



*A New Generation of Power*

February 1, 2016

Mr. Edward S. Andrews, P.E.  
WVDEP – Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

Re: Longview Power Project  
Plant ID # 061-00134

Dear Mr. Andrews,

Enclosed please find the original and 2 electronic copies of an application for a Class 1 Administrative Update to Longview's air permit # R14-0024E. A concurrent Minor Modification of Title V Operating Permit R30-06100134-2013 is also requested.

Specifically, two amendments are requested:

- Utilization of EPA-approved Part 60 methodology in place of Part 75 methodology for determination of PC Boiler heat input.
- Correction of Auxiliary Boiler annual capacity factor limit to utilize heat input in place of operating hours, as specified in 40 CFR 60.41b.

The requested permit amendments constitute a Class I Administrative Update:

- With respect to the PC Boiler heat input, the Part 60 methodology is considered “equivalent/superior” to the current Part 75 methodology, because it eliminates known high biases caused by Part 75 bias adjustment factors, missing data substitution routines, as well as the bias caused by non-combustion CO<sub>2</sub> originating from limestone slurry in the wet FGD.
- With respect to the Aux Boiler annual capacity factor, we are seeking revised language to mirror the definition of “annual capacity factor” provided at 40 CFR 60.41.b., which utilizes boiler heat input rather than hours of operation.

These requested amendments do not require any physical changes in methods of unit operations.

Thank you for your assistance in this matter. If you have any questions, or if you require additional information, please contact me at (304) 599-0930 ext. 2204.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JD 1/8', is written over a circular stamp or seal.

Joseph R. Douglass  
Asset and Environmental Director

**Application for Class 1 Administrative Update (PSD Permit)  
& Minor Modification (Title V Permit)**

**Table of Contents**

- NSR/Title V Revision Application Form
- Attachment A: Business Certificate
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- Attachment E: Plot Plan
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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**DIVISION OF AIR QUALITY**

601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
(304) 926-0475  
[www.dep.wv.gov/daq](http://www.dep.wv.gov/daq)

**APPLICATION FOR NSR PERMIT  
AND  
TITLE V PERMIT REVISION  
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):

- CONSTRUCTION     MODIFICATION     RELOCATION  
 CLASS I ADMINISTRATIVE UPDATE     TEMPORARY  
 CLASS II ADMINISTRATIVE UPDATE     AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION  
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

**FOR TITLE V FACILITIES ONLY:** Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

**Section I. General**

1. Name of applicant (as registered with the WV Secretary of State's Office):  
Longview Power, LLC

2. Federal Employer ID No. (FEIN):  
04-3561860

3. Name of facility (if different from above):  
Longview Power

4. The applicant is the:  
 OWNER     OPERATOR     BOTH

5A. Applicant's mailing address:  
1375 Fort Martin Road  
Maidsville, WV 26541

5B. Facility's present physical address:  
1375 Fort Martin Road  
Maidsville, WV 26541

6. **West Virginia Business Registration.** Is the applicant a resident of the State of West Virginia?     YES     NO  
– If YES, provide a copy of the **Certificate of Incorporation/Organization/Limited Partnership** (one page) including any name change amendments or other Business Registration Certificate as **Attachment A**.  
– If NO, provide a copy of the **Certificate of Authority/Authority of L.L.C./Registration** (one page) including any name change amendments or other Business Certificate as **Attachment A**.

7. If applicant is a subsidiary corporation, please provide the name of parent corporation:

8. Does the applicant own, lease, have an option to buy or otherwise have control of the *proposed site*?     YES     NO  
– If YES, please explain:    Applicant leases plant site  
– If NO, you are not eligible for a permit for this source.

9. Type of plant or facility (stationary source) to be **constructed, modified, relocated, administratively updated** or **temporarily permitted** (e.g., coal preparation plant, primary crusher, etc.): coal-fired power plant

10. North American Industry Classification System (NAICS) code for the facility:  
221112

11A. DAQ Plant ID No. (for existing facilities only):  
061-00134

11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):  
R14-0024E and R30-06100134-2013

**All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.**

<p>12A.</p> <ul style="list-style-type: none"> <li>– For <b>Modifications, Administrative Updates</b> or <b>Temporary permits</b> at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road;</li> <li>– For <b>Construction</b> or <b>Relocation permits</b>, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a <b>MAP</b> as <b>Attachment B</b>.</li> </ul> <p>From Morgantown, take WV Route 19 West to Route 100 North to Route 53 (Fort Martin Road). Proceed 5.4 miles. Turn left into Gate 2. Proceed to security.</p>		
12.B. New site address (if applicable):	12C. Nearest city or town: Maidsville	12D. County: Monongalia
12.E. UTM Northing (KM): 4395.7	12F. UTM Easting (KM): 589.2	12G. UTM Zone: 17
<p>13. Briefly describe the proposed change(s) at the facility:          Provision 5.1.1.a.- Use Part 60 methodology instead of Part 75 methodology for determination of PC Boiler heat input          Provision 6.1.1.b. &amp; c. - Use Heat Input instead of Operating Hours for determination of Auxiliary Boiler annual capacity factor</p>		
<p>14A. Provide the date of anticipated installation or change: Upon WVDEP approval</p> <ul style="list-style-type: none"> <li>– If this is an <b>After-The-Fact</b> permit application, provide the date upon which the proposed change did happen: N/A</li> </ul>		<p>14B. Date of anticipated Start-Up if a permit is granted: N/A</p>
<p>14C. Provide a <b>Schedule</b> of the planned <b>Installation</b> of/<b>Change</b> to and <b>Start-Up</b> of each of the units proposed in this permit application as <b>Attachment C</b> (if more than one unit is involved).</p>		
<p>15. Provide maximum projected <b>Operating Schedule</b> of activity/activities outlined in this application:</p> <p style="text-align: center;">Hours Per Day 24      Days Per Week 7      Weeks Per Year 52</p>		
<p>16. Is demolition or physical renovation at an existing facility involved?    <input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p>		
<p>17. <b>Risk Management Plans.</b> If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see <a href="http://www.epa.gov/ceppo">www.epa.gov/ceppo</a>), submit your <b>Risk Management Plan (RMP)</b> to U. S. EPA Region III.</p>		
<p>18. <b>Regulatory Discussion.</b> List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as <b>Attachment D</b>.</p>		
<p><b>Section II. Additional attachments and supporting documents.</b></p>		
<p>19. Include a check payable to WVDEP – Division of Air Quality with the appropriate <b>application fee</b> (per 45CSR22 and 45CSR13).      No fee required for Class I Administrative Amendment or Title V Minor Modification</p>		
<p>20. Include a <b>Table of Contents</b> as the first page of your application package.</p>		
<p>21. Provide a <b>Plot Plan</b>, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as <b>Attachment E</b> (Refer to <b>Plot Plan Guidance</b>) .</p> <ul style="list-style-type: none"> <li>– Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).</li> </ul>		
<p>22. Provide a <b>Detailed Process Flow Diagram(s)</b> showing each proposed or modified emissions unit, emission point and control device as <b>Attachment F</b>.</p>		
<p>23. Provide a <b>Process Description</b> as <b>Attachment G</b>.</p> <ul style="list-style-type: none"> <li>– Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).</li> </ul>		
<p><b>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</b></p>		

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.  
 – For chemical processes, provide a MSDS for each compound emitted to the air.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger	
<input type="checkbox"/> General Emission Unit, specify		

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System
<input type="checkbox"/> Other Collectors, specify		

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.  
 ➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?  
 YES       NO  
 ➤ If YES, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "**Precautionary Notice – Claims of Confidentiality**" guidance found in the **General Instructions** as **Attachment Q**.

**Section III. Certification of Information**

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

<input checked="" type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**.

**All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.**

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

**Certification of Truth, Accuracy, and Completeness**

I, the undersigned  **Responsible Official** /  **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

**Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE Charles D Oliver DATE: 2/1/2016  
(Please use blue ink) (Please use blue ink)

35B. Printed name of signee: Charles D. Oliver

35C. Title: Plant Manager  
 Responsible Official and Designated Representative

35D. E-mail: coliver@longviewpower.net

36E. Phone: (304) 599-0930 ext. 3021

36F. FAX: (304) 599-3829

36A. Printed name of contact person (if different from above): Joseph R. Douglass

36B. Title: Asset & Environmental Director

36C. E-mail: jdouglass@longviewpower.net

36D. Phone: (304) 599-0930 ext. 2204

36E. FAX: (304) 599-3829

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate    | <input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet            |
| <input checked="" type="checkbox"/> Attachment B: Map(s)                  | <input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)                     |
| <input type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)            |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion   | <input type="checkbox"/> Attachment N: Supporting Emissions Calculations                |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan               | <input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)   | <input type="checkbox"/> Attachment P: Public Notice                                    |
| <input type="checkbox"/> Attachment G: Process Description                | <input type="checkbox"/> Attachment Q: Business Confidential Claims                     |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms                                  |
| <input type="checkbox"/> Attachment I: Emission Units Table               | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information   |
| <input type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input type="checkbox"/> Application Fee  |

*Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.*

**FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:**

- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
  - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
  - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
  - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
  - NSR permit writer should notify a Title V permit writer of draft permit,
  - Public notice should reference both 45CSR13 and Title V permits,
  - EPA has 45 day review period of a draft permit.

**WEST VIRGINIA  
STATE TAX DEPARTMENT  
BUSINESS REGISTRATION  
CERTIFICATE**

ISSUED TO:  
**LONGVIEW POWER LLC  
85 WELLS AVE STE 300  
NEWTON, MA 02459-3215**

**BUSINESS REGISTRATION ACCOUNT NUMBER: 1006-4407**

This certificate is issued on: **06/28/2010**

*This certificate is issued by  
the West Virginia State Tax Commissioner  
in accordance with W.Va. Code § 11-12.*

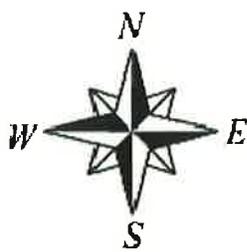
*The person or organization identified on this certificate is registered  
to conduct business in the State of West Virginia at the location above.*

**This certificate is not transferrable and must be displayed at the location for which issued.**

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.  
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.



**Attachment B**  
Site Location Map  
USGS 7.5 Minute Series Topographic Map  
Morgantown North, W.Va. Quadrangle  
Longview Power, LLC

## Attachment D – Regulatory Discussion

### Amendment #1 - PC Boiler Heat Input Limit

Longview requests a change to how compliance with the annual heat input limit is measured.

Currently, PSD Permit Provision 5.1.1. and Title V Permit Provision 5.1.1. provide that:

The following conditions and requirements are specific to the PC Boiler (ID #SB-1):

- a. The annual heat input of the PC Boiler shall not exceed 53,558,640 MMBtu per rolling 12-month total. The hourly heat input shall be determined as the hourly average heat input for each operating day, as determined via methods in 40 CFR 75 Appendix F.

The first 3 iterations of Longview's PSD permit did not specify the method by which heat input would be measured. For clarity and consistency, Longview agreed in early 2011 to add the Part 75 Appendix F language, as Longview was already required to monitor and report heat input to EPA in quarterly EDR's using the Part 75 methodology. This clarification was added to amended Permit # R14-00134C, issued February 23, 2011.

Accordingly, Longview currently utilizes Equation F-15 from Part 75 Appendix F Provision 5.2.1.:

$$HI = Q_w * 1/F_c * \%CO_{2w}/100$$

Where:

HI = Hourly heat input rate during unit operation, mmBtu/hr.

Q<sub>w</sub> = Hourly average volumetric flow rate during unit operation, wet basis, scfh.

F<sub>c</sub> = Carbon-based F-factor, listed in section 3.3.5 of this appendix for each fuel, scf/mmBtu.

%CO<sub>2w</sub> = Hourly concentration of CO<sub>2</sub> during unit operation, percent CO<sub>2</sub> wet basis.

Utilizing Part 75 methodology for heat input requires utilization of bias adjustment factors and missing data substitution under certain circumstances. While bias adjustment and missing data substitution conservative tools utilized for emissions trading programs, EPA consistently prohibits their use for Part 60 compliance applications. As Longview's heat input limit is a compliance limit, bias adjustment and missing data substitution should not be utilized.

In addition, Equation F-15 assumes that all measured CO<sub>2</sub> is from fuel combustion, and represents heat input to the boiler. But, at Longview, this is not the case. Longview measures CO<sub>2</sub> in the stack, downstream from the wet FGD scrubber. When we apply the limestone slurry for SO<sub>2</sub> control in the wet FGD, the following reaction occurs:



Assuming complete reaction, 40 tons/hr\*92% CaCO<sub>3</sub>\* (MW CO<sub>2</sub>/MW CaCO<sub>3</sub>) = 14.7 tons CO<sub>2</sub>/hr added to stack emissions. This reaction increases Longview's stack CO<sub>2</sub> emissions, and artificially inflates the Part 75 boiler heat input results.

During Longview's first few years of operation, the PC Boiler experienced considerable down time due to a number of design and construction issues, so the permitted annual heat input limit was never approached. However, following the major repairs completed in 2015, we anticipate that the PC Boiler will operate at a much higher annual capacity, necessitating this request for amendment.

Longview purchases fuel by MMBtu content, rather than by weight. To administer the fuel contract, Longview uses a mechanical sampler to obtain daily fuel samples for independent laboratory analysis. Daily samples are analyzed for moisture, sulfur, ash, and calorific value. The ISO 17000-025 certified laboratory uses ASTM method #D5865 to determine calorific value of the coal. This ASTM method is approved by EPA, incorporated by reference at 40 CFR 60.17, and specified for use at 40 CFR 60.45(f)(5)(ii) and 40 CFR 60.46(c)(2) to measure calorific value of coal. For purposes of determining compliance with an operating permit limit, this Part 60 methodology is more suitable and appropriate than the Part 75 methodology used for emissions trading programs.

A premature de-rate or shutdown of Longview operations due to biased heat input determination methodology would have detrimental effects on Longview's business, and would likely cause the Regional Transmission Organization (PJM Interconnection) to substitute Longview's generation with generation from older, less efficient EGU's (which typically do not have permit limits for annual heat input) for net negative environmental effect.

In summary, Longview requests replacement of the phrase "as determined via methods in 40 CFR 75 Appendix F" in Provision 5.1.1. with "as determined via methods in 40 CFR 60".

## **Amendment #2 - Auxiliary Boiler Capacity Factor Limit**

Longview requests changes to align the Auxiliary Boiler capacity factor limit with specific requirements of the federal Subpart Db rules.

Currently, PSD Permit Provision 6.1.1. and Title V Permit Provision 6.1.1 provide that:

The following conditions and requirements are specific to the Auxiliary Boiler (ID #SX-1):

- a. The hourly heat input of the Auxiliary Boiler shall not exceed 225 million British Thermal Units (MMBtu) per hour.
- b. The permittee shall not operate the Auxiliary Boiler greater than 876 hours in a calendar year.
- c. The Auxiliary Boiler shall not consume more than 197.1 million cubic feet of natural gas on an annual basis.
- d. The permittee shall perform annual maintenance of the Auxiliary Boiler.

However, 40 CFR §60.41b Definitions provide that:

*“Annual capacity factor”* means the ratio between the **actual heat input** to a steam generating unit from the fuels listed in §60.42b(a), §60.43b(a), or §60.44b(a), as applicable, during a calendar year and the **potential heat input** to the steam generating unit had it been operated for 8,760 hours during a calendar year at the maximum steady state design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility in a calendar year.

So, while the capacity factor limits in the permit currently utilize operating hours and gas volume, the Db rules provide that this limit should be based upon heat input. The difference is significant. From February 27 through June 9, 2015 Longview took an extended 3+ month outage to replace sections of the SCPC boiler nose and front wall panels, the plant’s Distributed Control System (DCS), and to address turbine vibration issues (Longview received WVDEP’s Permit Determination #PD14-040 prior to starting this outage). Between May 26 and June 9, Longview logged 273 non-routine hours on the Aux boiler to recommission the SCPC boiler. This non-routine period of aux boiler operation inflated Longview’s year-end total aux boiler operating hours to 889, 13 hours above the current annual permit limit of 876 hours/year. However, for this 889 hour period, total fuel consumed was only 45.18 MMscf, well below the permitted limit of 197.1 MMscf, because the boiler was frequently operated at reduced load, or idled. In terms of heat input, for this 889 hour period, the Aux boiler consumed 47,216.5 MMBtu versus the corrected limit of 197,100 MMBtu ( $197,100 = 225 \text{ MMBtu/hr} * 8760 \text{ hrs/yr} * 10\%$ ).

To repair this provision, Longview requests that Provision 6.1.1. items b. and c. be deleted, and replaced with the following:

“The Auxiliary Boiler shall not consume more than 197,100 million British Thermal Units (MMBtu) per calendar year”.



**Attachment S**  
**Title V Permit Revision Information**

<b>1. New Applicable Requirements Summary</b>	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input type="checkbox"/> Minor source NSR (45CSR13)	<input checked="" type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) <sup>(1)</sup>
<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)
<p><sup>(1)</sup> If this box is checked, please include <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why <b>Compliance Assurance Monitoring</b> is not applicable:</p>   	

<b>2. Non Applicability Determinations</b>
<p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p>          
<input type="checkbox"/> <b>Permit Shield Requested</b> <i>(not applicable to Minor Modifications)</i>

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

### 3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision?  Yes  No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

**Suggested Title V Draft Permit language:**

Provision 5.1.1. - Longview requests replacement of the phrase “as determined via methods in 40 CFR 75 Appendix F” with “as determined via methods in 40 CFR 60”.

Provision 6.1.1. - Longview requests that items b. and c. be deleted, and replaced with the following: “The Auxiliary Boiler shall not consume more than 197,100 million British Thermal Units (MMBtu) per calendar year”.

### 4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R14-0024E	07/20/2012	5.5.1.a., 6.1.1.b., 6.1.1.c.
	/ /	
	/ /	

### 5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

### 6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
No change in potential emissions	0

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

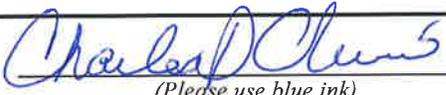
**7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)**

*Note:* This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

**Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.**

(Signed):	 <i>(Please use blue ink)</i>	Date:	<u>1</u> / <u>1</u> / <u>2016</u> <i>(Please use blue ink)</i>
Named (typed):	Charles D. Oliver	Title:	Plant Manager  Responsible Official and Designated Representative

**Note: Please check if the following included (if applicable):**

<input type="checkbox"/>	Compliance Assurance Monitoring Form(s)
<input checked="" type="checkbox"/>	Suggested Title V Draft Permit Language – Please see Section 3. above

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*