

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date:

Region: Washington Regional Office
County: Dare
NC Facility ID: 2800021
Inspector's Name: Kurt Tidd
Date of Last Inspection: 05/24/2022
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): NCEMC - Buxton</p> <p>Facility Address: NCEMC - Buxton 47123 Light Plant Road Buxton, NC 27920</p> <p>SIC: 4911 / Electric Services NAICS: 221122 / Electric Power Distribution</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 02D .0516, 02D .0521, 02D .1111. NSPS: NA NESHAP: GACT ZZZZ PSD: NA PSD Avoidance: 02Q .0317 NC Toxics: NA 112(r): NA Other: NA</p>
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Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Paul Flythe Manager of Diesel Generation (252) 995-4096 47123 Light Plant Road Buxton, NC 27920</p>	<p style="text-align: center;">Authorized Contact</p> <p>John Cook VP, Asset Management (919) 875-3046 3400 Sumner Blvd. Raleigh, NC 27616</p>	<p style="text-align: center;">Technical Contact</p> <p>Khalil Porter Environmental Manager (919) 875-3088 3400 Sumner Boulevard Raleigh, NC 27616</p>	<p>Application Number: 2800021.22A Date Received: 10/17/2022 Application Type: Renewal Application Schedule: TV-Renewal <p style="text-align: center;">Existing Permit Data</p> Existing Permit Number: 06612/T12 Existing Permit Issue Date: 06/11/2018 Existing Permit Expiration Date: 05/31/2023</p>

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2021	---	16.79	0.2500	0.2200	0.4500	0.0078	0.0035 [Benzene]
2020	---	4.03	0.0700	0.0500	0.1100	0.0019	0.0008 [Benzene]
2019	---	12.56	0.1900	0.1000	0.3300	0.0059	0.0026 [Benzene]
2018	---	11.11	0.1500	0.0500	0.3000	0.0052	0.0023 [Benzene]
2017	0.0100	30.97	0.4100	0.1400	0.8000	0.0140	0.0062 [Benzene]

<p>Review Engineer: Eric L. Crump, P.E.</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 06612/T13 Permit Issue Date: _____ Permit Expiration Date: _____</p>
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1. Purpose of Application

The North Carolina Electric Membership Corporation (NCEMC) Buxton Plant – listed in their air permit as NCEMC - Buxton – is an electricity generating station in Buxton, Dare County, North Carolina. The facility currently operates under Title V Permit No. 06612T12 with an expiration date of May 31, 2023. NCEMC - Buxton has applied for renewal of their Title V air quality permit. The renewal application was received on October 17, 2022, or at least six months prior to the expiration date as required by General Condition 3.K of the current permit. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

NCEMC - Buxton has not reported the addition, removal, or modification of any sources at the facility in permit renewal application No. 2800021.22A.

2. Facility Description

NCEMC - Buxton is a diesel-powered electricity generating station with a total capacity of 15 megawatts (MW). The plant operates primarily in emergency situations during peak load times of the year in the coldest months (typically January and February), the warmest months (typically June through August), and at other times on an as-needed basis. The facility, which began commercial operation in 1991, operates five No. 2 fuel oil-fired generators (ID Nos. ES-001 through ES-005), each rated at 27.8 million British thermal units (mmBtu) per hour heat input capacity. Each generator is a 4,400 brake horsepower Caterpillar ELM-GM L20-645E4B, installed in 1990. Emissions from the generators are controlled by dedicated oxidation catalyst units (ID Nos. CD001 through CD005).

3. Application Chronology

June 11, 2018	Division of Air Quality (DAQ) issues Permit No. 06612T12 to NCEMC - Buxton as a Title V renewal.
October 17, 2022	Washington Regional Office (WaRO) receives permit renewal application from NCEMC- Buxton.
March 23, 2023	Draft permit submitted to Stationary Source Compliance Branch (SSCB) to discuss validity of permit language regarding the testing of a single engine to demonstrate compliance for multiple engines, and testing at a lower catalyst temperature than specified in MACT Subpart ZZZZ rule.
May 12, 2023	Initial meeting with Permits Section (Joe Voelker, Eric Crump), Technical Services Section (Steve Hall), SSCB (Gary Saunders) to discuss MACT engine testing permit language in the Buxton permit.
May 24, 2023	Draft permit and review sent for DAQ supervisory review.
June 2, 2023	DAQ supervisor provides comments on draft permit and review.
June 7, 2023	DAQ sends draft permit to Buxton, SSCB, and WaRO for review and comment.
June 14, 2023	DAQ receives comments on draft permit from Buxton.

- June 22, 2023 Meeting with DAQ Permits Section (Mark Cuella, Booker Pullen, Rahul Thaker, Joe Voelker, Eric Crump), Technical Services Section (Steve Hall), SSCB (Gary Saunders) to discuss revisions and clarifications to the MACT engine testing permit language.
- June 29, 2023 Meeting with DAQ Permits Section (Mark Cuella, Booker Pullen, Rahul Thaker, Joe Voelker, and Eric Crump), Steve Hall, Gary Saunders, and WaRO (Betty Huddleston, Kurt Tidd) to further discuss revisions and clarifications to the MACT engine testing permit language.
- July 14, 2023 DAQ sends revised draft permit to Buxton and WaRO for review.
- xxx Permit renewal notice published, 30-day public notice and comment period begins, and 45-day EPA comment period begins.
- xxx 30-day public notice and comment period ends.
- xxx 45-day EPA comment period ends.

4. Changes to Permit and Title V Equipment Editor (TVEE) Discussion

The following table summarizes changes made to the current NCEMC - Buxton permit resulting from this permit renewal:

Page No.	Section	Description of Changes
Cover and throughout	---	Updated all dates and permit revision numbers
Insignificant Activities List	Attachment	Moved to Section 3 of permit
2	Table of Contents	Changed Section 3 from “General Conditions” to “Insignificant Activities per 15A NCAC 02Q .0503(8)” Added new Section 4, “General Conditions”
3	List of Acronyms	Relocated here (formerly on the last page of permit)
5	2.1 A	Updated limits and standards table to current format
6	2.1 A.3.c	Deleted the descriptive phrase “peak shaving/emergency/electrical power”
	2.1 A.3.d	Updated section to reflect the most current stipulations for 15A NCAC 02D .0317
	2.1 A.4	Updated section to reflect the most current stipulations for 15A NCAC 02D .1111 and GACT ZZZZ. Also made corrections and additions to the testing frequency and catalyst temperature requirements.
12	3	Section 3 is now “Insignificant Activities per 15A NCAC 02Q .0503(8)”
13-21	4	Updated General Conditions to Version 6.0 dated January 7, 2022

No changes were required to the TVEE as a result of this renewal.

5. Description of Changes and Estimated Emissions

EMC - Buxton has not reported the addition, removal, or modification of any sources at the facility. No changes in emissions are expected at this time.

6. Regulatory Review

EMC - Buxton is subject to the following state regulations, in addition to the requirements in the General Conditions:

15A NCAC 02D .0516, Sulfur Dioxide Emissions from Combustion Sources. Under this regulation, emissions of sulfur dioxide (SO₂) from any source of combustion discharged from any vent, stack, or chimney shall not exceed 2.3 pounds of SO₂ per million British thermal units (MMBtu) input. The five No. 2 fuel oil-fired peak shaving/emergency/electrical power generators (ID Nos. ES-001 through ES-005) are subject to 02D .0516. No monitoring, recordkeeping, or reporting is required when No. 2 fuel oil is fired in the generators, since this fuel is inherently low in sulfur. This permit revision does not affect this status. Continued compliance is expected.

15A NCAC 02D .0521, Control of Visible Emissions. This regulation establishes opacity limits for visible emissions generated by fuel burning operations and industrial processes where visible emissions are expected to occur (except during startups, shutdowns, and malfunctions approved according to procedures in 15A NCAC 02D .0535, Excess Emissions Reporting and Malfunctions). The five No. 2 fuel oil-fired generators (ID Nos. ES-001 through ES-005) are subject to 02D .0521. Because the generators were manufactured after July 1, 1971, this regulation limits them to 20 percent opacity averaged over a six-minute period. The six-minute averaging periods may exceed 20 percent not more than once in any hour, and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. Since No. 2 fuel oil is relatively clean burning with regard to visible emissions, no monitoring, recordkeeping, or reporting is required when No. 2 fuel oil is fired in the generators. This permit revision does not affect this status. Continued compliance is expected.

15A NCAC 02D .1111, Maximum Achievable Control Technology – The No. 2 fuel oil-fired peak shaving/emergency/electrical power generators (ID Nos. ES-001 through ES-005) and the No. 2 fuel oil-fired emergency generator (ID No. I-EG1) are subject to the “NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE),” 40 CFR 63 Subpart ZZZZ. This is discussed in more detail in Section 7 of this permit review.

15A NCAC 02Q .0317, Avoidance Conditions – EMC-Buxton has accepted an avoidance condition for 15A NCAC 02D .0530, Prevention of Significant Deterioration (PSD). This is discussed in more detail in Section 9 of this permit review.

The permit has been updated to reflect the most current stipulations for all applicable regulations.

7. National Emission Standards for Hazardous Air Pollutants (NESHAPS): Maximum and/or Generally Achievable Control Technology (MACT/GACT)

EMC – Buxton is classified as an area source of hazardous air pollutants (HAPs), because its potential HAP emissions are less than 10 tons per year of any individual HAP, and less than 25 tons per year of any combination of HAPs. As such, the facility is subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (also

referred to as GACT ZZZZ) as an area source of HAPs. More specifically, the generators at the facility are considered existing sources under GACT ZZZZ because the facility commenced construction on them prior to June 12, 2006. GACT Requirements for the No. 2 fuel oil-fired peak shaving/emergency/electrical power generators (ID Nos. ES-001 through ES-005) and the No. 2 fuel oil-fired emergency generator (ID No. I-EG1) are discussed separately below.

Five No. 2 fuel oil-fired peak shaving/emergency/electrical power generators (ID Nos. ES-001 through ES-005): An overview of permit requirements under GACT ZZZZ for these generators is presented in the following table.

Requirement	Overview
Compliance Date	May 3, 2013
Emission limits (Table 2d)	<ul style="list-style-type: none"> • Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent oxygen; or • Reduce CO emissions by 70 percent or more.
Operating limitation (Table 2b)	<ul style="list-style-type: none"> • Maintain catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop measured during the most recent performance test. • Maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450°F and less than or equal to 1350 °F • During startup periods, minimize time spent at idle and minimize engine’s startup time (not to exceed 30 minutes) • Closed crankcase system, or open crankcase filtration emission control system that filters exhaust to remove oil mist, particulates, and metals
Fuel limits (40 CFR 63.6604(a))	<p>The facility must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, as specified below:</p> <ul style="list-style-type: none"> • Sulfur content of 15 ppm maximum • Cetane index or aromatic content, as follows: <ul style="list-style-type: none"> ○ A minimum cetane index of 40; or ○ A maximum aromatic content of 35 volume percent.
Initial Performance Test (40 CFR 63.6612)	<p>As allowed under 40 CFR 63.6612(b), Buxton may use the performance test conducted on April 10 and 11, 2012¹ as an initial performance test because the test meets the following:</p> <ul style="list-style-type: none"> • Used the required methods • Was conducted within the last 2 years • Was approved by the DAQ • No process or equipment changes have been made since the test occurred.

¹ Memorandum from D. Hughes, SSCB to R. Fisher, WaRO, “NCEMC Buxton, Carbon Monoxide Emission Testing on Five Power Generators ES-001 through ES-005, Air Permit No. 06612T08, Facility ID 07/28/00021 Conducted April 10 and 11, 2012, Tracking No. 2012-048ST”, dated August 6, 2012.

Requirement	Overview
Demonstrate continuous compliance (Table 6)	<ul style="list-style-type: none"> • Maintain continuous parameter monitoring systems (CPMS) to monitor the catalyst inlet temperature for each catalyst and reduce the temperature data to 4- hour rolling averages. • Conduct subsequent performance tests on the five engines every 8,760 hours or 3 years, whichever comes first • Collect the catalyst inlet temperature data according to 40 CFR 63.6625(b) • Reduce these data to 4-hour rolling averages • Maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and • Measure the pressure drop across the catalyst once per month.
Recordkeeping (40 CFR 63.6655)	<ul style="list-style-type: none"> • Catalyst(s) inlet temperature data including the 4-hour rolling averages; and • Monthly measurements of the pressure drop across the catalyst(s). • Copy of each notification and report submitted to comply with this subpart, including Initial Notification or Notification of Compliance Status • Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. • Records of performance tests and evaluations as required in 40 CFR 63.10(b)(2)(viii). • Records of all required maintenance performed on the air pollution control and monitoring equipment. • Actions taken during periods of malfunction to minimize emissions • Records demonstrating all fuel burned meets rule requirements.

In reviewing this permit, three issues that warranted correction were identified regarding MACT ZZZZ generator testing requirements.

- The current permit language as written appears to allow Buxton to test a single generator and use those test results to demonstrate compliance for all five generators at Buxton as well as the generator at its sister electricity generating station, NCEMC - Ocracoke (in Hyde County, North Carolina, Facility No. 4800028).
- The permit language in Section 2.1 A.4.j and p of the current Buxton permit—and in Section 2.1 A.4.j of the Ocracoke permit (No. 06611T11, issued June 11, 2018)—required that only one of the five generators had to be tested every three years. This would result in each individual generator only needing to be tested once every 15 years.
- In Air Permit 00612T10 (issued September 26, 2017), Buxton requested that the lower limit of the inlet catalyst temperature range for the generators be lowered from 450°F to 390°F—below the lower limit stipulated in MACT ZZZZ. This request was made because during emergencies (e.g. hurricanes), Buxton needed to generate power with generators running at a lesser load; as a result, the generators would be unable to reach the catalyst temperature required by MACT ZZZZ. This temperature change had been incorporated into both the Buxton and Ocracoke permits, lowering the ongoing catalyst temperature requirements for all generators at both facilities.

In this permit renewal, DAQ has made corrections to the MACT ZZZZ language in the permit to establish that:

- 1) generator testing performed at a given facility can only reflect the compliance status of that given facility and none other,
- 2) performance tests shall be conducted on each engine every 8,760 hours or 3 years, whichever comes first, in accordance with the rule (40 CFR 63.6615, Table 3), unless prior written approval for an alternative testing schedule is granted by DAQ,
- 3) Except as allowed in accordance with item (5) below, Buxton shall conduct performance testing at each operating load range necessary to demonstrate compliance at all catalyst inlet temperatures that are representative of normal operation.
- 4) Except as allowed in accordance with item (5) below, the Permittee shall confirm or reestablish the lower bound temperature value in item (3) above with each performance test.
- 5) Buxton shall conduct performance testing in accordance with items (3) and (4) above unless prior written approval for alternative testing procedures/scenarios is obtained from the DAQ. Any requests for alternative testing procedures/scenarios shall be included in Buxton’s site-specific test plan and submitted to DAQ at least 60 days prior to the proposed test date. [40 CFR 63.7(b), (c)]
- 6) Whenever a catalyst is changed, Buxton shall conduct a performance test to demonstrate compliance with the emission limit, and to reestablish the values of the operating parameters measured during the last performance test. [40 CFR 63.6640(b) This performance test is required unless prior written approval for an alternative testing schedule is obtained from the DAQ. [40 CFR 63.7(h)]
- 7) The lower bound temperature value shall be revised, if necessary, based on the results of any performance testing. A permit application shall be required if necessary to reestablish the lower bound temperature value.

Emergency Generator (ID No. I-EG1): The table below provides an overview of the requirements for the emergency generator under GACT ZZZZ.

Source ID	Description	Overview of GACT 4Z Requirements
I-EG1	One No. 2 fuel oil-fired emergency generator (125 kW)	<ul style="list-style-type: none"> • Install a non-resettable hour meter on the engine • Change oil and filter every 500 hours of operation or annually • Inspect all hoses and belts every 500 hours of operation or annually and replace if necessary • Operate no more than 100 hours for maintenance and readiness testing • Inspect air cleaner every 1,000 hours of operation or annually • Achieve compliance by May 3, 2013

The emergency generator (ID No. I-EG1) has potential emissions of less than five tons per year of criteria pollutants. This engine is therefore exempt from permitting per 15A NCAC 02Q .0503(8) and can remain on the insignificant activities list. However, the facility still must meet the requirements of GACT ZZZZ for this generator.

This permit renewal does not affect this status of these generators with regard to GACT ZZZZ. Continued compliance is expected.

8. New Source Performance Standards (NSPS)

The five No. 2 fuel oil-fired peak shaving/emergency/electrical power generators (ID Nos. ES-001 through ES-005) began operation in February 1991.² Since the NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60, Subpart IIII) applies to facilities that commenced construction on their engines after July 11, 2005, the five generators at EMC - Buxton are not currently subject to any NSPS. This permit renewal does not affect this status.

9. New Source Review (NSR)/Prevention of Significant Deterioration (PSD)

EMC - Buxton is considered a minor source for NSR/PSD purposes because the facility has accepted an avoidance condition to limit nitrogen oxide (NO_x) emissions from the generators (ID Nos. ES-001 through ES-005) to less than 247.8 tons per 12-month period. To ensure that the avoidance condition is met, the permit limits the amount of No. 2 fuel combusted in the generators to less than 958,607 gallons in any 12-month period, based on an emission factor of 0.5170 pounds NO_x emissions per gallon of No. 2 fuel oil.³

When the Title V air permit was initially issued, the five peak shaving/emergency/electrical generators were limited to 250 tons per 12-month period of NO_x emissions for PSD avoidance. However, the original avoidance limit did not account for potential NO_x emissions from the No. 2 fuel oil-fired 125 kW emergency generator (ID No. I-EG1), which is included on the insignificant activities list. Potential emissions of NO_x from this emergency generator were estimated at 2.2 tons per year (based on an EPA AP-42 emission factor and an assumption of 500 hours of operation per year, per EPA policy⁴). The original avoidance limit was subsequently reduced by 2.2 tons to 247.8 tons per 12-month period to account for the potential NO_x emissions from the emergency generator (ID No. I-EG1). The revised limit was incorporated into Air Permit No. 06612T08 issued on May 3, 2006.

The permit requires calculations of NO_x emissions to be made at the end of each month, and monthly records of the amount of No. 2 fuel oil usage to be kept in a log. EMC – Buxton must submit a summary report including monthly NO_x emissions and monthly quantities of No. 2 fuel oil usage within 30 days after each calendar year semiannual period. No changes to the monitoring, recordkeeping, and reporting requirements are required under this permit renewal.

10. Risk Management Plan (RMP) Requirements

40 CFR Part 68 requires stationary sources storing more than threshold quantities of regulated substances to develop a RMP in accordance with Section 112(r) of the Clean Air Act. The RMP lists the potential effects of a chemical accident at the facility, steps the facility is taking to prevent an accident, and emergency response procedures to be followed if an accident should occur.

EMC - Buxton is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal does not affect the 112(r) status of the facility.

² Cited in initial Title V permit review (Booker Pullen, Air Permit No. 06612T07, November 3, 2000).

³ This NO_x emission factor was developed by OMNI Professional Environmental in August 1995 for NCEMC using vendor's source testing data.

⁴ U.S. Environmental Protection Agency. Memo from J. Seitz, Office of Air Quality Planning and Standards, "Calculating Potential to Emit (PTE) for Emergency Generators", September 6, 1995.

11. Compliance Assurance Monitoring (CAM)

The CAM rule (15A NCAC 02D .0614) applies to each pollutant specific emissions unit located at a source that is required to obtain a Title V permit if it meets all of the following criteria:

- It is subject to an emission limitation or standard, and
- It uses a control device to achieve compliance, and
- It has potential pre-control emissions that equal or exceed the major source threshold (i.e., either 100 tpy for criteria pollutants, 10 tpy of any individual HAP, or 25 tpy of any combination of HAP).

The following emission limitations or standards are exempted from the CAM rule:

- NSPS or NESHAP standards proposed after November 15, 1990;
- Stratospheric ozone protection requirements under Title VI of the Clean Air Act
- Acid rain program requirements;
- Emission limitations or standards or other requirements that apply solely under an approved emissions trading program;
- An emissions cap that meets requirements of 40 CFR 70.4(b)(12) or 71.6(a)(13);
- Emission limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance determination method, as defined in 40 CFR 64.1, unless the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device (e.g., a surface coating line controlled by an incinerator for which continuous compliance is determined by calculating emissions on the basis of coating records and an assumed control device efficiency factor based on an initial performance test; in this example, this part would apply to the control device and capture system, but not to the remaining elements of the coating line, such as raw material usage).
- Certain municipally owned utility units, as defined in 40 CFR 72.2.

Please note that the emission unit is not exempted from the CAM rule if nonexempt emission limitations or standards (e.g. a state rule or an older NSPS emission limits) apply to the emissions unit.

As stated in the preceding air permit review (B. Gatano, Air Permit No. 06612T12, June 11, 2018), EMC-Buxton uses oxidation catalysts (ID Nos. CD001 through CD005) to comply with the carbon monoxide emission limit under GACT ZZZZ. GACT ZZZZ is an emissions standard proposed by the U.S. EPA after November 15, 1990 pursuant to Section 112(d) of the Clean Air Act—therefore, the oxidation catalysts are exempt from CAM requirements. This permit renewal does not affect the facility's status with regard to CAM.

12. Facility-wide Air Toxics Review

The EMC – Buxton facility, being subject to a GACT standard under 40 CFR Part 63, as discussed in Section 7 of this review, is exempt from toxics permitting in accordance with 15A NCAC 02Q .0702(a)(27)(A).

13. Facility Emissions Review

The table in the header page of this review summarizes emissions EMC-Buxton has reported in the annual emissions inventories after application of required emission controls. Emissions of SO₂, VOC, CO, PM₁₀, and HAP have remained relatively constant over this time period. NO_x emissions dropped significantly between 2017 and 2018 (from 30.97 to 11.11 tons) and have not approached 2017 levels since.

14. Compliance History and Status

The following chronology dates from when the EMC - Buxton permit was last renewed on June 11, 2018.

February 13, 2019	Kurt Tidd, WaRO conducts facility compliance inspection. Facility appears to be operating in compliance with all permit requirements.
April 3, 2020	Doug Byrd, WaRO conducts partial facility compliance inspection via file review and facility contact interview due to COVID-19 pandemic restrictions. Facility appears to be operating in compliance with all permit requirements.
July 9, 2020	Samantha Mellott, WaRO conducts facility compliance inspection. Facility appears to be operating in compliance with all permit requirements.
June 23, 2021	Robert Bright, WaRO conducts facility compliance inspection. Facility appears to be operating in compliance with all permit requirements.
May 24, 2022	Kurt Tidd, WaRO conducts facility compliance inspection. Facility appears to be operating in compliance with all permit requirements.

In summary, EMC - Buxton appears to have been in compliance with all the requirements of their Title V air permit since the last renewal, with no violations.

15. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0518(b), the EPA will have a 45-day review period. In general, as agreed by DAQ and EPA Region 4, EPA's 45-day review period will run concurrent with the 30-day comment period unless advised otherwise. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit, and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.

There are no affected states or local programs within 50 miles of the facility.

Notice of the DRAFT Title V Permit to Affected States ran from XXXX, 2023, to XXXX, 2023. ***Discuss any comments received from Affected States or Local Programs.***

Public Notice of the DRAFT Title V Permit ran from XXXX, 2023, to XXXX, 2023. ***Discuss any public comments received.***

EPA’s 45-day review period ran concurrent with the 30-day Public Notice, from XXXX, 2023, to XXXX, 2023. **Discuss any comments received from EPA and U.S. EPA Region 4 regarding the DRAFT Title V Permit.**

16. Other Regulatory Considerations

The following items were not required in Permit Application No. 2800021.22A:

- Professional Engineer’s seal
- Zoning consistency determination
- Permit fee.

17. Recommendations

DAQ has reviewed the permit application(s) for NCEMC - Buxton located in Buxton, Dare County to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 06612T13 upon completion of the public participation and EPA review periods.