



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Matthew Warrick  
DAK Americas LLC  
3500 Daniels Road NE  
Leland, NC 28451

Dear Matthew Warrick,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 03033T42) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila C. Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Eric Warner  
Archer Daniels Midland Company  
1730 East Moore St., S.E.  
Southport, NC 28461

Dear Eric Warner,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 02502T21) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Elton Gibbs  
CPI USA North Carolina - Southport Plant  
1281 Power House Drive SE  
Southport, NC 28461

Dear Elton Gibbs,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 05884T10) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

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If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Andy Simmons  
American Distillation, Inc.  
1690 NE Royster Road  
Leland, NC 28451

Dear Andy Simmons,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 07627R08) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

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Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Floyd Whitmire  
International Paper - Riegelwood Mill  
865 John L Riegel Road  
Riegelwood, NC 28456

Dear Floyd Whitmire,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 03441R19) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Peter Haid  
Hess Corporation - Wilmington Terminal  
1 Hess Plaza, WB4  
Woodbridge, NJ 07095

Dear Peter Haid,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 03467R22) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Scott Bergman  
NuStar Asphalt Refining, LLC  
204 Grove Ave, Suite B  
West Deptford, NJ 08086

Dear Scott Bergman,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 03571T13) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

J. Frederick  
Carolina Power and Light Company d/b/a Progress Energy Caro  
801 Sutton Steam Plant Road  
Wilmington, NC 28401

Dear J. Frederick,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 01318T23) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

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Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Karl Ehemann  
Corning Incorporated  
310 North College Road  
Wilmington, NC 28405

Dear Karl Ehemann,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 03809T46) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

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Sincerely,

Sheila Holman

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Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
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Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Howard Morris  
Elementis Chromium  
5408 Holly Shelter Rd.  
Castle Hayne, NC 28429

Dear Howard Morris,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 02937T35) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

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Sincerely,

Sheila Holman

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Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

David Glover  
Barnhill Contracting Company  
P. O. Box 1529  
Tarboro, NC 27886

Dear David Glover,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 02905R17) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Mark Leik  
Global Nuclear Fuel - Americas, LLC  
PO Box 780, Mail Code G26  
Wilmington, NC 28402

Dear Mark Leik,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 01492R11) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

William King  
Invista, S.a.r.l.  
4600 Highway 421 North  
Wilmington, NC 28402

Dear William King,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 00130R21) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Reed Dulany III  
Southern States Chemical  
PO Box 546  
Savannah, GA 31404

Dear Reed Dulany III,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 01853T15) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Andy Keith  
Kinder Morgan, Wilmington  
2005 North 6th Street  
Wilmington, NC 28401

Dear Andy Keith,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 04382R14) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Stephen LePage  
National Gypsum Company  
838 Sunnyvale Drive  
Wilmington, NC 28412

Dear Stephen LePage,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 03725R18) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Marc Coggeshall  
Flint Hills Resources, LP  
4111 E. 37th Street North  
Wichita, KS 67201

Dear Marc Coggeshall,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 01694T18) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

William Baker, Jr.  
CTI of NC Inc  
P O Box 576  
Savannah, GA 31402

Dear William Baker, Jr.,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 05870T16) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

John Hubbard  
New Hanover County WASTEC  
3002 Hwy 421 North  
Wilmington, NC 28401

Dear John Hubbard,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 05151T17) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Gard Gershmel  
Fortron Industries LLC  
4600 Hwy 421 North  
Wilmington, NC 28402

Dear Gard Gershmel,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 07323T17) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

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If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Matthew Jordan  
Sweeney Water Treatment Plant  
235 Government Center Drive  
Wilmington, NC 28403

Dear Matthew Jordan,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 08181R05) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

The NCDAQ will review the protocol submitted by your facility and send written confirmation of either approval or disapproval of the protocol. Within 90 days after receiving a written notice of approval of your modeling protocol from the NCDAQ, please submit the modeling demonstration for the 1-hour sulfur dioxide NAAQS. The emission rates used in the demonstration should be based on current permit allowable standards. If an emission rate other than the current allowable rate is used this should be clearly identified and a request for a permit modification should be submitted along with the modeling demonstration requesting that the

emission rate be made enforceable as a practical matter. Both the modeling protocol and the required modeling analysis should be submitted to Donald R. van der Vaart at the address below.

If you have any questions regarding this letter please contact Donald R. van der Vaart at (919) 715-6253 or <Donald.vandervaart@ncdenr.gov>.

Sincerely,

Sheila Holman

cc: Donald van der Vaart, P.E.,  
Brad Newland



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Beverly Eaves Perdue  
Governor

Sheila C. Holman  
Director

Dee Freeman  
Secretary

September 29, 2010

Brian Gurganus  
S.T. Wooten Corporation  
PO Box 2408  
Wilson, NC 27894

Dear Brian Gurganus,

On June 2, 2010, the United States Environmental Protection Agency (USEPA) strengthened the primary sulfur dioxide (SO<sub>2</sub>) national ambient air quality standard (NAAQS) by establishing a new 1-hour standard at a level of 75 parts per billion. The revised SO<sub>2</sub> standard includes a new "form" of the standard. The new form is the 3-year average of the annual 99<sup>th</sup> percentile of 1-hour daily maximum concentrations. The new standard became effective on August 23, 2010 (See 75 Federal Register 35520). As part of the North Carolina Division of Air Quality's (NCDAQ) ambient air quality monitoring network, the NCDAQ operates and maintains an SO<sub>2</sub> ambient monitor in New Hanover County near the city of Wilmington (Latitude = 34.2684388, Longitude = -77.9565138). The data from that monitor indicates a violation of the new SO<sub>2</sub> NAAQS based on data from 2007-2009. As a first step toward addressing the violation, the NCDAQ is requiring each source that may cause or contribute to the measured violation to conduct and submit air dispersion modeling that estimates the ambient impacts of its sulfur dioxide emissions.

Your facility (currently operating under Air Quality Permit No. 09567R01) has been identified as a source that may be contributing to exceedance of the new SO<sub>2</sub> standard at the New Hanover County monitor. Pursuant to North Carolina General Statutes §143-215.107 and 108, the NCDAQ requests submission of an air dispersion modeling protocol for the new 1-hour SO<sub>2</sub> NAAQS within 45 days of receipt of this letter. A sample modeling protocol for this demonstration is attached. The purpose of the SO<sub>2</sub> analysis will be to determine your facility's SO<sub>2</sub> 1-hr impacts at the New Hanover SO<sub>2</sub> monitor and overall compliance with the new 1-hr SO<sub>2</sub> NAAQS.

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Sincerely,

Sheila Holman

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Brad Newland