 Sheeter paper sheeting trim system (ID No. ES-49-70) be removed from the permit because it and all of its parts had

² October 21, 2014 Compliance Inspection Report from Betsy Huddleston, Washington Regional Office.

³ Letter from Michael Pjetraj, SSCB to Dennis Askew, Domtar. Request for approval of 07/10/2012 No. 2 Hog Fuel Boiler Metals Test and Revised Boiler MACT Fuel Sampling Plan. January 27, 2014.

been removed from the facility.⁴ While the unit was removed from the permit, two references to that unit remained. Domtar requested these references be removed.

- Domtar provided the revisions to the toxics limits in Section 2.2 E.2, Table 2.2 E.2.a - “Facility Wide Toxic Air Pollutant Emission Limits” that were discussed in the July 29, 2015 meeting between DAQ and Domtar. These were incorporated into the permit.

V. Regulatory Review – State Rules

The Nos. 1 and 2 Hog Fuel Boilers are subject to the following State Regulations:

- 15A NCAC 02D .0504 – Particulates from Wood Burning Indirect Heat Exchangers;
- 15A NCAC 02D .0516 – Sulfur Dioxide Emissions from Combustion Sources;
- 15A NCAC 02D .0524 – New Source Performance Standards (40 CFR Part 60, Subpart D);
- 15A NCAC 02D .0530 – Prevention of Significant Deterioration; and
- 15A NCAC 02D .0614 – Compliance Assurance Monitoring.

No changes to the regulations listed above in the permit are required for the proposed changes. This permit modification only impacts one state regulation applicable to the Hog Fuel Boilers: 112(j) Case-by-Case Maximum Achievable Control Technology (under 15A NCAC 2D .1109).

The Nos. 1 and 2 Hog Fuel Boilers are subject to the 112(j) provisions for boilers. With the promulgation of 40 CFR Part 63 Subpart DDDDD, “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters,” the applicability of the CAA §112(j) requirements will sunset and, consistent with 40 CFR 63.56(b), Domtar will be required to comply with Subpart DDDDD on May 20, 2019. Under 40 CFR 63.56(b), DAQ is required to incorporate requirements of the newly promulgated standard in each Title V permit upon its next renewal. Since this action is not a renewal, the full Subpart DDDDD conditions will not be added to the permit at this time.

As discussed above, Domtar is requesting revisions to 112(j) limits on individual metallic HAP. The Nos. 1 and 2 Hog Fuel Boilers originally were permitted to burn coal, and as a result, Domtar opted to use the health-based compliance alternative (HBCA) under 112(j) and the permit contained emission limits for individual metal HAP: arsenic, beryllium, cadmium, lead, manganese, nickel, and selenium. Because they are burning natural gas in these boilers, and the hog fuel boilers are no longer permitted to burn coal, Domtar is requesting that these limits be revised.

When the 112(j) requirements under 02D .1109 were incorporated into their permit (Permit No. 04291R36, issued February 23, 2011), the hybrid suspension grate boiler subcategory had not yet been finalized by EPA. EPA finalized the definition of this subcategory on January 13, 2013 and revised it in the reconsideration amendments issued on November 20, 2015 (the 2015 definition is presented in Section II, above). By creating this subcategory, EPA stated that they recognized the design differences in these types of boilers and set standards for CO, PM, and mercury for the HSG boiler subcategory (76 FR 15634, March 21, 2011).

On May 31, 2012, after EPA initially proposed the HSG boiler subcategory, DAQ incorporated the CO emission limits for this subcategory into Domtar’s Title V permit (Permit No. 04291T37). Replacing the individual metals limits with the Boiler MACT PM and mercury emission standards would be consistent with DAQ’s position that the Nos. 1 and 2 Hog Fuel Boilers are HSG boilers and that it is appropriate to incorporate the Boiler MACT standards for this subcategory into the permit. Therefore, the permit was modified to replace the emission limits for arsenic, beryllium, cadmium, lead, manganese, nickel, and selenium with a PM limit of 0.44 lb/million Btu (on a 30-day average) and the hourly mercury limit was

⁴ Email from Diane Hardison, Domtar to Mark Cuilla, DAQ. July 7, 2015. “RE: Draft Permit and Review - Domtar comments.”

replaced with a limit of 5.7×10^{-6} lb/million Btu of heat input (on a 30-day average). The 112(j) PM limit of 0.45 lb/million Btu for No. 6 fuel oil was retained, but only applies if less than 10 percent of the heat input comes from biomass being burned in the hog fuel boilers.

In addition, the following changes were made to the 112(j) condition:

- To ensure that the boiler is being operated as a HSG boiler, Domtar will need to demonstrate through monthly fuel analysis that the boilers are combusting biomass with a moisture content greater than 40 percent.
- The HSG boiler subcategory definition is based on monthly fuel analysis, therefore the permit was modified to require Domtar to develop a new fuel analysis plan and conduct an initial fuel analysis.
- The mercury limit is a 30-day average and if a fuel analysis is used to demonstrate compliance, Domtar will need to conduct monthly fuel analyses.
- A new initial performance test will be required within 180 days after the permit is issued. In their March 28th comments, Domtar expressed a desire to use a performance test conducted in March 2016 as the initial compliance test. The permit was revised to allow for a performance test conducted prior to permit issuance provided it had been conducted within the last 13 months, approved prior to the date the initial compliance test would have been due, and the test included analyses that would demonstrate compliance with the PM and mercury limits.
- The initial and periodic compliance requirements were revised to separate the two and clarify what was required as an initial compliance demonstration and what was required for ongoing compliance.

VI. Regulatory Review - Federal Rules (NSPS, NESHAP/MACT, NSR/PSD)

The Nos. 1 and 2 Hog Fuel Boilers are subject to the following federal rules:

- Standards of Performance for Fossil-Fuel-Fired Steam Generators – 40 CFR Part 60, Subpart D;
- National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters – 40 CFR Part 63 Subpart DDDDD; and
- Prevention of Significant Deterioration

No changes are being made to the conditions for the new source performance standards (NSPS) under Subpart D and the PSD conditions. As discussed above, the Nos. 1 and 2 Hog Fuel Boilers are subject to the NESHAP under Subpart DDDDD, but the conditions for this regulation are not being incorporated in to the permit until the permit is renewed in 2017.

VII. Facility Wide Air Toxics

The proposed modifications will not result in an increase in emissions of toxic air pollutants due to a physical change in the unit. Therefore, no changes to the permit will be required in association with this modification. However, in their March 28th comments, Domtar provided revisions to the toxics limits in Section 2.2 E.2, Table 2.2 E.2.a - "Facility Wide Toxic Air Pollutant Emission Limits" that were discussed in a July 29, 2015 meeting between DAQ and Domtar. The result of that meeting was that DAQ would revise the toxics limits during the processing of Permit Application No. 5900069.14G. These were incorporated into the permit.

VIII. Facility Emissions Review

The table above (in the review summary) represents the criteria pollutant (plus total HAP) from the latest available reviewed facility emissions inventory (2014).

IX. Facility Compliance Status

DAQ has reviewed the compliance status of this facility. During the most recent inspections, conducted by Ms. Betsy Huddleston of the WaRO on the following dates in 2015: March 2 and 3, July 9, 14, 17, and 21, and August 5, 6, and 18. According to the compliance report the facility appeared to operate in compliance with the conditions of the permit at the time of the inspections. However, there is an ongoing violation for failure to obtain a PSD permit for construction and operation of the lignin plant. Domtar is resolving the violation through a Special Order of Consent.

Additionally, a signed Title V Compliance Certification (Form E5) indicating that the facility was in compliance with all applicable requirements was included with the permit modification.

X. Draft Permit Review Summary

A copy of the draft permit was submitted to Domtar and to WaRO on March 18, 2016. The WaRO submitted comments on the draft permit on March 21, 2016. Other than some minor editorial comments, the primary comment was related to the use of a performance test and fuel analysis conducted prior to the issuance of permit T43. This was also an issue raised by Domtar and is discussed in Section V, above. Domtar submitted comments on the draft permit on March 28, 2016. Comments and DAQ response to these comments are discussed in Sections IV and V, above.

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

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit was published on **XXXX YY, 2016** (via DAQ website). The notice provided for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice were sent to persons on the Title V mailing list, EPA, and affected States.

Summarize any comments received.

XII. Conclusions, Comments and Recommendations

PE Seal

Pursuant to 15A NCAC 2Q .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;
- (3) or determination and interpretation of performance; of air pollution capture and control systems.

A professional engineer’s seal (PE Seal) was **NOT** required for this modification.

Zoning

A Zoning Consistency Determination per 2Q .0304(b) was **NOT** required for this modification.

Recommendations

This permit modification 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. 04921T43. WaRO has received a copy of this permit and submitted comments that were incorporated as described in Section X.