

**PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR QUALITY PERMIT**

**FORSYTH COUNTY  
OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION  
WINSTON-SALEM, NORTH CAROLINA**

**January 24, 2024**

Notice is hereby given by the Forsyth County Office of Environmental Assistance and Protection (EAP) of an opportunity for the public to review and comment on a draft Title V air quality permit for:

**Alliance One North America – Recon Facility  
4040 Reynolds Ct. - 603-1  
Winston-Salem, NC  
Permit #01095-TV-2**

This facility had applied for a renewal of its Title V Air Quality operating permit. The draft permit meets the Title V requirements as specified in FCAQTC Section 3Q-0500.

EPA will process this draft permit as a proposed permit and perform its 45-day review provided by Section 3Q-0522 *Review by EPA and Affected States* concurrently with the public notice period. If public comments are received that result in a change to the permit, EPA's 45-day review period will cease to be performed concurrently with the public notice period. The deadline for citizen's petitions to the EPA Administrator will be determined based on EPA's 45-day review period beginning after the public comment period has ended. The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address:

<https://www.epa.gov/caa-permitting/north-carolina-proposed-title-v-permits>

The EAP will issue a final Air Quality Permit, in accordance with the conditions of the draft/proposed Air Quality Permit, unless there are public comments which result in a different decision or significant change in the permit.

A copy of the draft permit and statement of basis is available at the EAP's website:

[http://www.forsyth.cc/EAP/public\\_notices.aspx](http://www.forsyth.cc/EAP/public_notices.aspx)

Additional information regarding the draft permit may be obtained from the Office of Environmental Assistance and Protection, Forsyth County Government Center, 201 N. Chestnut Street, Winston-Salem, NC 27101-4120; telephone (336) 703-2440. The public may submit written comments on these proceedings to the address above or by e-mail to [lloydpb@forsyth.cc](mailto:lloydpb@forsyth.cc) on or before **February 23, 2024**, the close of the public comment period.



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Peter B. Lloyd, Ph.D., P.E., Manager  
Compliance Assistance & Permitting Division

# DRAFT

## OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION

FORSYTH COUNTY GOVERNMENT CENTER  
201 NORTH CHESTNUT STREET  
WINSTON-SALEM, NC 27101-4120

PERMIT TO OPERATE  
AIR QUALITY CONTROL  
CLASS: Title V

PERMIT NUMBER	EFFECTIVE DATE	EXPIRATION DATE	RENEWAL DUE
01095-TV-2	TBD	TBD	TBD

**Facility Name:** Alliance One North America - Recon Facility

**Mailing Address:** P.O. Box 450  
**City, State, ZIP Code:** Wilson, NC 27894

**Facility Location:** 4040 Reynolds Ct. - 603-1  
**City:** Winston-Salem, NC

In accordance with the provisions set forth in the Forsyth County Air Quality Technical Code and Chapter 3 of the Forsyth County Code, "Air Quality Control", the facility identified above is authorized to operate, as outlined in Part I, "Air Quality Title V Operation Permit", the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations contained within this permit.

The permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete air quality permit application to the Forsyth County Office of Environmental Assistance and Protection and received an Air Quality Permit, except as provided in this permit or in accordance with applicable provisions of the Forsyth County Air Quality Technical Code.

This permit supersedes all previous permits issued to the permittee by the Forsyth County Environmental Affairs Department or Forsyth County Office of Environmental Assistance and Protection.

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Peter B. Lloyd, Ph.D., P.E., Manager  
Compliance Assistance & Permitting Division

DATE:

# Alliance One North America - Recon Facility Air Quality Permit # 01095-TV-2

**Zzzz XX, 2024**

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# Part I

## AIR QUALITY OPERATING PERMIT

### SECTION 1 PERMITTED EQUIPMENT AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)

#### 1.1 Equipment List and Applicable Conditions

ES#	Emission Source	Applicable Standards		CD#			EP#	Emission Point
		PM	max. lb/hr	CAM		non-CAM		
	Applicable Permit Condition	3.2(A)		Fabric Filter	Visual Observ.	Fabric Filter	Visible Emissions 20%	Source Specific Limits
				3.4(B) (1,3,4)	3.4(B) (2,3,4)	3.4(A)	3.3(A)	3.1
ES-X-603-1				CD-X-603-1	Controls		EP-X-603-1	

Building 603-1 Processing									
ES#	Emission Source	PM	max. lb/hr	CD#	Fabric Filter	Visual Observ.	Fabric Filter	EP#	Emission Point
ES-1-603-1	Tobacco Scrap Feed Broke Recovery System	X	15.8	1			X	14	X
ES-2-603-1	Tobacco Stem Feed	X	15.8	1			X	14	X
				2			X	15	X
ES-3-603-1	Dust Infeed & Extraction	X	7.58	1			X	14	X
ES-4-603-1	Dryer #6	X	9.94	None				1, 6, 7	X
ES-5-603-1	Dryer #7	X	9.94	None				16, 17, 17A*, 18	X
ES-6-603-1	Tobacco Mills	X	15.8	5	X	X		27	X

\*EP-17A is an alternate stack that bypasses the economizer heat exchanger.

Note: The "X" denotes the applicable conditions in Sections 3.2 - 3.5.

**1.2 Operating Conditions Not Covered Under the Permit Shield**

The following specific conditions have been revised or added to this permit following procedures other than the Significant Modification procedures in Section 3Q-0500 of the Forsyth County Air Quality Control Ordinance and Technical Code. As required under Sec. 3Q-0512 Permit Shield and Application Shield, a permit shield is not provided for these new or revised permit requirements. During the next Significant Modification as defined in Sec. 3Q-0516 or renewal of this permit, the Title V permit applications for the new and revised permit requirements listed below will also be processed according to the Significant Modification procedures and then a permit shield will be extended at that time.

Source ID	Source Description	Unshielded Operating Conditions	Effective Date

## SECTION 2 FACILITY GENERAL ADMINISTRATIVE CONDITIONS

### 2.1 General Provisions [Sections 3-0100, 3-0200 and Sec. 3Q-0508(i)(16)]

- A. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in Subchapters 3D and 3Q of the Forsyth County Air Quality Technical Code (FCAQTC).
- B. The terms, conditions, requirements, limitations and restrictions set forth in this permit are binding and enforceable pursuant to Sections 3-0100 and 3-0200 of the FCAQTC, including assessment of civil and/or criminal penalties. This permit is valid only for the specific processes and operations applied for and indicated in the air quality permit application. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and enforcement action by the Office of Environmental Assistance and Protection (Office).
- C. This permit is not a waiver of or approval of any other permits that may be required for other aspects of the facility which are not addressed in this permit.
- D. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore. This permit does not allow the permittee to cause pollution in contravention of local laws or rules, unless specifically authorized by an order from the Director, or to cause pollution in contravention of state laws or rules.
- E. Terms and conditions contained herein shall be enforceable by this Office, the U.S. EPA and citizens of the United States as defined in the federal Clean Air Act, except those identified as **Locally Enforceable Only** requirements which are enforceable by this Office.
- F. Any stationary installation which will reasonably be expected to be a source of pollution shall not be operated, maintained or modified without the appropriate and valid permits issued by this Office, unless the source is exempted by rule. This Office may issue a permit only after it receives reasonable assurance that the installation will not cause pollution in violation of any of the applicable requirements.

- G. In addition to the authority found in Sec. 3D-0501 and 3Q-0508(i)(16), any deviation from the monitoring provisions of this permit may result in a request by this Office to submit data on rates of emissions in order to demonstrate compliance with any applicable regulation.

## 2.2 Permit Availability [Sec. 3Q-0507(k), 0508(i)(16), 0508(i)(9) and 0110]

The permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of this Office or the U.S. EPA upon request.

## 2.3 Submissions [Sec. 3Q-0507(c), 0508(i)(16) and 0104]

- A. All documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required to be sent to this Office by this permit shall be submitted to the Forsyth County Office of Environmental Assistance and Protection, Forsyth County Government Center, 201 N. Chestnut Street, Winston-Salem, NC 27101-4120.
- B. All documents, reports, test data, monitoring data, notifications, and any other information required to be sent to **U.S. EPA Region 4, Air Enforcement Branch** shall be submitted through EPA's Compliance and Emissions Data Reporting Interface, CEDRI, or submitted to U.S. EPA Region 4, Air Enforcement Branch, 61 Forsyth Street, S.W., Atlanta, GA 30303.
- C. All documents, reports, test data, monitoring data, notifications, and any other information required to be sent to U.S. EPA Region 4, Air Permits Section shall be submitted through EPA's Compliance and Emissions Data Reporting Interface, CEDRI, or submitted to U.S. EPA Region 4, Air Permits Section, 61 Forsyth Street, S.W., Atlanta, GA 30303.

## 2.4 Severability Clause [Sec. 3Q-0508(i)(2)]

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any specific circumstance, is challenged, the application of the provision in question to other circumstances, as well as the remainder of this permit's provisions, shall not be affected.

## 2.5 Duty to Comply [Sec. 3Q-0508(i)(3)]

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.

## 2.6 Need to Halt or Reduce Activity Not a Defense [Sec. 3Q-0508(i)(4)]



It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

## 2.7 Permit Shield [Sec. 3Q-0512(a)]

- A. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
  
- B. A permit shield shall not alter or affect:
  - 1. the power of the Forsyth County Board of Commissioners, Director, or Governor under NCGS 143-215.3(a)(12) or the U.S. EPA under Section 303 of the federal Clean Air Act;
  - 2. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
  - 3. the applicable requirements under Title IV of the Clean Air Act; or
  - 4. the ability of the Director or the U.S. EPA under Section 114 of the federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
  
- C. A permit shield shall not apply to any change made at a facility that does not require a permit or to any permit revision made under Sec. 3Q-0523.
  
- D. A permit shield shall not extend to minor permit modifications made under Sec. 3Q-0515.

## 2.8 Circumvention [Sec. 3D-0502 and 3Q-0508(i)(16)]

No person shall circumvent any permitted air pollution control device, or allow the emissions of regulated air pollutants without the applicable air pollution control device operating properly. Unless otherwise specified by this permit, no permitted emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

## 2.9 Good Air Pollution Control Practice [Sec. 3D-0502 and 3Q-0508(i)(16)]

At all times, the equipment listed in *Section 1* shall be operated and maintained in a manner consistent with the design and emissions control as applied for in the application.

## 2.10 Reporting Requirements for Excess Emissions and Permit Deviations

“Excess Emissions” - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections 3D-0500, 0900, 1200 or 1400; or by a permit condition; or that exceeds a **Locally Enforceable Only** emission limit established in a permit issued under Section 3Q-0700. (*Note: This definition applies where the NSPS does not further define excess emissions for an affected NSPS emissions source.*)

“Deviation” - means any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions.

A. Sources subject to Sec. 3D-0524, 1110 or 1111

Excess Emissions and Permit Deviations

1. If the source specific NSPS (Sec. 3D-0524) or NESHAP (Sec. 3D-1110 or 1111) defines "excess emissions", these shall be reported as prescribed in Sec. 3D-0524, 1110 or 1111.
2. If the source specific NSPS (Sec. 3D-0524) or NESHAP (Sec. 3D-1110 or 1111) does NOT define “excess emissions”, the permittee shall report excess emissions as deviations from permit requirements as prescribed in paragraph 3, below.
3. In addition to any specific NSPS or NESHAP reporting requirements the permittee shall upon becoming aware:
  - a. report to this Office any deviations from permit requirements by the next business day, unless an alternative reporting schedule is specifically provided in the permit, and
  - b. report in writing to this Office all deviations from permit requirements or any excess emissions within two business days, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such deviations and any corrective actions or preventative actions taken. Reports of all deviations from permit requirements shall be certified by a responsible official.

B. Sources NOT subject to Sec. 3D-0524, 1110 or 1111

1. Excess Emissions Greater than Four Hours in Duration [Sec. 3D-0535(f)]

The permittee shall report excess emissions greater than four hours in duration as prescribed in Sec. 3D-0535(f) including, but not limited to the following:

- a. Notify this Office of any such occurrence by 9:00 a.m. Eastern time of this Office's next business day of becoming aware of the occurrence as described in Sec. 3D-0535(f)(1);
- b. Notify this Office immediately when corrective measures have been accomplished; and

- c. Submit, if requested, to this Office within 15 days after the request, a written report as described in Sec. 3D-0535(f)(3).
2. Excess Emissions Less than Four Hours in Duration and Deviations [Sec. 3Q-0508(f)]

The permittee shall report excess emissions less than four hours in duration and deviations from permit requirements as follows:

- a. Report to this Office any excess emissions less than four hours in duration and any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit; and
  - b. Report in writing to this Office any excess emission less than four hours in duration or any deviations from permit requirements quarterly, unless an alternative reporting schedule is specifically provided in the permit. The written report shall include the probable cause of such excess emissions and deviations and any corrective actions or preventative actions taken. All reports of excess emissions and deviations from permit requirements shall be certified by a responsible official.
- C. Other Requirements under Sec. 3D-0535 (Sec. 3D-0535(g) is **Locally Enforceable Only**).

The permittee shall comply with all other requirements contained in Sec. 3D-0535(c) for excess emissions that do not occur during startup or shutdown and Sec. 3D-0535(g) for excess emissions that occur during startup or shutdown.

## 2.11 Emergency Provisions <40 CFR 70.6(g)>

The permittee shall be subject to the following provision with regard to emergencies:

- A. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the facility to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- B. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in paragraph C below are met.
- C. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

1. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
  2. the permitted facility was at the time being properly operated;
  3. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the standards, or other requirements in the permit; and
  4. the permittee submitted notice of the emergency to this Office within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, and steps taken to mitigate emissions, and corrective actions taken.
- D. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- E. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

#### 2.12 **Permit Fees [Sec. 3Q-0206(b), 0508(i)(10) and 0519(a)(4)]**

If, within 30 days after being billed, the permittee fails to pay an annual permit fee required under Subchapter 3Q-0200 of the FCAQTC, the Director may initiate action to terminate this permit under Sec. 3Q-0519 of the FCAQTC.

#### 2.13 **Annual Emission Inventory Requirements [Sec. 3Q-0207]**

The permittee shall report to the Director by June 30<sup>th</sup> of each year the actual emissions of each air pollutant listed in Sec. 3Q-0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form(s) as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

#### 2.14 **Compliance Certification <40 CFR 70.6(c)> [Sec. 3Q-0508(n) and 0508(i)(16)]**

By March 1<sup>st</sup> unless another date is established by the Director, the permittee shall submit to this Office and the U.S. EPA Air Enforcement Branch a compliance certification by a responsible official with all terms and conditions in the permit, including emissions limitations, standards, or work practices. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the federal Clean Air Act. The compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

- A. the identification of each term or condition of the permit that is the basis of the certification;

- B. the status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the methods or means designated in 40 CFR 70.6(c)(5)(iii)(B). The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;
- C. whether compliance was continuous or intermittent;
- D. the identification of the method(s) or other means used by the owner and operator for determining the compliance status with each term and condition during the certification period; these methods shall include the methods and means required under 40 CFR Part 70.6(a)(3); and
- E. such other facts as the Director may require to determine the compliance status of the source.

#### 2.15 **Retention of Records [Sec. 3Q-0508(f)]**

The permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit.

#### 2.16 **NESHAP - Recordkeeping Requirement for Applicability Determinations <40 CFR 63.10(b)(3)> [Sec. 3D-1111]**

If the permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR Part 63, the permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source. This record shall include all of the information required under 40 CFR 63.10(b)(3).

#### 2.17 **Duty to Provide Information [Sec. 3Q-0508(i)(9)]**

- A. The permittee shall furnish to this Office, in a timely manner, any reasonable information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
- B. The permittee shall furnish this Office copies of records required to be kept by the permit when such copies are requested by the Director.

**2.18 Duty to Supplement or Correct Application [Sec. 3Q-0507(f)]**

The permittee, upon becoming aware that any relevant facts were omitted from the application or that incorrect information was submitted with the application, shall promptly submit such supplementary facts or corrected information to this Office. The permittee shall also provide additional information necessary to address any requirements that become applicable to the source after the date a complete application was submitted but prior to release of the draft permit.

**2.19 Certification by Responsible Official [Sec. 3Q-0520]**

A responsible official (as defined in 40 CFR 70.2) shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statement and information in the document are true, accurate, and complete.

**2.20 Inspection and Entry [Sec. 3Q-0508(l)]**

- A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of this Office to perform the following:
1. enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  2. have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
  3. inspect, at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  4. sample or monitor substances or parameters, at reasonable times and using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements.

Nothing in this condition shall limit the ability of the U.S. EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

- B. No person shall obstruct, hamper or interfere with any such authorized representative while in the process of carrying out his official duties.

**2.21 Averaging Times <40 CFR 70.6(a)(3)> [Sec. 3Q-0508(f)]**

Unless otherwise specified in *Section 3* of this permit for a specific emission standard or limitation, the applicable averaging period for determining compliance with an emission standard or limitation during compliance testing shall be based on the applicable U.S. EPA reference test method.

**2.22 Compliance Testing [Sec. 3D-2602(e)]**

When requested by this Office for determining compliance with emission control standards, the permittee shall provide sampling ports, pipes, lines, or appurtenances for the collection of samples and data required by the test procedure; scaffolding and safe access to the sample and data collection locations; and light, electricity, and other utilities required for sample and data collection.

**2.23 General Emissions Testing and Reporting Requirements [Sec. 3D-2602 and 3Q-0508(i)(16)]**

Testing shall be conducted in accordance with FCAQTC Sec. 3D-2600 except as may be otherwise required in FCAQTC Sections 3D-0524, 3D-0912, 3D-1110, 3D-1111, 3D-1415 or a permit condition specific to the emissions source. Requests to use an alternative test method or procedure must be made in writing at least 45 days prior to the test and approved by this Office. Alternatives to test methods or procedures specified for emissions sources subject to test requirements under 40 CFR 60, 40 CFR 61 or 40 CFR 63, may require approval by the U.S. EPA. When required to conduct emissions testing under the terms of the permit:

- A. The permittee shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved prior to air pollution testing. Emission testing protocols must be submitted at least 45 days before conducting the test for pre-approval prior to testing if requested by the permittee.
- B. The permittee shall notify this Office of the specific test dates at least 15 days prior to the scheduled test date in order to afford this Office the opportunity to have an observer on-site during the sampling program.
- C. During all sampling periods, the permittee shall operate the emission source(s) under operating conditions that best fulfill the purpose of the test and are approved by the Director or his delegate.
- D. The permittee shall submit one copy of the test report to this Office not later than 30 days after sample collection. The permittee may request an extension to submit the final test report if the extension request is a result of actions beyond the control of the permittee. The test report shall contain at a minimum the following information:
  1. a certification of the test results by sampling team leader and facility representative;
  2. a summary of emissions results expressed in the same units as the emission limits given in the rule for which compliance is being determined and text detailing the objectives of the testing program, the applicable state and federal regulations, and conclusions about the testing and compliance status of the emission source(s) as appropriate;
  3. a detailed description of the tested emission source(s) and sampling location(s) process flow diagrams, engineering drawings, and sampling location schematics as necessary;

4. all field, analytical and calibration data necessary to verify that the testing was performed as specified in the applicable test methods;
  5. example calculations for at least one test run using equations in the applicable test methods and all test results including intermediate parameter calculations; and
  6. documentation of facility operating conditions during all testing periods and an explanation relating these operating conditions to maximum normal operation. If necessary, provide historical process data to verify maximum normal operation.
- E. This Office will review emission test results with respect to the specified testing objectives as proposed by the permittee and approved by this Office.

#### 2.24 Termination, Modification, and Revocation of the Permit [Sec. 3Q-0519]

The Director may terminate, modify, or revoke and reissue this permit if:

- A. the information contained in the application or presented in support thereof is determined to be incorrect;
- B. the conditions under which the permit or permit renewal was granted have changed;
- C. violations of conditions contained in the permit have occurred;
- D. the permit holder fails to pay fees required under Section 3Q-0200 within 30 days after being billed;
- E. the permittee refuses to allow the Director or his authorized representative upon presentation of credentials:
  1. to enter, at reasonable times and using reasonable safety practices, the permittee's premises in which a source of emissions is located or in which any records are required to be kept under terms and conditions of the permit;
  2. to have access, at reasonable times, to any copy or records required to be kept under terms and conditions of the permit;
  3. to inspect, at reasonable times and using reasonable safety practices, any source of emissions, control equipment, and any monitoring equipment or method required in the permit; or
  4. to sample, at reasonable times and using reasonable safety practices, any emission sources at the facility;
- F. the U.S. EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
- G. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of Chapter 3 of the Forsyth County Code.



## 2.25 **Permit Reopenings, Modifications, Revocations and Reissuances, or Terminations [Sec. 3Q-0508(i)(5)]**

The Director may reopen, modify, revoke and reissue, or terminate this permit for reasons specified in Sec. 3Q-0517 or 0519. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition in this permit.

## 2.26 **Permit Renewal [Sec. 3Q-0508(e) and Sec. 3Q-0513]**

This permit is issued for a term not to exceed five years. Permits issued under Title IV of the Clean Air Act shall be issued for a fixed period of five years. This permit shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete renewal application is submitted at least nine months before the date of permit expiration. If the permittee or applicant has complied with Sec. 3Q-0512(b)(1), this permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of this permit shall remain in effect until the renewal permit has been issued or denied.

## 2.27 **Reopening for Cause [Sec. 3Q-0517 and 0508(g)]**

This permit shall be reopened and revised in accordance with Sec. 3Q-0517 prior to its expiration date, for any of the following reasons:

- A. Additional applicable requirements become applicable to the facility with remaining permit term of three or more years.
- B. Additional requirements, including excess emissions requirements, become applicable to this source under Title IV of the Clean Air Act. Excess emissions offset plans for this source shall become part of this permit upon approval by the U.S. EPA.
- C. The Director or the U.S. EPA finds that a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- D. The Director or the U.S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

## 2.28 **Construction and Operation Permits [Sections 3Q-0100 and 0300]**

A construction and operating permit shall be obtained by the permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in following the procedures under Sec. 3Q-0500 (except for Sec. 3Q-0504) or a construction and operation permit following the procedures under Sec. 3Q-0504 and filing a complete application to modify the construction and operation permit to meet the requirements of Section 3Q-0500. If the procedures under Sec. 3Q-0504 are followed, the application to meet the requirements of Section 3Q-0500 shall be submitted:

- A. within 12 months of beginning operation if the modification does not contravene or conflict with a condition in the existing permit, or

- B. before beginning operation if the significant modification contravenes or conflicts with a condition in the existing permit.

**2.29 Permit Modifications [Sec. 3Q-0514, 0515, 0516, 0517, 0523 and 0524]**

- A. Permit modifications may be subject to the requirements of Sec. 3Q-0514, 0515, 0516 and 0524.
- B. Changes made pursuant to Sec. 3Q-0523(a), Section 502(b)(10) changes, and (b), Off-permit changes do not require a permit modification. The permittee shall notify the Director and U.S. EPA Region 4, Air Permits Section at least seven days before making a 502(b)(10) change.
- C. The permittee shall submit an application for reopening for cause in accordance with Sec. 3Q-0517 if notified by this Office.
- D. To the extent that emissions trading is allowed under FCAQTC Subchapter 3D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to Sec. 3Q-0523(c).

**2.30 Insignificant Activities [Sec. 3Q-0503 and 0508(i)(15)]**

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The permittee shall have available at the facility at all times and made available to an authorized representative of this Office upon request, documentation, including calculations if necessary, to demonstrate that an emission source or activity is insignificant.

**2.31 Standard Application Form and Required Information [Sec. 3Q-0505 and 0507]**

The permittee shall submit applications and required information in accordance with the provision of Sec. 3Q-0505 and 0507.

**2.32 Property Rights [Sec. 3Q-0508(i)(8)]**

This permit does not convey any property rights of any sort, or any exclusive privileges.

**2.33 Refrigerant Requirements (Stratospheric Ozone and Climate Protection) [Sec. 3Q-0508(b)]**

- A. If the permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR 82 Subpart A, Appendices A and B, the permittee shall service, repair, and maintain such equipment according to the work practices and personnel certification requirements, and the permittee shall use certified recycling and recovery equipment specified in 40 CFR 82 Subpart F.

- B. The permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR 82 Subpart F.
- C. The permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the U.S. EPA or its designee as required.

**2.34 Prevention of Accidental Releases - Section 112(r) [Sec. 3Q-0508(h)]**

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 in accordance with 40 CFR Part 68.

**2.35 Title IV Allowances [Sec. 3Q-0508(i)(1)]**

The facility's emissions are prohibited from exceeding any allowances that the facility lawfully holds under Title IV of the Clean Air Act. This permit shall not limit the number of allowances held by the permittee, but the permittee may not use allowances as a defense to noncompliance with any other applicable requirement.

**2.36 Air Pollution Alert, Warning or Emergency [Section 3D-0300]**

Should the Director of this Office declare an Air Pollution Alert, Warning or Emergency, the permittee will be required to operate in accordance with the permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in Section 3D-0300.

**2.37 Registration of Air Pollution Sources [Sec. 3D-0202]**

The Director of this Office may require the permittee to register a source of air pollution. If the permittee is required to register a source of air pollution, this registration and required information shall be in accordance with Sec. 3D-0202(b).

**2.38 Ambient Air Quality Standards [Sec. 3D-0501(e)]**

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in Sec. 3D-0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

**2.39 Odor [Sec. 3D-0522] *Locally Enforceable Only***

The permittee shall not cause or permit the emission of odors beyond the facility's property lines which are harmful, irritating or which unreasonably interfere with the use and enjoyment of any person's properties or living conditions, or any public properties or facilities. Such odors are prohibited by Sec. 3D-0522. No violation shall be cited, provided that the best practical treatment, maintenance, and control of odor(s) currently available is used. This requirement does not apply to normal agricultural practices, nor to accidental emissions of odors which are not normally produced during routine operations and activities as determined by the Director.

**2.40 Fugitive Dust Control Requirement [Sec. 3D-0540]**

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 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 60, Appendix A), the owner or operator may be required to submit and implement a fugitive dust control plan as described in 3D .0540(f).

**2.41 NESHAP - National Emission Standard for Asbestos <40 CFR Part 61, Subpart M> [Sec. 3D-1110]**

The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

**Compliance Assurance Monitoring for Major Stationary Sources (CAM) -  
General Conditions - <40 CFR Part 64>**

Following are conditions based on the requirements found in 40 CFR Part 64. These conditions only apply to sources subject to the CAM requirements.

**2.42 CAM - Proper Maintenance <40 CFR 64.7(b)> [Sec. 3D-0614]**

At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

**2.43 CAM - Continued Operation <40 CFR 64.7(c)> [Sec. 3D-0614]**

Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

#### 2.44 **CAM - Response to Excursions or Exceedances <40 CFR 64.7(d)> [Sec. 3D-0614]**

Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designed condition, or below the applicable emissions limitation or standard, as applicable.

Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. Based on the results of this determination, this Office may require the permittee to develop and implement a Quality Improvement Plan (QIP). The elements of a QIP are identified in 40 CFR 64.8(b).

**2.45 CAM - Documentation of Need for Improved Monitoring <40 CFR 64.7(e)> [Sec. 3D-0614]**

After approval of the CAM plan, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify this Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conduction monitoring and collecting data, or the monitoring of additional parameters.

## SECTION 3

### SPECIFIC LIMITATIONS AND CONDITIONS

The emission source(s) and associated air pollution control device(s) listed below are subject to the following specific terms, conditions, and limitations, including the monitoring recordkeeping, and reporting requirements to which those requirements apply:

#### 3.1 Source Specific Emission Limits/Conditions

A. **ES-4-603-1 (Dryer #6) and ES-5-603-1(Dryer #7) - Prevention of Significant Deterioration (PSD), Limit to Avoid PSD Review [Sec. 3D-0530 and 3Q-0317(b)]**

1. **Emission limit**

Emissions of VOC from processing GTC products at dryers #6 and #7 (ES-4-603-1 and ES-5-603-1) shall be limited to less than 40 tons in any consecutive 12-month period. Emissions shall be calculated using the following formula:

$$V = (A \times 2.324) / 2000$$

where:

*V = monthly VOC emission in tons*

*A = Monthly G7-48/56/63 production in tons at Plant 603*

*The non-integer constant in the equation is an emission factor in lb-VOC per ton of production, as determined by the most recent stack tests.*

2. **Monitoring/Recordkeeping requirement [Sec. 3Q-0508(f)]**

The permittee shall monitor and maintain monthly records of production of G7-48/56/63 processed through dryers #6 and #7 (ES-4-603-1 and ES-5-603-1). At the end of each month, the total VOC emissions shall be calculated and recorded for each 12-month period.

3. **Reporting requirement [Sec. 3Q-0508(f)]**

The records in 3.1(A)(2) shall form the basis of a semi-annual report which shall be submitted to this Office by January 30th and July 30th for the proceeding six-month period. This reporting requirement is an alternative excess emission report as described in condition 2.10(B)(2)(b).

**B. ES-4-603-1 (Dryer #6) and ES-5-603-1 (Dryer #7) - Prevention of Significant Deterioration (PSD), Limits to Avoid PSD Review [Sec. 3D-0530 and 3Q-0317(b)]**

**1. Emission limit**

- (a) Combined emissions of VOC from processing G7 products shall be limited to less than 62.66 tons in any consecutive 12-month period.
- (b) No more than 20,000,000 lbs. of the "E" family of reconstituted sheet shall be processed in any consecutive 12-month period.
- (c) No more than 12,000,000 lbs. of the "F" family of reconstituted sheet shall be processed in any consecutive 12-month period.

**2. Monitoring/Recordkeeping requirement [Sec. 3Q-0508(f)]**

The permittee shall monitor and maintain monthly records of the amounts of all G7 products processed. The records shall classify the G7 products according to the VOC emission factor (lbs. VOC/ton of G7) as follows:

<b>G7 "family"</b>	<b>Factor greater than:</b>	<b>Factor less than or equal to:</b>
A		1.54
B	1.78	2.32
C	1.54	1.78
D	2.32	2.56
E	equal to 2.32	
F	2.56	4.82
G	4.82	6.27
H	equal to 0.704	



$$V = [ (A \times 1.54) + (B \times 2.32) + (C \times 1.78) + (D \times 2.56) + (E \times 2.32) + (F \times 4.82) + (G \times 6.27) + (H \times 0.704) ] / 2000$$

where:

*V = monthly VOC emission in tons*

*A = Monthly production in tons of A family*

*B = Monthly production in tons of B family*

*C = Monthly production in tons of C family*

*D = Monthly production in tons of D family*

*E = Monthly production in tons of E (GTC) family*

*F = Monthly production in tons of F family*

*G = Monthly production in tons of G family*

*H = Monthly production in tons of H family*

*The non-integer constants in the equation are emission factors in lb-VOC per ton production, as determined by the most recent stack tests.*

At the end of each month the permittee shall calculate and record the total VOC emissions for that 12-month period.

At the end of each month the permittee shall calculate and record the amount of "E" family of reconstituted sheet processed for that 12-month period.

At the end of each month the permittee shall calculate and record the amount of "F" family of reconstituted sheet processed for that 12-month period.

**3. Reporting requirement [Sec. 3Q-0508(f)]**

The records in 3.1(B)(2) shall form the basis of a semi-annual report which shall be submitted to this Office by January 30th and July 30th for the proceeding six-month period. This reporting requirement is an alternative excess emission report as described in condition 2.10(B)(2)(b).

## 3.2 Particulate Emission Limits

### A. Control of Particulates from Miscellaneous Industrial Processes - [Sec. 3D-0515]

#### 1. Particulate Allowable Emissions Rate - [Sec. 3D-0515]

Emissions for particulate matter from emission sources designated in condition 1.1, shall not exceed the allowable emission rate calculated with the equation  $E = 4.10(P)^{0.67}$  calculated to three significant figures for process rates up to 30 tons/hr, or with the equation  $E = 55.0(P)^{0.11} - 40$  calculated to three significant figures for process rates greater than 30 tons/hr; where E equals the maximum allowable PM emission rate in lb/hr, and P equals the process rate in tons/hr. Accordingly, the potential emission rate from this equipment shall at no time exceed the emission rates based on maximum production.

2. **Monitoring/Recordkeeping/Reporting requirements [Sec. 3Q-0508(f)]** - For sources with particulate matter control, condition 3.4 provides monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with the above standard. For sources without particulate matter control, no monitoring, recordkeeping, or reporting is required for the specific purpose of demonstrating compliance with the above standard because each of those sources inherently meets the standard based on the nature of the source.

### 3.3 Control of Visible Emissions

#### A. Control of Visible Emissions [Sec. 3D-0521(d)]

**Opacity Standard** - Visible emissions from emission sources designated in condition 1.1 shall not exceed 20% opacity when averaged over a six-minute period. However, the six-minute averaging periods may exceed 20% opacity if:

1. no six-minute average exceeds 87%;
2. no more than one six-minute period exceeds 20% in any hour; and
3. no more than four six-minute periods exceed 20% in any 24 hours.

This standard shall apply at all times, except during periods of startup, shutdown, or malfunction.

#### B. Monitoring/Recordkeeping/Reporting Requirements [Sec. 3Q-0508(f)]

**Non-Combustion Sources** - For sources with particulate matter control, condition 3.4 provides monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with the above standard. For sources without particulate matter control, no monitoring, recordkeeping, or reporting is required for the specific purpose of demonstrating compliance with the above standard because each of those sources inherently meets the standard based on the nature of the source.

### 3.4 Monitoring, Recordkeeping, and Reporting

#### A. Periodic Monitoring [Sec. 3Q-0508(f)]

##### Sources Not Subject to 40 CFR Part 64 Compliance Assurance Monitoring (CAM)

1. **Periodic monitoring for equipment controlled by fabric filters** - Particulate matter emissions from emission sources designated in condition 1.1 shall be controlled during all periods of operation. To ensure the optimum efficiency of the control devices, the permittee shall perform inspections and maintenance in a manner and frequency consistent with good practice for minimizing emissions. At a minimum, an internal inspection shall be performed annually.
2. **Recordkeeping requirement** - A log shall be maintained on-site with the dates of inspection and maintenance activities, inspection results, and maintenance performed.
3. **Reporting requirement** - The permittee shall submit a summary report of the monitoring requirements to this Office by January 30th and July 30th for each preceding six-month period.

#### B. Compliance Assurance Monitoring (CAM) [Sec. 3D-0614, 40 CFR Part 64]

1. **Monitoring-Fabric Filter Inspection & Maintenance** - To ensure the optimum efficiency of the control devices as designated in condition 1.1, the permittee shall perform inspections and maintenance in a manner and frequency consistent with good practice for minimizing emissions. Inspection and maintenance must include the following:
  - (a) An internal inspection shall be performed of each control device at least on an annual basis.
  - (b) When an inspection reveals a problem, an investigation shall be initiated and maintenance activities, required to correct the problem, shall be scheduled and performed. The investigation and corrective action shall be conducted as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions.
  - (c) Only trained maintenance personnel will perform inspection and maintenance.
  - (d) An excursion is when improper maintenance results in the improper operation of the control device.
2. **Monitoring-Visual Stack Observations** - - In order to demonstrate compliance with the CAM plan for control devices identified in condition 1.1, the permittee shall perform visual stack observations. As a minimum, the visual stack observation program shall include the following:

- (a) With respect to the CAM plan visual stack observations, an "operational day" begins at 7:00:00 AM and ends at 6:59:59 AM the following calendar day. Visible emissions from each stack shall be monitored for the presence of visible emissions, once per operational day for each plant operational day. The visible emissions observation data for each stack must be available for at least 90 percent of the facility's operating days during the six-month reporting period to ensure compliance with this requirement. If an emission source is not operating, a record of this fact along with the corresponding date and time shall substitute for the daily check.
  - (b) The presence of any visible emissions shall trigger an investigation to determine the cause and, if applicable, corrective action. The investigation and corrective action shall be conducted as expeditiously as practicable in accordance with good air pollution control practice for minimizing emissions. The visual observation shall be repeated as soon as practicable after the investigation and completion of any corrective action to verify that the visual emissions are no longer present. If the visible emissions are present after the investigation and corrective action has been taken, the emissions shall be considered an excursion.
  - (c) Observers shall receive on-the-job training pertaining to visual observations and what constitutes an excursion.
3. **Recordkeeping** - Records of the monitoring required under conditions 3.4(B)(1) and (2) shall be maintained on-site, made available to Office personnel, that include the following:
- (a) Maintenance of fabric filters - dates of inspections and maintenance activities; results of investigations and corrective actions taken; names of persons conducting activities; records of employee on-the-job training for inspection and maintenance.
  - (b) Visual observations - date/time of each observation; person performing observation; results of observation (visible emissions present or absent); results of investigation and corrective action if visible emissions are present; records of employee on-the-job training for visual observations.

Copies of these records shall be retained by the permittee for a period of five years after the date on which the record was made.

If requested by an agent of this Office, the permittee shall readily supply copies of these records at the time of inspection. Likewise, the permittee shall submit copies of the records upon request by this Office.

4. **Reporting requirement** - The permittee shall submit a summary report of all monitoring requirements in this section to this Office by January 30th and July 30th for each preceding six-month period.

**SECTION 4**  
**CONTROL OF TOXIC AIR POLLUTANTS -**  
**LOCALLY ENFORCEABLE ONLY**

The entire facility is subject to Section 3D-1100 of the FCAQTC for the toxic air pollutants listed. This section is locally enforceable only. All the emission sources and their associated air pollution control device(s) are subject to the following specific terms, conditions, and limitations, including the monitoring recordkeeping, and reporting requirements to which those requirements apply.

**4.1. Facility-Wide Toxic Air Pollutant Conditions**

**A. Permit Requirements for Toxic Air Pollutants and Control of Toxic Air Pollutants [Section 3D-1100]**

1. **Other and future air toxic requirements [Sections 3D-1100 and 3Q-0700] -** Specification of a listed toxic air pollutant (TAP) in this permit does not excuse the permittee from complying with the requirements of Sections 3D-1100 and 3Q-0700 of the FCAQTC with regard to any other listed TAP emitted from the regulated facility, nor does this permit exempt the permittee from compliance with any future air toxic regulations promulgated pursuant to the requirements of the Clean Air Act.
2. **De minimis limits [Section 3Q-0700] -** Total facility-wide emissions of the following pollutants shall not exceed their respective de minimis emissions limits as shown in Sec. 3Q-0711 unless a modeling demonstration is first approved by this Office which shows that the emissions of the subject TAPs from the facility will not adversely affect human health. This demonstration shall be in accordance with the requirements set forth in Sections 3D-1100 and 3Q-0700 of the FCAQTC. This demonstration must be made with an up-to-date version of a U.S. EPA approved computer model or, upon approval by this Office, calculated using the results of a previous modeling analysis showing compliance with the acceptable ambient levels for the pollutants listed below.

<b>Pollutant (CAS Number)</b>	<b>De minimis level</b>
acetaldehyde (75-07-0)	6.8 lb/hr
chloroform (67-66-3)	290 lb/yr
cresol (1319-77-3)	0.56 lb/hr
methyl ethyl ketone (78-93-3)	78 lb/day and 22.4 lb/hr
phenol (108-95-2)	0.24 lb/hr
toluene (108-88-3)	98 lb/day and 14.4 lb/hr
trichlorofluoromethane (75-69-4)	140 lb/hr
xylene (1330-20-7)	57 lb/day and 16.4 lb/hr

3. **Dispersion modeling emission limits [Section 3D-1100]** - Combined emissions of the following TAPs from all sources not exempted by Sec. 3Q-0702(a) or (b) at this facility shall not exceed the emission rates listed below. Dispersion modeling, approved by this Office, demonstrated that the permitted emissions of the TAPs listed in the table below from this facility impacted the surrounding ambient air at levels below the acceptable ambient levels (AALs) specified in Sec. 3D-1104 of the FCAQTC. The emission rates listed below shall be used as a basis for certifying that any future modifications or changes in the methods of operation will result in ambient impacts below these AALs. In no case shall actual emissions resulting from changes or modifications exceed any of the following emission rates without first applying for and receiving a permit:

<b>Pollutant (CAS Number)</b>	<b>Maximum facility-wide emission rate</b>	<b>AERMOD EPA version</b>	<b>Date of model output file</b>
1,3-butadiene (106-99-0)	9,167.3 lb/yr	15181	01/04/2016
acetic acid (64-19-7)	61.8 lb/hr	15181	01/04/2016
acrolein (107-02-8)	4.3 lb/hr	15181	01/04/2016
ammonia (7664-41-7)	109.4 lb/hr	15181	01/04/2016
benzene (71-43-2)	31.4 lb/yr	07026	06/19/2007
carbon disulfide (75-15-0)	0.0085 lb/day	07026	06/19/2007
formaldehyde (50-00-0)	5.9 lb/hr	15181	01/04/2016

4. **Monitoring/recordkeeping/reporting requirement [Sec. 3D-0605 and 1105]** -The permittee shall maintain updated records of production rates, throughputs, material usage, and other process operational information as is necessary to determine compliance with the emission rates specified in permit conditions 4.1(A)(2) and (3). At a minimum these records shall include data sufficient to calculate monthly averaged emission rates (in pounds per hour of emission source operation) for TAPs with 1-hour or 24-hour emission limits and yearly emission rates (in pounds per calendar year) for TAPs with annual emission limits.

Copies of these records shall be retained by the permittee for a period of three years after the date on which the record was made.

If requested by an agent of this Office, the permittee shall readily supply copies of these records at the time of inspection. Likewise, the permittee shall submit copies of the records upon request by this Office.

## Attachment 1

### Insignificant Activities List

As provided in Sec. 3Q-0503(7) and (8), certain air emission sources are considered insignificant activities and are not listed on the permit. However, insignificant activities because of size or production rate [Sec. 3Q-0503(8)] are required to be listed in the initial permit application and with each request for renewal. The following list summarizes the insignificant activities provided in Title V permit applications and subsequent updates. Insignificant activities are not exempted from any applicable requirement or from demonstrating compliance with any applicable requirement.

<b>Insignificant because of size or production rate [Sec. 3Q-0503(8)]</b>	
<b>Emission Source ID.</b>	<b>Emission Source Description</b>
F-1-603-1	Pulp Press Room/Refining Area
F-2-603-1	Evaporator Building
F-3-603-1	#6 AND #7 Forming machines
F-(4, 4A)-603-1	Glycerine Tanks
F-5-603-1	DAP Tank
F-6-603-1	Urea Tank
F-7-603-1	Casing/Propylene Glycol Emulsion Tank
F-8-603-1	Pulping Tank A
F-9-603-1	Pulping Tank B
F-10-603-1	Extract Mixing Tank
F-11-603-1	Cold cleaning machine/maintenance activities
F-12-603-1	Waste Water Ventilation
IS-PACKER-603-1	Twin Ram Box Packer and conveyors
F-(14,15)-603-1	Glycerine day tanks
F-16-603-1	DAP Tank (relocated from 605-12)

<b>Insignificant because of category [Sec. 3Q-0503(7)]</b>	
<b>Emission Source ID.</b>	<b>Emission Source Description</b>
IS-PW1-603-1	Parts washer, (Building 603)



FORSYTH COUNTY  
OFFICE OF ENVIRONMENTAL ASSISTANCE AND PROTECTION

**DRAFT STATEMENT OF BASIS**  
**for Permit #01095-TV-2**

**Renewal**

**Alliance One North America – Recon Facility**  
**Premise # 01095**

Permit Tracking #: **1439**

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Site Location:  
**Winston-Salem, NC**

Current Permit:  
**01095-TV-1**

New Permit To Be Issued:  
**01095-TV-2**

Technical Contact:  
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Two Excel spreadsheet files are also part of this Statement of Basis. One of the spreadsheet files contains CONFIDENTIAL information (**01095-TV-2-SoB-CONFIDENTIAL.xlsx**) and is stored in a restricted directory on this Office's shared drive. The other spreadsheet file (**01095-TV-2-SoB-PUBLIC.xlsx**) does not contain any confidential information and is stored with the other public Alliance One North America – Recon Facility files.

## **SECTION A:** **Processing**

This Statement of Basis is for the renewal of the Alliance One North America – Recon Facility (AONA-Recon) Title V permit.

AONA-Recon's initial permit (#01095-TV-1) was issued 12-19-2023 with an effective date of 1-1-2024. That permit was for an ownership change for the manufacturing activity in Building 603-1 located in the Whitaker Park campus in Winston-Salem, NC. R.J. Reynolds Tobacco Company (RJRT) remains the owner of Building 603-1 and the property on which it is located, but the equipment inside the building and the associated manufacturing operations are being leased by Alliance One North America, LLC (AONA). Prior to the ownership change, the Building 603-1 manufacturing activity was operated by RJRT and permitted as part of an RJRT Whitaker Park Title V permit. With the ownership change, the manufacturing operations in Building 603-1 are now operated by AONA and permitted as part of an AONA-Recon Title V permit. In association with that change, a revised Title V permit was issued for the RJRT Whitaker Park facility, minus Building 603-1 operations. The initial revised RJRT Whitaker Park permit was Permit 00339-TV-37.

With the ownership change, the Building 603-1 manufacturing operations and the associated air quality compliance liability became the sole responsibility of AONA. RJRT has no authority regarding the Building 603-1 manufacturing operations. AONA runs the Building 603-1 manufacturing operations independently of RJRT. With the 01095-TV-1 and 01095-TV-2 permits, all references to "permittee", "owner", and "operator" refer to AONA.

In conjunction with the original ownership change, RJRT submitted an application to parse out the facility-wide toxic air pollutant (TAP) emissions between the two facilities. Documents related to this change of ownership were submitted by both RJRT and AONA. The original documents were received 12-8-2023.

The 01095-TV-1 AONA-Recon permit retained the past due expiration date from the originating RJRT permit (#00339-TV-36). However, the application shield applied to the AONA-Recon facility since RJRT submitted a timely renewal request. AONA submitted a renewal request in conjunction with the ownership change request. That renewal request application was received on 12-14-2023. The application was signed by AONA-Recon's responsible official, Cliff Purcell, U.S. Operations Director, with the signature dated 12-11-2023.

## **SECTION B:** **General Facility Description**

AONA leases Building 603-1 along with its equipment from R.J. Reynolds Tobacco Company. Building 603-1, now an AONA facility named Alliance One North America – Recon Facility, (AONA-Recon), has a process for making tobacco "cast sheet" from tobacco leaf stems and pieces. The cast sheet (which is formed like a large sheet of paper in paper making) is then ground up and used in cigarettes in a manner similar to how regular tobacco leaves are used. Additional information about the facility's emissions sources is presented in Section D.

## **SECTION C:** **Permit Conditions**

### **PART I, SECTION 1:** **PERMITTED EQUIPMENT AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S)**

#### **Condition 1.1** **Equipment List and Applicable Conditions**

The equipment list shows the permitted emission sources at the facility. The list is organized as a chart with control devices and emissions points identified. The chart header also lists various permit conditions that appear in the permit, and "X" marks are used to show which permit conditions apply to each source. For each emission source, the chart indicates the Sec. 3D-0515 particulate emission limit based on the source's maximum production rate. Control devices are identified by Control Device ID number (CD#), and the chart indicates with "X" marks the applicable CAM or non-CAM permit conditions that apply. Emission points are identified by Emission Point ID number (EP#).

#### **Condition 1.2** **Operating Conditions Not Covered Under the Permit Shield**

Permit Condition 1.2 is used to list any conditions in the permit that have been revised or added to the permit following procedures other than the Significant Modification procedures in Section 3Q-0500 of the FCAQTC. Because this permit (permit 01095-TV-2) is being processed as a renewal, it will go through a 30-day public comment period and a concurrent 45-day review by the U.S. EPA prior to final approval. Since this 01095-TV-2 permit is being reviewed by the U.S. EPA, the table (Operating Conditions Not Covered Under the Permit Shield) in Permit Condition 1.2 contains no entries.

### **PART I, SECTION 2:** **FACILITY GENERAL ADMINISTRATIVE CONDITIONS**

This section contains Title V permit general conditions including conditions pertaining to National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR Part 61) and Compliance Assurance Monitoring (CAM, 40 CFR Part 64). The general conditions included in the 01095-TV-2 permit reflect this Office's most up-to-date Title V permit general conditions template.

**PART I, SECTION 3:**  
**SPECIFIC LIMITATIONS AND CONDITIONS**

**Condition 3.1**

**Source Specific Emission Limits:**

**3.1(A)**

**Prevention of Significant Deterioration: PSD Avoidance**  
**ES-4-603-1 (Tobacco Dryer #6) and ES-5-603-1 (Tobacco Dryer #7)**  
**[Sec. 3D-0530 and 3Q-0317]**

This limit is in place to restrict VOC emissions to 40 tons/year to avoid PSD review. Emissions of VOC from processing GTC products at Dryer #6 and Dryer #7 (ES-4-603-1 and ES-5-603-1) shall be limited to less than 40 tons in any consecutive 12-month period. Emissions shall be calculated using the following formula:

$$V = (A \times 2.324) / 2000$$

where

*V = monthly VOC emission in tons*

*A = Monthly G7-48/56/63 production in tons at Plant 603*

*The non-integer constant in the equation is an emission factor in lb-VOC per ton of production, as determined by the most recent stack tests.*

The emission factor, 2.324 lbs VOC per ton of G7-48/56/63 production was determined based on stack tests of similar equipment.

Monitoring and recordkeeping of data used to calculate the emissions must be maintained at the source and emissions calculated monthly for each 12-month period and compared to the VOC limit.

A semi-annual report must be submitted by January 30 and July 30 that summarizes the records maintained and the emission calculations. Past semi-annual reports (mostly from when the equipment was operated by RJRT) have consistently shown compliance with the applicable VOC limit.

**3.1(B)**

**Prevention of Significant Deterioration: PSD Avoidance**  
**ES-4-603-1 (Tobacco Dryer #6) and ES-5-603-1 (Tobacco Dryer #7)**  
**[Sec. 3D-0530 and 3Q-0317]**

This limit covers Dryer #6 and Dryer #7 (ES-4-603-1 and ES-5-603-1) and limits VOC emissions to 62.66 tons/12-month period. Along with the VOC limit there are also process limits for individual process blends. The "E" family of reconstituted sheet is limited to 20,000,000 lbs./12-month period. The "F" family of reconstituted sheet is limited to 12,000,000 lbs./12-month period.

The following formula is used to calculate VOC emissions from the processing of G7 products:

G7 "family"	Factor greater than:	Factor less than or equal to:
A		1.54
B	1.78	2.32
C	1.54	1.78
D	2.32	2.56
E	equal to 2.32	
F	2.56	4.82
G	4.82	6.27
H	equal to 0.704	

$$V = [ (A \times 1.54) + (B \times 2.32) + (C \times 1.78) + (D \times 2.56) + (E \times 2.32) + (F \times 4.82) + (G \times 6.27) + (H \times 0.704) ] / 2000$$

Where

V = monthly VOC emission in tons

A = Monthly production in tons of A family

B = Monthly production in tons of B family

C = Monthly production in tons of C family

D = Monthly production in tons of D family

E = Monthly production in tons of E (GTC) family

F = Monthly production in tons of F family

G = Monthly production in tons of G family

H = Monthly production in tons of H family

The non-integer constants in the equation are emission factors in lb-VOC per ton production, as determined by the most recent stack tests.

Monitoring and recordkeeping of data used to calculate the emissions must be maintained at the source and emissions calculated monthly for each 12-month period and compared to the VOC limit.

A semi-annual report must be submitted by January 30 and July 30 that summarizes the records maintained and the emission calculations. Past semi-annual reports (mostly from when the equipment was operated by RJRT) have consistently shown compliance with the applicable limits.

## **Condition 3.2** **Particulate Emission Limits**

Permit condition 3.2(A) in permit 01095-TV-2 includes PM limits for the facility's industrial processes.

### **3.2(A)** **Particulates from Industrial Processes**

Condition 3.2(A) includes PM limits based on Sec. 3D-0515 of the FCAQTC for the facility's particulate emissions sources.

Sec. 3D-0515 states that emissions of particulate matter shall not exceed the allowable emission rate calculated by the equation,  $E = 4.10 \times P^{0.67}$ , for process weight rates up to 30 tons/hr or by the equation,  $(55.0 \times P^{0.11}) - 40$ , for process weight rates greater than 30 tons/hr; where E = allowable PM emission rate in lb/hr, and P = process weight in tons/hr.

The allowable emission rate is dependent on the throughput at any point in time. For comparison to the standard, the potential emission rate is compared to the allowable emission rate at maximum throughput.

In Section D of this Statement of Basis, the potential controlled and uncontrolled PM emissions of each emissions source are compared to the applicable Sec. 3D-0515 PM standard. In all cases, the sources are shown to be in compliance with Sec. 3D-0515 either without controls or when utilizing required controls.

For sources with particulate control, 40 CFR Part 64 Compliance Assurance Monitoring (CAM) and non-CAM periodic monitoring requirements for PM are located in permit condition 3.4. The requirements include monitoring and recordkeeping requirements for fabric filters - plus requirements to submit reports of the monitoring requirements twice each year. Also in condition 3.4 is a CAM requirement to conduct daily stack observations for visible emissions. The daily stack observations permit condition includes monitoring and recordkeeping requirements, plus a requirement to submit a report of the monitoring requirements twice each year. For sources without particulate matter control, no monitoring, recordkeeping, or reporting is required for the specific purpose of demonstrating compliance with the Sec. 3D-0515 PM standard because each of those sources inherently meets the standard based on the nature of the source.

### **Condition 3.3** **Control of Visible Emissions [Sec. 3D-0521(d)]**

Permit condition 3.3(A) in permit 01095-TV-2 includes opacity (visible emissions) limits for the facility's non-fugitive emissions sources. According to Sec. 3D-0521(b), the rule applies to "all fuel burning sources and to other processes that may have a visible emission. However, sources subject to a visible emission standard in Sec. 3D-0506, 0508, 0524, 0543, 0544, 1110, 1111, 1205, 1206, 1210, 1211 or 1212 shall meet that standard instead of the standard contained in this Rule."

Sec. 3D-0521 includes two sets of visible emissions (VE) standards: Sec. 3D-0521(c) for sources manufactured as of July 1, 1971 and Sec. 3D-0521(d) for sources manufactured after July 1, 1971. All of the sources at the AONA Building 603-1 facility were manufactured after July 1, 1971 – so Sec. 3D-0521(c) is not applicable at the AONA – Recon Facility.

Condition 3.3(A) addresses the opacity limits in Sec. 3D-0521(d) of the FCAQTC. The opacity limit requires that visible emissions shall not exceed 20% opacity when averaged over a six-minute period with the following exceptions: (a) No six-minute period exceeds 87% opacity; (b) No more than one six-minute period exceeds 20% opacity in any hour; and (c) No more than four six-minute periods exceed 20% opacity in any 24-hour period.

Permit condition 3.3(B) addresses Monitoring/Recordkeeping/Reporting requirements for visible emissions. For PM sources with particulate control, 40 CFR Part 64 Compliance Assurance Monitoring (CAM) and non-CAM periodic monitoring requirements for PM are located in permit condition 3.4. The requirements include monitoring and recordkeeping requirements for fabric filters - plus requirements to submit reports of the monitoring requirements twice each year. In condition 3.4(B) is a requirement to conduct daily stack observations for visible emissions for sources subject to CAM. The daily stack observations permit condition includes monitoring and recordkeeping requirements, plus a requirement to submit a report of the monitoring requirements twice each year. For PM sources without particulate matter control, no monitoring, recordkeeping, or reporting is required for the specific purpose of demonstrating compliance with the 3D-0521(d) opacity standard because each of those sources inherently meets the standard based on the nature of the source. Permit condition 3.3(B) addresses Monitoring/Recordkeeping/Reporting requirements for visible emissions.

## **Condition 3.4** **Monitoring, Recordkeeping, and Reporting**

This permit condition includes 40 CFR Part 64 Compliance Assurance Monitoring (CAM) requirements along with non-CAM periodic monitoring requirements. The only permitted control devices for permitted equipment at the AONA Building 603-1 facility are fabric filters for particulate matter control.

### **3.4(A)** **Periodic Monitoring (non-CAM) for Sources Not Subject to 40 CFR Part 64 Compliance Assurance Monitoring (CAM)**

This condition includes periodic monitoring for non-CAM equipment controlled by fabric filters. Condition 3.4(A)(3) requires that a semi-annual report be submitted summarizing the fabric filter monitoring requirements.

### **3.4(B)** **Compliance Assurance Monitoring (CAM) [Sec. 3D-0614, 40 CFR Part 64]**

This condition includes CAM requirements for Emission Source ES-6-603-1 (Tobacco Mills) which is the only source at the facility with a control device that is subject to CAM – fabric filter CD-5-603-1. The condition also includes CAM requirements to perform visual stack observations for the ES-6-603-1 stack: Emission Point EP-27-603-1. Condition 3.4(B)(4) requires that a semi-annual report be submitted summarizing the fabric filter monitoring and visual stack observation requirements.

CAM applicability is based on a “pollutant specific emission unit” (PSEU). There are many individual pieces of process equipment at the AONA Building 603-1 facility. In order to streamline the permit process, process equipment is grouped into "emission sources" for listing in the permit. In most cases the "emission source" is one line of process equipment, all with similar regulatory requirements.

An "emission source" may be comprised of a few pieces of equipment, and in other cases it may be comprised of many individual pieces of equipment. Even though the permit specifies an emission limit for the entire "emission source", each individual piece of equipment, comprising the "emission source", is subject to the Sec. 3D-0515 particulate standard based on the process rate of the individual piece of equipment.

For the purposes of CAM applicability, each individual piece of equipment is the appropriate emission source to be considered the PSEU for purposes of CAM.

There are many "emission sources" that have several individual PSEUs being controlled by the same control device. When determining the potential pre-control emission rate, AONA has added together the pre-control emissions from all PSEUs within an "emission source" that are controlled by the same control device. This method has been used to simplify the CAM applicability process. This is a conservative approach that has the potential to include more control devices under CAM

requirements than are necessary. The only thing that is needed is to calculate the potential pre-control PM10 emissions from each fabric filter within a particular emission source. If those emissions exceed 100 TPY - then CAM applies. For the AONA - Recon Facility, CAM only applies to CD-5-603-1.

ES-6-603-1 does not have potential controlled PM10 emissions at or above 100 TPY – so it is not considered to be a “large PSEU” that triggers the need for the collection of four or more data values equally spaced over each hour as specified in 40 CFR 64.3(b)(4)(ii).

**PART I, SECTION 4:**  
**CONTROL OF TOXIC AIR POLLUTANTS -**  
**LOCALLY ENFORCEABLE ONLY**

**Condition 4.1**  
**Facility-Wide Toxic Air Pollutant Conditions**

For the RJRT Whitaker Park facility (Premise 00339) an air toxics review was last performed in January 2016 in association with the Temporary Boiler Project that was incorporated in the 00339-TV-33 permit. That permit also included modeling-based limits associated with an earlier air toxics review from June 2007. The issuance of the following three permits (00339-TV-34, 00339-TV-35, and 00339-TV-36) did not involve an air toxics review. For both the 2007 and 2016 air toxics reviews, toxic air pollutants (TAPs) were emitted from Building 603-1 sources as well as other sources at the Whitaker Park facility.

With the removal of Building 603-1 as part of the 00339 Whitaker Park facility and its subsequent new ownership as part of a new Title V facility, the 01095 AONA – Recon Facility, the TAP emissions were reviewed and the amount of TAP emissions were apportioned to the facility from which they are emitted – either the new AONA – Recon Facility or the altered RJRT Whitaker Park facility now without Building 603-1. As with the previous permit (#01095-TV-1), This AONA – Recon Facility permit (#01095-TV-2) only includes triggered TAPs that are emitted from Building 603-1. **For more detail on the apportionment of the TAP emissions see the “01095-TV-2-SoB-PUBLIC.xlsx” or “01095-TV-2-SoB-CONFIDENTIAL.xlsx” Excel spreadsheet.** In those spreadsheet files, the worksheets pertaining to the apportionment of the TAP emissions contain no confidential information.

In the 01095-TV-2 permit, condition 4.1(A)(2) includes a list of 8 TAPs from sources at the AONA – Recon Facility. The facility-wide potential emissions of each of these TAPs from the AONA – Recon Facility emissions sources are below the *de minimis* levels or Toxic Pollutant Emission Rates (TPERs) listed in Sec. 3Q-0711(a). The AONA – Recon Facility has no controls for any TAPs. NOTE: Acetaldehyde was modeled as part of the 2007 modeling analysis, but the 2007 facility-wide modeled rate (0.38 lb/hr) is less than the 6.8 lb/hr TPER listed in Sec. 3Q-0711(a) so for the 01095-TV-2 AONA permit, acetaldehyde has been included in condition 4.1(A)(2) instead of in condition 4.1(A)(3) with the modeled TAPs. The following table shows the apportionment of non-modeled TAP emissions for the AONA – Recon Facility.

<b>Pollutant (CAS Number)</b>	<b>De minimis level</b>
acetaldehyde (75-07-0)	6.8 lb/hr
chloroform (67-66-3)	290 lb/yr
cresol (1319-77-3)	0.56 lb/hr



methyl ethyl ketone (78-93-3)	78 lb/day and 22.4 lb/hr
phenol (108-95-2)	0.24 lb/hr
toluene (108-88-3)	98 lb/day and 14.4 lb/hr
trichlorofluoromethane (75-69-4)	140 lb/hr
xylene (1330-20-7)	57 lb/day and 16.4 lb/hr

In the 01095-TV-2 permit, condition 4.1(A)(3) includes a list of 7 modeled TAPs. The original 2007 and 2016 modeling was performed based on the facility-wide potential emissions of each of the TAPs (not including sources exempt from the air toxics regulations). For each pollutant that was modeled, the maximum modeled ambient concentration was less than the respective Acceptable Ambient Level (AAL) listed in FCAQTC Sec. 3D-1104. The overall emission rate for each pollutant in the 2016 modeling (but not the 2007 modeling) was then proportionally adjusted to a level corresponding to 98% of the AAL and the model was rerun. The maximum facility-wide emissions rates that were included in condition 4.1(A)(3) of the resulting 00339-TV-33 Whitaker Park permit for the 2016 modeling were the emission rates corresponding to 98% of the AAL for each pollutant. The following table shows the apportionment of modeled TAP emissions for the AONA – Recon Facility.

<b>Pollutant (CAS Number)</b>	<b>Maximum facility-wide emission rate</b>	<b>AERMOD EPA version</b>	<b>Date of model output file</b>
1,3-butadiene (106-99-0)	9,167.3 lb/yr	15181	01/04/2016
acetic acid (64-19-7)	61.8 lb/hr	15181	01/04/2016
acrolein (107-02-8)	4.3 lb/hr	15181	01/04/2016
ammonia (7664-41-7)	109.4 lb/hr	15181	01/04/2016
benzene (71-43-2)	31.4 lb/yr	07026	06/19/2007
carbon disulfide (75-15-0)	0.0085 lb/day	07026	06/19/2007
formaldehyde (50-00-0)	5.9 lb/hr	15181	01/04/2016

Because the uncontrolled potential emissions of all non-modeled TAPs from the facility are below the respective Sec. 3Q-0711(a) TPER values and the modeling demonstrates that the respective AALs are not exceeded even at the facility's uncontrolled potential emission rates, only the basic TAP monitoring and recordkeeping requirements are included in condition 4.1(A)(4) of the permit with no TAP reporting required.

## **SECTION D:** **Tobacco Manufacturing and Processing – PM and VOC** **Emissions**

### **I. ES-1-603-1: Tobacco Scrap Feed / Broke Recovery System**

#### **A. ES-1-603-1 - Overview**

In Tobacco Scrap Feed / Broke Recovery System activities, tobacco scrap is blended and conveyed to tobacco presses where water is added. There are hoods to collect dust from tobacco feeders, conveyors, and can filling stations. Particulate matter is the only pollutant emitted from this emission source.

All emissions from Tobacco Scrap Feed / Broke Recovery System are vented to atmosphere via a stack with PM emissions controlled by a fabric filter with 99% control efficiency for PM.

For more detail see the “603-1 PM VOC HAP TAP emissions” worksheet in the “01095-TV-2-SoB-CONFIDENTIAL.xlsx” or “01095-TV-2-SoB-PUBLIC.xlsx” Excel spreadsheet.

#### **B. ES-1-603-1 – PM Emissions**

The PM emission factor (confidential) is based on past stack testing of a similar source. Based on the nature of the source, emissions determinations assume that PM10 and PM2.5 emissions equal PM emissions.

The uncontrolled potential hourly PM/PM10/PM2.5 emissions from the ES-1-603-1 equipment are 2.59 lb/hour which converts to 0.0259 lb/hour after control by the fabric filter with 99% control efficiency for particulate matter.

##### **Sec. 3D-0515, “Particulates from Miscellaneous Industrial Processes”**

Condition 3.2(A) includes requirements pertaining to Sec. 3D-0515. Based on the confidential maximum throughput rate for ES-1-603-1, the maximum allowable PM emission rate from the source according to Sec. 3D-0515 is 15.8 lb/hr. The source’s combined 0.0259 lb/hr controlled PM emissions are 0.16% of that limit. The source’s combined 2.59 lb/hr uncontrolled PM emissions are 16.4% of that limit. Consequently, particulate matter control by the fabric filter is not required for compliance with Sec. 3D-0515. Nonetheless, the non-CAM recordkeeping and reporting requirements listed in condition 3.4(A) are sufficient to assure that the fabric filter is operating properly.

##### **Sec. 3D-0521(d), “Control of Visible Emissions”**

Condition 3.3 includes requirements pertaining to Sec. 3D-0521(d). The non-CAM recordkeeping and reporting requirements listed in condition 3.4(A) are sufficient to assure compliance with Sec. 3D-0521(d).

Based on 8760 hours per year, the potential uncontrolled annual PM/PM10/PM2.5 emissions are 11.33 tons/year, and the potential controlled annual PM/PM10/PM2.5 emissions are 0.1133 tons/year.

### **C. ES-1-603-1 – VOC Emissions**

No VOC emissions are emitted from Tobacco Scrap Feed / Broke Recovery System (ES-1-603-1).

## **II. ES-2-603-1: Tobacco Stem Feed**

### **A. ES-2-603-1 - Overview**

In Tobacco Stem Feed, tobacco stem is blended and conveyed to tobacco presses where water is added. There are hoods and pickup points to collect dust from tobacco feeders, conveyors, and can filling stations. Particulate matter is the only pollutant emitted from this emission source.

All emissions from Tobacco Stem Feed are vented to atmosphere via a stack with PM emissions controlled by fabric filters with 99% control efficiency for PM.

For more detail see the “603-1 PM VOC HAP TAP emissions” worksheet in the “01095-TV-2-SoB-CONFIDENTIAL.xlsx” or “01095-TV-2-SoB-PUBLIC.xlsx” Excel spreadsheet.

### **B. ES-2-603-1 – PM Emissions**

The PM emission factor (confidential) is based on past stack testing of a similar source. Based on the nature of the source, emissions determinations assume that PM10 and PM2.5 emissions equal PM emissions.

The uncontrolled potential hourly PM/PM10/PM2.5 emissions from the ES-2-603-1 equipment are 2.12 lb/hour which converts to 0.0212 lb/hour after control by the fabric filters with 99% control efficiency for particulate matter.

#### **Sec. 3D-0515, “Particulates from Miscellaneous Industrial Processes”**

Condition 3.2(A) includes requirements pertaining to Sec. 3D-0515. Based on the confidential maximum throughput rate for ES-2-603-1, the maximum allowable PM emission rate from the source according to Sec. 3D-0515 is 15.8 lb/hr. The source’s combined 0.0212 lb/hr controlled PM emissions are 0.13% of that limit. The source’s combined 2.12 lb/hr uncontrolled PM emissions are 13.4% of that limit. Consequently, particulate matter control by the fabric filter is not required for compliance with Sec. 3D-0515. Nonetheless, the non-CAM recordkeeping and reporting requirements listed in condition 3.4(A) are sufficient to assure that the fabric filter is operating properly.

#### **Sec. 3D-0521(d), “Control of Visible Emissions”**

Condition 3.3 includes requirements pertaining to Sec. 3D-0521(d). The non-CAM recordkeeping and reporting requirements listed in condition 3.4(A) are sufficient to assure compliance with Sec. 3D-0521(d).

Based on 8760 hours per year, the potential uncontrolled annual PM/PM10/PM2.5 emissions are 9.31 tons/year, and the potential controlled annual PM/PM10/PM2.5 emissions are 0.0931 tons/year.

### **C. ES-2-603-1 – VOC Emissions**

No VOC emissions are emitted from Tobacco Stem Feed (ES-2-603-1).

### **III. ES-3-603-1: Dust Infeed & Extraction**

#### **A. ES-3-603-1 - Overview**

In Dust Infeed & Extraction, tobacco dust is blended and conveyed to tobacco centrifuges where water is added. There are hoods to collect dust from tobacco feeders, conveyors, and can filling stations. Particulate matter is the only pollutant emitted from this emission source.

All emissions from Dust Infeed & Extraction are vented to atmosphere via a stack with PM emissions controlled by a fabric filter with 99% control efficiency for PM.

For more detail see the "603-1 PM VOC HAP TAP emissions" worksheet in the "01095-TV-2-SoB-CONFIDENTIAL.xlsx" or "01095-TV-2-SoB-PUBLIC.xlsx" Excel spreadsheet.

#### **B. ES-3-603-1 – PM Emissions**

The PM emission factor (confidential) is based on past stack testing of a similar source. Based on the nature of the source, emissions determinations assume that PM10 and PM2.5 emissions equal PM emissions.

The uncontrolled potential hourly PM/PM10/PM2.5 emissions from the ES-3-603-1 equipment are 0.370 lb/hour which converts to 0.0037 lb/hour after control by the fabric filter with 99% control efficiency for particulate matter.

##### **Sec. 3D-0515, "Particulates from Miscellaneous Industrial Processes"**

Condition 3.2(A) includes requirements pertaining to Sec. 3D-0515. Based on the confidential maximum throughput rate for ES-3-603-1, the maximum allowable PM emission rate from the source according to Sec. 3D-0515 is 7.58 lb/hr. The source's combined 0.0037 lb/hr controlled PM emissions are 0.05% of that limit. The source's combined 0.370 lb/hr uncontrolled PM emissions are 4.9% of that limit. Consequently, particulate matter control by the fabric filter is not required for compliance with Sec. 3D-0515. Nonetheless, the non-CAM recordkeeping and reporting requirements listed in condition 3.4(A) are sufficient to assure that the fabric filter is operating properly.

##### **Sec. 3D-0521(d), "Control of Visible Emissions"**

Condition 3.3 includes requirements pertaining to Sec. 3D-0521(d). The non-CAM recordkeeping and reporting requirements listed in condition 3.4(A) are sufficient to assure compliance with Sec. 3D-0521(d).

Based on 8760 hours per year, the potential uncontrolled annual PM/PM10/PM2.5 emissions are 1.62 tons/year, and the potential controlled annual PM/PM10/PM2.5 emissions are 0.016 tons/year.

#### **C. ES-3-603-1 – VOC Emissions**

No VOC emissions are emitted from Dust Infeed & Extraction (ES-3-603-1).

## **IV. ES-4-603-1: Tobacco Dryer #6**

### **A. ES-4-603-1 - Overview**

Prior to entry into the dryer, tobacco scrap, stems, and dust are fed into the blending area and proceed from blending to the extraction area where tobacco/cellulose raw materials are mixed with water. This mixture then enters the pulp presses where the water solubles are removed and sent to the evaporator.

The remaining tobacco/cellulose pulp then enters the dryer forming machine where a paper-like tobacco sheet is formed. Some of the water solubles from the evaporator, which may be treated with ingredients, are then reapplied back to the tobacco sheet. The product then enters the dryer. The remaining water solubles are applied between the first and second pass of the three pass dryer. The dried product is then sent to product sizing.

From Dryer #6, emissions include VOC and PM emissions as well as some federal HAPs and local TAPs. TAP regulations are locally-enforceable only. There is no control for PM, VOCs, HAPs, or TAPs. The dryer's heat source is steam generated by the Whitaker Park boilers. No fuel is combusted in the dryer.

For more detail see the "603-1 PM VOC HAP TAP emissions" worksheet in the "01095-TV-2-SoB-CONFIDENTIAL.xlsx" or "01095-TV-2-SoB-PUBLIC.xlsx" Excel spreadsheet.

### **B. ES-4-603-1 – PM Emissions**

The PM emission factor (confidential) is based on past stack testing of the identical Whitaker Park Dryer #7 (ES-5-603-1). Based on the nature of the source, emissions determinations for the dryer assume that PM10 and PM2.5 emissions equal PM emissions.

Overall, the potential hourly PM/PM10/PM2.5 emissions from Dryer #6 are 0.698 lb/hour.

#### Sec. 3D-0515, "Particulates from Miscellaneous Industrial Processes"

Condition 3.2(A) includes requirements pertaining to Sec. 3D-0515. Based on the confidential maximum throughput rate for ES-4-603-1, the maximum allowable PM emission rate from the source according to Sec. 3D-0515 is 9.94 lb/hr. The source's 0.698 lb/hr PM emissions are 7.0% of that limit. Compliance with Sec. 3D-0515 is therefore demonstrated without the need for PM control.

#### Sec. 3D-0521(d), "Control of Visible Emissions"

Condition 3.3 includes requirements pertaining to Sec. 3D-0521(d). Compliance with Sec. 3D-0521(d) is assured based on the nature of the emission source.

Based on 8760 hours per year, the potential annual PM/PM10/PM2.5 emissions from Dryer #6 are 3.06 tons/year.

### **C. ES-4-603-1 – VOC Emissions**

The VOC emission factor (confidential) is based on past stack testing of the identical Whitaker Park Dryer #7 (ES-5-603-1).

The unlimited potential hourly VOC emissions from Dryer #6 are 23.51 lb/hour. Based on 8760 hours per year, the potential annual VOC emissions from are 102.985 tons/year. However, permit condition 3.1(B)(a) includes a PSD Avoidance limit of 62.66 tons VOC per 12-month period of combined VOC from processing G7 products on Dryer 6 and Dryer 7. The limit is for both dyers combined. Consequently, instead of each dryer having potential VOC emissions of 102.985 tons/year resulting in a total of 205.970 tons/year, the combined VOC emissions are limited to 62.66 tons of VOC per 12-month period.

## **V. ES-5-603-1: Tobacco Dryer #7**

### **A. ES-5-603-1 - Overview**

Tobacco Dryer #7 is identical to Tobacco Dryer #6 (ES-4-603-1) except that emissions vent through different stacks. The emissions from Tobacco Dryer #7 are the same as the emissions from Tobacco Dryer #6. From Dryer #7, emissions include VOC and PM emissions as well as some federal HAPs and local TAPs. TAP regulations are locally-enforceable only. There is no control for PM, VOCs, HAPs, or TAPs. Dryer #7 complies with the applicable standards in the same manner as Dryer #6.

For more detail see the “603-1 PM VOC HAP TAP emissions” worksheet in the “01095-TV-2-SoB-CONFIDENTIAL.xlsx” or “01095-TV-2-SoB-PUBLIC.xlsx” Excel spreadsheet.

### **B. ES-5-603-1 – PM Emissions**

The potential hourly PM/PM10/PM2.5 emissions from Dryer #7 are 0.698 lb/hour. Based on 8760 hours per year, the potential annual PM/PM10/PM2.5 emissions are 3.06 tons/year.

### **C. ES-5-603-1 – VOC Emissions**

The potential hourly VOC emissions from Dryer #7 are 23.51 lb/hour. Based on 8760 hours per year, the potential annual VOC emissions from are 102.985 tons/year. However, permit condition 3.1(B)(a) includes a PSD Avoidance limit of 62.66 tons VOC per 12-month period of combined VOC from processing G7 products on Dryer 6 and Dryer 7. The limit is for both dyers combined. Consequently, instead of each dryer having potential VOC emissions of 102.985 tons/year resulting in a total of 205.970 tons/year, the combined VOC emissions are limited to 62.66 tons of VOC per 12-month period.

## **VI. ES-6-603-1: Tobacco Mills**

### **A. ES-6-603-1 - Overview**

The ES-6-603-1 tobacco mills process a portion of tobacco from Dryer #6 and Dryer #7 (ES-4-603-1 and ES-5-603-1, respectively). The remaining tobacco bypasses the mills and goes directly to the packers. Conveyors and a mill feed system carry the tobacco to the mills. Particulate matter is the only pollutant emitted from this emission source.

All emissions from the tobacco mills are vented to atmosphere via a stack with PM emissions controlled by a fabric filter with 99.9% control efficiency for PM.

For more detail see the “603-1 PM VOC HAP TAP emissions” worksheet in the “01095-TV-2-SoB-CONFIDENTIAL.xlsx” or “01095-TV-2-SoB-PUBLIC.xlsx” Excel spreadsheet.

## **B. ES-6-603-1 – PM Emissions**

The PM emission factors (confidential) are based on past stack testing of similar sources (conveying and milling). Based on the nature of the source, emissions determinations assume that PM10 and PM2.5 emissions equal PM emissions.

The uncontrolled potential hourly PM/PM10/PM2.5 emissions from the ES-6-603-1 equipment are 370.44 lb/hour which converts to 0.3704 lb/hour after control by the fabric filter with 99.9% control efficiency for particulate matter.

### **Sec. 3D-0515, “Particulates from Miscellaneous Industrial Processes”**

Condition 3.2(A) includes requirements pertaining to Sec. 3D-0515. Based on the confidential maximum throughput rate for ES-6-603-1, the maximum allowable PM emission rate from the source according to Sec. 3D-0515 is 15.8 lb/hr. The source’s combined 0.3704 lb/hr controlled PM emissions are 2.3% of that limit. The source’s combined 370.44 lb/hr uncontrolled PM emissions are 2,345% of that limit. Consequently, particulate matter control by the fabric filter is required for compliance with Sec. 3D-0515. The CAM monitoring, recordkeeping and reporting requirements listed in condition 3.4(B), are sufficient to assure compliance with the Sec. 3D-0515 PM limit for ES-6-603-1.

### **Sec. 3D-0521(d), “Control of Visible Emissions”**

Condition 3.3 includes requirements pertaining to Sec. 3D-0521(d). The CAM monitoring, recordkeeping and reporting requirements listed in condition 3.6(B), are sufficient to assure compliance with Sec. 3D-0521(d).

Based on 8760 hours per year, the potential uncontrolled annual PM/PM10/PM2.5 emissions are 1,622.5 tons/year, and the potential controlled annual PM/PM10/PM2.5 emissions are 1.623 tons/year.

## **C. ES-6-603-1 – VOC Emissions**

No VOC emissions are emitted from Tobacco Mills (ES-6-603-1).

## **SECTION E: Insignificant Activities**

The facility’s insignificant activities have been reviewed and verified. The activities are insignificant in accordance with either Sec. 3Q-0503(7) "Insignificant activities because of category" or Sec. 3Q-0503(8) "Insignificant activities because of size or production rate". Although the insignificant activities are not listed in the Title V permit, a general permit condition (condition 2.30) is placed in the Title V permit stating that all insignificant activities shall comply with all applicable requirements. An updated list of the insignificant activities is attached to the permit but is not an official part of the permit.

## **SECTION F:** **Permit Processing Notes**

12/14/2023

A Title V permit renewal application was received at this Office pertaining to the AONA – Recon facility. The application was signed by the facility’s responsible official, Cliff Purcell, U.S. Operations Director, with the signature dated 12/11/2023.

1/10/2024

I completed the DRAFT permit and Statement of Basis. I also completed a DRAFT public notice document. I sent an email to Peter Lloyd asking him to review the documents.

1/17/2024

Peter Lloyd completed his review and made PDF versions of the approved permit and Statement of basis. He also prepared the public notice with the appropriate dates and created a single PDF document of the three documents.

1/18/2024

The DRAFT 01095-TV-2 permit and Statement of Basis were submitted to our website for a 30-day public comment period and 45-day EPA review beginning on 1/24/2024. The public comment period will end on 2/23/2024, and the EPA review period on 3/10/2024.



**SECTION H:**  
**Statement of Basis Conclusions**

This Office, upon completion of its review of the Title V permit renewal request, has concluded that the AONA – Recon Facility will be in compliance with all applicable regulations and has created permit number 01095-TV-2 which details all the necessary permit conditions to ensure compliance with applicable air quality requirements