ROY COOPER
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ELIZABETH S. BISER
Secretary

MICHAEL A. ABRACZINSKAS
Director

NORTH CAROLINA
Environmental Quality

November 8, 2021

Mr. John Achzet
Regional Manager, Eastern Region
Ecolab, Inc.
53 McCullough Dr
New Castle, DE 19720

Subject: Air Permit No. 10313R04
Ecolab, Inc.
Wilmington, New Hanover County, North Carolina
Permit Class: Synthetic Minor
Facility ID# 6500356

Dear Mr. Achzet:

In accordance with your completed application received October 22, 2021, we are forwarding herewith Permit No. 10313R04 to Ecolab, Inc., Wilmington, New Hanover County, North Carolina for the construction and operation of air emissions sources or air cleaning devices and appurtenances. Please note the records retention requirements are contained in General Condition 2 of the General Conditions and Limitations.

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

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

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

subject the Permittee to civil or criminal penalties as described in G.S. 143-215.114A and 143-215.114B.

This permit shall be effective from November 8, 2021 until August 31, 2029, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

This permit revision is the result of a request for a permit modification to alter the modeling configuration with back-up emission stacks (alternate operating scenario stack ES-1A and stack ES-2A), which shall be allowed for a six month time period only. **The Permittee is responsible for carefully reading the entire permit and evaluating the requirements of each permit stipulation. The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.**

Should you have any questions concerning this matter, please contact Dean Carroll at 910-796-7242.

Sincerely,

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

Enclosures

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

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF AIR QUALITY

AIR PERMIT NO. 10313R04

Issue Date: November 8, 2021
Expiration Date: August 31, 2029

Effective Date: November 8, 2021
Replaces Permit: 10313R03

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

Ecolab, Inc.
2202 Burnett Boulevard
Wilmington, New Hanover County, North Carolina
Permit Class: Synthetic Minor
Facility ID# 6500356

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

Emission Source ID	Emission Source Description	Control System ID	Control System Description
ES-1	One log fumigation process in shipping containers utilizing methyl bromide and one fumigation process in shipping containers using phosphine. Emissions exhausted to an aeration tower stack 40 feet in height and 20 inches by 20 inches square discharge or equivalent surface area. (Hours of operation {aeration} for ES-1 are 8 a.m. to 6 p.m. only.)	N/A	N/A
ES-2	one bulk perishable commodity fumigation process inside a cold storage building and under a tarpaulin utilizing methyl bromide. Emissions exhausted to an aeration tower stack 40 feet in height and 20 inches by 20 inches square discharge or equivalent surface area. (Hours of operation {aeration} are 10 pm to 2 am only.)	N/A	N/A

in accordance with the completed application 6500356.21A received October 22, 2021 including any plans, specifications, previous applications, and other supporting data, all of which are filed with the Department of Environmental Quality, Division of Air Quality (DAQ) and are incorporated as part of this permit.

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

A. SPECIFIC CONDITIONS AND LIMITATIONS

1. Any air emission sources or control devices authorized to construct and operate above must be operated and maintained in accordance with the provisions contained herein. The Permittee shall comply with applicable Environmental Management Commission Regulations, including Title 15A North Carolina Administrative Code (NCAC), Subchapter 2D .0202, 2D .0535, 2D .0540, 2D .0546, 2D .1104, 2D .1806, and 2Q .0315.

2. PERMIT RENEWAL AND EMISSION INVENTORY REQUIREMENT - The Permittee, at least **90** days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit (without a modification request). The renewal request (with application Form A) should be submitted to the Regional Supervisor, DAQ. Also, at least **90** days prior to the expiration date of this permit, the Permittee shall submit the air pollution emission inventory report (with Certification Sheet) in accordance with 15A NCAC 2D .0202, pursuant to N.C. General Statute 143 215.65. The report shall be submitted to the Regional Supervisor, DAQ and shall document air pollutants emitted for the **2028** calendar year.

3. NOTIFICATION REQUIREMENT - As required by 15A NCAC 2D .0535, the Permittee of a source of excess emissions that last for more than four hours and that results from a malfunction, a breakdown of process or control equipment or any other abnormal conditions, shall:

    a. Notify the Director or his designee of any such occurrence by 9:00 a.m. Eastern time of the Division's next business day of becoming aware of the occurrence and describe:

        i. the name and location of the facility,

        ii. the nature and cause of the malfunction or breakdown,

        iii. the time when the malfunction or breakdown is first observed,

        iv. the expected duration, and

        v. an estimated rate of emissions.

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

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

4. FUGITIVE DUST CONTROL REQUIREMENT - As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible

emissions beyond the property boundary. If substantive complaints are received or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 2D .0540(f).

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

5. Pursuant to 15A NCAC 2D .0546 Control of Emissions from Log Fumigation Operations – the facility shall comply with the following emission control requirements for hazardous air pollutants and toxic air pollutants from log fumigation operations:

   a. Emission Control Requirements. The owner or operator of a log fumigation operation shall comply with the Toxic Air Pollutant Guidelines specified in 15A NCAC 02D .1104 and follow the procedures specified in 15A NCAC 02D .1106, 15A NCAC 02Q .0709, and .0710.

   b. The owner or operator shall post DAQ approved signs notifying the public of fumigation operations. The signs shall be visible and legible to the public at the fence or property line closest to any public right-of-way. The signs shall remain in place while fumigation activities are in process.

   c. Monitoring, Recordkeeping, and Reporting. The owner or operator of a bulk, chamber, or container log fumigation operation shall comply with the requirements pursuant to 15A NCAC 02D .0600:

      i. The owner or operator shall send an initial notification of commencement of operations to the appropriate Division of Air Quality regional office within 15 days of initial fumigation start-up.
      ii. The owner or operator shall submit a quarterly summary report, with the original signature of the permittee or the authorized responsible official, of the monitoring and recordkeeping activities postmarked no later than 30 days after the end of each calendar year quarter. The report shall contain the following:
         A. the company name, address, and facility ID number;
         B. the calendar year quarter represented by the report;
         C. the daily and total fumigant usage in pounds for each quarter;
         D. a summary of the monitoring data required by the permit that was collected during the quarter; and
         E. a summary of exceedances from the levels established in the permit that occurred during the quarter of any monitoring parameters.

   d. Compliance Schedule. The owner or operator of an existing log fumigation operation subject to this Rule shall achieve compliance within 60 days after the Rule is effective or in accordance with an alternate compliance schedule approved by the Director.

6. In accordance with 15A NCAC 2D .1104 - and the approved application (6500356.20A) – For 10313R03 - emission limits in the table below shall not be exceeded. Ecolab, Inc. submitted a toxic air pollutant dispersion modeling analysis dated July 8, 2021 for the facility's toxic air pollutant emissions. The modeling analysis was reviewed and approved by the DAQ Air Quality Analysis Branch (AQAB) on July 23, 2021. Placement of the emission sources, configuration of the emission points, and operation of the sources shall be in accordance with the approved dispersion modeling analysis and should reflect any changes from the original analysis submittal as outlined in the AQAB review memo.

Affected Source	Toxic Air Pollutant	Emission Limit	2D .1104 AAL	% of the AAL
ES-1 containers	Methyl Bromide	2,234 lb/day	1.0 mg/m^3	99.7%
ES-1 containers	Methyl Bromide	20,000 lb/yr*	0.005 mg/m^3	94.4%
ES-1 containers	Phosphine	2.5 lb/hr	0.13 mg/m^3	98.6%

* 20,000 lb/yr is 10 ton/yr; this is a NC toxics limit. The facility also has a 10 ton/yr methyl bromide synthetic minor limit (rolling total) in permit condition A.8.

Affected Source	Toxic Air Pollutant	Emission Limit	2D .1104 AAL	% of the AAL
ES-2 bulk piles	Methyl Bromide	400 lb/day	1.0 mg/m^3	99.7%
ES-2 bulk piles	Methyl Bromide	9,500 lb/yr	0.005 mg/m^3	94.4%

ES-1 aeration is only to be conducted in containers between 8 a.m. to 6 p.m.
ES-2 aeration is only to be conducted between 10 p.m. to 2 a.m.

Methyl bromide treatment of commodities at ES-2 is only allowed during the hours between 6 p.m. and 6 a.m. Each affected source (ES-1 and ES-2) shall utilize a separate stationary stack in accordance with design specifications used in the modeling analysis submitted on July 8, 2021.

Per the application submitted on October 22, 2021 (6500356.21A) for an alternate operating scenario using back-up stacks ES-1A and ES-2A for a six-month temporary time period:

Affected Source	Toxic Air Pollutant	Emission Limit	2D .1104 AAL	% of the AAL
ES-1A	Methyl Bromide	1,100 lb/day	1.0 mg/m^3	98.8 %
ES-1A	Methyl Bromide	15,999.2 lb/yr	0.005 mg/m^3	99.6 %
ES-1A	Phosphine	1.65 lb/hr	0.13 mg/m^3	98.8 %

Affected Source	Toxic Air Pollutant	Emission Limit	2D .1104 AAL	% of the AAL
ES-2A (fruit)	Methyl Bromide	110 lb/day	1.0 mg/m^3	98.8 %
ES-2A (fruit)	Methyl Bromide	2,149.4 lb/yr	0.005 mg/m^3	99.6 %

Each affected source (ES-1A and ES-2A) shall utilize a separate stationary stack in accordance with design specifications used in the modeling analysis submitted on October 12, 2021.

This temporary alternate scenario with back-up stacks ES-1A and ES-2A will be allowed for 6 months: from November 8, 2021 until May 8, 2022. Operating under the Primary Operating Scenario is not permitted during this time. No later than February 8, 2022, Ecolab, Inc. shall submit one permit application with two distinct Alternate Operating Scenarios and related ambient modeling showing compliance with 15A NCAC 2D .0546 as follows:

1. An application that includes the ambient modeling for 6 months of continuous operations under the Alternate Operating Scenario permitted in 10313R04 in combination with 6 months of continuous operations in the Primary Operating Scenario; including the appropriate number of days anticipated to be needed for maintenance/emergency use of the Alternate Operating Scenario Stack when the Primary Operating Scenario Stack will not be in use.

2. An application that includes use of the Primary Operating Scenario stack for a 12 month period incorporating the appropriate number of days anticipated to be needed for maintenance/emergency use of the Alternate Operating Scenario Stack when the Primary Operating Scenario Stack will not be in use.

A. Bulk Fumigation Inside Cold Storage Building with Tarpaulin (Emission Source ID No. ES-2)

Emission Control Requirements — To ensure compliance with the above limits for ES-2, the following restrictions shall apply:

1. Fumigation Preparation

a. Operational Requirements for Bulk Fumigation Preparation: To mitigate leaks of fumigant during fumigation and aeration operations, the Permittee shall comply with the following requirements:

i. The bulk perishable commodity fumigation operation shall be conducted on an impervious surface. If the fumigation operation is not conducted on an impervious surface, a ground tarpaulin (tarp) or polyethylene sheeting shall be used to provide an impervious surface on which the perishable commodity may be stacked.

ii. Three fumigant sampling lines shall be used for monitoring fumigant concentrations. Two of the fumigant sampling lines shall be placed inside the bulk enclosure at opposite ends, one at the top of the bulk pile and the other at the bottom of the bulk pile, and one shall be located in the middle of the bulk pile.

iii. The tarp shall be placed and positioned on the bulk pile as to prevent tears in the tarpaulin.

iv. The top and bottom tarpaulin condition shall be inspected for rips, tears, and holes. If any rips, tears, or holes are found, they shall be sealed with adhesive and/or sealed tightly with tape.

v. The top tarpaulin must be large enough to cover the bulk pile and allow a minimum margin of 2 feet at the base of the bulk pile. The surface around the bulk commodity shall be prepared (swept) to provide a smooth surface for sealing the tarpaulin.

vi. The top tarp edges shall be weighted down to provide a seal with the impervious surface by using sandbags measuring 6 feet long and 6 inches wide arranged in rows no less than three sandbags wide and arranged end to end. Loose wet sand may be used in the place of sandbags where gas introduction, gas sampling lines, and aeration ductwork are located if there is danger of crimping the lines.

b. Monitoring and Recordkeeping for Bulk Fumigation Preparation: For each bulk fumigation, the Permittee shall complete a pre-fumigation inspection checklist with the date and time of the inspection and the names and titles of personnel performing the inspection. The records shall be maintained on site and made available upon request by the Division of Air Quality. The checklist shall include the following:

i. Whether the fumigation is conducted on an impervious surface.

ii. Confirmation sampling lines are placed in the appropriate locations (as specified in condition A. I .a.ii. above) prior to the addition of fumigant to the enclosure.

iii. Confirmation tarps are placed and positioned over the bulk pile in a manner that prevents tears and holes.

iv. Documentation of the condition of the top and bottom tarp and any necessary repairs.

v. Confirmation the tarp provides at least 2 feet margin around the bulk pile and the margin is prepared (swept) for sealing.

vi. Confirmation the entire perimeter of the tarp is sealed in accordance with A. I .a.vi. above in the Operating Requirements for Bulk Fumigation Preparation.

vii. Documentation of the number and size of recirculation fans (for circulating fumigant inside the enclosure).

c. Reporting for Bulk Fumigation Preparation: No reporting is required.

2. Bulk Fumigation

a. Operating Requirements for Bulk Fumigation: The Permittee shall be limited to methyl bromide tarpaulin fumigation emission limits of 400 lbs/day and 9,500 lbs/year.

i. A scale shall be used to measure the amount of fumigant applied during each fumigation. The amount of fumigant used shall be determined by measuring the scale weight of the fumigant cylinder at the beginning and at the end of the application of fumigant and calculating the difference.

ii. The scale shall be operated, maintained, and calibrated in accordance with the manufacturer's recommendations and calibrated by the State, a company that is certified to conduct scale calibrations, or by the fumigator under the supervision of Plant Protection Quarantine (PPQ). The manufacturer's recommendations shall be maintained on site for review by DAQ upon request.

iii. The scale shall be calibrated following every repair and at a minimum of once per year. The certifier and date of calibration must be posted in a visible location or on the scale at all times.

iv. Once the bulk pile has received the desired level of fumigant, the fumigant supply line(s) shall be disconnected from the methyl bromide cylinder(s), and the ends shall be taped shut to prevent fugitive emissions.

v. Commodities treated with methyl bromide awaiting aeration are only allowed onsite at ES-2 and ES-2A between the hours of 6 p.m. and 6 a.m.

b. Monitoring and Recordkeeping Requirements for Bulk Fumigation: The Permittee shall monitor and record the following for each fumigation activity:

i. The scale weight of the fumigant cylinder at the beginning and the end of the application of fumigant and the calculated difference.

ii. Date and times for the beginning and the end of each bulk fumigation application period.

iii. When applicable, scale calibration data and/or scale maintenance records.

iv. The amount of commodity (cubic feet) fumigated.

v. Confirmation the ends of the fumigant lines are taped shut at the end of fumigation application.

vi. All of the above records shall be maintained on site and made available for review upon request by the DAQ.

c. Reporting Requirements for Bulk Fumigation: The Permittee shall submit a quarterly report with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar quarter for the following:

i. The monthly tonnage of fumigant used.

ii. The 12-month rolling total tonnage of fumigant used for each month in the three-month period.

iii. Confirmation that the daily fumigant limits contained in this permit were not exceeded or a listing of days when the limits were exceeded and the total fumigant usage for those days.

3. Leak Detection and Repair Program (LDAR) for Bulk Fumigation

a. Operating Requirements for LDAR:

i. An LDAR program shall be developed by the Permittee to identify and monitor all potential sources of leaks including (but not limited to) gas cylinders, fumigation delivery lines, vaporizers, perimeter of tarp at ground level, locations where tape is used to provide a seal, aeration system ductwork, aeration system fans/blowers, valves, fittings, and connections.

ii. The Permittee shall use a USDA-recommended instrument that will detect and analyze fumigant gases as part of a LDAR program. Any reading above 0 ppm is considered a leak. Leak detection monitors shall be operated, maintained, and calibrated in accordance with manufacturer's recommendations.

iii. To account for ambient background conditions interfering with LDAR monitoring activities, Section 8.3.2 of Method 21 of 40 CFR Part 60, Appendix A may be employed ("Determination of VOC Leaks").

b. The LDAR program shall include the following:

i. The sources of all potential leaks (including but not limited to the list provided above in A.3.a.i.) from equipment and/or locations where leaks may occur shall be identified in a checklist matrix for use on site by personnel implementing the LDAR program.

ii. Each potential source identified in the checklist matrix shall be monitored during each fumigation and aeration process at a distance of no more than 3 inches from the identified monitoring perimeters and points.

iii. When a leak is detected (reading above 0 ppm) corrective action(s) shall be implemented immediately and monitoring shall be repeated at the location of the leak to determine effectiveness of the corrective action(s).

c. LDAR Monitoring and Recordkeeping for Bulk Fumigation: The Permittee shall comply with the following monitoring and recordkeeping requirements:

i. Maintain records of handheld monitor calibration data and maintenance.

ii. The names and titles of persons performing the leak detection monitoring shall be recorded on each completed LDAR checklist with the dates, times, and locations of monitoring.

iii. At the onset of fumigation (when the fumigant cylinder is opened), the Permittee shall leak check the fumigation delivery system including (but not limited to) the gas cylinder, the gas fumigation tubing, vaporizer, and all fittings and connections for the system. If a leak is detected (reading above 0 ppm), immediately repair the leak and document the location of the leak, the corrective action(s) taken, and the reading from the detection device before and after the corrective action(s).

iv. At the end of addition of fumigant to the enclosure, monitor for leaks at a minimum (but not limited to) at ground level along the perimeter of the tarp including all locations where gas sampling lines, fumigant supply lines, aeration system ductwork, monitoring lines, and electrical cords enter or exit the tarp perimeter. If a leak is detected (reading above 0 ppm), immediately repair the leak and document the location of the leak, the corrective action(s) taken, and the reading from the detection device before and after the corrective action(s).

v. At the beginning of aeration, the Permittee shall wait until a vacuum is started on the opposite end of the bulk enclosure (using the exhaust blower) before opening the tarpaulin to allow air to flow through the bulk enclosure. Immediately after opening, the Permittee shall monitor the perimeter of the opening for leaks. If a leak is detected, the Permittee shall reduce the size of the opening and re-monitor. This process shall be repeated until no leaks are detected.

vi. At the onset of aeration, the aeration system shall be monitored for leaks which includes (but is not limited to) the location where the aeration system exits (exhaust) the tarp and at each connection within the aeration system including connections at the stack and blower, at the aeration system fan/blower, and all aeration system valves, fittings, and connections. If a leak is detected, document the location of the leak, the corrective action(s) taken, and the readings from the detection device before and after the corrective action(s).

d. Reporting Requirements for LDAR Program for Bulk Fumigation: The Permittee shall submit the following reports:

i. An initial copy of the LDAR checklist matrix with the identified equipment and locations for monitoring leaks during fumigation and aeration shall be submitted to the Regional Supervisor DAQ within 30 days of issuance of the Air Quality Permit.

ii. A quarterly summary report, with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar year quarter for the following:

A. Certification that all LDAR monitoring and recordkeeping for the quarter were in accordance with the LDAR Program monitoring and recordkeeping requirements. The certification shall include confirmation based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

B. Submission of completed LDAR checklists for all fumigation monitoring activities that recorded detection of a leak during the reporting quarter. If no leaks were detected during the reporting quarter, the Permittee shall certify that no leaks were detected.

C. Any deviation(s) from the requirements specified in A.3.a., b, and c. above, along with an explanation as to why the deviation(a) occurred.

4. Exhaust Stack

a. Operating Requirements for Exhaust Stack: The exhaust stack shall be located, built and operated as described in the approved dispersion modeling submission to the DAQ, dated July 8, 2021 or in the case of ES-2A the approved dispersion modeling submission to the DAQ dated October 12, 2021. The stack shall be used for all fumigation operations during the aeration periods. The stack shall be no less than 40 feet in height and 20 by 20 inches square or equivalent discharge area and construction must be confirmed with as-built construction documentation.

b. Monitoring and Recordkeeping for Exhaust Stack: The Permittee shall maintain as-built construction schematics and photographs for the stack and aeration system on site and make them available for review upon request by DAQ.

5. Aeration

a. Operating Requirements for Bulk Aeration: The aeration system must be used during all aeration activities until the Permittee has demonstrated completion of the aeration period. In accordance with the approved toxic air pollutant dispersion modeling analysis (July 8, 2021), the Permittee shall meet the following (with the exception of A.6.5.a.i below, this section referencing performance testing and pressure monitoring is only applicable to the Primary Operating Scenario ES-2 and does not apply to the Alternate Operating Scenario ES-2A):

i. The start of aeration shall be conducted as follows: start the blower located under the tarp, inflate the collapsible duct, lift the tarp and place it on the top of the blower sealing the tarp along the top, sides and bottom against the sides of the blower using sand snakes, create an opening on the opposite side of the bulk pile to facilitate airflow and monitor/adjust the opening as specified in the LDAR section above.

ii. The blower and aeration ductwork shall be sized and designed to provide the required minimum stack velocity (> 57.6 fps) and minimum stack flow (> 9,600 scfm).

iii. A device to measure the centerline static and dynamic pressure within the stack shall be permanently installed.

iv. The pressure meter shall be installed in a rigid section of the stack appropriately distanced from duct obstructions and/or turbulence.

v. An initial performance test shall be conducted within 45 days of operation of the stack fan and ductwork equipment under the Primary Operating Scenario to verify the flow and velocity requirements in ii. above and to establish the minimum duct pressure associated with those values.

vi. After the initial performance test, annual performance tests validating the minimum pressure shall be conducted no more than 13 months apart.

vii. A stack test protocol shall be submitted and approved prior to any testing and establishment of the minimum pressure corresponding to the minimum velocity.

viii. During the initial and annual performance tests, the average "Standard" or "Mass" velocity indicated during testing shall be equal to or greater than the value used in the modeling analysis approved on July 23, 2021. The actual total pressure (static plus dynamic) indicated by the permanent pressure meter shall be recorded during testing as established in the approved stack testing protocol.

ix. Once the minimum total pressure is established during initial performance testing, and annual testing begins the new minimum pressure required will be established by averaging all subsequent minimum pressures established during the annual testing with the minimum pressure established during the initial performance test.

x. Duct pressure meters shall be operated, maintained, and calibrated in accordance with manufacturer's specifications, which shall be maintained on site for review by DAQ upon request.

xi. Duct pressure meter calibrations shall be performed no less than every 13 months.

b. Monitoring and Recordkeeping for Bulk Aeration: In order to demonstrate compliance with the minimum velocity (57.6 fps) and flow limitations (9,600 scfm), the following shall be monitored and recorded:

i. Velocity and flow data represented by parametric monitoring of pressure (established during annual testing) shall be recorded at the beginning and end of each fumigation aeration. The start and end time for each aeration of a bulk pile shall also be recorded. The duct pressure recorded at the beginning and end of

each fumigation shall be compared to the minimum pressure requirement established during the most recent test.

ii. Calibration and maintenance records for the pressure meters.

iii. All of the above records shall be maintained on site and made available for review upon request by DAQ.

c. Reporting for Bulk Aeration: The Permittee shall submit a quarterly summary report, with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar year quarter for the following:

i. Any deviations of the minimum pressure established during testing or an indication that no deviations occurred throughout the reporting period.

6. De-tarping/Opening Bulk Pile

a. Operating Requirements for De-Tarping Following Aeration: To demonstrate the end of the aeration period, the following activities shall be performed:

i. The tarpaulin may not be removed until the concentration of fumigant in the bulk pile at each of the three monitoring locations is at or below 5 ppm for two consecutive measurements (conducted no less than 15 minutes apart) using USDA-recommended instrumentation that will detect and analyze fumigant gases.

ii. If the concentration of fumigant is greater than 5 ppm, monitoring shall resume until the concentration inside the enclosure is measured to be at or below 5 ppm (with the blower off) for two consecutive readings no less than 15 minutes apart.

iii. The fumigant monitoring device(s) (Fumiscope or other comparable device) shall be maintained, operated, and calibrated in accordance with the manufacturer's recommendations which shall be maintained on-site for review by DAQ upon request. Calibrations shall be conducted no less than once per year.

b. Monitoring and Recordkeeping for De-tarping following Aeration: For each fumigation, the Permittee shall perform the following monitoring and recordkeeping and maintain the records on site for review by DAQ upon request:

i. The Permittee shall monitor all three sampling lines inside the container at the end of the aeration period with the aeration blower off. All measurements taken for all three monitoring lines with the dates, times, the names and titles of personnel performing the monitoring are recorded.

ii. The make and model of the detection devices shall be recorded along with dated calibration and maintenance records.

c. Reporting Requirements for De-Tarping following Aeration: The Permittee shall submit a quarterly summary report, with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar year quarter, for any deviations from the activities required in A.6.a. and A.6.b. above.

B. Fumigation in Containers — Methyl Bromide and/or Phosphine (ID No. ES-I)

Emission Control Requirements — To ensure compliance with the phosphine and methyl bromide emission limits, the following restrictions shall apply:

1. Fumigation Preparation

a. Operating Requirements for Container Fumigation Preparation: To mitigate leaks of fumigant during fumigation and aeration operations, the Permittee shall comply with the following requirements:

i. Inspect the container(s) prior to any fumigation to determine suitability for use. The inspection shall include the door seals, all six sides of the container, and the wooden floors underneath the container for any visible damage.

ii. Three fumigant sampling lines shall be used for monitoring methyl bromide and phosphine concentrations. Two of the fumigant sampling lines shall be placed inside the container at opposite ends, one at the top of the commodity at the front of the container, one at the bottom of the commodity near the rear and the third located in the middle of the container.

iii. Any potential sources of fugitive emissions shall be identified and sealed with tape and/or adhesive during the container inspection which includes, but is not limited to, the door seams, vents, and drains.

b. Monitoring and Recordkeeping Requirements for Container Fumigation Preparation: For each container fumigation the Permittee shall complete pre-fumigation inspection and container preparation activities with the dates and times of the inspections and the names and titles of personnel performing the inspections for each of the following items below. Records shall be maintained on site and made available upon request by the Division of Air Quality.

i. Results of the container's inspection prior to any fumigation to determine suitability for use. The inspection results shall include the door seals, all six sides of the container and the wooden floors underneath the container.

ii. Confirmation the fumigant sampling lines are in the appropriate locations described in condition B.1.a.ii. above (methyl bromide and phosphine).

iii. Documentation that all vents, drain holes, and other potential sources of fugitive emissions are sealed with tape/adhesive.

iv. Documentation whether fans were used inside the container to help with disbursing the fumigant.

c. Reporting Requirements for Container Fumigation Preparation: The Permittee shall submit a quarterly report with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar quarter, for any deviations from the requirements specified in B.I.a. and B.I.b. above. If no deviations occurred during the period, the report shall indicate such.

2. Container Fumigation

a. Operating Requirements for Container Fumigation: The Permittee shall be limited to phosphine container fumigation emissions of 2.5 lbs/hour under the Primary Operating Scenario ES-1 and shall be limited to methyl bromide container fumigation emissions of 2,230 lbs/day. The Permittee shall be limited to phosphine container fumigation emissions of 1.65 lbs/hour and 1,100 lbs/day methyl bromide under the Alternate Operating Scenario (ES-1A).

i. A scale shall be used to measure the amount of methyl bromide or gaseous phosphine used during each fumigation. The amount of fumigant used shall be determined by measuring the scale weight of the fumigant cylinder at the beginning and at the end of the application of fumigant and calculating the difference.

ii. The scale shall be operated, maintained, and calibrated in accordance with the manufacturer's recommendations and calibrated by the State, a company that is certified to conduct scale calibrations, or by the fumigator under the supervision of Plant Protection Quarantine (PPQ). The manufacturer's recommendations shall be maintained on site for review by DAQ upon request.

iii. The scale shall be calibrated following every repair and at a minimum of once per year. The certifier and date of calibration must be posted in a visible location or on the scale at all times.

iv. Once the container has received the desired level of methyl bromide or phosphine gas, the fumigant supply line(s) shall be disconnected from the fumigant cylinder(s), and the ends shall be taped shut to prevent fugitive emissions.

v. When using phosphine tablets, the tablets shall be introduced to the container, the aeration barrier is immediately installed and the doors closed.

b. Monitoring and Recordkeeping Requirements for Container Fumigation:

The Permittee shall monitor and record the following for each fumigation activity:

i. The scale weight of the fumigant cylinder at the beginning and the end of the application of methyl bromide or gaseous phosphine and the calculated difference.

ii. The total weight of solid and gases phosphine used in each "aeration event". That amount of solid or gaseous phosphine usage is assumed to be emitted during the first hour of every aeration event consistent with assumptions used to model compliance with 15A NCAC 2D .1104. This value shall be compared to the hourly limitations.

iii. Date and times for the beginning and end of the fumigation application period.

iv. When applicable, scale calibration data and/or scale maintenance record.

v. The number and size of containers for each fumigation activity.

vi. Confirmation the fumigant supply lines were sealed shut with tape after disconnecting from the fumigant cylinder.

vii. When using solid phosphine, confirmation the container was immediately sealed and the doors shut after introduction of the solid phosphine.

viii. The weight of solid phosphine added to each container.

ix. All of the above records shall be maintained on site and made available for review upon request by the DAQ.

c. Reporting Requirements for Container Fumigation: The Permittee shall submit a quarterly report with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar quarter for the following:

i. The monthly tonnage of methyl bromide and/or phosphine usage.

ii. The 12-month rolling tonnage of methyl bromide and/or phosphine usage for the three-month period.

iii. Confirmation that the daily and hourly fumigant limits contained in this permit were not exceeded or a listing of days when the limits were exceeded and the total fumigant usage for those days and/or hours. All phosphine emissions are assumed to be emitted in the first hour of aeration consistent with assumptions made by Ecolab in the ambient modeling submissions.

3. Leak Detection and Repair (LDAR)

a. Operating Requirements for LDAR:

i. An LDAR program shall be developed by the Permittee to identify and monitor all potential sources of leaks including (but not limited to) gas cylinders, fumigation delivery lines, vaporizer, container bottom four corners, along the door seals, at the midpoint (bottom) of the two side walls of the container, vents and drain holes, any area that was taped to seal damage to the container, and the locations where

aeration system ductwork, monitoring lines, fumigation lines, and electrical cord(s) enter and/or exit the container.

ii. The Permittee shall use a USDA-recommended instrument that will detect and analyze fumigant gases as part of a LDAR program. Any reading above 0 ppm is considered a leak. The leak detection monitors shall be operated, maintained, and calibrated in accordance with manufacturer's recommendations, which shall be maintained on site for review by DAQ upon request.

iii. To account for ambient background conditions interfering with LDAR monitoring activities, Section 8.3.2 of Method 21 of 40 CFR Part 60, Appendix A may be employed ("Determination of VOC Leaks").

b. The LDAR program shall include the following:

i. The sources of all potential leaks from equipment and/or locations where leaks may occur shall be identified in a checklist matrix for use on site by personnel implementing the LDAR program.

ii. Each potential source identified in the checklist matrix shall be monitored during each fumigation and aeration process at a distance of no more than 3 inches from the identified monitoring perimeters and points.

iii. When a leak is detected (reading above 0 ppm), corrective actions shall be implemented immediately and monitoring shall be repeated at the location of the leak to determine effectiveness of the corrective actions.

c. LDAR Monitoring and Recordkeeping Requirements for Container Fumigation and Aeration: The Permittee shall comply with the following monitoring and recordkeeping requirements:

i. Maintain records of handheld monitor calibration data and maintenance.

ii. The names and titles of persons performing the leak detection monitoring shall be recorded on the completed LDAR checklist with the dates, times, locations of monitoring, fumigant concentration readings for any detected leaks before and after repair, and corrective actions taken for iii. Through iv. Below.

iii. At the onset of the application of fumigant to the container, The Permittee shall leak check the fumigation delivery system including (but not limited to) the gas cylinder, the gas fumigation tubing, vaporizer, and all fittings and connections for the system. If a leak is detected (reading above 0 ppm), immediately repair the leak and document the location of the leak, the corrective actions taken, and the reading from the detection device before and after the corrective actions. Discontinue the application of fumigant and take corrective actions before reintroducing more fumigant.

iv. At the end of the addition of fumigant to the container, monitor for leaks with handheld monitors at a minimum of the bottom four corners, along the door seals, at the midpoint (bottom) of the two side walls of the container, at vents and drain holes, the locations where aeration system ductwork, monitoring lines, fumigation lines, and electrical cord enters and/or exits the container, and any area that was taped to seal damage to the container.

v. If a container exhibits leaks which cannot be sufficiently repaired using tape and adhesive, fumigant delivery to the container shall be immediately stopped and a tarp shall be placed over the container and sealed to the ground using sandbags (using methods described in the Fumigation Preparation section of this permit for bulk piles). The bottom edges of the tarp shall be monitored for leaks and documented as described in the LDAR section of this permit for bulk piles (Specific Condition 6.A.3).
Corrective actions shall be taken to address any leaks until the enclosure is deemed leak free.

vi. Once the tarp covered container is determined to be leak free, fumigation of the container may resume.

vii. A tarp large enough to cover the container and truck chassis (if used) shall be maintained on-site at all times during active fumigation.

viii. Immediately following start-up of the aeration blower, monitor the perimeter of the air inlet to the container for leaks. If a leak is detected reduce the size of the air intake and monitor the perimeter again. Repeat this process until no leaks are detected.

ix. At the beginning of aeration, monitor the air inlet to the container. If leaks are detected, decrease the size of the opening and re-monitor for leaks. Repeat the process until no leaks are detected.

d. LDAR Reporting Requirements for Containers: The Permittee shall submit the following reports:

i. An initial copy of the LDAR checklist matrix with the identified equipment and locations for monitoring leaks during fumigation and aeration shall be submitted to the Regional Supervisor DAQ within 30 days of issuance of the Air Quality Permit.

ii. A quarterly summary report, with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar year quarter for the following:

A. Certification that all LDAR monitoring and recordkeeping for the quarter were in accordance with the LDAR Program monitoring and recordkeeping requirements. The certification shall include confirmation based on information and belief formed after reasonable

inquiry, the statements and information in the document are true, accurate, and complete.

B. Submission of all completed LDAR checklists for all fumigation monitoring activities that recorded detection of a leak during the reporting quarter. If no leaks were detected during the reporting quarter, the Permittee shall certify that no leaks were detected.

C. Any deviation(s) from the requirements specified in B.3. a., b., and c. above, with an explanation as to why the deviation(s) occurred.

4. Exhaust Stack for Containers

a. Operating Requirements for Exhaust Stack: The exhaust stack shall be built and operated as described in the approved dispersion modeling submission to the DAQ, dated July 8, 2021 or in the case of the Alternate Operating Scenario ES-2A the approved dispersion modeling submission to the DAQ dated October 12, 2021. The stack shall be used for all fumigation operations during the aeration periods. The stack shall be no less than 40 feet in height, located at the coordinates provide in the dispersion modeling referenced above and 20 by 20 inches exhaust or equivalent discharge area and construction must be confirmed with as built construction documentation.

b. Monitoring and Recordkeeping for Exhaust Stack: The Permittee shall maintain as-built construction for the stack and aeration system on site and make them available for review upon request by DAQ.

5. Aeration

a. Operating Requirements for Container Aeration: The aeration system must be used during all aeration activities until the Permittee has demonstrated completion of the aeration period. In accordance with the approved toxic air pollutant dispersion modeling analysis (dated July 8, 2021), the Permittee shall meet the following (this section referencing performance testing and pressure monitoring is only applicable to the Primary Operating Scenario ES-1 and does not apply to the Alternate Operating Scenario ES-1A):

i. The blower and aeration ductwork shall be sized and designed to provide the required minimum stack velocity (> 57.6 fps) and minimum stack flow (> 9,600 scfm).

ii. A device to measure the centerline static and dynamic pressure within the stack shall be permanently installed.

iii. The pressure meter shall be installed in a rigid section of the stack appropriately distanced from duct obstructions and/or turbulence.

iv. An initial performance test shall be conducted within 45 days of operation under the Primary Operating Scenario ES-1 to verify the flow and velocity requirements in 5.a.i. above to establish the minimum duct pressure associated with those values.

v. After the initial performance test, annual performance tests validating the minimum pressure shall be conducted no more than 13 months apart.

vi. A stack test protocol shall be submitted and approved prior to any testing and establishment of the minimum pressure corresponding to the minimum velocity.

vii. During the initial and annual performance tests, the average "Standard" or "Mass" velocity indicated during testing shall be equal to or greater than the value used in the modeling analysis approved on July 23, 2021. The actual total pressure (static plus dynamic) indicated by the permanent pressure meter shall be recorded as specified in the approved stack testing protocol.

viii. Once the minimum total pressure is established during initial performance testing, and annual testing begins, the new minimum pressure required will be established by averaging all subsequent minimum pressures established during the annual testing with the minimum pressure established during the initial performance test.

ix. Duct pressure meters shall be operated, maintained, and calibrated in accordance with manufacturer's specifications, which shall be maintained on site for review by DAQ upon request.

x. Duct pressure meter calibrations shall be performed no less than every 13 months.

xi. At the beginning of aeration, monitor the air inlet to the container as described in the LDAR section for containers in this permit. If leaks are detected, decrease the size of the opening and re-monitor for leaks. Repeat the process until no leaks are detected.

xii. If a tarp was used over the container aerate the tarp in accordance with the procedures contained in the Operating Requirements for Bulk Fumigation section of this permit prior to removing the tarp and aerating the container as described above.

b. Monitoring and Recordkeeping for Container Aeration: In order to demonstrate compliance with the minimum velocity (57.6 fps) and flow limitations (9,600 scfm), the following shall be monitored and recorded when operating in the Primary Operating Scenario ES-1:

i. Velocity and flow data represented by parametric monitoring of pressure shall be recorded at the beginning and end of each fumigation aeration. The start and end time for each aeration of a container shall also be recorded. The duct pressure recorded at the beginning and end of each fumigation shall be compared to the minimum pressure requirement established during the most recent test.

ii. Calibration and maintenance records for the pressure meters.

All of the above records shall be maintained on site and made available for review upon request by DAQ.

c. Reporting for Bulk Aeration: The Permittee shall submit a quarterly summary report, with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar year quarter for the following:

i. Any deviations of the minimum pressure established during the most recent testing throughout the reporting period.

6. Opening Containers

a. Operating Requirements for Completion of Container Aeration: To demonstrate the end of the aeration period, the following activities shall be performed:

i. The container may not be opened until the concentration of the fumigant in the container at each of the three monitoring locations is at or below 5 ppm for two consecutive measurements (conducted no less than 15 minutes apart) using USDA-recommended instrumentation that will detect and analyze fumigant gases.

ii. If the concentration of fumigant is greater than 5 ppm, monitoring shall resume until the concentration inside the container is measured to be at or below 5 ppm (with the blower off) for two consecutive readings no less than 15 minutes apart.

iii. If a container was tarped in response to an un-sealable leak, the void between the tarp and container shall be aerated. A value of 5ppm or less shall be verified using the handheld LDAR device prior to de-tarping and aerating the container.

iv. The fumigant monitoring device(s)shall be maintained, operated, and calibrated in accordance with the manufacturer's recommendations which shall be accessible on-site for review by DAQ request. Calibrations shall be conducted no less than once per year.

b. Monitoring and Recordkeeping Requirements for Completion of Container Aeration:

The Permittee shall perform the following monitoring and recordkeeping and maintain the records on site and available for review by DAQ upon request:

i. The Permittee shall monitor all three sampling lines inside the container at the end of the aeration period with the blower off. All measurements taken for all three monitoring lines with the dates, times, the names and titles of personnel performing the monitoring are recorded.

ii. The make and model of the detection devices shall be recorded along with dated calibration and maintenance records.

c. Reporting Requirements: The Permittee shall submit a quarterly summary report, with the original signature of the authorized responsible official, postmarked no later than 30 days after the end of each calendar year quarter, for any deviations from the activities required in B.6.a. and B.6.b. above.

7. CONTROL AND PROHIBITION OF ODOROUS EMISSIONS - As required by 15A NCAC 2D .1806 "Control and Prohibition of Odorous Emissions" the Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

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

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

1. Operations Restrictions - To ensure emissions do not exceed the limitations above, the following restrictions shall apply:

i. The amount of methyl bromide and phosphine actual emissions shall each be less than 10 tons per consecutive 12-month period.

ii. All methyl bromide and phosphine used are assumed to be emitted.

b. Recordkeeping Requirements

i. The Permittee shall record monthly the following:

A. The facility-wide actual methyl bromide and phosphine usage (emissions) in tons per month.

B. The 12-month rolling total methyl bromide and phosphine usages in tons per 12-months (rolling total).

c. Reporting Requirements - Within 30 days after each calendar year quarter, regardless of the actual emissions, the Permittee shall submit the following:

i. The rolling 12-month total tons of methyl bromide and phosphine for the calendar year.

B. GENERAL CONDITIONS AND LIMITATIONS

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

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

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

2. RECORDS RETENTION REQUIREMENT - In accordance with 15A NCAC 2D .0605, any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. These records must be kept on site for a minimum of 2 years, unless another time period is otherwise specified.

3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.

4. EQUIPMENT RELOCATION - In accordance with 15A NCAC 2Q .0301, a new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.

5. REPORTING REQUIREMENT - In accordance with 15A NCAC 2Q .0309, any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:

   a. changes in the information submitted in the application regarding facility emissions;

   b. changes that modify equipment or processes of existing permitted facilities; or

   c. changes in the quantity or quality of materials processed.

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

6. In accordance with 15A NCAC 2Q .0309, this permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. In accordance with G.S. 143-215.108(c)(1), the facility shall be properly operated and maintained at all times in a manner that will effectuate an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.

7. In accordance with G.S. 143-215.108(c)(1), this permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.

8. In accordance with G.S. 143-215.108(c)(1), this issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.

9. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.

10. In accordance with 15A NCAC 2D .0605, reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.

11. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.

12. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

13. In accordance with G.S. 143-215.108(c)(1), this permit does not relieve the Permittee of the responsibility of complying with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.

14. PERMIT RETENTION REQUIREMENT - In accordance with 15A NCAC 2Q .0110, the Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.

15. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 15A NCAC 2D .2100 "Risk Management Program," if the Permittee is required to develop and register a risk

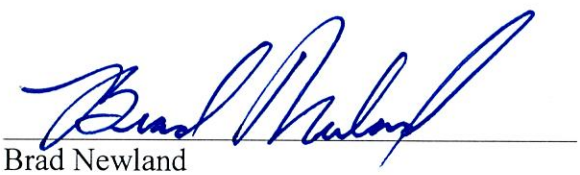
management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan with the USEPA in accordance with 40 CFR Part 68.

16. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**

17. GENERAL EMISSIONS TESTING AND REPORTING REQUIREMENTS - If emissions testing is required by this permit, or the DAQ, or if the Permittee submits emissions testing to the DAQ in support of a permit application or to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 2D .2600 and follow all DAQ procedures including protocol approval, regional notification, report submittal, and test results approval. Additionally, in accordance with 15A NCAC 2D .0605, the Permittee shall follow the procedures for obtaining any required audit sample and reporting those results.

Permit issued this the 8th day of November, 2021.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION



Brad Newland
Wilmington Regional Supervisor
By Authority of the Environmental Management Commission