

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Air Permit Review**

**Permit Issue Date:**

**Region:** Fayetteville Regional Office  
**County:** Cumberland  
**NC Facility ID:** 2600094  
**Inspector's Name:** Joshua L. Harris  
**Date of Last Inspection:** 08/05/2015  
**Compliance Code:** 3 / Compliance - inspection

<p align="center"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> Public Works Commission Butler-Warner Generation Plant</p> <p><b>Facility Address:</b>                  Public Works Commission Butler-Warner Generation Plant                  2274 Custer Avenue                  Fayetteville, NC 28306</p> <p><b>SIC:</b> 4931 / Elec &amp; Other Services Combined  <b>NAICS:</b> 221112 / Fossil Fuel Electric Power Generation</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p align="center"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b>  <b>NSPS:</b>  <b>NESHAP:</b>  <b>PSD:</b>  <b>PSD Avoidance:</b>  <b>NC Toxics:</b>  <b>112(r):</b>  <b>Other:</b> CAIR removed, CSAPR added</p>
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Contact Data			Application Data
<p align="center"><b>Facility Contact</b></p> Ace May Operations Supervisor (910) 223-4814 P O Drawer 1089 Fayetteville, NC 28302	<p align="center"><b>Authorized Contact</b></p> Allen Wallace Director of Generation Power Supply (910) 223-4813 PO Drawer 1089 Fayetteville, NC 28302	<p align="center"><b>Technical Contact</b></p> Allen Wallace Director of Generation Power Supply (910) 223-4813 PO Drawer 1089 Fayetteville, NC 28302	<p><b>Application Number:</b> 2600094.16A  <b>Date Received:</b> 10/24/2015  <b>Application Type:</b> Modification  <b>Application Schedule:</b> TV-Reopen for Cause</p> <p align="center"><b>Existing Permit Data</b></p> <p><b>Existing Permit Number:</b> 03029/T17  <b>Existing Permit Issue Date:</b> 11/09/2012  <b>Existing Permit Expiration Date:</b> 10/31/2017</p>

**Total Actual emissions in TONS/YEAR:**

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	3.92	39.92	0.0900	4.90	1.41	0.1560	0.0872 [Manganese & compounds]
2013	0.2800	3.88	0.0500	2.48	0.1100	0.0286	0.0144 [Formaldehyde]
2012	0.7500	27.99	0.4500	28.51	1.43	0.2208	0.1524 [Formaldehyde]
2011	0.9600	35.70	0.5800	39.22	1.86	0.2916	0.2014 [Formaldehyde]
2010	2.19	55.00	0.9000	60.84	3.03	0.4593	0.3058 [Formaldehyde]

<p><b>Review Engineer:</b> Russell Braswell</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>	<p align="center"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 03029/T18  <b>Permit Issue Date:</b>  <b>Permit Expiration Date:</b></p>
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## 1. Purpose of Application:

Public Works Commission Butler - Warner Generation Plant (PWC) currently operates under Air Quality Permit 03029T17. The existing permit contains references to the federal Clean Air Interstate Rule [CAIR]. This rule no longer applies and has been superseded by the Cross State Air Pollution Rule [CSAPR].

The DAQ has reopened this permit in order to remove references to CAIR and replace them with CSAPR.

## 2. Facility Description:

According to the most recent inspection report<sup>1</sup>, this facility "...is designed to provide electric generation to meet the needs of Duke Energy Progress on short notice...This is a 280 megawatt capacity plant. There are eight turbine generators available for electricity generation..."

## 3. Application Chronology:

- August 25, 2015 Rahul Thaker sent an email to PWC informing them of the potential need for DAQ to reopen the permit in order to remove CAIR and add CSAPR.
- January 21, 2016 Application initiated by the NCDAQ.
- XXXXXX Initial draft
- XXXXXX Public / EPA Notice
- XXXXXX Permit issued.

## 4. Regulatory Review:

### a. CAIR requirements

According to 40 CFR 52.35(f) and 52.36(e), CAIR no longer applies as of January 1, 2015. CAIR has been moved to Section 2.3. in the permit, which is for non-applicable regulations.

According to 15A NCAC 2D .2401(a), the purpose of the 2D .2400 rules was to implement CAIR. Given that CAIR no longer applies, the NC rules that implement CAIR also do not apply. Therefore, references to 2D .2400 rules have been moved to Section 2.3. in the permit.

### b. CSAPR requirements

CSAPR (specifically, 40 CFR Part 97, Subparts AAAAA, BBBBB, 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.

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<sup>1</sup> Joshua Harris, August 5, 2015

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.

## 5. Facility Emissions Review

The transition from CAIR to CSAPR is not expected to change actual or potential emissions from this facility.

## 6. 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.

## 7. Recommendations

Issue permit 05543T23

### Change List

Pages	Section	Description of Changes
Throughout	Throughout	<ul style="list-style-type: none"><li>• Updated application/permit numbers</li><li>• Updated dates</li><li>• Removed references to CAIR.</li><li>• Added references to CSAPR</li><li>• Changed "2D" and "2Q" to "02D" and "02Q"</li><li>• Fixed formatting errors.</li></ul>
	2.4.	<ul style="list-style-type: none"><li>• Added section for non-applicable requirements</li><li>• Added CAIR and 02D .2400 to this section.</li></ul>
	3.	<ul style="list-style-type: none"><li>• Updated General Conditions to v4.0.</li></ul>

DRAFT