



Air Quality
ENVIRONMENTAL QUALITY

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL A. ABRACZINSKAS
Director

April 6, 2017

Mr. Roger Richardson
Director of Fumigation
Royal Pest Solutions Log Facility
53 McCullough Drive
New Castle, DE 19720

Subject: Air Permit No. 10531R00
Royal Pest Solutions Log Facility
Wilmington, New Hanover County, North Carolina
Permit Class: Synthetic Minor
Facility ID# 6500367

Dear Mr. Richardson:

In accordance with your completed application received March 15, 2017, we are forwarding herewith Permit No. 10531R00 to Royal Pest Solutions Log Facility, Wilmington, New Hanover County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Please note the records retention requirements are contained in General Condition 2 of the General Conditions and Limitations.

If any parts, requirements, or limitations contained in this permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. Such a request will stay the effectiveness of the entire permit. This hearing request must be in the form of a written petition, conforming to G.S. 150B-23 of the North Carolina General Statutes, and filed with the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, NC 27699-6714. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Unless a request for a hearing is made pursuant to G.S. 150B-23, this air permit shall be final and binding.

You may request modification of your air permit through informal means pursuant to G.S. 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that the permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under G.S. 150B-23.

Unless exempted by a condition of this permit or the regulations, construction of new air pollution sources or air cleaning devices, or modifications to the sources or air cleaning devices described in this permit must be covered under a permit issued by the Division of Air Quality prior to construction. Failure to do so is a violation of G.S. 143-215.108 and may subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-

215.114B.

This permit shall be effective from April 6, 2017 until March 31, 2025, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

This permit is the result of a request for a First-Time/Greenfield permit. All air emission sources are considered new. The facility will exist on a portion of land adjacent to and owned by Service Transport Inc. (3701 River Road, Wilmington, North Carolina) by lease agreement. The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Should you have any questions concerning this matter, please contact Linda Willis at 910-796-7235.

Sincerely,



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

Enclosures

c: Wilmington Regional Office
WiRO Permit Coordinator
IBeam Doc Mod ____

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF AIR QUALITY

AIR PERMIT NO. 10531R00

Issue Date: April 6, 2017
Expiration Date: March 31, 2025

Effective Date: April 6, 2017
Replaces Permit: (new)

To construct and operate air emission source(s) and/or air cleaning device(s), and for the discharge of the associated air contaminants into the atmosphere in accordance with the provisions of Article 21B of Chapter 143, General Statutes of North Carolina (NCGS) as amended, and other applicable Laws, Rules and Regulations,

Royal Pest Solutions Log Facility
3701 River Rd
Wilmington, New Hanover County, North Carolina
Permit Class: Synthetic Minor
Facility ID# 6500367

(the Permittee) is hereby authorized to construct and operate the air emissions sources and/or air cleaning devices and appurtenances described below:

Emission Source ID	Emission Source Description	Control System ID	Control System Description
ES-1	one fumigation process utilizing methyl bromide on import/export commodities in shipping containers and bulk piles utilizing a 30 foot stack	N/A	N/A

in accordance with the completed application 6500367.17A received March 15, 2017 including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environmental Quality, Division of Air Quality (DAQ) and are incorporated as part of this permit.

This permit is subject to the following specified conditions and limitations including any **TESTING, REPORTING, OR MONITORING REQUIREMENTS:**

A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0202, 2D .0535, 2D .0540, and 2Q .0315.

2. PERMIT RENEWAL AND EMISSION INVENTORY REQUIREMENT - The Permittee, at least **90** days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with AA application form) should be submitted to the Regional Supervisor, DAQ. Also, at least **90** days prior to the expiration date of this permit, the Permittee shall submit the air pollution emission inventory report (with Certification Sheet) in accordance with 15A NCAC 2D .0202, pursuant to N.C. General Statute 143 215.65. The report shall be submitted to the Regional Supervisor, DAQ and shall document air pollutants emitted for the **2023** calendar year.

3. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:
 - a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:
 - i. the name and location of the facility,
 - ii. the nature and cause of the malfunction or breakdown,
 - iii. the time when the malfunction or breakdown is first observed,
 - iv. the expected duration, and
 - v. an estimated rate of emissions.

 - b. Notify the Director or his designee immediately when the corrective measures have been accomplished.

This reporting requirement does not allow the operation of the facility in excess of Environmental Management Commission Regulations.

4. FUGITIVE DUST CONTROL REQUIREMENT - As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints are received or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 2D .0540(f).

"Fugitive dust emissions" means particulate matter that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

5. LIMITATION TO AVOID 15A NCAC 2Q .0501 - Pursuant to 15A NCAC 2Q .0315 "Synthetic Minor Facilities," to avoid the applicability of 15A NCAC 2Q .0501 "Purpose of Section and Requirement for a Permit," as requested by the Permittee, facility-wide emissions shall be less than the following:

Pollutant	Emission Limit (Tons per consecutive 12-month period)
Individual HAPs	10

- a. Operations Restrictions – To ensure emissions do not exceed the limitations above, the following restrictions shall apply:
 - i. The amount of methyl bromide actual emissions shall be less than 10 tons per consecutive 12-month rolling periods. The Permittee has assumed that 100% of the methyl bromide used is emitted. No emission factors were used.
- b. Recordkeeping Requirements
 - i. The Permittee shall calculate and record the following each month:
 - A. The amount of methyl bromide used in the fumigation process each month.
 - B. The amount of methyl bromide used in the fumigation process on a 12-month rolling basis.
- c. Reporting Requirements – Within 30 days after each calendar month, regardless of the actual emissions, the Permittee shall submit the following:
 - i. The amount of methyl bromide used in the fumigation process in each reporting month.
 - ii. The total amount of methyl bromide used in the fumigation process over the 12-month rolling period ending with the reporting month.

B. GENERAL CONDITIONS AND LIMITATIONS

1. In accordance with G.S. 143-215.108(c)(1), TWO COPIES OF ALL DOCUMENTS, REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, REQUESTS FOR RENEWAL, AND ANY OTHER INFORMATION REQUIRED BY THIS PERMIT shall be submitted to the:

Regional Supervisor
 North Carolina Division of Air Quality
 Wilmington Regional Office
 127 Cardinal Drive Extension
 Wilmington, NC 28405
 910-796-7215

For identification purposes, each submittal should include the facility name as listed on the permit, the facility identification number, and the permit number.

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 2D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 2Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
5. REPORTING REQUIREMENT - In accordance with 15A NCAC 2Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

6. In accordance with 15A NCAC 2Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
8. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.

9. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
10. In accordance with 15A NCAC 2D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
12. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
13. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
14. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 2Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
15. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 2D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.
16. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**
17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee

shall perform such testing in accordance with 15A NCAC 2D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval.

Permit issued this the 6th day of April, 2017.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

A handwritten signature in black ink, appearing to read 'Brad Newland', is written over a horizontal line.

Brad Newland

Wilmington Regional Supervisor

By Authority of the Environmental Management Commission

Air Permit No. 10531R00