

## Chalam Pakala Engineering and Environmental Solutions

10017 Allyson Park Dr., Charlotte, NC 28277 Tel: (704) 541-4042 Fax: (704) 541-4043

October 31, 2019

**Ms. Heather Carter**, Regional Supervisor  
System Building  
225 Green Street, Suite 74  
Fayetteville, North Carolina 28301

**Re: Air Permit Request for Pellet Manufacturing Air Emission Sources**  
Active Energy Renewable Power  
1885 Alamac Road  
Lumberton, Robeson County, North Carolina  
**CPEES Project No. 1198-001**

Dear Ms. Carter:

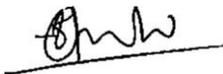
On behalf of Active Energy Renewable Power (AERP), per the requirements of NC DEQ - Division of Air Quality, CP Engineering and Environmental Solutions (CPEES) is pleased to submit an Air Permit request for all the proposed air emission sources at the subject facility located in Lumberton, Robeson County, North Carolina. In an effort to ensure that all proposed operations are under the permit exemption or in need of a permit, AERP had retained CPEES to review all the proposed operations and to calculate air emissions at the subject facility. The air emission sources at the facility include: one 20mmBTU/hr Boiler, 4mmBTU/hr Dryer, one Screw Press and Pellet Making. A condenser, as a control device, is proposed for the pressure cooker to condense VOCs and other pollutants from the pressure cooker operations. Based on the air emissions calculations performed for all the proposed air emission sources at the subject facility, CPEES has concluded that an Air Permit is required for the proposed air emission sources due to VOC emissions expected from the proposed sources. A few insignificant sources approved by NC DEQ will be in the permit as per the several NC DEQ exemption criteria. The enclosed permit exemption application package includes:

- Permit fee \$50
- State air permit forms (A1, A2, A4, B, B2, C7, D1, D2, D2A, D3, D4, D5);
- Facility Operations and Air Emission Sources Description;
- Air emissions calculations for the proposed air emission sources with supporting documentation; and
- Process Flow Schematic;
- Site USGS Topo Map.

Please call Mr. Antonia Esposito of AERP at 910-547-1920 or me at (704) 541-4042 if you have any questions or comments on this permit exemption package. We appreciate your help and cooperation on the progress of this project.

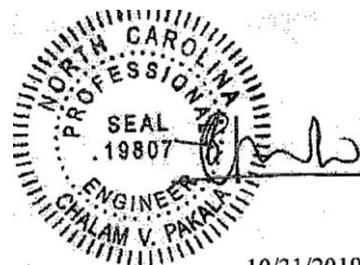
Respectfully submitted,

**CP Engineering and Environmental Solutions**  
(A Cost Effective Solution Provider for Manufacturing)



Chalam V. Pakala, P.E.  
Managing Principal

Attachments: Air Permit Exemption Package



10/31/2019

# *Air Permit Request for all the Proposed Air Emission Sources*

Prepared for:



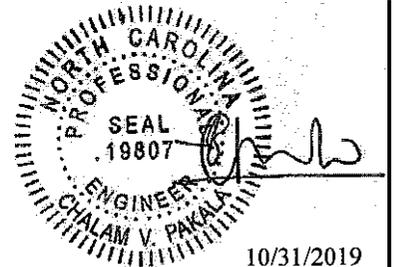
ACTIVE  
ENERGY  
GROUP

**Active Energy Renewable Power**

1885 Alamac Road

Lumberton, Robeson County, North Carolina

CPEES Project No. 1198-001  
October 31, 2019



Prepared by:

**Chalam Pakala Engineering and Environmental Solutions**

10017 Allyson Park Dr.

Charlotte, North Carolina 28277

Tel: (704) 541-4042 Fax: 704-541-4043

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## 1.0 FACILITY DESCRIPTION AND MANUFACTURING OPERATIONS

Active Energy Renewable Power (AERP) located at 1885 Alamac Road, Lumberton, Robeson County, North Carolina, manufactures wooden pellets for fuel source for industries. The geographic site location can also be given as 34°35'20.49"North Latitude and 79° 0'21.99"West Longitude (Figure 1). AERP proposed operations at the facility are 8000 hrs per year (potential hours are 24hrs/day, 7 days/wk and 52 wks/year = 8760 hrs/year).

## 2.0 PROPOSED AIR EMISSION SOURCES

The proposed air emissions sources at the site are:

Air Emissions Source ID	Sources	Rating	Release	Control Device
<b>Pellet Manufacturing</b>				
ES-B-1	Natural Gas fired Boiler	20mmBTU/hr	Outside	None
ES-D-1	Natural Gas fired Dr er	4mmBTU/hr	Outside	None
ES-P-1	Pressure Cooker with a Condenser 80-95%	Max 5 ton/hr	Outside	None
ES-SPD-1	Screw Press/Dryer/Pellet Press	Max 5 ton/hr	Outside	None
ES-PS-I	Pellet Stora e	Max 5 ton/hr	Intside	None

The process includes:

1. Dry chips received at the site are pressure cooked using steam generated from a 20 mmBTU/hr boiler. The released steam with all VOCs and HAPs/TAPs is condensed using a condenser and the condensed liquids are either disposed of/ sold of as a side product. We believe 20% emissions will be released from this operation.
2. Wet chips from the pressure cooker are sent to Screw Press for pellet making. We believe 80-90% of VOCs in the raw chips are removed during the pressure cooking process and small amounts of VOCs will be released from the Screw Press/Pellet Making/lyring. No coolers will be present with the Screw Press unlike Enviva or other pellet manufacturing facilities.
3. The proposed process is a new process and therefore, we do not have any relevant Emission Factors to calculate air emissions from the proposed sources. Therefore, based on our discussions with Mr. Greg Reeves of the NC DEQ, we have obtained EFs from the Enviva Stack Tests conducted in 2017 and 2018. Our air emissions calculations were based on Emissions Factors (EF) collected from above described Enviva Stack test results supplied by the State. No coolers will be installed at this rocess unlike Enviva.
4. *Based on the NC DEQ Wood Waste Burning Worksheet, VOC EF was 0.272 lb/ton and the facility wide VOCs for the 36000 ODT would be 4.896 tons/year. Therefore, we believe the VOC EFs supplied by the State for VOCs were too high for our processes. However, for the permitting purpose, AERP and CPEES had used the State supplied EF for VOCs and HAPs.*

The process Flow Schematic is attached with this report.

### 3.0 REGULATED AIR POLLUTANTS EMISSIONS CALCULATIONS

CP Engineering and Environmental Solutions (CPEES) performed calculations for the actual and potential air emissions for all the identified sources. The actual and potential air emissions are based on emissions calculated from operations: 24 hours a day and 365 days a year (8,760 hours).

Based on the air emission calculations for the proposed sources, VOC emissions were above the 5.0 ton/year limit and therefore the facility needs an air permit for the installation and operation of the proposed sources. The Hazardous Air Pollutants (HAPs) were below the 10 for a single constituent and 25 tons/yr for the combined emissions. Further, the Toxic Air Pollutants (TAPs) were below the TPER limits and thus, NO modeling is required at this time.

The calculations and the tabulated results are presented in the attached tables. Any supporting documentation used for the air emission calculations is provided in Attachment A.

### 4.0 PAST INSIGNIFICANT/EXEMPTED SOURCES ACTIVE ENERGY WOULD LIKE TO KEEP IN THE PERMIT

Lumberton Energy Holdings, LLC acquired the Air Permit (permit #0362R23, Facility ID #7800003) from the previous company when the company sold the building to Lumberton Energy Holdings. However, Lumberton Energy Holding, LLC do not either operate/remove majority of the permitted sources at the facility except the Insignificant Emission Sources listed below. Please note Lumberton Energy Holdings, LLC is the parent company for Active Energy Renewal Power and Active Energy Renewal Power would like to rescind the current Air Permit and obtain a new permit or the exemption status under Active Energy Renewal Power.

Description of the Source	Emission Rate
<b>IES-WWTP</b> One wastewater treatment plant	2Q .0102 (g)(6)
<b>IES-FP</b> Diesel-fired fire pump (180 horsepower) (NESHAP ZZZZ)	2Q.0102 (h)(S)
<b>IES-GEN</b> Diesel-fired emergency generator (15 horsepower) (NESHAPZZZZ)	2Q .0102 (h)(S)
<b>IES-PROPANE</b> Propane vaporizer	2Q .0102 (h)(S)

# PERMIT APPLICATION

Active Energy Air Permit Matrix  
 Lumberton, NC

	A-1 (Forris Settlement)	A1 Minor	A2	A3	B Forms	C Forms	D1	D2	D2A	D3	D4	D5	D6	II
New Facility (Unpermitted) / Greenfield	X		X	XX	XX	XX	X	XX	XX	XX	XX	XX	XX	



FORM A {continued, page 2 of 2}

GENERAL FACILITY INFORMATION

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

A

SECTION AA1 - APPLICATION FOR NON-TITLE V PERMIT RENEWAL/A

ACTIVE ENERGY RENEWABLE POWER

(Company Name) hereby formally requests renewal of Air Permit No. \_\_\_\_\_

There have been no modifications to the originally permitted facility or the operations therein that would require an air permit since the last permit was issued.

Is your facility subject to 40 CFR Part 68 "Prevention of Accidental Releases" - Section 112(r) of the Clean Air Act?

YES @ NO

If yes, have you already submitted a Risk Management Plan (RMP) to EPA?

YES  NO

Date Submitted: \_\_\_\_\_

Did you attach a current emissions inventory?

YES

NO

If no, did you submit the inventory via AERO or by mail?

Mailed

Date Mailed: N/A

SECTION AA2- APPLICATION FOR TITLE V PERMIT RENEWAL/A

In accordance with the provisions of Title 15A 2Q .0513, the responsible official of \_\_\_\_\_ (Company Name)

hereby formally requests renewal of Air Permit No. \_\_\_\_\_ (Air Permit No.) and further certifies that:

- (1) The current air quality permit identifies and describes all emissions units at the above subject facility, except where such units are exempted under the North Carolina Title V regulations at 15A NCAC 20 .0500;
- (2) The current air quality permit cites all applicable requirements and provides the method or methods for determining compliance with the applicable requirements;
- (3) The facility is currently in compliance, and shall continue to comply, with all applicable requirements. (Note: As provided under 15A NCAC 20 .0512 compliance with the conditions of the permit shall be deemed compliance with the applicable requirements specifically identified in the permit);
- (4) For applicable requirements that become effective during the term of the renewed permit that the facility shall comply on a timely basis;
- (5) The facility shall fulfill applicable enhanced monitoring requirements and submit a compliance certification as required by 40 CFR Part 64.

The responsible official (signature on page 1) certifies under the penalty of law that all information and statements provided above, based on information and belief formed after reasonable inquiry, are true, accurate, and complete.

SECTION AA3- APPLICATION FOR NAME CHANGE

New Facility Name: \_\_\_\_\_

Former Facility Name: \_\_\_\_\_

An official facility name change is requested as described above for the air permit mentioned on page 1 of this form. Complete the other sections if there have been modifications to the originally permitted facility that would require an air quality permit since the last permit was issued and if there has been an ownership change associated with this name change.

SECTION AA4- APPLICATION FOR AN OWNERSHIP CHANGE

By this application we hereby request transfer of Air Quality Permit No. \_\_\_\_\_

The transfer of permit responsibility, coverage and liability shall be effective \_\_\_\_\_

from the former owner to the new owner as described below.

(immediately or insert date.) The legal ownership of the

facility described on page 1 of this form has been or will be transferred on \_\_\_\_\_

(date). There have been no modifications to the originally

permitted facility that would require an air quality permit since the last permit was issued.

Signature of New (Buyer) Responsible Official/Authorized Contact (as typed on page 1):

X Signature (Blue Ink): \_\_\_\_\_

Date:

New Facility Name:

Former Facility Name:

Signature of Former (Seller) Responsible Official/Authorized Contact:

Name (typed or print):

Title:

X Signature (Blue Ink): \_\_\_\_\_

Date:

Former Legal Corporate/Owner Name:

In lieu of the seller's signature on this form, a letter may be submitted with the seller's signature indicating the ownership change

SECTION AA5- APPLICATION FOR ADMINISTRATIVE AMENDMENT

Describe the requested administrative amendment here (attach additional documents as necessary):

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: \_\_\_\_\_ ; FACILITY ID# \_\_\_\_\_  
FORMs A2,A3  
EMISSION SOURCE LISTING FOR THIS APPLICATION • A2  
112r APPLICABILITY INFORMATION -A3**

REVISED 09/22/16

NCDEQ/Division of Air Quality • Application for Air Permit to Construct/Operate

**A2**

<b>EMISSION SOURCE LISTING: New, Modified, Previously Unpermitted, Replaced, Deleted</b>			
EMISSION SOURCE ID NO.	EMISSION SOURCE DESCRIPTION	CONTROL DEVICE ID NO.	CONTROL DEVICE DESCRIPTION
<b>Equipment To Be ADDED By This Application (New, Previously Unpermitted, or Replacement)</b>			
ES-B-1	ONE 20MMBTU/HR NATURAL GAS FIRED BOILER	NA	NONE
ES-P-1	ONE PRESSURE COOKER WITH 20MMBTU/HR NATURAL GAS FIRED BOILER (ES-B-1)	ES-CD-1	WATER CIRCULATION CONDENSER
ES-D-1	ONE 4MMBTU/HR NATURAL GAS FIRED DRYER	NA	NONE
ES-SPD-1	ONE SCREW PRESS W/DRYER (ES-0-1)/PELLET PRESS	NA	NONE
<b>Existing Permitted Equipment To Be MODIFIED By This Application</b>			
IES-WWTP	ONE WASTEWATER TREATMENT		
IES-FP	DIESEL-FIRED FIRE PUMP (180 HP) (NESHAP ZZZZ)		NONE
IES-GEN	DIESEL-FIRED EMERGENCY GENERATOR (15 HP) (NESHAP ZZZZ)	NA	NONE
JES-PROPANE	PROPANE VAPORIZER	NA	NONE
P-STG	PELLET STORAGE	NA	NONE
<b>Equipment To Be DELETED By This Application</b>			

<b>112(r) APPLICABILITY INFORMATION</b>			<b>A3</b>
Is your facility subject to 40 CFR Part 68 "Prevention of Accidental Releases" - Section 112(r) of the Federal Clean Air Act?			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If No, please specify in detail how your facility avoided applicability:			<u>REVIEW OF CHEMICALS AND THEY ARE BELOW THE THRESHOLD VALUES</u>
If your facility is Subject to 112(r), please complete the following:			
A. Have you already submitted a Risk Management Plan (RMP) to EPA Pursuant to 40 CFR Part 68.10 or Part 68.150?			
D Yes    D No                      Specify required RMP submittal date: _____                      If submitted, RMP submittal date: _____			
B. Are you using administrative controls to subject your facility to a lesser 112(r) program standard?			
D Yes    D No                      If yes, please specify: _____			
C. List the processes subject to 112(r) at our facility:			
PROCESS DESCRIPTION	PROCESS LEVEL (1, 2, or 3)	HAZARDOUS CHEMICAL	MAXIMUM INTENDED INVENTORY (LBS)

**Attach Additional Sheets As Necessary**

# ACTIVE ENERGY RENEWABLE POWER LUMBERTON, NC

**AIR PERMIT: \_\_\_\_\_ ; FACILITY ID# \_\_\_\_\_  
FORM B**

## SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

**B**

EMISSION SOURCE DESCRIPTION: ONE 20MMBTU/HR NATURAL GAS FIRED BOILER		EMISSION SOURCE ID NO:ES-B-1	
OPERATING SCENARIO <u>  1  </u> OF _____		CONTROL DEVICE ID NO(S):NA	
DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM): 20MMBTU/HR NATURAL GAS FIRED BOILER TO GENERATE STEAM		EMISSION POINT (STACK) ID NO(S):EP-B-1	
TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-89 ON THE FOLLOWING PAGES):			
<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form 81)	<input type="checkbox"/> Woodworking (Form 84)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form 87)	
<input checked="" type="checkbox"/> Int. combustion engine/generator (Form 82)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form BB)	
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form 89)	
START CONSTRUCTION DATE: NOVEMBER 2019		DATE MANUFACTURED: NOVEMBER 2019	
MANUFACTURER/ MODEL NO.:		EXPECTED OP. SCHEDULE: 22_HR/DAY    7_DAY/WK    52_WK/YR	
IS THIS SOURCE SUBJECT TO? <input type="checkbox"/> NSPS (SUBPARTS?):		<input type="checkbox"/> NESHAP (SUBPARTS?):	
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25    MAR-MAY 25    JUN-AUG 25    SEP-NOV 25			

### CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTR. LS/ LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS/ LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42/NC DEQ	0.01	0.04	0.01	0.04	0.01	0.04
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )	AP-42/NC DEQ	0.01	0.04	0.01	0.04	0.01	0.04
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )	AP-42/NC DEQ	0.01	0.04	0.01	0.04	0.01	0.04
SULFUR DIOXIDE (SO <sub>2</sub> )	AP-42/NC DEQ	0.01	0.05	0.01	0.05	0.01	0.05
NITROGEN OXIDES (NO <sub>x</sub> )	AP-42/NC DEQ	1.96	7.84	1.96	8.59	1.96	8.59
CARBON MONOXIDE (CO)	AP-42/NC DEQ	1.65	6.59	1.65	7.21	1.65	7.21
VOLATILE ORGANIC COMPOUNDS (VOC)	AP-42/NC DEQ	0.11	0.43	0.11	0.47	0.11	0.47
LEAD							
OTHER							

### HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CASNO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
			lb/hr	lbs/yr	lb/hr	lbs/yr	lb/hr	lbs/yr
AMMONIA (n)	7664417					549.65	6.27E-02	549.65
Benzene (TH)	71432	AP-42/NC DEQ	4.12E-05	0.33	4.12E-05	0.36	4.12E-05	0.36
Cobalt unlisted compounds (H)	COG-other	AP-42/NC DEQ	1.65E-06	0.01	1.65E-06	0.01	1.65E-06	0.01
Formaldehyde (TH)	50000	AP-42/NC DEQ	1.47E-03	11.76	1.47E-03	12.88	1.47E-03	12.88
Hexane, n- (TH)	110543	AP-42/NC DEQ	3.53E-02	282.35	3.53E-02	309.18	3.53E-02	309.18
Lead unlisted compounds (H)	PBC-other	AP-42/NC DEQ	9.80E-06	0.08	9.80E-06	0.09	9.80E-06	0.09
Napthalene (H)	91203			0.10	1.20E-05	0.10		0.10
Toluene (TH)								

### TOXIC AIR

TOXIC AIR POLLUTANT	CASNO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS/ LIMITATIONS		
			lb/hr	lb/day	lb/yr
Acetaldehyde (TH)	75070	AP-42/NC DEQ	2.98E-07	6.56E-06	0.00
Acrolein (TH)	107028	AP-42/NC DEQ	3.53E-07	7.76E-06	0.00
Ammonia (T)	7664417	AP-42/NC DEQ	6.27E-02	1.38E+00	501.95
Arsenic unlisted compounds (TH)	ASC-other	AP-42/NC DEQ	0.00E+00	0.00E+00	0.00
Benzene (TH)	71432	AP-42/NC DEQ	4.12E-05	9.06E-04	0.33
Benzo(a)pyrene (TH)	50328	AP-42/NC DEQ	2.35E-08	5.18E-07	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	1.47E-03	3.24E-02	11.76
Hexane, n- (TH)	110543	AP-42/NC DEQ	3.53E-02	7.76E-01	282.35
Toluene (TH)	108883	AP-42/NC DEQ	6.67E-05	1.47E-03	0.53

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

**COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE  
Attach Additional Sheets As Necessary**

# ACTIVE ENERGY RENEWABLE POWER LUMBERTON, NC

AIR PERMIT: \_\_\_\_\_ ; FACILITY ID# \_\_\_\_\_

## FORM B

### SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 09/22/16

NCDEQ/Division of Air Quality -Application for Air Permit to Construct/Operate

**B**

EMISSION SOURCE DESCRIPTION: ONE 4MMBTU/HR NATURAL GAS FIRED BOILER	EMISSION SOURCE ID NO:ES-D-1
OPERATING SCENARIO 1 OF	CONTROL DEVICE ID NO(S):NA
	EMISSION POINT (STACK) ID NO(S):EP-D-1

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
4MMBTU/HR NATURAL GAS FIRED DRYER TO DRY WET WOOD CHIP PULP

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM 81-89 ON THE FOLLOWING PAGES):

- |  |  |   |
|--|--|---|
| <input type="radio"/> Coal, wood, oil, gas, other burner (Form B1) | <input type="radio"/> Woodworking (Form 84)                | <input type="radio"/> Manuf. of chemicals/coatings/inks (Form B7) |
| <input type="radio"/> Int. combustion engine/generator (Form B2)   | <input type="radio"/> Coating/finishing/printing (Form B5) | <input type="radio"/> Incineration (Form B8)                      |
| <input type="radio"/> Liquid storage tanks (Form B3)               | <input type="radio"/> Storage silos/bins (Form B6)         | <input type="radio"/> Other (Form 89)                             |

START CONSTRUCTION DATE: NOVEMBER 2019	DATE MANUFACTURED: NOVEMBER 2019
MANUFACTURER/ MODEL NO.:	EXPECTED OP. SCHEDULE: 22 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT TO?  NSPS (SUBPARTS?): \_\_\_\_\_  NESHAP (SUBPARTS?): \_\_\_\_\_

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

#### CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	AP-42/NC DEQ	0.00	0.01	0.01	0.04	0.01	0.04
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )	AP-42/NC DEQ	0.00	0.01	0.01	0.04	0.01	0.04
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )	AP-42/NC DEQ	0.00	0.01	0.01	0.04	0.01	0.04
SULFUR DIOXIDE (SO <sub>2</sub> )	AP-42/NC DEQ	0.00	0.01	0.00	0.01	0.00	0.01
NITROGEN OXIDES (NO <sub>x</sub> )	AP-42/NC DEQ	0.39	1.57	0.39	1.72	0.39	1.72
CARBON MONOXIDE (CO)	AP-42/NC DEQ	0.33	1.32	0.33	1.44	0.33	1.44
VOLATILE ORGANIC COMPOUNDS (VOC)	AP-42/NC DEQ	0.02	0.09	0.02	0.09	0.02	0.09
LEAD							

#### HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE

HAZARDOUS AIR POLLUTANT	CASNO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
			lb/hr	lbs/yr	lb/hr	lbs/yr	lb/hr	lbs/yr
AMMONIA (T)	7664417	AP-42/NC DEQ	1.25E-02	100.38	1.25E-02	109.93	1.25E-02	109.93
Benzene (TH)	71432	AP-42/NC DEQ	8.24E-06	0.07	8.24E-06	0.07	8.24E-06	0.07
Cobalt unlisted compounds (H)	COG-other	AP-42/NC DEQ	3.29E-07	0.00	3.29E-07	0.00	3.29E-07	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	2.94E-04	2.35	2.94E-04	2.58	2.94E-04	2.58
Hexane, n- (TH)	110543	AP-42/NC DEQ	7.06E-03	56.47	7.06E-03	61.84	7.06E-03	61.84
Lead unlisted compounds (H)	PBC-other	AP-42/NC DEQ	1.96E-06	0.02	1.96E-06	0.02	1.96E-06	0.02
Naphthalene (H)	91203	AP-42/NC DEQ	2.39E-06	0.02	2.39E-06	0.02		0.02
Toluene (TH)								

#### TOXIC AIR

TOXIC AIR POLLUTANT	CASNO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS/ LIMITATIONS		
			lb/hr	lb/day	lb/yr
Acetaldehyde (TH)	75070	AP-42/NC DEQ	5.96E-06	1.31E-06	0.00
Acrolein (TH)	107028	AP-42/NC DEQ	7.06E-06	1.55E-06	0.00
Ammonia (T)	7664417	AP-42/NC DEQ	1.25E-02	2.76E-01	100.38
Arsenic unlisted compounds (TH)	ASC-other	AP-42/NC DEQ	0.00E+00	0.00E+00	0.00
Benzene (TH)	71432	AP-42/NC DEQ	8.24E-06	1.81E-04	0.07
Benzo(a)pyrene (TH)	50328	AP-42/NC DEQ	4.71E-09	1.04E-07	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	2.94E-04	6.47E-03	2.35
Hexane, n- (TH)	110543	AP-42/NC DEQ	7.06E-03	1.55E-01	56.47
Toluene (TH)	108883	AP-42/NC DEQ	1.33E-05	2.93E-04	0.11

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

**COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE**

**Attach Additional Sheets As Necessary**

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC**

**AIR PERMIT: ; FACILITY ID#**

**FORM B**

**SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

**B**

EMISSION SOURCE DESCRIPTION: PRESSURE COOKER W/CONDENSER	EMISSION SOURCE ID NO:ES-P-1
OPERATING SCENARIO 1 OF	CONTROL DEVICE ID NO(S):CD-CD-1
	EMISSION POINT (STACK) ID NO(S):EP-CD-1

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
PRESSURE COOKER WITH A CONDENSER

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM 81-89 ON THE FOLLOWING PAGES):		
<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form 81)	<input type="checkbox"/> Woodworking (Form 84)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B7)
<input type="checkbox"/> Int. combustion engine/generator (Form B2)	<input type="checkbox"/> Coating/finishing/printing (Form B5)	<input type="checkbox"/> Incineration (Form 88)
<input type="checkbox"/> Liquid storage tanks (Form 83)	<input type="checkbox"/> Storage silos/bins (Form 86)	<input type="checkbox"/> other (Form 89)

START CONSTRUCTION DATE: NOVEMBER 2019	DATE MANUFACTURED: NOVEMBER 2019
MANUFACTURER/ MODEL NO.:	EXPECTED OP. SCHEDULE: 22 HR/DAY 7 DAY/WK 52 WK/YR

IS THIS SOURCE SUBJECT TO?  NSPS (SUBPARTS?);  NESHAP (SUBPARTS?):

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25

**CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)							
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )							
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )							
SULFUR DIOXIDE (SO <sub>2</sub> )							
NITROGEN OXIDES (NO <sub>x</sub> )							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)	AP-42/NC DEQ	0.96	3.85	4.82	21.09	0.96	4.22
LEAD							
OTHER							

**HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
			lb/hr	lbs/yr	lb/hr	lbs/yr	lb/hr	lbs/yr
Acetaldehyde (TH)	75070	AP-42/NC DEQ	5.76E-02	460.80	2.88E-01	2522.88	5.76E-02	504.56
Acrolein (TH)	107028	AP-42/NC DEQ	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	6.09E-02	487.44	3.05E-01	2668.73	6.09E-02	533.75
Methanol	67561	AP-42/NC DEQ	2.68E-02	214.56	1.34E-01	1174.72	2.68E-02	234.94
Phenol	108952	AP-42/NC DEQ	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Propionaldehyde	123386	AP-42/NC DEQ	3.54E-02	282.96	1.77E-01	1549.21	3.53E-02	308.84

**TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS/ LIMITATIONS		
			lb/hr	lb/day	lb/yr
Acetaldehyde (TH)	75070	AP-42/NC DEQ	5.76E-02	1.27	460.80
Acrolein (TH)	107028	AP-42/NC DEQ	0.00E+00	0.00	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	6.09E-02	1.34	487.44

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

**COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE**

**Attach Additional Sheets As Necessary**

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC**  
AIR PERMIT: \_\_\_\_\_ ; FACILITY ID# \_\_\_\_\_  
**FORM B**

**SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 09/22/16

NCDEQ/Division of Air Quality -Application for Air Permit to Construct/Operate

**B**

EMISSION SOURCE DESCRIPTION; SCREW PRESS/DRYER	EMISSION SOURCE JD NO:ES-SP0-1
OPERATING SCENARIO _____ OF _____	CONTROL DEVICE ID NO(S):NA
	EMISSION POINT (STACK) ID NO(S):EP-SPD-1

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):  
SCREW PRESS AND DRYER

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM 81-B9 ON THE FOLLOWING PAGES):

<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1)	<input type="checkbox"/> Woodworking (Form 84)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B7)
<input type="checkbox"/> Int. combustion engine/generator (Form 82)	<input type="checkbox"/> Coating/finishing/printing (Form 85)	<input type="checkbox"/> Incineration (Form 88)
<input type="checkbox"/> Liquid storage tanks (Form B3)	<input type="checkbox"/> Storage silos/bins (Form B6)	<input type="checkbox"/> Other (Form B9)

START CONSTRUCTION DATE: NOVEMBER 2019      DATE MANUFACTURED: NOVEMBER 2019

MANUFACTURER/ MODEL NO.: \_\_\_\_\_      EXPECTED OP. SCHEDULE: 22 HR/DAY    7 DAY/WK    52 WK/YR

IS THIS SOURCE SUBJECT TO?     NSPS (SUBPARTS?): \_\_\_\_\_      NESHAP (SUBPARTS?): \_\_\_\_\_

PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25    MAR-MAY 25    JUN-AUG 25    SEP-NOV 25

**CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
		(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)							
PARTICULATE MATTER <10 MICRONS (PM <sub>10</sub> )							
PARTICULATE MATTER <2.5 MICRONS (PM <sub>2.5</sub> )							
SULFUR DIOXIDE (SO <sub>2</sub> )							
NITROGEN OXIDES (NO <sub>x</sub> )							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)	AP-42/NC DEQ	4.82	19.26	4.82	21.09	4.82	21.09
LEAD							
OTHER							

**HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
			{ } lb/hr	lbs/yr	lb/hr	lbs/yr	lb/hr	lbs/yr
Acetaldehyde (TH)	75070	AP-42/NC DEQ	1.16E-01	925.20	1.16E-01	1013.09	1.16E-01	1013.09
Acrolein (TH)	107028	AP-42/NC DEQ	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	6.30E-03	50.40	6.30E-03	55.19	6.30E-03	55.19
Methanol	67561	AP-42/NC OEQ	2.03E-02	162.00	2.03E-02	177.39	2.03E-02	177.39
Phenol	108952	AP-42/NC OEQ	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Propionaldehyde	123386	AP-42/NC DEQ	2.03E-02	162.00	2.03E-02	177.39	2.03E-02	177.39

**TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE**

TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS/ LIMITATIONS		
			lb/hr	lb/day	lb/yr
Acetaldehyde (TH)	75070	AP-42/NC DEQ	1.16E-01	2.54	925.20
Acrolein (TH)	107028	AP-42/NC OEQ	0.00E+00	0.00	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	6.30E-03	0.14	50.40

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

**COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE**

Attach Additional Sheets As Necessary

ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: \_\_\_\_\_ ; FACILITY ID# \_\_\_\_\_  
**FORM B**

**SPECIFIC EMISSION SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)**

REVISED 09/22/16	NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate	<b>B</b>						
EMISSION SOURCE DESCRIPTION: PELLET STORAGE (FUGITIVE EMISSIONS)		EMISSION SOURCE ID NO: ES-PS-1						
OPERATING SCENARIO 1 OF		CONTROL DEVICE ID NO(S): NA						
OPERATING SCENARIO 1 OF		EMISSION POINT (STACK) ID NO(S): NA						
DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM): PELLET STORAGE								
TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):								
<input type="checkbox"/> Coal, wood, oil, gas, other burner (Form 81)	<input type="checkbox"/> Woodworking (Form 84)	<input type="checkbox"/> Manuf. of chemicals/coatings/inks (Form B7)						
<input type="checkbox"/> Int. combustion engine/generator (Form 82)	<input type="checkbox"/> Coating/finishing/printing (Form BS)	<input type="checkbox"/> Incineration (Form 88)						
<input type="checkbox"/> liquid storage tanks (Form 83)	<input type="checkbox"/> Storage silos/bins (Form 86)	<input type="checkbox"/> Other (Form 89)						
START CONSTRUCTION DATE: NOVEMBER 2019		DATE MANUFACTURED: NOVEMBER 2019						
MANUFACTURER/ MODEL NO.:		EXPECTED OP. SCHEDULE: 22 HR/DAY 7 DAY/WK 52 WK/YR						
IS THIS SOURCE SUBJECT TO? NSPS (SUBPARTS?):		NESHAP (SUBPARTS?):						
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25 MAR-MAY 25 JUN-AUG 25 SEP-NOV 25								
<b>CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE</b>								
AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS				
		(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)		
		lb/hr	tons/ r	lb/hr	tons/yr	lb/hr	tons/ r	
PARTICULATE MATTER (PM)								
PARTICULATE MATTER<10 MICRONS (PM <sub>10</sub> )								
PARTICULATE MATTER<2.5 MICRONS (PM <sub>2.5</sub> )								
SULFUR DIOXIDE (SO <sub>2</sub> )								
NITROGEN OXIDES (NO <sub>x</sub> )								
CARBON MONOXIDE (CO)								
VOLATILE ORGANIC COMPOUNDS (VOC)	AP-42/NC DEQ	0.23	0.90	0.23	0.99	0.23	0.99	
LEAD								
OTHER								
<b>HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE</b>								
HAZARDOUS AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL		POTENTIAL EMISSIONS			
			(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)	
			lb/hr	lbs/yr	lb/hr	lbs/yr	lb/hr	lbs/yr
Acetaldehyde (TH)	75070	AP-42/NC DEQ					1.16E-02	101.31
Acrolein (TH)	107028	AP-42/NC DEQ	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Formaldehyde (TH)	50000	AP-42/NC DEQ	6.30E-04	5.04	6.28E-04	5.50	6.28E-04	5.50
Methanol	67561	AP-42/NC DEQ	2.03E-03	16.20	2.03E-03	17.74	2.03E-03	17.74
Phenol	108952	AP-42/NC DEQ	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00
Propionaldehyde	123386	AP-42/NC DEQ	2.03E-03	16.20	2.03E-03	17.74	2.03E-03	17.74
<b>TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE</b>								
TOXIC AIR POLLUTANT	CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS/ LIMITATIONS					
			lb/hr	lb/day	lb/yr			
Acetaldehyde (TH)	75070	AP-42/NC DEQ	1.16E-02	0.25	92.52			
Acrolein (TH)	107028	AP-42/NC DEQ	0.00E+00	0.00	0.00			
Formaldehyde (TH)	50000	AP-42/NC DEQ	6.30E-04	0.01	5.04			

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE  
Attach Additional Sheets As Necessary

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: ; FACILITY ID #  
FORM B1**

**EMISSION SOURCE (WOOD, COAL, OIL, GAS, OTHER FUEL-FIRED BURNER)-----**

REVISED 09/22/16

NCDEQ/Oivision of Air Quality- Application for Air Permit to Construct/Operate

**B1**

EMISSION SOURCE DESCRIPTION: ONE 20MMBTU/HR NATURAL GAS FIRED BOILER		EMISSION SOURCE ID NO: ES-B-1	
		CONTROL DEVICE ID NO(S): NA	
OPERATING SCENARIO: 1 OF 1		EMISSION POINT (STACK) ID NO(S): EP=B-1	
DESCRIBE USE: <input checked="" type="checkbox"/> PROCESS HEAT <input type="checkbox"/> SPACE HEAT <input type="checkbox"/> ELECTRICAL GENERATION <input type="checkbox"/> CONTINUOUS USE <input type="checkbox"/> STAND BY/EMERGENCY <input type="checkbox"/> OTHER (DESCRIBE):			
HEATING MECHANISM: <input checked="" type="checkbox"/> INDIRECT <input type="checkbox"/> DIRECT			
MAX. FIRING RATE (MMBTU/HOUR): 20			
<b>WOOD-FIRED BURNER</b>			
WOOD TYPE: <input type="checkbox"/> BARK <input type="checkbox"/> WOOD/BARK <input type="checkbox"/> WET WOOD <input type="checkbox"/> DRYWOOD <input type="checkbox"/> OTHER (DESCRIBE):			
PERCENT MOISTURE OF FUEL:			
<input type="checkbox"/> UNCONTROLLED <input type="checkbox"/> CONTROLLED WITH FLYASH REINJECTION <input type="checkbox"/> CONTROLLED W/O REINJECTION			
FUEL FEED METHOD:		HEAT TRANSFER MEDIA: <input type="checkbox"/> STEAM <input type="checkbox"/> AIR <input type="checkbox"/> OTHER (DESCRIBE)	
<b>COAL-FIRED BURNER</b>			
TYPE OF BOILER		IF OTHER DESCRIBE:	
<input type="checkbox"/> PULVERIZED <input type="checkbox"/> WET BED <input type="checkbox"/> DRY BED	<input type="checkbox"/> OVERFEED STOKER <input type="checkbox"/> UNCONTROLLED <input type="checkbox"/> CONTROLLED	<input type="checkbox"/> UNDERFEED STOKER <input type="checkbox"/> UNCONTROLLED <input type="checkbox"/> CONTROLLED	<input type="checkbox"/> SPREADER STOKER <input type="checkbox"/> UNCONTROLLED <input type="checkbox"/> FLYASH REINJECTION <input type="checkbox"/> NO FLYASH REINJECTION
<input type="checkbox"/> FLUIDIZED BED <input type="checkbox"/> CIRCULATING <input type="checkbox"/> RECIRCULATING			
<b>OIL/GAS-FIRED BURNER</b>			
TYPE OF BOILER: <input type="checkbox"/> UTILITY <input checked="" type="checkbox"/> INDUSTRIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> INSTITUTIONAL			
TYPE OF FIRING: <input type="checkbox"/> NORMAL <input type="checkbox"/> TANGENTIAL <input checked="" type="checkbox"/> LOW NOX BURNERS <input type="checkbox"/> NO LOW NOX BURNER			
<b>OTHER FUEL-FIRED BURNER</b>			
TYPE(S) OF FUEL: _____ PE			
TYPE OF BOILER: <input type="checkbox"/> UTILITY <input type="checkbox"/> INDUSTRIAL <input type="checkbox"/> COMMERCIAL <input type="checkbox"/> INSTITUTIONAL			
TYPE OF FIRING: _____ TYPE(S) OF CONTROL(S) (IF ANY): _____			
<b>FUEL USAGE (INCLUDE STARTUP/BACKUP FUELS)</b>			
FUEL TYPE	UNITS	MAXIMUM DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
NATURAL GAS	MMSCF	172	157
<b>FUEL CHARACTERISTICS (COMPLETE ALL THAT ARE APPLICABLE)</b>			
FUEL TYPE	SPECIFIC BTU CONTENT	SULFUR CONTENT (% BY WEIGHT)	ASH CONTENT (% BY WEIGHT)
NATURAL GAS	1020		
COMMENTS:			

**Attach Additional Sheets As Necessary**

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: \_\_\_\_\_ ; FACILITY ID# \_\_\_\_\_  
FORM 81**

**EMISSION SOURCE (WOOD, COAL, OIL, GAS, OTHER FUEL-FIRED BURNER) ...-----, ----,**

REVISED 09/22/16

NCDEQ/Division of Air Quality Application for Air Permit to Construct/Operate

**B1**

EMISSION SOURCE DESCRIPTION: ONE 4MMBTU/HR NATURAL GAS FIRED DRYER 1	E.M.S. ID NO.: Se, ORC = E'ND 83-D 1
OPERATING SCENARIO: 1 OF 1	CONTROL DEVICE ID NO(S): NA
EMISSION POINT (STACK) ID NO(S): EP=D-1	

DESCRIBE USE	PROCESS HEAT <input checked="" type="checkbox"/> [2]	SPACEHEAT <input type="checkbox"/> 0	ELECTRICAL GENERATION <input type="checkbox"/> 0
	CONTINUOUS USE <input type="checkbox"/> 0	STAND BY/EMERGENCY <input type="checkbox"/> 0	OTHER (DESCRIBE): <input type="checkbox"/> 0

HEATING MECHANISM:  INDIRECT  DIRECT

MAX. FIRING RATE (MMBTU/HOUR): 20

**WOOD-FIRED BURNER**

WOOD TYPE  BARK  WOOD/BARK  WET WOOD  DRY WOOD  OTHER (DESCRIBE):

PERCENT MOISTURE OF FUEL:

UNCONTROLLED  CONTROLLED WITH FLYASH REINJECTION  CONTROLLED W/O REINJECTION

FUEL FEED METHOD: \_\_\_\_\_ HEAT TRANSFER MEDIA:  STEAM  AIR  OTHER (DESCRIBE)

**COAL-FIRED BURNER**

TYPE OF BOILER		IF OTHER DESCRIBE:		
PULVERIZED	OVERFEED STOKER	UNDERFEED STOKER	SPREADER STOKER	FLUIDIZED BED
<input type="checkbox"/> WET BED	<input type="checkbox"/> UNCONTROLLED	<input type="checkbox"/> UNCONTROLLED	<input type="checkbox"/> UNCONTROLLED	<input type="checkbox"/> CIRCULATING
<input type="checkbox"/> DRY BED	<input type="checkbox"/> CONTROLLED	<input type="checkbox"/> CONTROLLED	<input type="checkbox"/> FLYASH REINJECTION	<input type="checkbox"/> RECIRCULATING
<input type="checkbox"/> NO FLYASH REINJECTION				

**OIL/GAS-FIRED BURNER**

TYPE OF BOILER:  UTILITY  INDUSTRIAL  COMMERCIAL  INSTITUTIONAL

TYPE OF FIRING:  NORMAL  TANGENTIAL  LOW NOX BURNERS  NO LOW NOX BURNER

**OTHER FUEL-FIRED BURNER**

TYPE(S) OF FUEL: \_\_\_\_\_ PE

TYPE OF BOILER:  UTILITY  INDUSTRIAL  COMMERCIAL  INSTITUTIONAL

TYPE OF FIRING: \_\_\_\_\_ TYPE(S) OF CONTROL(S) (IF ANY): \_\_\_\_\_

**FUEL USAGE (INCLUDE STARTUP/BACKUP FUELS)**

FUEL TYPE	UNITS	MAXIMUM DESIGN CAPACITY (UNIT/HR)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
NATURAL GAS	MMSCF	35	32

**FUEL CHARACTERISTICS (COMPLETE ALL THAT ARE APPLICABLE)**

FUEL TYPE	SPECIFIC BTU CONTENT	SULFUR CONTENT (% BY WEIGHT)	ASH CONTENT (% BY WEIGHT)
NATURAL GAS	1020		

COMMENTS:

**Attach Additional Sheets As Necessary**

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: ; FACILITY ID i  
FORM B9  
EMISSION SOURCE (OTHER)**

REVISED 09/22/16 NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate 89

EMISSION SOURCE DESCRIPTION: PRESSURE COOKER W/CONDENSER	EMISSION SOURCE ID NO: ES-P-1 CONTROL DEVICE ID NO(S): CD-CD-1
OPERATING SCENARIO: 1 OF 1	EMISSION POINT (STACK) ID NO(S): EP-CD-1
DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): PRESSURE COOKER WITH A CONDENSER (SEE PROCESS SCHEMATIC FOR DETAILS)	

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/YR)	REQUESTED CAPACITY LIMITATION (UNIT/YR)
TYPE	UNITS		
WOOD CHIPS	ODT/YR	39420	36000

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES/ HOUR):	
REQUESTED LIMITATION (BATCHES/ HOUR):	(BATCHES/YR):
FUEL USED: NONE	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR):
MAX. CAPACITY HOURLY FUEL USE:	REQUESTED CAPACITY ANNUAL FUEL USE:

COMMENTS:

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: ; FACILITY ID#  
FORM B9  
EMISSION SOURCE (OTHER)**

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

**B9**

EMISSION SOURCE DESCRIPTION: SCREW PRESS AND A DRYER	EMISSION SOURCE ID NO:ES-SPD-1
	CONTROL DEVICE ID NO(S):NA
OPERATING SCENARIO: OF_ 1	EMISSION POINT (STACK) ID NO(S):EP-SPD-1

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): SCREW PRESS W/ DRYER TO REDUCE MOISTURE (SEE PROCESS SCHEMATIC FOR DETAILS)

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/YR)	REQUESTED CAPACITY LIMITATION (UNIT/YR)
TYPE	UNITS		
WOOD CHIPS	ODTNR	39420	36000

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES   HOUR):	
REQUESTED LIMITATION (BATCHES/ HOUR):	(BATCHESNR):
FUEL USED: NONE	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR):
MAX. CAPACITY HOURLY FUEL USE:	REQUESTED CAPACITY ANNUAL FUEL USE:

COMMENTS:

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: ; FACILITY ID#  
FORM B9  
EMISSION SOURCE (OTHER)**

REVISED 09/22/16

NCDEQ/Division of Air Quality -Application for Air Permit to Construct/Operate

**B9**

EMISSION SOURCE DESCRIPTION: PELLET STORAGE (FUGITIVE EMISSIONS)

EMISSION SOURCE ID NO:ES-PP-1

CONTROL DEVICE ID NO(S):NA

OPERATING SCENARIO: \_ 1 OF

EMISSION POINT (STACK) ID NO(S):NA

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOWDIAGRAM):PELLET STORAGE IN BAGS (SEE PROCESS SCHEMATIC FOR DETAILS)

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (UNIT/YR)	REG\ JS:TEDit8R1\CITY L1M1WX' ftoNcl filf:ilY11RI
TYPE	UNITS		
WOOD CHIPS	ODTNR	39420	36000

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES I HOUR):	
REQUESTED LIMITATION (BATCHES I HOUR):	(BATCHESNR):
FUEL USED:NONE	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR):
MAX. CAPACITY HOURLY FUEL USE:	REQUESTED CAPACITY ANNUAL FUEL USE:

COMMENTS:

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC  
AIR PERMIT: ; FACILITY ID#**

**FORM C7  
CONTROL DEVICE (CONDENSER)**

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

**C7**

**AS REQUIRED BY 15A NCAC 2Q. 0112, THIS FORM IS TO BE COMPLETED BY A PROFESSIONAL ENGINEER (P.E.) LICENSED IN NORTH CAROLINA.**

CONTROL DEVICE ID NO: CD-CD-1	CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-P-1		
EMISSION POINT ID NO(S): EP-CD-1	POSITION IN SERIES OF CONTROLS	NO. <u>1</u> OF <u>1</u> UNITS	
<b>OPERATING SCENARIO:</b>			
_____ OF _____			
CONDENSER TYPE: <input type="checkbox"/> DIRECT CONTACT <input type="checkbox"/> INDIRECT CONTACT    CONDENSER TYPE: <input checked="" type="checkbox"/> SHELL AND TUBE <input type="checkbox"/> OTHER			

DESIGNE CONTROL SYSTEM: CONDENSER

POLLUTANT(S) COLLECTED:	VOE			
CORRESPONDING EFFICIENCY:	a_0_ %	%	%	%
EFFICIENCY DETERMINATION CODE:				
BEFORE CONTROL CONCENTRATION (PPMV):				
BEFORE CONTROL EMISSION RATE (LB/HR):	4.815			
AFTER CONTROL CONCENTRATION (PPMV):				
AFTER CONTROL EMISSION RATE (LB/HR):	0.9625			
BOILING POINT OF COLLECTED POLLUTANT (°F):	5010180			
HEAT OF VAPORIZATION OF COLLECTED POLLUTANT (BTU/LB-MOL):				
SPECIFIC HEAT OF POLLUTANT COLLECTED (BTU/LB-MOL °F):				

EMISSION STREAM FLOW RATE (ACFM): 75.25	INLET EMISSION STREAM TEMPERATURE (°F): 439 (226C)
MOISTURE CONTENT OF EMISSION STREAM (%): 99.8	OUTLET EMISSION STREAM TEMPERATURE (°F): 210 (99C)
COOLANT USED: WATER	TEMPERATURE OF INLET COOLANT (°F): 68 (20C)
TEMPERATURE OF CONDENSATION (°F): 210 (99C)	TEMPERATURE OF OUTLET COOLANT (°F): 185 (85C)
COOLANT FLOW RATE (LB/HR): 30,024 (0.92 gal/sec)	REFRIGERATION CAPACITY (TONS): NONE
CONDENSER SURFACE AREA (FT <sup>2</sup> ): 2015 (20 m <sup>2</sup> )	

DESCRIBE MAINTENANCE PROCEDURES: CLEAN CONDENSER AS PER THE MANUFACTURER SPECS

DESCRIBE ANY MONITORING DEVICES, GAUGES, TEST PORTS, ETC: TEMPERATURE AND PRESSURE GAUGES

ATTACH A DIAGRAM OF THE RELATIONSHIP OF THE CONTROL DEVICE TO IT EMISSION SOURCE(S); SEE THE PROCESS FLOW DIAGRAM

COMMENTS:

**Attach Additional Sheets As Necessary**



# FORM D2 (N/A)

## AIR POLLUTANT NETTING WORKSHEET AND FACILITY-WIDE EMISSION SUMMARY **- D2 -**

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

PURPOSE OF NETTING: AIR TOXICS

TOXIC AIR POLLUTANT:

CAS NO.:

EMISSION SOURCE ID NOS.:

### SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES

Summarize in this section using the B-forms	EMISSIONS - USE APPROPRIATE COLUMNS ONLY		
	LB/NEAR	LB/DAY	LB/HR
MODIFICATION INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
MODIFICATION DECREASE			
=EQUALS=	=EQUALS=	=EQUALS=	= EQUALS=
NET CHANGE FROM MODIFICATION			

### SECTION B - FACILITY-WIDE EMISSION NETTING ANALYSIS

CREDITABLE INCREASE			
- MINUS -	- MINUS -	- MINUS -	- MINUS -
CREDITABLE DECREASE			
=EQUALS=	=EQUALS=	=EQUALS=	=EQUALS=
NET CREDITABLE CHANGE			

### SECTION C - FACILITY-WIDE EMISSIONS

TOTAL FACILITY EMISSIONS			
TPER LEVELS (20 .0711)		<input type="checkbox"/>	

Are the total facility-wide emissions less than the TPER levels?:                    0    YES                    0

If YES, no further analysis is required.

Air dispersion modeling analysis is required if the total facility-wide emission level is greater than the 20 .0711 Toxic Air Pollutant Permitting Emissions Rate (TPER) and the source emitting the toxic air pollutant is not exempted by 15A NCAC 20 .0702(a)(27) "Exemptions".

CHECK HERE IF AN AIR DISPERSION MODELING ANALYSIS IS REQUIRED                    0

If air dispersion modeling analysis is required, complete the stack parameters section of Form D3-1 for each emission source that emits this TAP. Review the modeling plan requirements.

COMMENTS:

**Attach Additional Sheets As Necessary**

**FORM D2A (N/A)**  
**AIR POLLUTANT "PROJECT ONLY" NETTING WORKSHEET**

REVISED 09/22/16

NCDEQ/Division of Air Quality - Application for Air Permit to Construct/Operate

**D2A**

PURPOSE OF NETTING: PREVENTION OF SIGNIFICANT DETERIORATION (PSD)
PSD AIR POLLUTANT:
EMISSION SOURCE JD NO. AND DESCRIPTION:
EMISSION SOURCE ID NO. AND DESCRIPTION:
EMISSION SOURCE ID NO. AND DESCRIPTION:
EMISSION SOURCE ID NO. AND DESCRIPTION:

**SECTION A - EMISSION OFFSETTING ANALYSIS FOR MODIFIED/NEW SOURCES IN PROJECT**

Summarize in this section using the B forms	EMISSIONS TONS/YR
MODIFICATION INCREASE	
- MINUS -	
MODIFICATION DECREASE	
= EQUALS =	
<b>"PROJECT" NET CHANGE FROM MODIFICATION</b>	

PS <input type="checkbox"/> SIGNIFICANCE LEVEL FOR SPECIFIC POLLUTANT [40 CFR 51.166(b)(23)]
--

IS THE "PROJECT" NET CHANGE LESS THAN THE SIGNIFICANCE LEVEL?    0    YES        

If YES, no further analysis is required.

If NO, then a further evaluation should be done using credible emissions at the facility for each specific pollutant over a contemporaneous time period.

COMMENTS:

Attach Additional Sheets As Necessary



POINT SOURCE

STACK DATA

Emission Point ID						
Stack Description						
Stack Height (ft or m) - AGL						
Stack Temperature (oF or oK)						
Stack Exit Velocity (ft/s or mis)						
Stack Diameter (ft or m)						
Stack Base Elevation (ft) - MSL						
Stack UTM Coordinates (m)	E					
NAO version 27 / 83 (circle one)	N					
Zone						
Latitude	'N					
Longitude	'W					
Rain Cap? (Y/N)						
Vertical Stack? (Y/N)						

AREA SOURCE

AREA SOURCE DATA

(contact DAQ for clarification of input data requirements)

(for each area source, submit a separate detailed description of the area source, to include dimensions of the area and elevations. Also include source on site map.)

Emission Point ID						
Source Description						
Area Source Height (ft or m) - AGL						
Area Source Length (ft or m)						
Area Source Width (ft or m)						
Source Base Elevation (ft) - MSL						
Area Source UTM Coordinates (m)	E					
NAD version 27 / 83 (circle one)	N					
Zone						
Latitude	'N					
Longitude	'W					

VOLUME SOURCE

VOLUME SOURCE DATA

(contact DAQ for clarification of input data requirements)

(for each volume source, submit a separate detailed description of the volume source, to include dimensions of the volume source where emissions begin to disperse.)

Emission Point ID						
Source Description						
Volume Source Height (ft or m) - AGL						
Volume Source Length (ft or m)						
Volume Source Bldg Height (ft or m)						
Source base Elevation (ft) - MSL						
Volume Source UTM Coordinates (m)	E					
NAD version 27 / 83 (circle one)	N					
Zone						
Latitude	'N					
Longitude	'W					

ft- feet  
m- meters

AGL-Above Ground level  
UTM- Universal Transverse Mercator

mis- meters per second  
MSL- Mean Sea Level  
**Attach Additional Sheets As Necessary**

Kelvin (degrees)=273+(aF-32) x 5/9

A detailed site diagram must be submitted and should include all of the information listed below:

- Property boundaries
- Scale and true north indicator
- All existing and proposed buildings or structures on site
- Locations of all emission sources (existing and proposed) listed in Section 2, Page 1 of Form D3
- All public rights-of-way traversing the property { e.g. roads, railroad tracks, rivers, etc.}
- UTM coordinates or latitude/longitude of at least one point (e.g. source or building corner)

A USGS Contour Map must also be submitted with the location of your facility clearly designated.

A certified plat map from County Register of Deeds or a signed survey map.

5. BUILDING DATA		List each building. List tiers of different heights on a single building as separate buildings.				
Building ID						
Building Description						
Building Height (ft or m)						
Building Length (ft or m)						
Building Width (ft or m)						

**6. MISCELLANEOUS DATA**

Facility Operating Limits  
{Operating hours, fuel limits, or other enforceable limits}

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

If an operating schedule is not given, continuous operations will be assumed (i.e. 24 hours/day, 8760 hours/year).

Note: if compliance is demonstrated using the above facility operating limits, these limits will be imposed as a permit restriction

**7. FACILITY IDENTIFICATION**

Facility Name: \_\_\_\_\_ Facility ID: \_\_\_\_\_

Facility Address

Street: \_\_\_\_\_

City: \_\_\_\_\_

County: \_\_\_\_\_

Point of Contact

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

**ACTIVE ENERGY RENEWABLE POWER  
LUMBERTON, NC**

**AIR PERMIT: \_\_\_\_\_ ; FACILITY ID # \_\_\_\_\_**

**FORM D4**

**EXEMPT AND INSIGNIFICANT ACTIVITIES SUMMARY**

REVISED 09/22/16

NCDEQ/Division of Air Quality -Application for Air Permit to Construct/Operate

**D4**

**ACTIVITIES EXEMPTED PER 2Q .0102 OR  
INSIGNIFICANT ACTIVITIES PER 2Q .0503 FOR TITLE V SOURCES**

DESCRIPTION OF EMISSION SOURCE	SIZE OR PRODUCTION RATE	BASIS FOR EXEMPTION OR INSIGNIFICANT ACTIVITY
1.IES-WWTP One wastewater treatment plant		2Q .0102 (g)(6)
2.IES-FP Diesel-fired fire pump (180 horsepower) (NESHAP ZZZZ)	180HP	2Q .0102 (h)(S)
3.JES-GEN Diesel-fired emergency generator (15 horsepower) (NESHAP ZZZZ)	15 HP	2Q .0102 (h)(S)
4.JES-PROPANE Propane vaporizer		2Q .0102 (h)(S)
5.		
6.		
7.		
8.		
9.		
10.		

Attach Additional Sheets As Necessary

# ACTIVE ENERGY RENEWABLE POWER

## LUMBERTON, NC

AIR PERMIT: \_\_\_\_\_

; FACILITY ID# \_\_\_\_\_

### FORM D5

#### TECHNICAL ANALYSIS TO SUPPORT PERMIT APPLICATION

REVISED 09/22/16

NCDEQ/Division of Air Quality-Application for Air Permit to Construct/Operate

J D5

PROVIDE DETAILED TECHNICAL CALCULATIONS TO SUPPORT ALL EMISSION, CONTROL, AND REGULATORY DEMONSTRATIONS MADE IN THIS APPLICATION. INCLUDE A COMPREHENSIVE PROCESS FLOW DIAGRAM AS NECESSARY TO SUPPORT AND CLARIFY CALCULATIONS AND ASSUMPTIONS. ADDRESS THE FOLLOWING SPECIFIC ISSUES ON SEPARATE PAGES:

**A** SPECIFIC EMISSIONS SOURCE (EMISSION INFORMATION) (FORM Band B1 through B9) - SHOW CALCULATIONS USED, INCLUDING EMISSION FACTORS, MATERIAL BALANCES, AND/OR OTHER METHODS FROM WHICH THE POLLUTANT EMISSION RATES IN THIS APPLICATION WERE DERIVED. INCLUDE CALCULATION OF POTENTIAL BEFORE AND, WHERE APPLICABLE, AFTER CONTROLS. CLEARLY STATE ANY ASSUMPTIONS MADE AND PROVIDE ANY REFERENCES AS NEEDED TO SUPPORT MATERIAL BALANCE CALCULATIONS.

**B** SPECIFIC EMISSION SOURCE (REGULATORY INFORMATION) (FORM E2 - TITLE V ONLY) - PROVIDE AN ANALYSIS OF ANY REGULATIONS APPLICABLE TO INDIVIDUAL SOURCES AND THE FACILITY AS A WHOLE. INCLUDE A DISCUSSION OUTING METHODS (e.g. FOR TESTING AND/OR MONITORING REQUIREMENTS) FOR COMPLYING WITH APPLICABLE REGULATIONS, PARTICULARLY THOSE REGULATIONS LIMITING EMISSIONS BASED ON PROCESS RATES OR OTHER OPERATIONAL PARAMETERS. PROVIDE JUSTIFICATION FOR AVOIDANCE OF ANY FEDERAL REGULATIONS (PREVENTION OF SIGNIFICANT DETERIORATION (PSD), NEW SOURCE PERFORMANCE STANDARDS (NSPS), NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS), TITLE V), INCLUDING EXEMPTIONS FROM THE FEDERAL REGULATIONS WHICH WOULD OTHERWISE BE APPLICABLE TO THIS FACILITY. SUBMIT ANY REQUIRED INFORMATION TO DOCUMENT COMPLIANCE WITH ANY REGULATIONS. INCLUDE EMISSION RATES CALCULATED IN ITEM "A" ABOVE, DATES OF MANUFACTURE, CONTROL EQUIPMENT, ETC. TO SUPPORT THESE CALCULATIONS.

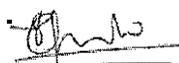
**C** CONTROL DEVICE ANALYSIS (FORM C and C1 through C9) - PROVIDE A TECHNICAL EVALUATION WITH SUPPORTING REFERENCES FOR ANY CONTROL EFFICIENCIES LISTED ON SECTION C FORMS, OR USED TO REDUCE EMISSION RATES IN CALCULATIONS UNDER ITEM "A" ABOVE. INCLUDE PERTINENT OPERATING PARAMETERS (e.g. OPERATING CONDITIONS, MANUFACTURING RECOMMENDATIONS, AND PARAMETERS AS APPLIED FOR IN THIS APPLICATION) CRITICAL TO ENSURING PROPER PERFORMANCE OF THE CONTROL DEVICES). INCLUDE AND LIMITATIONS OR MALFUNCTION POTENTIAL FOR THE PARTICULAR CONTROL DEVICES AS EMPLOYED AT THIS FACILITY. DETAIL PROCEDURES FOR ASSURING PROPER OPERATION OF THE CONTROL DEVICE INCLUDING MONITORING SYSTEMS AND MAINTENANCE TO BE PERFORMED.

**D** PROCESS AND OPERATIONAL COMPLIANCE ANALYSIS - (FORM E3 - TITLE V ONLY) - SHOWING HOW COMPLIANCE WILL BE ACHIEVED WHEN USING PROCESS, OPERATIONAL, OR OTHER DATA TO DEMONSTRATE COMPLIANCE. REFER TO COMPLIANCE REQUIREMENTS IN THE REGULATORY ANALYSIS IN ITEM "B" WHERE APPROPRIATE. LIST ANY CONDITIONS OR PARAMETERS THAT CAN BE MONITORED AND REPORTED TO DEMONSTRATE COMPLIANCE WITH THE APPLICABLE REGULATIONS.

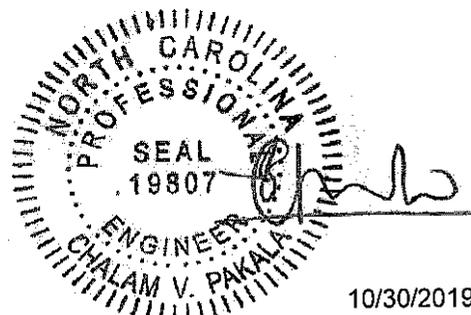
**E** PROFESSIONAL ENGINEERING SEAL - PURSUANT TO 15A NCAC 20 .0112 "APPLICATION REQUIRING A PROFESSIONAL ENGINEERING SEAL," A PROFESSIONAL ENGINEER REGISTERED IN NORTH CAROLINA SHALL BE REQUIRED TO SEAL TECHNICAL PORTIONS OF THIS APPLICATION FOR NEW SOURCES AND MODIFICATIONS OF EXISTING SOURCES. (SEE INSTRUCTIONS FOR FURTHER APPLICABILITY).

I, CHALAM PAKALA attest that this application for ACTIVE ENERGY RENEWABLE POWER has been reviewed by me and is accurate, complete and consistent with the information supplied in the engineering plans, calculations, and all other supporting documentation to the best of my knowledge. I further attest that to the best of my knowledge the proposed design has been prepared in accordance with the applicable regulations. Although certain portions of this submittal package may have been developed by other professionals, inclusion of these materials under my seal signifies that I have reviewed this material and have judged it to be consistent with the proposed design. Note: In accordance with NC General Statutes 143-215.6A and 143-215.6B, any person who knowingly makes any false statement, representation, or certification in any application shall be guilty of a Class 2 misdemeanor which may include a fine not to exceed \$10,000 as well as civil penalties up to \$25,000 per violation.

(PLEASE USE BLUE INK TO COMPLETE THE FOLLOWING)

NAME: CHALAM PAKALA  
 DATE: 30-Oct-19  
 COMPANY: CP ENGINEERING AND ENV SOLUTIONS  
 ADDRESS: 10017 ALLYSON PARK DR., CHARLOTTE, NC 282  
 TELEPHONE: 704-541-404  
 SIGNATURE:   
 PAGES CERTIFIED: "A" Llc \_\_\_\_\_

PLACE NORTH CAROLINA SEAL HERE



10/30/2019

(IDENTIFY ABOVE EACH PERMIT FORM AND ATTACHMENT THAT IS BEING CERTIFIED BY THIS SEAL)

**Attach Additional Sheets As Necessary**

## PROCESS SCHEMATICS



# **TABLES**

## **AIR EMISSION CALCULATIONS**

# Yearly Potential/Actual emissions: Boilers, Dryers, and Screw & Pellet Presses

Actual Hours of Operation/yr = 8000  
 Potential Hours of Operation/yr = 8760

Pollutant	CAS Number	BEFORE CONTROL DEVICE					AFTER CONTROL DEVICE				
		Steam Boiler (ES-B-1)	Dryer (ES-D-1)	Pressure Cooker/W/Condenser (ES-P-1)	Screw Press/Dryer/Pellet Press (ES-SPD-1)	Pellet Storage (ES-Ps-1)	Actual Emissions (ton/yr)	Potential Emissions (ton/yr)	Actual Emissions (ton/yr)	Potential Emissions (ton/yr)	Potential Emissions Before C.D. (ton/yr)
<b>Criteria Air Pollutants</b>											
PM	PM	0.04	0.01			0.05	0.00	0.05	0.00	0.05	
PM10	PM10	0.04	0.01			0.05	0.00	0.05	0.00	0.05	
PM2.5	PM2.5									0.04	
	SO <sub>2</sub>									0.73	
	NITROGEN OXIDES (NO <sub>x</sub> )	0.05	0.01							1.77	
	CARBON MONOXIDE (CO)	0.00	8.59	1.32						10.65	
	VOLATILE ORGANIC COMPOUNDS (VOC)	0.47	0.09	3.65	19.26	0.90				50.81	
<b>Greenhouse Gas Emissions</b>											
	CARBON DIOXIDE (CO <sub>2</sub> )	9424.29	1664.74						12,383.39		
	METHANE (CH <sub>4</sub> )	0.00	0.18	0.04					0.23		
	NITROUS OXIDE (N <sub>2</sub> O)	0.00	0.02	0.00					0.02		
<b>Toxic/Hazardous Air Pollutants</b>											
	Acetaldehyde	75070	0.002	0.000	460.800	925.20	92.52		1618.98	0.18	
	Acrolein	107028	0.003	0.001					0.004	0.00	
	Ammonia	7664417	501,952	100,364					659.86	0.06	
	Arsenic unlisted compounds	ASC-020							0.00	0.00	
	Benzene	71432	0.329	0.066					0.43	0.00	
	Beryllium	50328	0.000	0.000					0.00	0.00	
	Cadmium	7440417							0.00	0.00	
	Chromium metal								0.00	0.00	
	Chromium hexavalent								0.02	0.00	
	Formaldehyde	50000	11.765	2.353	487.440	50.40	5.04		609.111	0.07	
	Heptachlor	110543	282.348	511.466					371.00	0.04	
	Lead unlisted compounds	PBC-other	0.078	0.016					0.10	0.00	
	Manganese unlisted compounds	MNC-other							0.00	0.00	
	Mercury	7439976							0.00	0.00	
	1,1-Dichloroethene (H)	91203	0.096	0.019					0.13	0.00	
	Nickel metal	7440020							-0.00	0.00	
	Selenium compounds	see	0.004	0.001					0.00	0.00	
	Toluene	108883	0.533	0.107					0.10	0.00	
	Methanol	67561			214.560	162.00	16.20		430.07	0.05	
	Phenol	108952							0.00	0.00	
	Propionaldehyde	123386			1414.800	162.00	16.20		1744.34	0.20	
HAP Indiv. Max			501.115	100.364		915.20			2632.08		
HAP total			181.115	159.41		1299.60		826.00	6858.31		

<sup>1</sup>Xylenes (total) includes emission factors listed as Xylene.

**Active Energy Renewable Power**  
**Lumberton, Robeson County, NC**

**NOTES:**

Enviva Pellets Company makes their pellets from dry green chipped wood. The VOC emissions are estimated based on a conservative estimate of 80-95% efficiency. The majority of the VOC will be condensed in the steam released from the Pressure Cooker operation. The CO2 emissions are estimated based on a conservative estimate. We have estimated VOC emissions from the Pressure Cooker and Condenser (80-95% Efficiency) - Condenser 80-85% Used 80%.

VOC from the Pressure Cooker & Condenser (80-95% Efficiency) - Condenser 80-85% Used 80%				Emission Factor <sup>1</sup>	Actual Emissions	Potential Emissions	Actual Emissions (after Condenser 8D% Eff)	Potential Emissions (after Condenser 80% Eff)
				/lbs/ODT	lbs/yr	lbs/yr	lbs/yr	lbs/yr
Max Throughput	43,800.00 Ton/yr @ 10% m.c.							
	39,420.00 ODT/yr							
Actual Throughput	36,000.00 ODT/yr							
Composition	25% Hardwood 75% Softwood							
Pollutant								
VOE				< 1.070	19.26	21.09	3.66	4.22
					2304.00	2522.88	460.80	504.58
Acetaldehyde (BP-68.36F)	y	y	y	6.40E-02			0.00	0.00
Acrolein (BP-127.4F)	y	y	y	0.00E+00				
Formaldehyde (BP-(-2.2F)	y	y	y	6.77E-02	2437.20	2660.73	487.44	533.75
Methanol (BP-148.5 F)	y	N	y	2.98E-02	1072.80	1174.12	214.66	234.94
Phenol (BP-359.1 F)	y	y	y	0.00E+00	0.00	0.00	0.00	0.00
Propionaldehyde (BP-119.BF)	y	N	y	<3.93E-02	1414.80	1549.21	282.96	309.84
HAPs total (lbs/year)					7,228.80	7,915.54	-1,449.61	1,6B7.33
HAP total (tons/yr)								
TAP total (lbs/year)								
TAP total (tons/yr)								
Permit Name	ODT Processed (ODT/yr)	Facility Wide VOC (lbs/yr)	Emission Factor (lbs/ODT)					
2016 Enviva Pellets-Sampson-Dryer Stack Test			1.070	Used as the worst case				
Stack Test dated April 2017								

**Hazardous Air Pollutants and VOC from Screw Press/Pellet Drying/Pellet Press (ES-SPD-1)**

Max Throughput				Emission Factor <sup>1</sup>	Actual Emissions	Potential Emissions
				/lbs/ODT	lbs/yr	lbs/yr
39,420.00 CDT/yr						
36,000.00 CDT/yr						
25% Hardwood 75% Softwood						
Pollutant						
VOE				1.07	38,620.00	42,179.40
Eff from Enviva Pellet Press Stack Test Dated April 2017						2.09
Acetaldehyde (BP-68.36F)	y	y	y	2.57E-02	925.20	1,013.09
Acrolein (BP-127.4F)	y	y	y	0.00E+00		
Formaldehyde (BP-(-2.2F)	y	y	y	1.44E-03	50.40	56.19
Methanol (BP-148.5F)	y	N	y	4.50E-03	162.00	177.39
Phenol (BP-359.1 F)	y	y	y	0.00E+00		
Propionaldehyde (BP-119.BF)	y	N	y	4.50E-03	162.00	177.39
HAP total (lbs/year)					1,299.60	1,423.06
HAP total (tons/yr)					0.65	0.71
TAP total (lbs/year)					975.60	1,068.28
TAP total (tons/yr)					0.4	0.53
2016 Enviva Pellets-Sampson-Dryer Stack Test						
Stack Test dated April 2017						

**Hazardous Air Pollutants and VOC from Pellet Storage (ES-PS-1)**

Max Throughput				Emission Factor <sup>1</sup>	Actual Emissions	Potential Emissions
				/lbs/ODT	lbs/yr	lbs/yr
39,420.00 ODT/yr						
36,000.00 ODT/yr						
25% Hardwood 75% Softwood						
Pollutant						
VOE				1.050		1,971.00
Acetaldehyde (BP-68.36F)	y	y	y	2.57E-02		101.31
Acrolein (BP-127.4F)	y	y	y	0.00E+00		
Formaldehyde (BP-(-2.2F)	y	y	y	1.40E-03		
Methanol (BP-148.5F)	y	N	y	4.50E-03	16.20	17.74
Phenol (BP-359.1 F)	y	y	y	0.00E+00		
Propionaldehyde (BP-119.BF)	y	N	y	4.50E-03	16.20	17.74
HAP total (lbs/year)					39.6	142.31
HAP total (tons/yr)					0.06	0.07
TAP total (lbs/year)					97.56	106.83
TAP total (tons/yr)					0.05	0.05
2016 Enviva Pellets-Sampson-Pellet Press Stack Test						
Stack Test dated April 2017				0.500	0.050	Used as the worst case

**Active Energy Renewable Power  
Lumberton, Robeson County, NC**

Calculations of NG usage based on Hours of Operation

**Data Input (BOILER)**

Maximum Heat Input	<u>20,000</u>	mmBtu/hr
Boiler Size/Type	Small Industrial	
Actual Fuel Usage	_____	ftA3/yr
or	_____	_____
Hours of Operation	<u>8,000</u>	hr/yr
and	_____	_____
Heating Value	<u>1,020</u>	Btu/ftA3
Calculated Fuel Usage	156,862,745 .. ftA3/yr	
	<u>1.2</u> mmscf/yr	

**Data Input (DRYER)**

Maximum Heat Input	<u>14,000</u>	mmBtu/hr
Boiler Size/Type	Small Industrial	
Actual Fuel Usage	_____	ftA3/yr
or	_____	_____
Hours of Operation	<u>8,000</u>	hr/yr
and	_____	_____
Heating Value	<u>1,020</u>	Btu/ftA3
Calculated Fuel Usage	31,372,549 ftA3/yr	
	<u>0.3</u> mmscf/yr	

**NATURAL GAS COMBUSTION EMISSIONS CALCULATOR REVISION N 01/05/2017 -INPUT SCREEN**



Instructions: Enter emission source/ facility data on the "INPUT" tab/screen. The air emission results and summary of input data are viewed / printed on the "OUTPUT" tab/screen. The different tabs are on the bottom of this screen.

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*Directions: Enter and select information in the boxes in the column on the right:*

**FIELDS**

COMPANY NAME:  
FACILITY ID NUMBER:  
PERMIT NUMBER  
FACILITY CITY:  
FACILITY COUNTY:  
SPREADSHEET PREPARED BY:

**SELECTIONS**

ACTIVE ENERGY RENEWABLE POWER  
NA  
NA  
LUMBERTON  
ROBESON  
CHALAM PAKALA, PE

EMISSION SOURCE ID NO.: ES-8-1  
MAXIMUM HEAT INPUT (MILLION BTU PER HOUR): 20.00 mmBTU/HR

TYPE OF BOILER:  SMALL BOILER (<100 mmBTU/HR)

DOES THE SOURCE ALSO BURN COAL OR FUEL OIL?  No  ...

DATE OF CONSTRUCTION: 10/1/2019  
(mm/dd/yyyy)

**ADDITIONAL INFORMATION FOR GREENHOUSE GAS (GHG) EMISSIONS**

ENTER Calculation Tier from EPA Mandatory Reporting Rule (MRR)\* Subpart C TIER 1: DEFAULT HHV AND DEFAULT EF \_\_\_\_\_  
\* See <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>

1-.1

SINCE TIER 3 IS NOT BEING USED, DO NOT ENTER FUEL CARBON CONTENT  0.7500

SINCE TIER 3 IS NOT BEING USED, DO NOT ENTER MOLECULAR WEIGHT  19.00  kg/kg-mole

**FUEL HEATING VALUE**

ANNUAL AVG MEASURED FUEL HEATING VALUE (BTU/SCF):  1,020  BTU/SCF

DEFAULT FUEL HEATING VALUE (BTU/SCF) -- will be used for GHG calculations under TIER 1 approach  
 1,028 BTU/SCF (default value is from EPA's mandatory reporting rule, Table C-1, "Natural Gas Pipeline (Weighted U.S. Average)")

**USAGE AND OTHER SOURCE-SPECIFIC DATA**

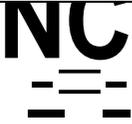
ACTUAL YEARLY FUEL USAGE (MILLION SCF): 156.86 MILLION SCF  
CALCULATED POTENTIAL YEARLY USAGE (MILLION SCF) 171.76 MILLION SCF  
REQUESTED ANNUAL LIMITATION (MILLION SCF) 171.76 MILLION SCF (TYPE OVER IF NECESSARY - DEFAULT IS POTENTIAL)

DAILY HOURS OF OPERATION: 22 HOURS

TYPE OF EMISSION CONTROL:  NO CONTROL

IS SNCR APPLIED TO THE BOILER?  No  1.1

NATURAL GAS COMBUSTION EMISSIONS CALCULATOR REVISION N 01/05/2017 - OUTPUT SCREEN



Instructions: Enter emission source / facility data on the "INPUT" tab/screen. The air emission results and summary of Input data are viewed / printed on the "OUTPUT" tab/screen. The different tabs are on the bottom of this screen.

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COMPANY:	ACTIVE ENERGY RENEWABLE POWER	FACILITY ID NO.:	NA
EMISSION SOURCE DESCRIPTION:	20 MMBTU/HR NATURAL GAS-FIRED BOILER	PERMIT NUMBER:	NA
EMISSION SOURCE IDNO.:	ES-B-1	FACILITY CITY:	LUMBERTON
CONTROL DEVICE:	NO CONTROL	FACILITY COUNTY:	ROBESON
SPREADSHEET PREPARED BY:	CHALAM PAKALA, PE	POLLUTANT	CONTROL EFF.
ACTUAL FUEL THROUGHPUT:	156.86 10 <sup>6</sup> SCF/NR	FUEL HEAT VALUE:	1,020 BTU/SCF
POTENTIAL FUEL THROUGHPUT:	171.76 10 <sup>6</sup> SCF/NR	BOILER TYPE:	SMALL BOILER <100 mmBTU/HRI
REQUESTED MAX FUEL BURST:	156.86 10 <sup>6</sup> SCF/NR	BOILER TYPE:	SMALL BOILER <100 mmBTU/HRI
CEILING HOURS OF OPERATION:	8760	INOSNCR APPLIED	

AIR POLLUTANT EMITTED	ACTUAL EMISSIONS (AFTER CONTROLS) (LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS) (LIMITS)				EMISSION FACTOR (lb/mmBtu)	
	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	uncontrolled	controlled
PARTICULATE MATTER /Total	0.01	0.04	0.01	0.04	0.01	0.04	0.001	0.001
PARTICULATE MATTER /Filterable	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.000
PARTICULATE MATTER /Condensable	0.01	0.00	0.01	0.03	0.01	0.03	0.000	0.000
PM 2.5 /Total	0.01	0.00	0.01	0.04	0.01	0.04	0.000	0.000
PM 2.5 /Filterable	0.00	0.00	0.00	0.01	0.00	0.01	0.000	0.000
SULFUR DIOXIDE SO2	0.01	0.00	0.01	0.05	0.01	0.05	0.001	0.001
NITROGEN OXIDES NOx	1.96	7.84	1.96	8.59	1.96	8.59	0.098	0.098
CARBON MONOXIDE CO1	1.65	6.59	1.65	7.21	1.65	7.21	0.082	0.082
VOLATILE ORGANIC COMPOUNDS 11,cc	0.11	0.43	0.11	0.47	0.11	0.47	0.005	0.005

TOXIC /HAZARDOUS AIR POLLUTANT	CM NUMBER	ACTUAL EMISSIONS (AFTER CONTROLS) (LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS) (LIMITS)		POTENTIAL EMISSIONS (AFTER CONTROLS) (LIMITS)		EMISSION FACTOR (lb/mmBtu)	
		lb/hr	lbs/yr	lb/hr	lbs/yr	lb/hr	lbs/yr	uncontrolled	controlled
Acetaldehyde /TH	75070	2.98E-07	2.38E-03	2.98E-07	2.61E-03	2.98E-07	2.61E-03	1.49E-08	1.49E-08
Acrolein /TH	107028	3.53E-07	2.82E-03	3.53E-07	3.09E-03	3.53E-07	3.09E-03	1.76E-08	1.76E-08
Ammonia /TH	7864417	6.27E-02	5.02E+02	6.27E-02	5.50E+02	6.27E-02	5.50E+02	3.14E-03	3.14E-03
Arsenic unlisted compounds /TH	ASC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Benzene /TH	71432	4.12E-05	3.29E-04	4.12E-05	3.61E-04	4.12E-05	3.61E-04	2.06E-06	2.06E-06
Beryllium metal (unreacted) /TH	7440417	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cadmium metal (elemental unreacted) /TH	7440439	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Chromic acid /TH	7738945	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cobalt unlisted compounds /TH	COG-other	1.65E-08	1.32E-02	1.65E-08	1.44E-02	1.65E-08	1.44E-02	8.24E-08	8.24E-08
Formaldehyde /TH	50000	1.47E-03	1.18E+01	1.47E-03	1.29E+01	1.47E-03	1.29E+01	7.35E-05	7.35E-05
Hexane, n- /TH	110543	3.53E-02	2.82E+02	3.53E-02	3.09E+02	3.53E-02	3.09E+02	1.76E-03	1.76E-03
Lead unlisted compounds (HL)	PBC-other	9.80E-06	7.84E-02	9.80E-06	8.59E-02	9.80E-06	8.59E-02	4.90E-07	4.90E-07
Manganese unlisted compounds (TH)	MNC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Mercury vapor H	7439976	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Naphthalene /TH	91203	1.20E-05	9.57E-02	1.20E-05	1.05E-01	1.20E-05	1.05E-01	5.98E-07	5.98E-07
Nickel metal /TH	7440020	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Selenium compounds rH1	SEC	4.71E-07	3.76E-03	4.71E-07	4.12E-03	4.71E-07	4.12E-03	2.35E-08	2.35E-08
Toluene /TH	108883	6.67E-05	5.33E-01	6.67E-05	5.84E-01	6.67E-05	5.84E-01	3.33E-06	3.33E-06
Total HAPs		3.69E-02	1.29E+02	3.69E-02	3.23E+02	3.69E-02	3.23E+02	1.84E-03	1.84E-03

EMISSIONS UNIT: TONS PER YEAR (T/yr)

TOXIC AIR POLLUTANT	CAS Num.	EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS			EMISSION FACTOR (lb/mmBtu)	
		lb/hr	lb/day	lb/yr	uncontrolled	controlled
Acetaldehyde /TH	75070	2.98E-07	6.56E-06	2.38E-03	1.49E-08	1.49E-08
Acrolein /TH	107028	3.53E-07	7.76E-06	2.82E-03	1.76E-08	1.76E-08
Ammonia	7664417	6.27E-02	1.38E+00	5.02E+02	3.14E-03	3.14E-03
Arsenic unlisted compounds /TH	ASC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Benzene /TH	71432	4.12E-05	9.06E-04	3.29E-01	2.06E-06	2.06E-06
Benzene /TH	50328	2.35E-08	5.18E-07	1.88E-04	1.18E-08	1.18E-08
Beryllium metal (unreacted) /TH	7440417	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cadmium metal (elemental unreacted) /TH	7440439	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Soluble chromate compounds, as chromium /VI equivalent	SoICR6	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Formaldehyde /TH	50000	1.47E-03	3.24E-02	1.18E+01	7.35E-05	7.35E-05
Hexane, n- /TH	110543	3.53E-02	7.76E-01	2.82E+02	1.76E-03	1.76E-03
Manganese unlisted compounds /TH	MNC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Mercury vapor /TH	7439976	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Nickel metal /TH	7440020	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

GREENHOUSE GAS POLLUTANT	ACTUAL EMISSIONS			POTENTIAL EMISSIONS		
	metric tons/yr	metric tons/yr, CO2e	short tons/yr	short tons/yr	short tons/yr, CO2e	
CARBON DIOXIDE (CO2)	8549.59	8,549.59	9,424.29	10,239.47	10,239.47	
METHANE (CH4)	1.61E-01	4.01E+00	1.78E-01	1.93E-01	4.83E+00	
NITROUS OXIDE (N2O)	1.61E-02	4.81E+00	1.78E-02	1.93E-02	5.76E+00	
		TOTAL CO2e (metric tons)	8,558.42		TOTAL CO2e (short tons)	10,250.06

NOTE: CO2e means CO2 equivalent

NOTE: The DAQ Air Emissions Reporting Online (AERO) system requires short tons be reported. The EPA MRR requires metric tons be reported.

NOTE: Do not use greenhouse gas emission estimates from this spreadsheet for PSD (Prevention of Significant Deterioration) purposes.

**NATURAL GAS COMBUSTION EMISSIONS CALCULATOR REVISION N 01/05/2017 - INPUT SCREEN**



Instructions: Enter emission source / facility data on the "INPUT" tab/screen. The air emission results and summary of input data are viewed / printed on the "OUTPUT" tab/screen. The different tabs are on the bottom of this screen.

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*Directions: Enter and select information in the boxes in the column on the right:*

**FIELDS**

COMPANY NAME:  
FACILITY ID NUMBER:  
PERMIT NUMBER  
FACILITY CITY:  
FACILITY COUNTY:  
SPREADSHEET PREPARED BY:

**SELECTIONS**

ACTIVE ENERGY RENEWABLE POWER  
NA  
NA  
LUMBERTON  
ROBESON  
CHALAM PAKAL, PE

EMISSION SOURCE ID NO.: ES-0-1  
 MAXIMUM HEAT INPUT (MILLION BTU PER HOUR): 4.00 mmBTU/HR  
 TYPE OF BOILER: SMALL BOILER (<100 mmBTU/HR)  
 DOES THE SOURCE ALSO BURN COAL OR FUEL OIL? No  
 DATE OF CONSTRUCTION: 5/1/2000 (mm/dd/yyyy)

ADDITIONAL INFORMATION FOR GREENHOUSE GAS (GHG) EMISSIONS

ENTER Calculation Tier from EPA Mandatory Reporting Rule (MRR)\* Subpart C TIER 1: DEFAULT HHV AND DEFAULT EF 1..-1  
 \* See <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>

SINCE TIER 3 IS NOT BEING USED, DO NOT ENTER FUEL CARBON CONTENT 0.7500  
 SINCE TIER 3 IS NOT BEING USED, DO NOT ENTER MOLECULAR WEIGHT 19.00 kg/kg-mole

FUEL HEATING VALUE

ANNUAL AVG MEASURED FUEL HEATING VALUE (BTU/SCF): 1,020 BTU/SCF  
 DEFAULT FUEL HEATING VALUE (BTU/SCF) -- will be used for GHG calculations under TIER 1 approach  
 I 1,028 BTU/SCF (default value is from EPA's mandatory reporting rule, Table C-1, "Natural Gas Pipeline (Weighted U.S. Average)")

USAGE AND OTHER SOURCE-SPECIFIC DATA

ACTUAL YEARLY FUEL USAGE (MILLION SCF): 31.37 MILLION SCF  
 CALCULATED POTENTIAL YEARLY USAGE (MILLION SCF) 34.35 MILLION SCF  
 REQUESTED ANNUAL LIMITATION (MILLION SCF) 34.35 MILLION SCF (TYPE OVER IF NECESSARY - DEFAULT IS POTENTIAL)  
 DAILY HOURS OF OPERATION: 22 HOURS  
 TYPE OF EMISSION CONTROL: NO CONTROL  
 IS SNCR APPLIED TO THE BOILER? 0



**NATURAL GAS COMBUSTION EMISSIONS CALCULATOR REVISION N 01/05/2017- OUTPUT SCREEN**

Instructions: Enter emission source/facility data on the "INPUT" tab/screen. The air emission results and summary of input data are viewed / printed on the "OUTPUT" tab/screen. The different tabs are on the bottom of this screen.

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COMPANY:	<b>ACTIVE ENERGY RENEWABLE POWER</b>	FACILITY ID NO.:	NA
EMISSION SOURCE DESCRIPTION:	4 MMBTU/HR NATURAL GAS-FIRED BOILER	PERMIT NUMBER:	NA
EMISSION SOURCE ID NO.:	ES-D-1	FACILITY CITY:	LUMBERTON
CONTROL DEVICE:	NO CONTROL	FACILITY COUNTY:	ROBESON
SPREADSHEET PREPARED BY:	CHALAM PAKAL, PE	POLLUTANT	CONTROL EFF.
ACTUAL FUEL THROUGHPUT:	31.37 10bSCF/YR IFUEL HEAT VALUE:	NOX	CALC/DASO%
POTENTIAL FUEL THROUGHPUT:	34.35 10 <sup>6</sup> SCF/YR BOILER TYPE: SMALL BOILER 1<100mmBTU/HRI	INOSNCR APPLIED	
REQUESTED MAX. FUEL TURB:	34.35 10 <sup>6</sup> SCF/YR HOURS OF OPERATIONS: 22		

AIR POLLUTANT EMITTED	ACTUAL EMISSIONS		POTENTIAL EMISSIONS				EMISSION FACTOR	
	(AFTER CONTROLS / LIMITS)		(BEFORE CONTROLS / LIMITS)		(AFTER CONTROLS / LIMITS)		lb/mmBtu	
	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	uncontrolled	controlled
PARTICULATE MATTER (Total)	0.00	0.01	0.00	0.01	0.00	0.01	0.001	0.001
PARTICULATE MATTER (Filterable)	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.000
PARTICULATE MATTER (Condensable)	0.00	0.01	0.00	0.01	0.00	0.01	0.000	0.000
PM 2.5 (Total)	0.00	0.01	0.00	0.01	0.00	0.01	0.000	0.000
PM 2.5 (Filterable)	0.00	0.00	0.00	0.00	0.00	0.00	0.000	0.000
SULFUR DIOXIDE (SO2)	0.00	0.01	0.00	0.01	0.00	0.01	0.001	0.001
NITROGEN OXIDES (NOx)	0.39	1.57	0.39	1.72	0.39	1.72	0.098	0.098
VOLATILE ORGANIC COMPOUNDS (VOC)	0.33	1.33	0.33	1.44	0.33	1.44	0.082	0.082
	0.02	0.09	0.02	0.09	0.02	0.09	0.005	0.005

TOXIC / HAZARDOUS AIR POLLUTANT	H NUMBER	ACTUAL EMISSIONS		POTENTIAL EMISSIONS				EMISSION FACTOR	
		lb/hr	lbs/yr	lb/hr	lbs/yr	lb/hr	lbs/yr	uncontrolled	controlled
Acetaldehyde (H)	75070	5.9E-08	4.77E-04	5.96E-08	5.22E-04	5.96E-08	5.22E-04	1.49E-08	1.49E-08
Acrolein (H)	107028	7.05E-08	5.65E-04	7.06E-08	6.18E-04	7.05E-08	6.18E-04	1.76E-08	1.76E-08
Ammonia (H)	7664417	1.25E-02	1.00E+02	1.25E-02	1.10E+02	1.25E-02	1.10E+02	3.14E-03	3.14E-03
Arsenic (H)	ASC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Benzene (H)	71432	8.24E-06	6.59E-02	8.24E-06	7.21E-02	8.24E-06	7.21E-02	2.06E-06	2.06E-06
Benzo(a)anthracene (H)	50328	4.71E-09	3.76E-05	4.71E-09	4.12E-05	4.71E-09	4.12E-05	1.18E-09	1.18E-09
Beryllium metal (H)	7440417	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cadmium metal (H)	7440439	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Chromium (H)	7738945	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cobalt (H)	COG-other	3.29E-07	2.64E-03	3.29E-07	2.89E-03	3.29E-07	2.89E-03	8.24E-08	8.24E-08
Formaldehyde (H)	50000	2.94E-04	2.35E+01	2.94E-04	2.58E+01	2.94E-04	2.58E+01	7.35E-05	7.35E-05
Hexane, n- (H)	110543	7.06E-03	5.65E+01	7.06E-03	6.18E+01	7.06E-03	6.18E+01	1.76E-03	1.76E-03
Lead (H)	PBC-other	1.96E-06	1.57E-02	1.96E-06	1.72E-02	1.96E-06	1.72E-02	4.90E-07	4.90E-07
Manganese (H)	MNC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Mercury (H)	7439976	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Naphthalene (H)	91203	2.39E-06	1.91E-02	2.39E-06	2.10E-02	2.39E-06	2.10E-02	5.88E-07	5.88E-07
Nickel metal (H)	7440020	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Selenium (H)	SEC	9.41E-08	7.53E-04	9.41E-08	8.24E-04	9.41E-08	8.24E-04	2.35E-08	2.35E-08
Toluene (H)	108683	1.33E-05	1.07E-01	1.33E-05	1.17E-01	1.33E-05	1.17E-01	3.33E-05	3.33E-05
Total HAPs		7.38E-03	5.90E+01	7.38E-03	6.46E+01	7.38E-03	6.46E+01	1.84E-03	1.84E-03

TOXIC AIR POLLUTANT	CAS Num.	lb/hr	lb/day	lb/yr	lb/mmBtu
Acetaldehyde (H)	75070	5.96E-08	1.31E-06	4.77E-04	1.49E-08
Acrolein (H)	107028	7.05E-08	1.55E-06	5.65E-04	1.76E-08
Ammonia (H)	7664417	1.25E-02	2.76E-01	1.00E+02	3.14E-03
Arsenic (H)	ASC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Benzene (H)	71432	8.24E-06	1.81E-04	6.59E-02	2.06E-06
Benzo(a)anthracene (H)	50328	4.71E-09	1.04E-07	3.76E-05	1.18E-09
Beryllium metal (H)	7440417	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cadmium metal (H)	7440439	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Soluble chromium (H)	SoICr6	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Formaldehyde (H)	50000	2.94E-04	6.47E-03	2.35E+01	7.35E-05
Hexane, n- (H)	110543	7.06E-03	1.55E-01	5.65E+01	1.76E-03
Manganese (H)	MNC-other	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Mercury (H)	7439976	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Nickel metal (H)	7440020	0.00E+00	0.00E+00	0.00E+00	0.00E+00

GREENHOUSE GAS POLLUTANT	ACTUAL EMISSIONS			POTENTIAL EMISSIONS		
	EPA MRR CALCULATION METHOD: TIER 1					
	metric tons/yr	metric tons/yr, CO2e	short tons/yr	short tons/yr	short tons/yr, CO2e	
CARBON DIOXIDE (CO2)	1709.81	1,709.81	1,884.74	2,047.89	2,047.89	
METHANE (CH4)	3.22E-02	8.06E-01	3.55E-02	3.86E-02	9.66E-01	
NITROUS OXIDE (N2O)	3.22E-03	9.61E-01	3.55E-03	3.86E-03	1.19E+00	
		TOTAL CO2e (metric tons)	1,711.58		TOTAL CO2e (short tons)	2,050.01

NOTE: CO2e means CO2 equivalent  
 NOTE: The OAQ Air Emissions Reporting Online (AERO) system requires short tons be reported. The EPA MRR requires metric tons be reported.  
 NOTE: Do not use greenhouse gas emission estimates from this spreadsheet for PSD (Prevention of Significant Deterioration) purposes.

Emission factors based on AP-42 Fifth Edition, Chapter 1 - Section 4 WebFIRE Factors, and the 2014 EPA National Emissions Inventory Documentation.  
 Factor units are lb/10<sup>6</sup> scf

POLLUTANT	Uncontrolled				Controlled		Scenario Summary Per INPUT															
	Pre-NSPS	Post-NSPS	Low NOx Burner	Controlled	Uncontrolled	Controlled																
NOx	100	50	50	100	50	100																
CO	84	84	84	84	84	84																
PM* (Total)	0.52	0.52	0.52	0.52	0.52	0.52																
PM (Filterable)	0.32	0.32	0.32	0.32	0.32	0.32																
PM (Condensable)	0.20	0.20	0.20	0.20	0.20	0.20																
PM2.5** (Total)	0.43	0.43	0.43	0.43	0.43	0.43																
PM2.5 (Filterable)	0.11	0.11	0.11	0.11	0.11	0.11																
SO <sub>2</sub>	0.0	0.0	0.0	0.0	0.0	0.0																
TOC	11	11	11	11	11	11																
VOC	5.5	5.5	5.5	5.5	5.5	5.5																
Total HAP	1.89E+00	1.89E+00	1.89E+00	1.89E+00	1.89E+00	1.89E+00																
Largest HAP (n-hexane)	3.20E+00	3.20E+00	3.20E+00	3.20E+00	3.20E+00	3.20E+00																
type control	TRUE	TRUE	FALSE	FALSE	TRUE	FALSE																
NSPS (type and control)	TRUE	TRUE	FALSE	FALSE	TRUE	FALSE																
SNCR reduction (%)	24	24	24	24	24	24																
Wt% SNCR NOx (overall)																						
<b>Haps/Taps</b>																						
Acetaldehyde (H,T)***	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.52E-05	1.52E-05																
Acrolein (H,T)***	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.80E-05	1.80E-05																
Ammonia (T)***	3.20E+00	3.20E+00	3.20E+00	3.20E+00	3.20E+00	3.20E+00																
Arsenic (H,T)	2.00E-04	2.00E-04	2.00E-04	2.00E-04	2.00E-04	2.00E-04																
Benzene (H,T)	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03																
Benzo(a)pyrene (H,T)	1.20E-06	1.20E-06	1.20E-06	1.20E-06	1.20E-06	1.20E-06																
Beryllium (H,T)	1.10E-03	1.10E-03	1.10E-03	1.10E-03	1.10E-03	1.10E-03																
Cadmium (H,T)	1.40E-03	1.40E-03	1.40E-03	1.40E-03	1.40E-03	1.40E-03																
Chromium (VI) (H,T)	8.40E-05	8.40E-05	8.40E-05	8.40E-05	8.40E-05	8.40E-05																
Cobalt (H)	7.50E-02	7.50E-02	7.50E-02	7.50E-02	7.50E-02	7.50E-02																
Formaldehyde (H,T)****	1.80E+00	1.80E+00	1.80E+00	1.80E+00	1.80E+00	1.80E+00																
n-Hexane (H,T)	5.00E-04	5.00E-04	5.00E-04	5.00E-04	5.00E-04	5.00E-04																
Lead (H)	3.80E-04	3.80E-04	3.80E-04	3.80E-04	3.80E-04	3.80E-04																
Manganese (H,T)	2.60E-04	2.60E-04	2.60E-04	2.60E-04	2.60E-04	2.60E-04																
Mercury (H,T)	6.10E-04	6.10E-04	6.10E-04	6.10E-04	6.10E-04	6.10E-04																
Naphthalene (H)	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03																
Nickel (H,T)	2.40E-05	2.40E-05	2.40E-05	2.40E-05	2.40E-05	2.40E-05																
Selenium (H)	3.40E-03	3.40E-03	3.40E-03	3.40E-03	3.40E-03	3.40E-03																
Toluene (H,T)																						
ALL HAPS ARE LISTED IN GREEN																						
Emission Factors based on AP-42, Chapter 1.4 (revised 7/98) except acetaldehyde, acrolein, and ammonia. Units are lb/10 <sup>6</sup> scf.																						
*PM (Total) and PM (Filterable) are assumed to be PM10. PM (Total) = PM (Filterable) + PM (Condensable).																						
**PM2.5 (Total) = PM2.5 (Filterable) + PM (Condensable).																						
***Acetaldehyde, acrolein, and ammonia factors are from WebFIRE database.																						
****The FGR control factor for formaldehyde is from the WebFIRE database.																						
The 2014 EPA NEI is located here: <a href="https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-documentation">https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-documentation</a>																						
<table border="1"> <tr> <td>HHV Used</td> <td>TIER 1</td> <td>1028</td> <td>Btu/sci</td> </tr> <tr> <td>Emission Factor, k /mmBTU</td> <td colspan="3">Emission Factors based on Tier 1 C-1 and C-2 or EPA Moratorium Rule 1/g Rule, 40CFR part 60, <a href="https://www.epa.gov/ci/moratorium-rule">https://www.epa.gov/ci/moratorium-rule</a></td> </tr> <tr> <td>0.0010</td> <td colspan="3"></td> </tr> <tr> <td>0.0001</td> <td colspan="3"></td> </tr> </table>							HHV Used	TIER 1	1028	Btu/sci	Emission Factor, k /mmBTU	Emission Factors based on Tier 1 C-1 and C-2 or EPA Moratorium Rule 1/g Rule, 40CFR part 60, <a href="https://www.epa.gov/ci/moratorium-rule">https://www.epa.gov/ci/moratorium-rule</a>			0.0010				0.0001			
HHV Used	TIER 1	1028	Btu/sci																			
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0.0010																						
0.0001																						



NATURAL GAS COMBUSTION EMISSIONS CALCULATOR REVISION N0110512017 - REVISION SCREEN

**NC**  
195 ..

Instructions: Enter emission source/facility data on the "INPUT" tab/screen. The actual emission results and summary of input data are viewed/printed on the "OUTPUT" tab/screen. The different tabs are on the bottom of this screen.

This spreadsheet is for your use only and should be used with caution. NCDEQ does not guarantee the accuracy of the information contained. This spreadsheet is subject to continual revision and updating. It is your responsibility to always use the most current information available. NCDEQ is not responsible for errors or omissions that may be contained herein.

Version	Author	Revisions
NG20008		<ul style="list-style-type: none"> <li>Moved SNCR selector from below the list of boiler types to above the list of boiler types on input sheet</li> <li>Added flag to indicate when heat input rate doesn't match boiler type selection on input sheet</li> <li>Added revision letter and date to input sheet</li> <li>Modified instructions on input sheet clarifying that "..." may become a permit limit "only applies to using the spreadsheet for permit applications"</li> <li>Modified instructions on input sheet to include an indication of how to calculate potential emissions.</li> <li>Added note on input sheet for non-boiler/non-residential furnace users.</li> <li>Changed label "Maximum Annual Fuel Throughput" on input sheet to "Annual Fuel Throughput" to minimize confusion re. the value expected for this cell</li> <li>Modified "Emissions Output" label on input sheet to include hours of operation</li> <li>Added disclaimer text to input sheet.</li> <li>Removed "left over" HMA plant footnotes from Emission Factors sheet</li> <li>Added Revisions sheet</li> </ul>
NG2010C		<ul style="list-style-type: none"> <li>Removed emission factors for metals from small boilers and residential furnaces.</li> <li>Put into new format.</li> </ul>
NG2000D 7/13/12	Janet Boyar	<ul style="list-style-type: none"> <li>Change fuel heat value to Btu/sci instead of Btu/lb on output</li> <li>Change column heading on output from tons/yr to lbs/yr on HAP/TAP column heading</li> <li>Add "Total HAPS" line to output</li> <li>Add "Highest HAP" line to output</li> <li>Change TAP "lb/yr" calculation to be based on annual fuel limitation</li> <li>Correct formula in "Input85"</li> </ul>
NG2000E 2/20/20	Janet Boyar	<ul style="list-style-type: none"> <li>Change Output PM labels to match emission factors</li> <li>Added Greenhouse Gas pollutant data, emissions, and factors to input, output, and factors sheets</li> <li>Added Mercury in the toxic pollutant table since it is a toxic pollutant.</li> </ul>
NG2000F 10/14/2006	Dellise Hayes	<ul style="list-style-type: none"> <li>Revised GHG calculations such that the ACTUAL emissions calculated are consistent with the EPA GHG Mandatory Reporting Rule</li> <li>Updated cell for "Requested annual limitation" on input screen to default to maximum potential with the option to enter facility specific limitation.</li> <li>Updated descriptions and CAS numbers of HAP/HAP pollutants. Added disclaimer to not use GHG emissions for PSD purposes</li> <li>Updated metal HAP reduction emission factors for when boilers are permitted to also burn fuel oil or coal. The metal HAP oxides are only for dual fuel boilers.</li> <li>Added actual hours of operation item. Made miscellaneous corrections</li> <li>Corrected factor for formaldehyde for large boiler. Without control. Corrected requested limit usage on input tab to default to the potential usage.</li> <li>Corrected print area on input sheet. Corrected acrolein, acetaldehyde, ammonia, cobalt, and lead to show up for both ng only and ng/fuel oil</li> <li>Updated calculation for GHG emissions. GWP81 warming potential changed on 1/11/14 for methane (21 to 25) and N2O (310 to 298)</li> <li>Updated particulate matter emission factors based on new data from EPA National Emissions Inventory. Spreadsheet titled "Emission Factors for Particulate Matter from Natural Gas Combustion"</li> </ul>
NG2000G 11/22/2010	Suzanna Masemore	
NG2000H 5/12/2010	Denise Hayes	
NG2000I 11/30/2012	Denise Hayes	
NG2000J 3/12/2012	Denise Hayes	
NG2000K 5/19/2012	Denise Hayes	
NG2000L 10/8/2013	Denise Hayes	
NG2000M 6/12/2015	Denise Hayes	
NG2000N 1/5/2017	Denise Hayes	

<https://www.ncdeq.gov/hic/emissions-inventory/14-national-emissions-inventory-report>

Emission factors based on AP-42, Fifth Edition Chapter 1 - Section 4 WebFIRE Factors, and the 2014 EPA National Emissions Inventory Documentation.

Factor units are lb/10<sup>6</sup> scf.

POLLUTANT	Uncontrolled		Controlled		NOT USED	
	Pre-NSPS	Post-NSPS	Low NOx Burner	SOR	Uncontrolled	Controlled
NOx	0	0	0	0	0	0
CO	0.52	0.52	0.52	0.52	0	0
PM* (Total)	0.32	0.32	0.32	0.32	0	0
PM (Filterable)	0.32	0.32	0.32	0.32	0	0
PM (Condensable)	0	0	0	0	0	0
PM2.5* (Total)	0.43	0.43	0.43	0.43	0	0
PM2.5 (Filterable)	0.43	0.43	0.43	0.43	0	0
SO <sub>2</sub>	0	0	0	0	0	0
TOC	0	0	0	0	0	0
VOC	0	0	0	0	0	0
Total HAP	1.89E+00	1.89E+00	1.89E+00	1.89E+00	0.00E+00	0.00E+00
Largest HAP (n-hexane)	3.20E+00	3.20E+00	3.20E+00	3.20E+00	0.00E+00	0.00E+00
(type and control)	FALSE	FALSE	FALSE	FALSE		
(type and NSPS)	TRUE	TRUE	FALSE	FALSE		
SNCR reduction (%)	24	24	24	24		
Wt% n-SNGR NOx (overall)	280	100	140	100		
<b>Haps/Taps</b>						
Acetaldehyde (H,T)***	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Acrolein (H,T)***	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Ammonia (T)***	3.20E+00	3.20E+00	3.20E+00	3.20E+00	0.00E+00	0.00E+00
Arsenic (H,T)	2.00E-04	2.00E-04	2.00E-04	2.00E-04	0.00E+00	0.00E+00
Benzene (H,T)	2.10E-03	2.10E-03	2.10E-03	2.10E-03	0.00E+00	0.00E+00
Benzo(a)pyrene (H,T)	1.20E-06	1.20E-06	1.20E-06	1.20E-06	0.00E+00	0.00E+00
Beryllium (H,T)	1.10E-03	1.10E-03	1.10E-03	1.10E-03	0.00E+00	0.00E+00
Cadmium (H,T)	1.40E-03	1.40E-03	1.40E-03	1.40E-03	0.00E+00	0.00E+00
Chromium (VI) (H,T)	8.40E-05	8.40E-05	8.40E-05	8.40E-05	0.00E+00	0.00E+00
Cobalt (H)	7.50E-02	7.50E-02	7.50E-02	3.95E-05	0.00E+00	0.00E+00
Formaldehyde (H,T)****	1.80E+00	1.80E+00	1.80E+00	1.80E+00	0.00E+00	0.00E+00
n-Hexane (H,T)	5.00E-04	5.00E-04	5.00E-04	5.00E-04	0.00E+00	0.00E+00
Lead (H)	5.00E-04	3.80E-04	3.80E-04	3.80E-04	0.00E+00	0.00E+00
Manganese (H,T)	2.60E-04	2.60E-04	2.60E-04	2.60E-04	0.00E+00	0.00E+00
Mercury (H,T)	6.10E-04	6.10E-04	6.10E-04	6.10E-04	0.00E+00	0.00E+00
Naphthalene (H)	2.10E-03	2.10E-03	2.10E-03	2.10E-03	0.00E+00	0.00E+00
Nickel (H,T)	2.40E-05	2.40E-05	2.40E-05	2.40E-05	0.00E+00	0.00E+00
Selenium (H)	3.40E-03	3.40E-03	3.40E-03	3.40E-03	0.00E+00	0.00E+00
Toluene (H,T)	0	0	0	0	0	0

ALL HAPS ARE LISTED IN GREEN

Emission Factors based on AP-42, Chapter 1.4 revised 7/198 except for acetaldehyde, acrolein and ammonia. Units are lb/1 scf.

PM Total and PM Filterable are assumed to be PM10. PM Total = PM Filterable + PM Condensable.

PM2.5 Total = PM2.5 Filterable + PM Condensable

Acetaldehyde, acrolein and ammonia factors are from WebFIRE database.

The FGR control factor for formaldehyde is from the WebFIRE database.

The 2014 EPA NEI is located here: <https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-documentation>

Emission Factor, lb/mmBtu	HHV Used	TIER 1	
		1.0	2.0
CO <sub>2</sub>	53.02	1.0	2.0
Methane	0.0010	1.0	2.0
	0.0001	1.0	2.0

Reported Molecular Weight If using TIER 1

not using - this is Tier 1

POLLUTANT	Uncontrolled		Controlled		NOT USED	
	Pre-NSPS	Post-NSPS	Low NOx Burner	SOR	Uncontrolled	Controlled
NOx	0	0	0	0	0	0
CO	0.52	0.52	0.52	0.52	0	0
PM* (Total)	0.32	0.32	0.32	0.32	0	0
PM (Filterable)	0.32	0.32	0.32	0.32	0	0
PM (Condensable)	0	0	0	0	0	0
PM2.5* (Total)	0.43	0.43	0.43	0.43	0	0
PM2.5 (Filterable)	0.43	0.43	0.43	0.43	0	0
SO <sub>2</sub>	0	0	0	0	0	0
TOC	0	0	0	0	0	0
VOC	0	0	0	0	0	0
Total HAP	1.89E+00	1.89E+00	1.89E+00	1.89E+00	0.00E+00	0.00E+00
Largest HAP	3.20E+00	3.20E+00	3.20E+00	3.20E+00	0.00E+00	0.00E+00
(type and control)	TRUE	TRUE	TRUE	TRUE		
(type and NSPS)	TRUE	FALSE	TRUE	TRUE		
SNCR reduction (%)	24	24	24	24		
Wt% n-SNGR NOx (overall)	280	100	140	100		
<b>Haps/Taps</b>						
Acetaldehyde (H,T)***	1.52E-05	1.52E-05	1.52E-05	1.52E-05	1.52E-05	1.52E-05
Acrolein (H,T)***	1.80E-05	1.80E-05	1.80E-05	1.80E-05	1.80E-05	1.80E-05
Ammonia (T)***	3.20E+00	3.20E+00	3.20E+00	3.20E+00	3.20E+00	3.20E+00
Arsenic (H,T)	2.00E-04	2.00E-04	2.00E-04	2.00E-04	2.00E-04	2.00E-04
Benzene (H,T)	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03
Benzo(a)pyrene (H,T)	1.20E-06	1.20E-06	1.20E-06	1.20E-06	1.20E-06	1.20E-06
Beryllium (H,T)	1.20E-05	1.20E-05	1.20E-05	1.20E-05	1.20E-05	1.20E-05
Cadmium (H,T)	1.10E-03	1.10E-03	1.10E-03	1.10E-03	1.10E-03	1.10E-03
Chromium (VI) (H,T)	1.40E-03	1.40E-03	1.40E-03	1.40E-03	1.40E-03	1.40E-03
Cobalt (H)	8.40E-05	8.40E-05	8.40E-05	8.40E-05	8.40E-05	8.40E-05
Formaldehyde (H,T)****	7.50E-02	7.50E-02	7.50E-02	1.97E-01	7.50E-02	7.50E-02
n-Hexane (H,T)	1.80E+00	1.80E+00	1.80E+00	1.80E+00	1.80E+00	1.80E+00
Lead (H)	5.00E-04	5.00E-04	5.00E-04	5.00E-04	5.00E-04	5.00E-04
Manganese (H,T)	3.80E-04	3.80E-04	3.80E-04	3.80E-04	3.80E-04	3.80E-04
Mercury (H,T)	2.60E-04	2.60E-04	2.60E-04	2.60E-04	2.60E-04	2.60E-04
Naphthalene (H)	6.10E-04	6.10E-04	6.10E-04	6.10E-04	6.10E-04	6.10E-04
Nickel (H)	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03	2.10E-03
Selenium (H)	2.40E-05	2.40E-05	2.40E-05	2.40E-05	2.40E-05	2.40E-05
Toluene (H,T)	3.40E-03	3.40E-03	3.40E-03	3.40E-03	3.40E-03	3.40E-03

ALL HAPS ARE LISTED IN GREEN

Emission Factors based on AP-42, Chapter 1.4 (revised)

Factor units are lb/10<sup>6</sup> scf.

PM (Total) and PM (Filterable) are assumed to be PM10

PM2.5 (Total) = PM2.5 (Filterable) + PM (Condensable)

Acetaldehyde, acrolein, and ammonia factors are from WebFIRE database.

The FGR control factor for formaldehyde is from the WebFIRE database.

The 2014 EPA NEI is located here: <https://www.epa.gov/air-emissions-inventories/2014-national-emissions-inventory-nei-documentation>

Emission Factor, lb/10 <sup>6</sup> scf	HHV Used	TIER 1	
		1.0	2.0
CO <sub>2</sub>	53.02	1.0	2.0
Methane	0.0010	1.0	2.0
	0.0001	1.0	2.0

Reported Molecular Weight If using TIER 1

not using - this is Tier 1



NATURAL GAS COMBUSTION EMISSIONS CALCULATOR REVISION N 01/05/2017 - REVISION SCREEN



Instructions: Enter emission source/facility data on the "INPUT" tab/screen. The air emission results and summary of input data are viewed/printed on the "OUTPUT" tab/screen. The different tabs are on the bottom of this screen.

This spreadsheet is for your use only and should be used with caution. NCDEQ does not guarantee the accuracy of the information contained. This spreadsheet is subject to annual revision and updating. It is your responsibility to be aware of the most current information available. NCDEQ is not responsible for errors or omissions that may be contained herein.

Veriflon  
 NG2000A  
 NG2000B  
 NG2000C  
 NG2000D 713112002 Janet Boyer  
 NG2000E 2120/2003 Janet Boyer  
 NG2000F 10/14/2008 Denise Hayes  
 NG2000G 1122/20.0 Sushma Masemore  
 NG2000H 512412010 Denise Hayes  
 NG2000I 1/30/2012 Denise Hayes  
 NG2000J 3126.12012 Denise Hayes  
 NG2000K 6/19/2012 Denise Hayes  
 NG2000L 10/18/2013 Denise Hayes  
 NG2000M 6/22/2015 Denise Hayes  
 NG2000N 1/5/2017 Denise Hayes

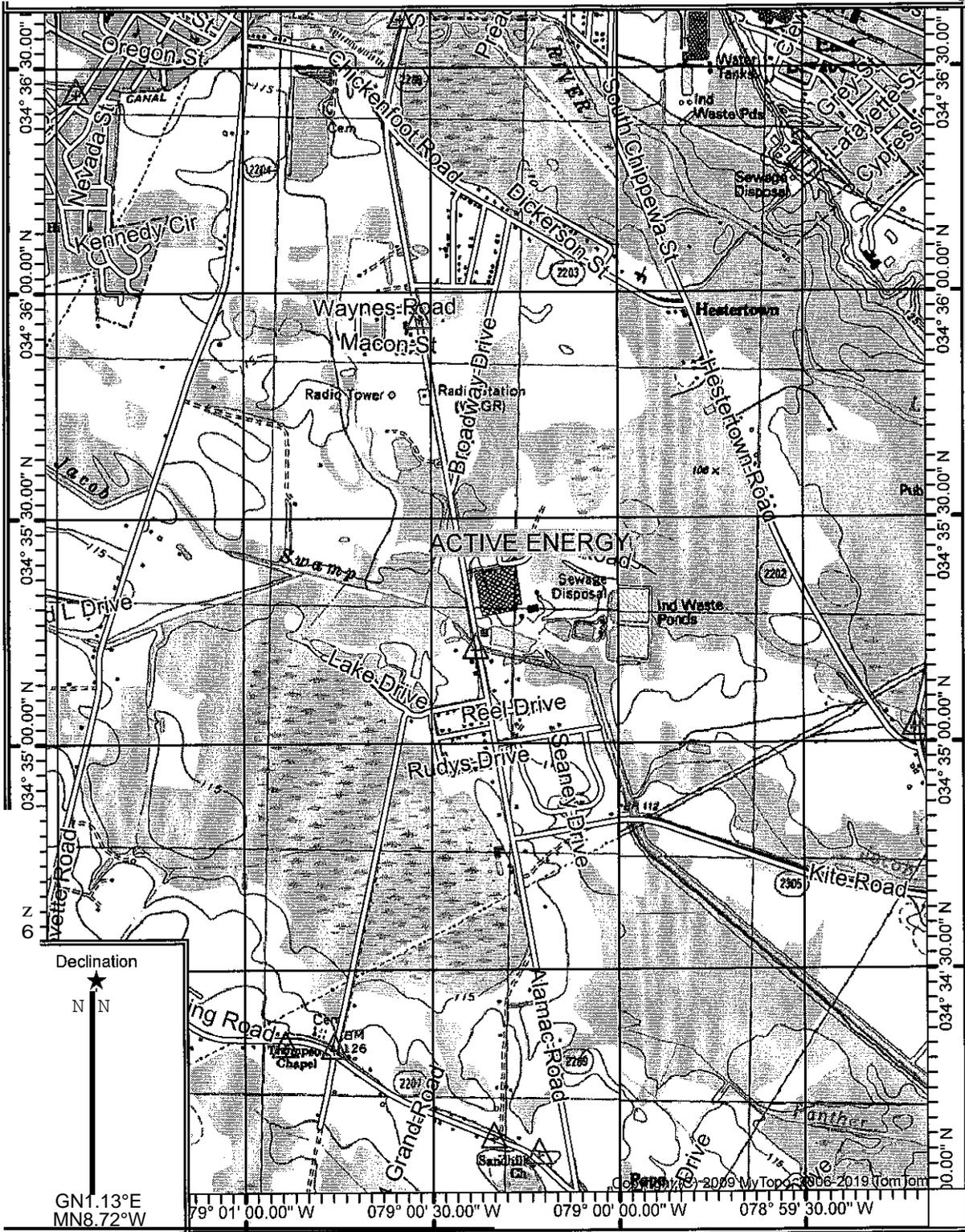
**Revisions**  
 Moved SNCR selector from below the 11st of boiler types to above the list of boiler types on Input sheet.  
 Added flags to indicate when heat input rate doesn't match boiler type selection on Input sheet.  
 Added revision letter and date to Input sheet  
 Modified instructions on Input sheet clarifying that "... may become a permit limit ." only applies to using the spreadsheet for permit applications.  
 Modified instructions on Input sheet to include an explanation of how to calculate potential emissions  
 Added note on Input sheet for non-boiler/non-residential furnace users  
 Changed label "Maximum Annual Fuel Throughput" on Input sheet to "Annual Fuel Throughput" to minimize confusion re. the value expected for this column.  
 Modified "Emissions Output" label on Input sheet to include hours of Off-Flare on.  
 Added disclaimer text to Input sheet  
 Removed "left over" HMA plant footnote from Emission Factors sheet.  
 Added Revisions sheet  
 Removed emission factors for metal from small boilers and residential furnaces  
 Put into new format.  
 Changed heat value to Btu/sd instead of Btu/lb on output  
 Change column heading on output from tons/yr to lbs/yr on HAP/TAP column heading  
 Add "Total HAPS" line to output  
 Add "Highest HAP" line to output  
 Change TAP "lb/yr" calculation to be based on annual sulfur limitation  
 Correct formula in "Input35"  
 Change Output PM labels to match emission factors  
 Added Greenhouse Gas pollutant data, emissions, and factors to Input, output, and factors screens.  
 Added Mercury in the toxic pollutant table since it is a toxic pollutant  
 Revised GHG calculations such that the ACTUAL emissions calculated are consistent with the EPA GHG Mandatory Reporting Rule  
 Updated cell for "Requested annual limitation" on input screen to default to maximum potential, with the option to enter facility specific limitation  
 Updated descriptions and CAS numbers of HAP/TAP pollutants. Added disclaimer to not use GHG emissions for PSD purposes.  
 Updated metal HAP/toxic emission factors for when boilers are permitted to also burn fuel oil or coal. The metal HAPs, metals are only for dual fuel boilers  
 Added actual hours of operation to input sheet. Made miscellaneous corrections.  
 Corrected factor for formaldehyde on large boilers without control. Corrected requested limit usage on input tab to default to the potential usage  
 Corrected print area for input sheet. Corrected acrolein, acetaldehyde, ammonia, cobalt, and lead to show up for both ng only and ng fuel oil.  
 Updated calculation for GHG emissions. Global warming potential changed on 11114101 methane (21 to 25) and N2O (310 to 298).  
 Updated particulate matter emission factors based on new data from EPA National Emissions Inventory. Spreadsheet titled "Emission Factors for Particulate Matter from Natural Gas Combustion"  
<http://www.flp.org/air-emissions-inventory/2014-national-emissions-inventory/Documentation>

## **FIGURES**

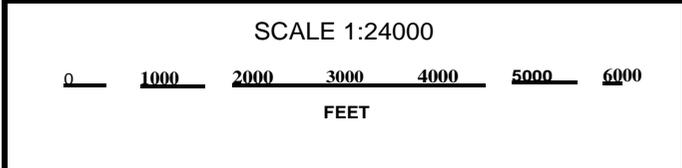
FIGURE 1 - USGS Site Location Map

Map Name: SOUTHWEST LUMBERTON  
Print Date: 10/24/19

Scale: 1 inch = 2,000 ft.  
Map Center: 034°35'21.10"N, 079°00'21.09"W



GN1.13°E  
MN8.72°W



SITE LOCATION MAP  
ACTIVE ENERGY RENEWABLE  
POWER  
LUMBERTON, NC  
FIGURE 1 JOB NO. 1198-001

# **ATTACHMENT A**

Supporting Documentation

**CHUCK PAKALA**

---

**From:** "Reeves, Gregory W" <gregory.reeves@ncdenr.gov>  
**Date:** Monday, October 14, 2019 11:39 AM  
**To:** "CHUCK PAKALA" <cvpakala@carolina.rr.com>  
**Cc:** "Antonio Esposito" <antonio.esposito@aegplc.com>; "Michael Rowan" <michael.rowan@aegplc.com>; "Carter, Heather" <Heather.Carter@ncdenr.gov>; "Cole, Jeffrey D" <jeffrey.cole@ncdenr.gov>; "Lowery-jacobs, Evangelyn" <evangelyn.lowery-jacobs@ncdenr.gov>; "Kadir, Abdul" <abdul.kadir@ncdenr.gov>  
**Subject:** RE: Air permit for Active Energy

Chuck, based on the information submitted and our conversation this morning, it would appear that the facility will require an air permit, as the facility-wide **VOE** emissions after controls appear to exceed 5 tons per year.

In reaching that conclusion, I assumed that the pressure cooker emissions at Active Energy would be similar to the dryer emissions at the Enviva Sampson pellet facility. Uncontrolled emissions from the Enviva Sampson dryer were 1.07 lb/ODT in a stack test conducted in April 2017. I further assumed that the condenser in the Active Energy process would condense 80% of the **VOE** from the pressure cooker, so 20% of the **VOE** emissions (0.21lb/ODT) would be emitted to the atmosphere. I assumed that the pellet press/dryer operation at Active Energy would have VOC emissions similar to the pellet press/cooler operations at Enviva Sampson. The emission factor for the Enviva Sampson pellet presses during the April 2017 stack testing was 0.50 lb/ODT (5.82 lb/hr **VOE** emission with throughput rate of 11.54 ODT/hr). There may be additional emissions of VOC from the pellet dryer operation at the Active Energy facility that we have not yet quantified.

Based on this information, the overall facility-wide actual emissions are estimated to be 0.71lb/ODT. Using the expected throughput of 36,000 ODT/yr, this yields an expected **VOE** emission of 12.78 tons/yr.

Based on this **VOE** emission, the facility does not qualify for an exemption from air permitting, and thus an air permit application is required prior to construction and operation.

There is a \$50 fee required for the air permit application (classification is Small), and a zoning consistency determination will be required. A PE review will be required for the condenser VOC control. Call me if you need assistance with the proper forms for the air permit application or if you have other questions.



Greg Reeve,  
*Permits Coordinator*  
 Division of Air Quality, Fayetteville Regional Office  
 225 Green Street, Suite 714 910.433.3373 (Office)  
 Fayetteville, NC 28301-5043 910.452.7467 (Fax)  
 Gregory.Reeve@ncdenr.gov

ftu.,J.../IS\*(\*)> fa"" .., <"/>,trJll.,,/, .fl<hO) to the North Carolina  
 m» I< ...CC\,Ss/ X,,;,,a ...;,,CC;,S,

**From:** CHUCK PAKALA [mailto:cvpakala@carolina.rr.com]  
**Sent:** Monday, October 7, 2019 6:20 PM  
**To:** Reeves, Gregory W <gregory.reeves@ncdenr.gov>  
**Cc:** Antonio Esposito <antonio.esposito@aegplc.com>; Michael Rowan <michael.rowan@aegplc.com>  
**Subject:** [External] Air permit for Active Energy

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**CHUCK PAKALA**

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**From:** "Reeves, Gregory W" <gregory.reeves@ncdenr.gov>  
**Date:** Monday, October 28, 2019 8:26 AM  
**To:** "CHUCK PAK.ALA" <cvpakala@carolina.rr.com>  
**Subject:** RE: [External] Dryer EF

Chuck, here are the results of stack testing at Enviva -Sampson for HAP: (All results expressed in lb/ODT)

March 2017

	<u>Dryer</u>	<u>Green Hammermills</u>	<u>Pellet</u>
<u>Press/Coolers</u>			
Methanol	0.0428	0.00008	0.0045
Formaldehyde	0.0760	0.00008	0.0014
Acetaldehyde	0.0640	0	0.0257
Propionaldehyde	0.0319	0	0.0045
Total HAP	0.215	0.00016	0.036

March 2018

	<u>Dryer</u>
Methanol	0.0298
Formaldehyde	0.0677
Propionaldehyde	0.0393
Total HAP	0.1757

Testing was also conducted in March 2019 for Formaldehyde, but that was on the dryer including thermal oxidizer control, so I don't think that would be similar to the Active Energy process. I think you could use any of these factors. I don't think any of these factors would cause an exceedance of the toxic TPERs in 02Q.0711.

Call me if questions ..... Greg



Greg Reeve,  
*Pm?nits Coordi lator*  
Division of Air Quality, Fayetteville Regional Office  
225 Green Stree Suire 714 910.433.3373 (Office)  
Fayette>,j]]e, NC2&301-5043 910.485.7467 (Fax)  
Grego,y.Reeves@nodem.gov

1/18) 1>1; Y fa"J X/ North Carolina Public Records Law and

**From:** CHUCK PAKALA [mailto:cvpakala@carolina.rr.com]  
**Sent:** Saturday, October 26, 2019 10:59 AM  
**To:** Reeves, Gregory W <gregory.reeves@ncdenr.gov>  
**Cc:** Antonio Esposito <antonio.esposito@aegplc.com>  
**Subject:** Re: [External] Dryer EF

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Greg,

Having used the Enviva stack test data for VOC calculations. Did Enviva have EFs for HAPS listed below or do you have any idea what you want me to use based on your past reviews. Looks like there is so much data on Enviva that you agree as recent and some you told me that it was old. Sorry to bother you many times like this.

11.cetaldehyde
11.crolein
Formaldehyde
Methanol
Phenol
Propionaldehyde

Regards

Chuck Pakala, PE  
CP Engineering and Environmental Solutions  
704-541-4042  
704-756-7451 (cell)  
704-541-4043 (fax)  
Email: [cvpakala@carolina.rr.com](mailto:cvpakala@carolina.rr.com)

**From:** [Reeves, Gregory W](mailto:Reeves_Gregory_W)  
**Sent:** Friday, October 25, 2019 8:48 AM  
**To:** CHUCK PAKALA  
**Subject:** RE: [External] Dryer EF

Chuck, I have not seen the test data from Ahoskie, so I don't know if that is any more representative of what Active Energy is doing. For the purposes of the permit, it probably does not matter at this point, as we will almost certainly be requiring stack testing at Active Energy to establish the emission factors from the processes. Either EF used will still require permitting.....Greg



Oreg Re""""  
Pmllli Coordinator  
Division of Air Quality, Fayetteville Regional Office  
225 Gm,n.Street,Suite 714 910.433.3373 (Office)  
Fayetteville, NC 28301-5043 910.485.1461 (Fax)  
[Gregory.Reeves@ncdem.gov](mailto:Gregory.Reeves@ncdem.gov)

*Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.*

**From:** CHUCK PAKALA (<mailto:cvpakala@carolina.rr.com>)  
**Sent:** Thursday, October 24, 2019 6:57 PM  
**To:** Reeves, Gregory W <[gregory.reeves@ncdenr.gov](mailto:gregory.reeves@ncdenr.gov)>  
**Subject:** (External] Dryer EF

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Greg,

I saw a stack test data on Enviva-Ahoskie in June 2014 and the Dryer EF is given as 0.781 lb/ODT. Would you be okay to use this number for my Dryer emissions at Screw Press/Dryer. Please note the purpose of this Dryer is to remove moisture content from 30% to 15% so that pellet making would be easier. Attached is the copy of that test. Currently I am using the same EF as the pressure cooker (1.07 lb/ODT). What are your thoughts.

Regards

Chuck Pakala, PE  
CP Engineering and Environmental Solutions  
704-541-4042  
704-756-7451 (cell)  
704-541-4043 (fax)  
Email: [cvpakala@carolina.rr.com](mailto:cvpakala@carolina.rr.com)

Greg,

Based on our conversations, research of available literature and also my extensive review of all Enviva and Natures Pellet permits, attached please find Air permit Exemption report for your review and approval process.

Assumptions:

- I. Used facility wide voes (all operations including fuel sources) from Enviva and other pellet making industries to calculate Emission Factor for our Pressure Cooker Process
2. We believe 80% of voe will be emitted from the Pressure Cooker process but as a conservative estimate, we used 100% voe to be released from this (Pressure Cooker) process.
3. A Condenser (80-95% eff) will be used to control Pressure Cooker emissions and we took as a conservative estimate 80% of Pressure Cooker emissions to be condensed in the condenser and 20% will be released to the air from this process.
4. The wet chips/wood product are sent to Screw Press with NO COOLERS (@Active Energy) unlike Enviva and other Pellet manufacturing process. Therefore, the voes released from the Screw Press would be due to the friction heat and it will be far less compared to the dryer emissions. Therefore, as a conservative estimate, we took Enviva Dryer EF for the Screw Press air emission calcs. In addition, Enviva presses were declared as insignificant sources at one time and later in combination with Coolers were added as a significant source in the permit.
5. Our Dryer Emissions are calculated using the Enviva Dryer EF.
6. In our opinion, all our calculations were based of conservative numbers taken from Enviva and other Pellet production.
7. Based on our calcs, all actual voe emissions were below the 5.0 ton/yr limit and thus, Active Energy Renewal Power will be qualified for an Air Permit Exemption status.

Regards

Chuck Pakala, PE  
CP Engineering and Environmental Solutions  
704-541-4042  
704-756-7451 (cell}  
704-541-4043 (fax)  
Email: [cvpakala@carolina.rr.com](mailto:cvpakala@carolina.rr.com)

October 30, 2019

VIA <<HAND DELIVERY/CERTIFIED MAIL RETURN RECEIPT REQUESTED>>

Dixon Ivey Jr. Zoning Director  
Robeson County Zoning Dept  
415 Country Club Rd  
Lumberton, NC 28360  
910-671-6298/272-6520

**Current Air Permit No. 03.62f2ffl3**

Dear Mr. Ivey:

On behalf of ActiveEnergy Renewable Power (AERP) previously known as Lumberton Energy Holdings located 1885 Alamac Road, Lumberton, NC, I am writing to inform you that we intend to install and operate a wood pellet manufacturing operations at the subject site. Please note the building was permitted in the past (**#03642R23**). Based on my conversations with your Zoning Dept., I hereby certify that to the best of my knowledge, that the Robeson County is the only local government having jurisdiction over this part of the land for an approval.

In accordance with § 143-215.108(£) of the North Carolina General Statutes, we hereby request that you issue a determination as to whether your municipality has in effect a zoning or subdivision ordinance that is applicable to the proposed facility. Additionally, please issue a determination as to whether the proposed use would be consistent with applicable zoning or subdivision ordinances. For your convenience, I have included a form with which you may remit your determination and a copy of the draft air permit application. As a means of demonstrating proof of transmittal, please sign, title, stamp, and date the enclosed form and mail to both the facility mailing address and the checked air quality office at your earliest **convenience**.

Thank you for your prompt attention to this matter. If you have any questions regarding this request, please contact me at 910-547-1920 or Ms. Doris Sampson at 910-734-5863 or Mr. Chuck Pakala at 704-541-4042.

Sincerely,

Antonio Esposito  
Chief Operating Officer  
910-547-1920

Enclosures:

Zoning Consistency Determination Form  
Air Permit Application

Courtesy of the Small Business Assistance Program  
toll free at 1-877-623-6748 or on the web at [www.envhelp.org/sb](http://www.envhelp.org/sb)