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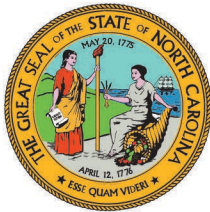
Governor

ELIZABETH S. BISER

Secretary

MICHAEL ABRACZINSKAS

Director



NORTH CAROLINA
Environmental Quality

August 19, 2021

Mr. Mark Maloney
Manager
Optima TH
4441-106 Six Forks Road, Unit 379
Raleigh, NC 27609

SUBJECT: Completeness Determination
Modification of Permit No. 10673R00
Application No. 0900096.21A
Optima TH
Facility ID: 0900096, Tar Heel, Bladen County

Dear Mr. Maloney:

On August 6, 2021, NC Division of Air Quality (DAQ) sent an acknowledgement letter to you, regarding the receipt of the subject application. Through this letter, DAQ deemed the application “complete” for processing effective July 30, 2021, unless informed otherwise within 60 days of the receipt of the application.

It is DAQ’s understanding that the referenced application is submitted pursuant to the Condition A.9 of the subject permit, which requires Optima TH to obtain an initial Title V permit.

Upon review, DAQ believes that the application is not just for satisfying the initial Title V permitting requirement, but also for modifying the current permit with respect to how the facility has been actually constructed and operated. The Permittee specifies both physical and operational changes to the permitted equipment or facility. For example, the application includes (i) permanent closure of delivery of biogas to the existing flare; thus, removing the gas upgrading system (GUS) bypass operation, (ii) burning both the on-site generated product gas and the off-site generated natural gas in the existing flare for meeting NC’s SO₂ standard, (iii) removal of additional (325 scfm) biogas flaring capacity for the facility beyond the tail gas and product gas flaring, as applicable, associated with the GUS’s design capacity (900 scfm). All these changes affect compliance with the current permit and create a different set of criteria for compliance than the criteria upon which the current permit is based upon.



Mr. Mark Maloney

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DAQ recognizes these changes as meeting the definition of “modification”¹ as defined in 15A NCAC 02Q .0103(23). Therefore, the Permittee is required to pay the processing fees of \$1,002 per DAQ’s current fees schedule² before the application can be processed. Thus, DAQ deems the application “incomplete” for processing. The application will remain incomplete until the required fees are paid. You can use the DAQ’s electronic payment platform³ for this payment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark J. Cuilla".

Mark J. Cuilla, EIT, CPM, Chief, Permitting Section
Division of Air Quality, NCDEQ

cc: Fayetteville Regional Office
Central Files

¹ “means any physical change or change in method of operation that results in a change in emissions or affects compliance status of the source or facility.”

² [SKM_C36820121418090 \(nc.gov\)](#).

³ [NC DEQ: Air Quality Application ePayments](#).