Class 1 Administrative Update to R13-2663, Minor Modification to R30-07900006

(40 CFR Part 63 Subpart DDDDD Provisions)

Date: March 15, 2015

Prepared For: Appalachian Power Company
John E. Amos Plant
P.O. Box 4000
St. Albans, WV 25177

Prepared By: AEP Environmental Services Division
1 Riverside Plaza
Columbus, OH 43215

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AMOS PLANT AUXILIARY BOILERS AUX 1 and AUX3
10% ANNUAL CAPACITY FACTOR LIMIT
40 CFR 63 SUBPART DDDDD PROVISIONS
REG. 13 PERMIT APPLICATION AND TITLE V MODIFICATION

(R13-2663 and R30-05100005)

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION **DIVISION OF AIR QUALITY** 601 57th Street, SE Charleston, WV 25304 (304) 926-0475 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):* Appalachian Power Company	2. Federal Employer ID No. ***(FEIN):*** 540124790
3. Name of facility *(if different from above):* John E. Amos Plant	4. The applicant is the: ☐ OWNER ☐ OPERATOR ☒ BOTH
5A. Applicant's mailing address: John E. Amos Plant, P.O. Box 4000 St. Albans, WV 25177	5B. Facility's present physical address: 1530 Winfield Road Winfield, West Virginia 25213

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: American Electric Power

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: Site is owned by applicant.
- 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.): Establish a federally enforceable capacity factor limitation on two oil fired auxiliary boilers, located at an electric generating facility.	10. North American Industry Classification System **(NAICS)** code for the facility: 221112
11A. DAQ Plant ID No. (for existing facilities only): 079-00006	11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R30-07900006-2010, R13-480, R13-2663, R33-3935-4A

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

12A.

- For **Modifications, Administrative Updates** or **Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction** or **Relocation permits,** please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP as Attachment B.**

From Charleston, take I-64 West towards Huntington. Turn right onto Exit 44 ramp and proceed to State Route 817. Turn left onto State Route 817 (north). Facility is located on State Route 817 (Winfield Rd.) approximately 1.5 miles.

12.B. New site address (if applicable):	12C. Nearest city or town: Winfield	12D. County: Putnam County
12.E. UTM Northing (KM): 4258.42	12F. UTM Easting (KM): 428.16	12G. UTM Zone: 17

13. Briefly describe the proposed change(s) at the facility:
No physical change at the facility. Requesting a heat input capacity limit (10% of total capacity) on an annual basis to meet the definition of a limited use boiler in 40 CFR 63 DDDDD (Auxiliary Boiler 1 and Auxiliary Boiler 3).

14A. Provide the date of anticipated installation or change: 01/31/2016 – If this is an **After-The-Fact** permit application, provide the date upon which the proposed change did happen: / /	14B. Date of anticipated Start-Up if a permit is granted: 01/31/2016

14C. Provide a **Schedule** of the planned **Installation of/Change** to and **Start-Up** of each of the units proposed in this permit application as **Attachment C** (if more than one unit is involved).

15. Provide maximum projected **Operating Schedule** of activity/activities outlined in this application:
Hours Per Day 24 Days Per Week 7 Weeks Per Year52

16. Is demolition or physical renovation at an existing facility involved? ☐ **YES** ☒ **NO**

17. **Risk Management Plans.** If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your **Risk Management Plan (RMP)** to U.S.EPA Region III. NA

18. **Regulatory Discussion.** List all Federal and State air pollution control regulations that you believe are applicable to the proposed process *(if known)*. 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 *(if known)*. Provide this information as **Attachment D.**

Section II. Additional attachments and supporting documents.

19. Include a check payable to WVDEP – Division of Air Quality with the appropriate **application fee** (per 45CSR22 and 45CSR13).

20. Include a **Table of Contents** as the first page of your application package.

21. Provide a **Plot Plan,** 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 **Attachment E** (Refer to ***Plot Plan Guidance***) .
- Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).

22. Provide a **Detailed Process Flow Diagram(s)** showing each proposed or modified emissions unit, emission point and control device as **Attachment F.**

23. Provide a **Process Description** as **Attachment G.**
- Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).

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

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:

☐ Bulk Liquid Transfer Operations
☐ Chemical Processes
☐ Concrete Batch Plant
☐ Grey Iron and Steel Foundry
☐ Haul Road Emissions
☐ Hot Mix Asphalt Plant
☐ Incinerator
☐ Indirect Heat Exchanger
☐ Quarry
☐ Solid Materials Sizing, Handling and Storage Facilities
☐ Storage Tanks
☒ General Emission Unit, specify: Auxiliary Boilers 1 and 3

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

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

☐ Absorption Systems
☐ Adsorption Systems
☐ Afterburner
☐ Baghouse
☐ Condenser
☐ Electrostatic Precipitator
☐ Flare
☐ Mechanical Collector
☐ Wet Collecting System
☐ 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:

☐ Authority of Corporation or Other Business Entity
☐ Authority of Governmental Agency
☐ Authority of Partnership
☐ 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 David D. Wickline *(Please use blue ink)* DATE: 3/30/2015 *(Please use blue ink)*

35B. Printed name of signee: David D. Wickline		35C. Title: Plant Manager
35D. E-mail: ddwickline@aep.com	36E. Phone: 304-759-3200	36F. FAX: 304-759-3201
36A. Printed name of contact person (if different from above): Gregory J. Wooten		36B. Title: Principal Engineer
36C. E-mail: gjwooten@aep.com	36D. Phone: 614-716-1262	36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

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

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

Attachment A

West Virginia Certificate of Authority

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State of West Virginia

Certificate

I, Natalie E. Tennant, Secretary of State of the State of West Virginia, hereby certify that

APPALACHIAN POWER COMPANY

a corporation formed under the laws of Virginia filed an application to be registered as a foreign corporation authorizing it to transact business in West Virginia. The application was found to conform to law and a "Certificate of Authority" was issued by the West Virginia Secretary of State on March 08, 1926.

I further certify that the corporation has not been revoked by the State of West Virginia nor has a Certificate of Withdrawal been issued to the corporation by the West Virginia Secretary of State.

Accordingly, I hereby issue this

CERTIFICATE OF AUTHORIZATION

Validation ID:2WV1G_CK2GX

Given under my hand and the Great Seal of the State of West Virginia on this day of January 14, 2014

Natalie E Tennant

Secretary of State

Notice: A certificate issued electronically from the West Virginia Secretary of State's Web site is fully and immediately valid and effective. However, as an option, the issuance and validity of a certificate obtained electronically may be established by visiting the Certificate Validation Page of the Secretary of State's Web site, https://apps.wv.gov/sos/businessentitysearch/validate.aspx entering the validation ID displayed on the certificate, and following the instructions displayed. Confirming the issuance of a certificate is merely optional and is not necessary to the valid and effective issuance of a certificate.

Attachment B

Map

Driving Directions to John E. Amos Plant: From Charleston, take I-64 West towards Huntington. Turn right onto Exit 44 ramp and proceed to State Route 817. Turn left onto State Route 817 (north). Facility is located on State Route 817 (Winfield Rd.) approximately 1.5 miles.

Attachment C

Installation and Start Up Schedule

Installation and Start-up Schedule

This application is Appalachian Power Company's request for a voluntary heat input capacity limit on the John E. Amos Plant auxiliary boilers (Emission Units Aux1 and Aux3). The annual heat input capacity limit will allow these boilers to meet the requirements of the Industrial Boiler MACT at 40 CFR 63 Subpart DDDDD in the limited use boiler subcategory. This limit on the heat input capacity is requested to begin on January 31, 2016.

Attachment D

Regulatory Discussion

Regulatory Discussion – 40 CFR 63 Subpart DDDDD

The IB Boiler MACT for Major Sources was published in the Federal Register on January 31, 2013. This subpart covers all affected boilers and process heaters at sources that are major for Hazardous Air Pollutants. Within the AEP system, the auxiliary boilers at the electric generating plants are regulated by this Subpart.

Compliance Date: - January 16, 2016 for existing sources.

For Limited Use Subcategory Boilers

- The final IB MACT rule includes a limited use boiler subcategory. A unit may be included in this subcategory as long as the unit **obtains a federally enforceable permit limit on the unit's operation to 10% capacity (by heat input or steam output) per year.** The permit will define the monitoring and reporting required for complying with the capacity limit.
- Units in this subcategory are not subject to numerical limits or the energy assessment. No stack testing is required for limited use boilers and process heaters.
- Units in this subcategory will have to comply with a work practice standard which will include **performing a boiler tune-up initially and then every 5-years**.
  - Tune-ups include inspecting the burner, cleaning or replacing any components as necessary, inspect flame pattern and adjust to manufacturer's specs, inspect system controlling air-to-fuel ratio to ensure it is correctly calibrated and functioning properly, optimize CO emissions consistent with manufacturer's specs, measure concentrations in effluent of CO and O2 before and after adjustments are made.
  - Maintain on-site and submit if required an annual report containing information of the inspections, tune-up adjustments and testing.

Timeline for Compliance: Limited Use Subcategory Boilers:

Air Permit Modification – (Due by January 31, 2016)

- Obtain a permit modification limiting the operation of the boilers to 10% capacity (based on heat input) or less.

Initial Performance Test – (Due by January 31, 2016)

- Boiler inspections and tuning

Compliance Status (60-days after completing performance testing and no later than March 31, 2016)

- Notification of Compliance Status due within 60-days of completing performance testing (63.9(h))

Continuing Compliance

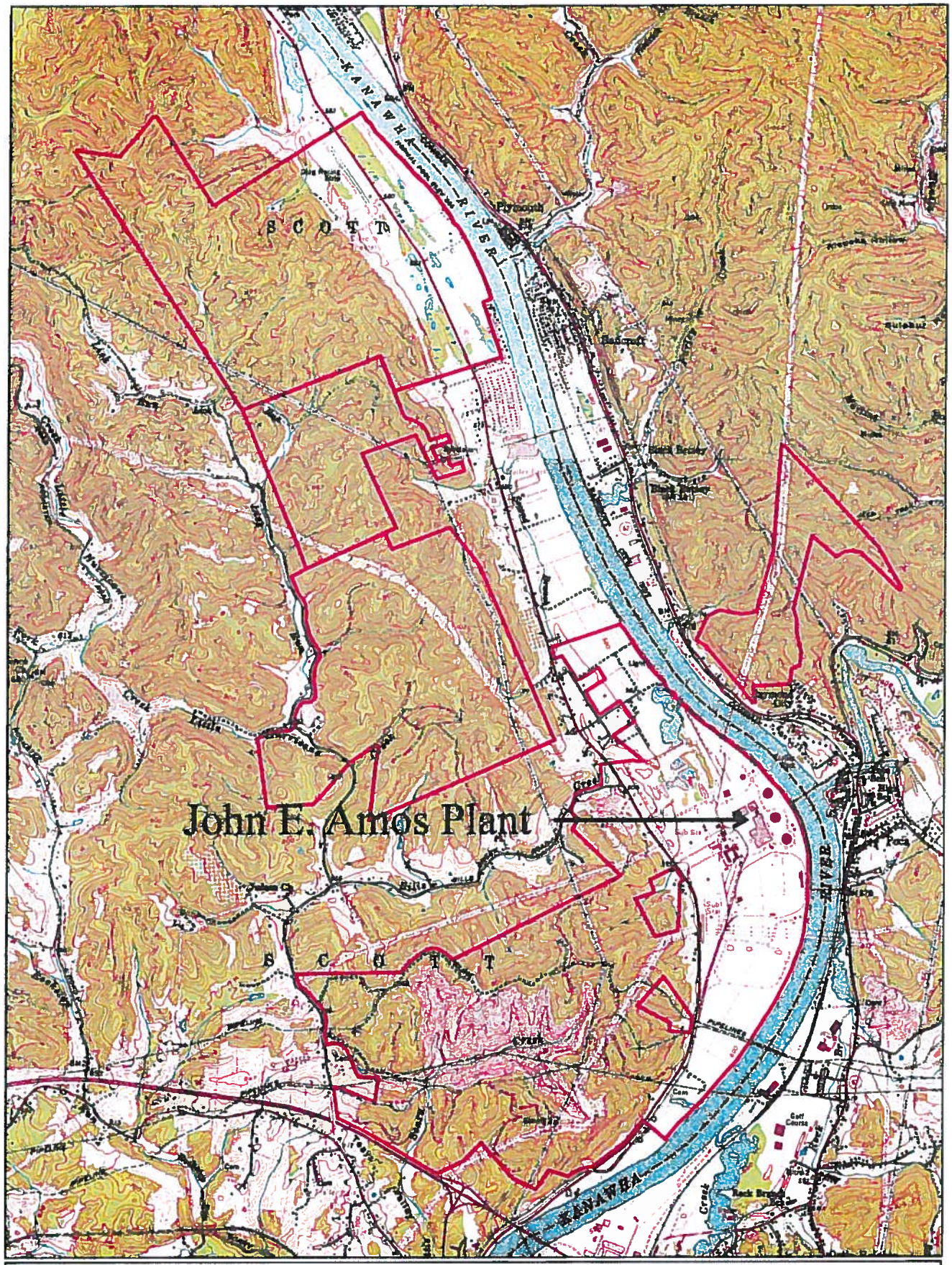
- Perform boiler inspections and tune-ups (within 5-years of prior inspection and tune-up). These must be completed within 61 months from prior inspection/tune-up.

Reporting

- Semiannual Deviation reporting
- Annual Boiler Inspection/Tune-up reporting

Attachment E

Plot Plan



N

0 ¼ ½ 1mi

Saint Albans & Bancroft, WVa
Quadrangles
USGS Topographic Map

3.17.05

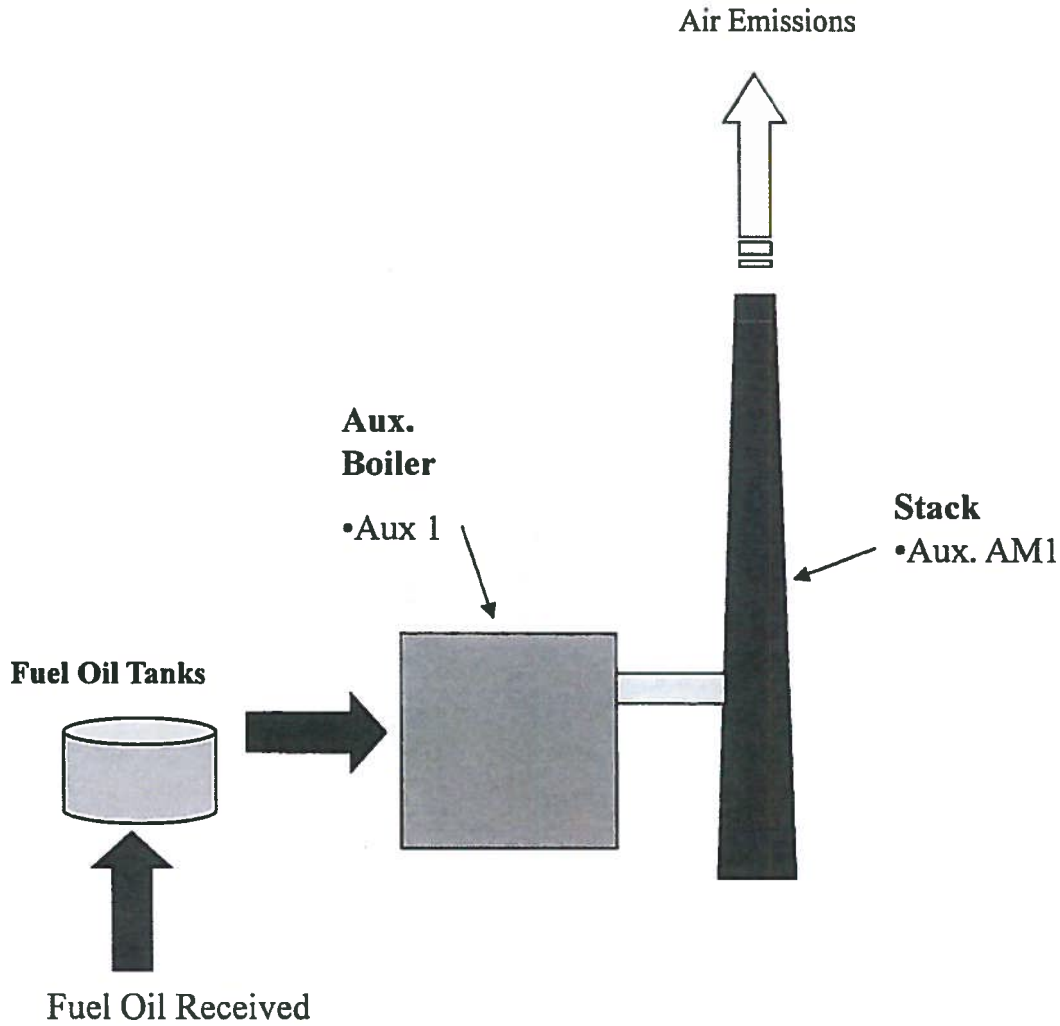
Appalachian Power Company
John E. Amos Plant

Property Boundary

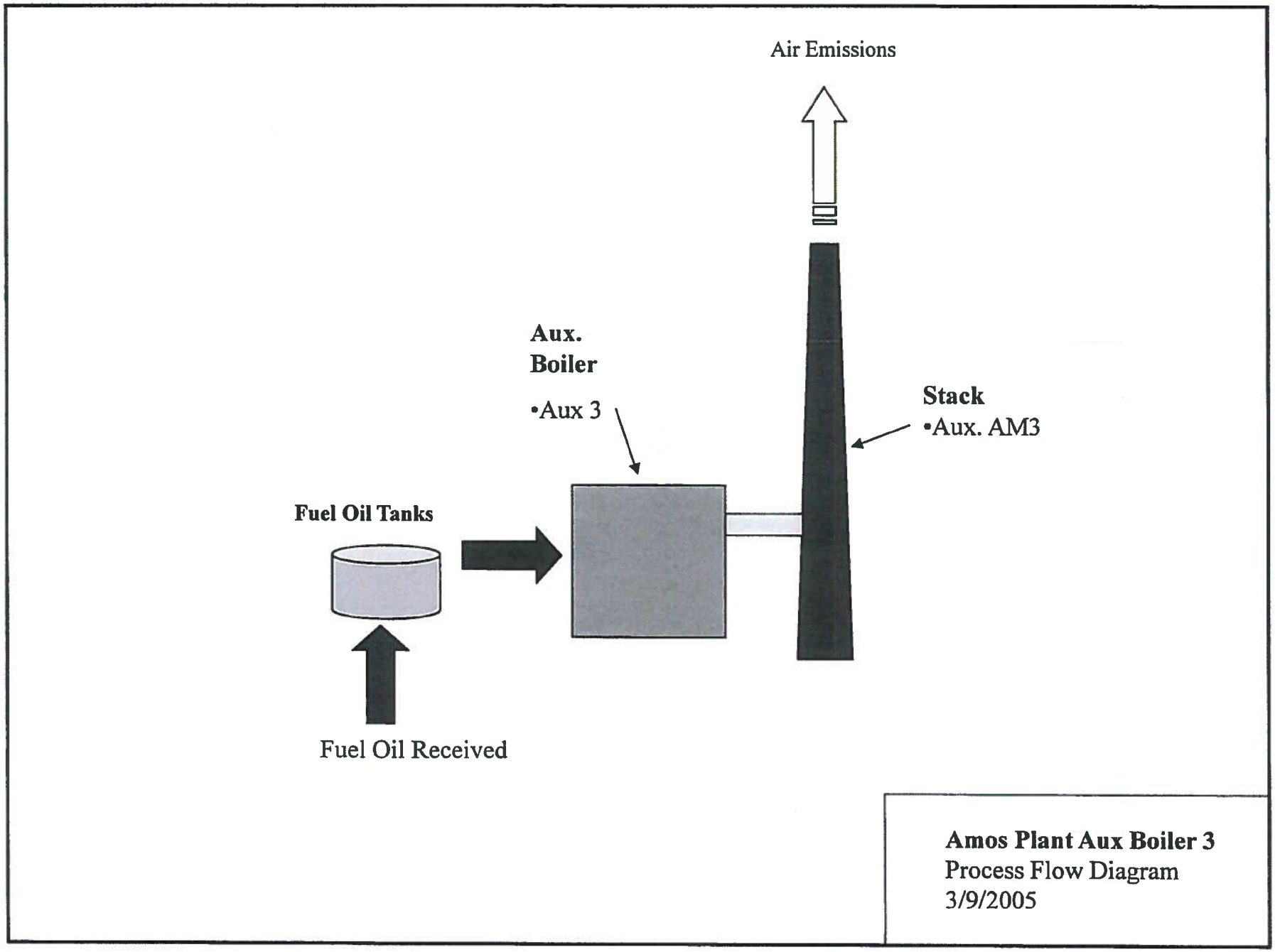
Air Quality Services AEP

Attachment F

Flow Diagrams



Amos Plant Aux Boiler 1
Process Flow Diagram
3/9/2005


Air Emissions
Aux.
Boiler
•Aux 3
Stack
•Aux. AM3
Fuel Oil Tanks
Fuel Oil Received
Amos Plant Aux Boiler 3
Process Flow Diagram
3/9/2005

Attachment G

Process Description

Process Description

The Appalachian Power John E. Amos Plant is located in Putnam County at 1530 Winfield Road, near Winfield West Virginia.

John E. Amos Plant Units 1 and 2 are each 800 MW (nominal) coal fired units and Unit 3 is a 1300 MW (nominal) coal fired unit. The facility is served by two fuel oil fired auxiliary boilers that are used to provide auxiliary steam for start-up, chemical cleaning, and building heating services. Auxiliary boiler 1 (Aux 1) is a 642 mmBtu/hr (nominal) boiler and Auxiliary boiler 3 (Aux 3) is a 600 mmBtu/hr boiler. The auxiliary boilers were constructed in 1971 during the construction of the John E. Plant facility.

This permit application is not seeking a physical modification of either auxiliary boiler. Instead, Appalachian power is simply requesting a heat input capacity limit (10% of total capacity) on an annual basis to meet the definition of a limited use boiler in 40 CFR 63 DDDDD (Auxiliary Boiler 1 and Auxiliary Boiler 3).

Attachment H

MSDS

(Not Applicable)

Attachment I

Emission Units Table

Equipment Units Table

This permit request will result in no additional emission units or changes to the existing equipment permitted at John E. Amos Plant. This permitting action is simply requesting a heat input capacity limit (10% of total capacity) on an annual basis to meet the definition of a limited use boiler in 40 CFR 63 DDDDD for existing Auxiliary Boilers 1 and 3 (Aux 1 and Aux 3).

Attachment J

Emission Points Data Summary Sheet

Emission Points Data Summary Form

This permit request will result in no additional emission points or changes to the existing emission points permitted at John E. Amos Plant. This permitting action is simply requesting a heat input capacity limit (10% of total capacity) on an annual basis to meet the definition of a limited use boiler in 40 CFR 63 DDDDD for existing Auxiliary Boilers 1 and 3 (Aux 1 and Aux 3).

Attachment K

Fugitive Emissions Data Summary Sheet

(Not Applicable)

Attachment L

Emission Unit Data Sheets

Attachment L
EMISSIONS UNIT DATA SHEET
GENERAL

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.
Identification Number (as assigned on *Equipment List Form*):

1. Name or type and model of proposed affected source:

   Auxiliary Boiler 1 (Aux 1)
   Foster Wheeler Model SD-25

2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.

3. Name(s) and maximum amount of proposed process material(s) charged per hour:

   Water is the process material. The water is heated to produce steam in the auxiliary boiler. The auxiliary boiler steam is provided to the main boilers during startup and shutdown, provides space heat to the buildings and is used to heat the steam generator chemical cleaning solution during the chemical cleaning process.

4. Name(s) and maximum amount of proposed material(s) produced per hour:

   The boiler is nominally rated at 642 mmBtu/hr and a 390,000 lb/hr steam flow.

5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:

   Chemical reactions that produce heat to convert water to steam are the reactions supporting combustion of the fuel oil in the auxiliary boiler.

* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

The auxiliary boiler is capable of combusting varying qualities of oil as fuel, but typically utilizes #1/#2 distillate fuel oil. The auxiliary boiler is capable of combusting approximately 130,000 gallons of fuel oil per day.

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

Fuel oil
Percent Ash - Trace
Percent Sulfur - Max of 1%
Heating Value - Approximately 139,000 Btu/gal

(c) Theoretical combustion air requirement (ACF/unit of fuel):

NA @ °F and psia.

(d) Percent excess air: NA

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

Six Foster Wheeler air atomizing burners. Typically, all six burners are needed to achieve rated full load heat input.

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

Not Applicable

(g) Proposed maximum design heat input: 642 $\times 10^6$ BTU/hr.

7. Projected operating schedule:

Hours/Day	24	Days/Week	7	Weeks/Year	52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@ °F and psia

a.	NO_X	128.4	lb/hr	grains/ACF
b.	SO_2	379.85	lb/hr	grains/ACF
c.	CO	26.75	lb/hr	grains/ACF
d.	PM_{10}	5.35	lb/hr	grains/ACF
e.	Hydrocarbons		lb/hr	grains/ACF
f.	VOCs	1.07	lb/hr	grains/ACF
g.	Pb	0.003	lb/hr	grains/ACF
h.	Specify other(s)			
			lb/hr	grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING	RECORDKEEPING
In addition to the monitoring plan in Attachment O, collect monthly fuel data (gallons burned and heat content) using existing monitoring methods for gallons utilized and fuel heat content as determined by actual sampling or fuel supplier shipment records.	Maintain monthly records of gallons burned and fuel oil heat content collected in the monitoring portion of this section.
REPORTING	**TESTING**
No reporting is required unless the annual heat input exceeds the 10% capacity level. This reporting would be accomplished via the semi-annual Title monitoring and deviation report. Fuel use and quality records to be maintained on site and made available if requested.	No testing is required for this program.

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty
Not applicable

Attachment L
EMISSIONS UNIT DATA SHEET
GENERAL

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.
Identification Number (as assigned on *Equipment List Form*):

1. Name or type and model of proposed affected source: Auxiliary Boiler 3 (Aux 3) Babcock & Wilcox Model PFI-3134
2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.
3. Name(s) and maximum amount of proposed process material(s) charged per hour: Water is the process material. The water is heated to produce steam in the auxiliary boiler. The auxiliary boiler steam is provided to the main boilers during startup and shutdown, provides space heat to the buildings and is used to heat the steam generator chemical cleaning solution during the chemical cleaning process.
4. Name(s) and maximum amount of proposed material(s) produced per hour: The boiler is nominally rated at 600 mmBtu/hr and a 375,000 lb/hr steam flow.
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants: Chemical reactions that produce heat to convert water to steam are the reactions supporting combustion of the fuel oil in the auxiliary boiler.

* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

6. Combustion Data (if applicable):

(a) Type and amount in appropriate units of fuel(s) to be burned:

The auxiliary boiler is capable of combusting varying qualities of oil as fuel, but typically utilizes #1/#2 distillate fuel oil. The auxiliary boiler is capable of combusting approximately 120,000 gallons of fuel oil per day.

(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:

Fuel oil
Percent Ash - Trace
Percent Sulfur - Max of 1%
Heating Value - Approximately 139,000 Btu/gal

(c) Theoretical combustion air requirement (ACF/unit of fuel):

NA @ °F and psia.

(d) Percent excess air: NA

(e) Type and BTU/hr of burners and all other firing equipment planned to be used:

Five Babcock & Wilcox air atomizing burners. Typically, all burners are needed to achieve rated full load heat input.

(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:

Not Applicable

(g) Proposed maximum design heat input: 600 $\times 10^6$ BTU/hr.

7. Projected operating schedule:

Hours/Day	24	Days/Week	7	Weeks/Year	52

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@ °F and psia

a.	NO_X	120 lb/hr	grains/ACF
b.	SO_2	355 lb/hr	grains/ACF
c.	CO	25 lb/hr	grains/ACF
d.	PM_{10}	5 lb/hr	grains/ACF
e.	Hydrocarbons	lb/hr	grains/ACF
f.	VOCs	1 lb/hr	grains/ACF
g.	Pb	0.003 lb/hr	grains/ACF
h.	Specify other(s)		
		lb/hr	grains/ACF
		lb/hr	grains/ACF
		lb/hr	grains/ACF
		lb/hr	grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing
Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING	RECORDKEEPING
In addition to the monitoring plan in Attachment O, collect monthly fuel data (gallons burned and heat content) using existing monitoring methods for gallons utilized and fuel heat content as determined by actual sampling or fuel supplier shipment records.	Maintain monthly records of gallons burned and fuel oil heat content collected in the monitoring portion of this section.
REPORTING	**TESTING**
No reporting is required unless the annual heat input exceeds the 10% capacity level. This reporting would be accomplished via the semi-annual Title monitoring and deviation report. Fuel use and quality records to be maintained on site and made available if requested.	No testing is required for this program.

MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

RECORDKEEPING. PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

REPORTING. PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

TESTING. PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty
Not applicable

Attachment M

Air Pollution Control Device Sheets

(Not Applicable)

Attachment N

Supporting Emissions Calculations

	Aux 1	Aux 3	
Auxiliary Boiler HI (mmbtu/hr) =	642	600	
Fuel Oil Heat Content (BTU/gal) =	120000	120000	(Minimum Value)
Capacity Factor =	10.00%	10.00%	

John E. Amos Aux 1-Oil

Inputs:

Annual Oil Usage (gal): 4,686,600
(assuming 10% cap. Limit)

John E. Amos Aux 1- Oil		
Pollutant	EF	Tons of Pollu't
	lb/10^3gal	Uncontrolled
SO_2	71.00	166.37
NO_x	24	56.24
CO_2	22,300	52255.59
Partic	2	4.69
VOC	0.2	0.47
PM_{10}	1	2.34
CO	5	11.72
Lead	0.0006	0.0014
CH_4	0.794	1.86
N_2O	0.16	0.37
NH_3 (NAPAP)	0.8	1.87
Condensibles	1.3	3.05
$PM_{2.5}$	0.25	0.59

Unit	Pollu't	Oil Emission Factor (EF)	Equiv. SCC EF (lb/10^3gal)	Tons of Pollu't (uncontrl.)	lb/hr Pollu't (uncontrl.)	Source
AUX1 - Oil	SO_2	71.00 lb/10^3gal	71.00	166.37	379.85	AP-42
	NO_x	24 lb/10^3gal	24	56.24	128.40	AP-42
	CO_2	22300 lb/10^3gal	22300	52255.59	119305.00	AP-42
	Partic	2 lb/10^3gal	2	4.69	10.70	AP-42
	VOC	0.2 lb/10^3gal	0.2	0.47	1.07	AP-42
	PM_{10}	1 lb/10^3gal	1	2.34	5.35	AP-42
	CO	5 lb/10^3gal	5	11.72	26.75	AP-42
	Lead	5 lb/10^12btu	0.0006	0.0014	0.003	AP-42
	CH_4	0.003 kg/mmBtu	0.794	1.86	4.25	AP-42
	N_2O	0.0006 kg/mmBtu	0.159	0.37	0.85	AP-42
	NH_3 (NAPAP)	0.8 lb/10^3 gal	0.8	1.87	4.28	NAPAP
	Condensibles	1.3 lb/10^3 gal	1.3	3.05	6.96	AP-42
	$PM_{2.5}$	0.25 lb/10^3gal	0.25	0.59	1.34	AP-42

John E. Amos Aux 3-Oil

Inputs:

Annual Oil Usage (gal): 4,380,000
(assuming 10% cap. Limit)

John E. Amos Aux 3- Oil		
Pollutant	EF	Tons of Pollu't
	lb/10^3gal	Uncontrolled
SO_2	71.00	155.49
NO_x	24	52.56
CO_2	22,300	48837.00
Partic	2	4.38
VOC	0.2	0.44
PM_{10}	1	2.19
CO	5	10.95
Lead	0.0006	0.0013
CH_4	0.794	1.74
N_2O	0.16	0.35
NH_3 (NAPAP)	0.8	1.75
Condensibles	1.3	2.85
$PM_{2.5}$	0.25	0.55

Unit	Pollu't	Oil Emission Factor (EF)	Equiv. SCC EF (lb/10^3gal)	Tons of Pollu't (uncontrl.)	lb/hr Pollu't (uncontrl.)	Source
AUX3 - Oil	SO_2	71.00 lb/10^3gal	71.00	155.49	355.00	AP-42
	NO_x	24 lb/10^3gal	24	52.56	120.00	AP-42
	CO_2	22300 lb/10^3gal	22300	48837.00	111500.00	AP-42
	Partic	2 lb/10^3gal	2	4.38	10.00	AP-42
	VOC	0.2 lb/10^3gal	0.2	0.44	1.00	AP-42
	PM_{10}	1 lb/10^3gal	1	2.19	5.00	AP-42
	CO	5 lb/10^3gal	5	10.95	25.00	AP-42
	Lead	5 lb/10^12btu	0.0006	0.0013	0.003	AP-42
	CH_4	0.003 kg/mmBtu	0.794	1.74	3.97	40CFR98 Table C2
	N_2O	0.0006 kg/mmBtu	0.159	0.35	0.79	40CFR98 Table C2
	NH_3 (NAPAP)	0.8 lb/10^3 gal	0.8	1.75	4.00	NAPAP
	Condensibles	1.3 lb/10^3 gal	1.3	2.85	6.50	AP-42
	$PM_{2.5}$	0.25 lb/10^3gal	0.25	0.55	1.25	AP-42

SO2 Emission Factor = 142 x S = 142 x 0.5 = 71 lb/1000 gal.

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HAPS EMISSION CALCS: Amos Aux Boilers

Assume 8760 for auxiliary boiler PTE, Calculations are for each boiler

Use WebFire list of reported chemicals

	Aux 1	Aux 3
Auxiliary Boiler HI (mmbtu/hr) =	642	600
Annual 1000 Gallons per Year =	46,866	43,800

	Auxiliary Boiler 1					Auxiliary Boiler 3				
WebFire List	Emission Factor (lb/TBTU)	HAPS PTE (TPY)	Emission Factor Source	HAPS (TPY) (At 10% capacity)	HAPS (lb/hr)	Emission Factor (lb/TBTU)	HAPS PTE (TPY)	Emission Factor Source	HAPS (TPY) (At 10% capacity)	HAPS (lb/hr)
Arsenic	4	0.0112	WebFire	**0.001125**	**0.0026**	4	0.0105	WebFire	**0.001051**	**0.0024**
Beryllium	3	0.0084	WebFire	**0.000844**	**0.0019**	3	0.0079	WebFire	**0.000788**	**0.0018**
Cadmium	3	0.0084	WebFire	**0.000844**	**0.0019**	3	0.0079	WebFire	**0.000788**	**0.0018**
Chromium	3	0.0084	WebFire	**0.000844**	**0.0019**	3	0.0079	WebFire	**0.000788**	**0.0018**
Lead	9	0.0253	WebFire	**0.002531**	**0.0058**	9	0.0237	WebFire	**0.002365**	**0.0054**
Manganese	6	0.0169	WebFire	**0.001687**	**0.0039**	6	0.0158	WebFire	**0.001577**	**0.0036**
Mercury	3	0.0084	WebFire	**0.000844**	**0.0019**	3	0.0079	WebFire	**0.000788**	**0.0018**
Nickel	3	0.0084	WebFire	**0.000844**	**0.0019**	3	0.0079	WebFire	**0.000788**	**0.0018**
Selenium	15	0.0422	WebFire	**0.004218**	**0.0096**	15	0.0394	WebFire	**0.003942**	**0.0090**
Polycyclic Organic Matter (lb/1000 gal EF)	0.0033	0.0773	WebFire	**0.007733**	**0.018**	0.00275	0.0602	WebFire	**0.006023**	**0.014**
Benzene (lb/1000 gal EF)	0.00275	0.0644	WebFire	**0.006444**	**0.015**	0.00275	0.0602	WebFire	**0.006023**	**0.014**
Formaldehyde (lb/1000 gal EF)	0.061	1.4294	WebFire	**0.143**	**0.33**	0.061	1.3359	WebFire	**0.134**	**0.31**
Total HAPS		**1.71**		**0.17**	**0.39**		**1.59**		**0.16**	**0.36**

	Aux 1	Aux 3
Boiler Max. Heat Input (mmBTU/hr):	642	600

	Aux 1		Aux 3	
GHG	TPY (with 10% HI limit)	TPY CO2e (with 10% HI limit)	TPY (with 10% HI limit)	TPY CO2e (with 10% HI limit)
CO2	52255.59	52255.59	48837.00	48837.00
CH4	1.86	39.06	1.74	36.50
N20	0.37	115.31	0.35	107.76
	Total CO2e (TPY) =	52409.95	Total CO2e (TPY) =	48981.26

Attachment O

Monitoring/Recordkeeping/Reporting/Testing Plans

Monitoring, Recordkeeping, Reporting and Testing Plans

The monitoring, recordkeeping, reporting and testing associated with this request are included on the Emission Unit Forms (Attachment L) and no changes to the existing 45 CSR 2 and 45 CSR 10 Monitoring and Recordkeepiing Plan (see enclosed) are associated with this permit change for John E. Amos Plant's Auxiliary Boilers 1 and 3 (Emission Unit IDs Aux 1 and Aux 3).

45 CSR 2 and 45 CSR 10
Monitoring and Recordkeeping Plan

John E. Amos Plant

Facility Information:

Facility Name: John E. Amos Plant

Facility Address: P.O. Box 4000
State Route 35
St. Albans, WV 25177

Facility Environmental Contact: Mr. J. P. Webster

A. Facility Description:

John E. Amos (i.e. Amos) Plant is a coal-fired electric generating facility with three main combustion units. Units 1 and 2 discharge through a common stack shell utilizing two separate stack discharge flues. Unit 3 discharges through a separate main stack utilizing a single discharge flue. Amos plant also has two auxiliary boilers. Auxiliary boiler 1 discharges through an independent auxiliary stack (aux 1.) Auxiliary boiler 3 discharges through an independent auxiliary stack (aux. 3.) Units 1, 2 and 3, and Aux. Boilers 1 and 3 each have design heat inputs greater than 10 mmBTU/hr making both 45 CSR 2A (Interpretive Rule for 45 CSR 2) and 4 CSR 10A (Interpretive Rule for 45 CSR 10) applicable to these sources.

I. 45 CSR 2 Monitoring Plan:

In accordance with Section 8.2.a of 45 CSR 2, following is the proposed plan for monitoring compliance with opacity limits found in Section 3 of that rule:

A. Main Stacks (1E, 2E, 3E)

1. Applicable Standard:

   45 CSR 2, §3.1. *No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.*

2. Monitoring Method(s):

45 CSR 2, §8.2.a.1. *Direct measurement with a certified continuous opacity monitoring system (COMS) shall be deemed to satisfy the requirements for a monitoring plan. Such COMS shall be installed, calibrated, operated and maintained as specified in 40 CFR Part 60, Appendix B, Performance Specification 1 (PS1). COMS meeting the requirements of 40 CFR Part 75 (Acid Rain) will be deemed to have satisfied the requirements of PS1.*

a. Primary Monitoring Method: While a Continuous Opacity Monitoring System (COMS) would not be required on a wet scrubbed fuel burning unit, Amos Plant has chosen to use COMS on each of the fuel burning units upstream of the wet scrubbers and located in plant ductwork. As such, the primary method of monitoring opacity at Amos Plant will be Continuous Opacity Monitors (COMS). The COMS are installed, maintained and operated in compliance with requirements of 40 CFR Part 75.

b. Other Credible Monitoring Method(s): While Amos Plant will use COMS as the primary method of monitoring opacity of the fuel burning units, we are also reserving the right to use Method 9 readings or any other appropriate method that would produce credible data. These "other monitoring methods" will generally be used in the absence of COMS data or as other credible evidence used in conjunction with COMS data.

3. Recordkeeping:

a. **Operating Schedule and Quality/Quantity of Fuel Burned**

45 CSR 2A §7.1.a. *The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule, and the quality and quantity of fuel burned in each fuel burning unit as specified in paragraphs 7.1.a.1 through 7.1.a.6, as applicable.*

The applicable paragraphs for Amos Plant are the following:

§7.1.a.2: *For fuel burning unit(s) which burn only distillate oil, such records shall include, but not be limited to, the date and time of start-up and shutdown, the quantity of fuel consumed on a monthly basis and a BTU analysis for each shipment.*

§7.1.a.4: *For fuel burning unit(s) which burn only coal, such records shall include, but not be limited to, the date and time of start-up and shutdown, the quantity of fuel consumed on a daily basis and an ash and BTU analysis for each shipment.*

§7.1.a.6: *For fuel burning unit(s) which burn a combination of fuels, the owner or operator shall comply with the applicable Recordkeeping requirements of paragraph 7.1.a.1 through 7.1.a.5 for each fuel burned.*

The date and time of each startup and shutdown of Units 1, 2 and 3 will be maintained. The quantity of coal burned on a daily basis as well as the ash and Btu content will also be maintained. From a fuel oil perspective, the quantity of fuel oil burned on a monthly basis, as well as the Btu content will be maintained. The fuel oil analysis will generally be one that is provided by the supplier for a given shipment but in some cases, we may use independent sampling and analyses. The quantity of fuel oil burned on a monthly basis may be maintained on a facility wide basis.

b. **Record Maintenance**

45 CSR 2A §7.1.b. *Records of all required monitoring data and support information shall be maintained on-site for a period of at least five (5) years from the date of monitoring, sampling, measurement or reporting. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.*

Records of all required monitoring data and support information will be maintained on-site for at least five (5) years. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.

4. Exception Reporting:

a. **Particulate Mass Emissions:**

45 CSR 2A, §7.2.a. *With respect to excursions associated with measured emissions under Section 4 of 45CSR2, compliance with the reporting and testing requirements under the Appendix to 45CSR2 shall fulfill the requirement for a periodic exception report under subdivision 8.3.b. or 45CSR2.*

Amos Plant will comply with the reporting and testing requirements specified under the Appendix to 45 CSR 2.

b. **Opacity:**

45 CSR 2A, §7.2.b. *COMS – In accordance with the provisions of this subdivision, each owner or operator employing COMS as the method of monitoring compliance with opacity limits shall submit a "COMS Summary Report" and/or an "Excursion and COMS Monitoring System Performance Report" to the Director on a quarterly basis; the Director may, on a case-by-case basis, require more frequent reporting if the Director deems it necessary to*

accurately assess the compliance status of the fuel burning unit(s). All reports shall be postmarked by the thirtieth (30th) day following the end of each calendar quarter. The COMS Summary Report shall contain the information and be in the format shown in Appendix B unless otherwise specified by the Director.

45 CSR 2A, §7.2.b.1. *If the total duration of excursions for the reporting period is less than one percent (1%) of the total operating time for the reporting period and monitoring system downtime for the reporting period is less than five percent (5%) of the total operating time for the reporting period, the COMS Summary Report shall be submitted to the Director; the Excursion and COMS Monitoring System Performance report shall be maintained on-site and shall be submitted to the Director upon request.*

45 CSR 2A, §7.2.b.2. *If the total duration of excursions for the reporting period is one percent (1%) or greater of the total operating time for the reporting period or the total monitoring system downtime for the reporting period is five percent (5%) or greater of the total operating time for the reporting period, the COMS Summary Report and the Excursion and COMS Monitoring System Performance Report shall both be submitted to the Director.*

45 CSR 2A, §7.2.b.3. *The Excursion and COMS Monitoring System Performance Report shall be in a format approved by the Director and shall include, but not be limited to, the following information:*

45 CSR 2A, §7.2.b.3.A. *The magnitude of each excursion, and the date and time, including starting and ending times, of each excursion.*

45 CSR 2A, §7.2.b.3.B. *Specific identification of each excursion that occurs during start-ups, shutdowns, and malfunctions of the facility.*

45 CSR 2A, §7.2.b.3.C. *The nature and cause of any excursion (if known), and the corrective action taken and preventative measures adopted (if any).*

45 CSR 2A, §7.2.b.3.D. *The date and time identifying each period during which quality- controlled monitoring data was unavailable, except for zero and span checks, and the reason for data unavailability and the nature of the repairs or adjustments to the monitoring system.*

45 CSR 2A, §7.2.b.3.E. *When no excursions have occurred or there were no periods of quality-controlled data unavailability, and no*

monitoring systems were inoperative, repaired, or adjusted, such information shall be stated in the report.

Attached, as Appendices A and B are sample copies of the COMS "Summary Report" and "Excess opacity and COM downtime report" that we plan on using to fulfill the opacity reporting requirements. The COMS "Summary Report" will satisfy the conditions under 45 CSR 2A, §7.2.b for the "COMS Summary Report" and will be submitted to the Director according to its requirements. The "Excess opacity and COM downtime report" satisfies the conditions under 45 CSR 2A, §7.2.b.3. for the "Excursion and COMS Monitoring System Performance Report". The "Excess opacity and COM downtime report" shall be submitted to the Director following the conditions outlined in 45 CSR 2A, §7.2.b.1. and §7.2.b.2.

To the extent that an excursion is due to a malfunction, the reporting requirements in section 9 of 45CSR2 shall be followed – 45 CSR 2A, §7.2.d.

B. <u>Aux. Stacks (aux 1 and aux 3)</u>

1. Applicable Standard:

45 CSR 2, §3.1. *No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.*

2. Monitoring Method:

45 CSR 2, §8.2.a.1. *Direct measurement with a certified continuous opacity monitoring system (COMS) shall be deemed to satisfy the requirements for a monitoring plan. Such COMS shall be installed, calibrated, operated and maintained as specified in 40 CFR Part 60, Appendix B, Performance Specification 1 (PS1). COMS meeting the requirements of 40 CFR Part 75 (Acid Rain) will be deemed to have satisfied the requirements of PS1.*

45 CSR 2, §8.4.a. *The owner or operator of a fuel burning unit(s) may petition for alternatives to testing, monitoring, and reporting requirements prescribed pursuant to this rule for conditions, including, but not limited to, the following:*

45 CSR 2, §8.4.a.1. *Infrequent use of a fuel burning unit(s)*

Pursuant to 45 CSR 2, Section 8.4.a and 8.4.a.1, Amos Plant previously petitioned the Office of Air Quality (OAQ) Chief for alternative testing, monitoring, and reporting requirements for the auxiliary boilers and associated stacks. Based on limited operating hours, the requirement for COMS installation per Section 6.2.a of interpretive rule 45 CSR 2A was determined to be overly-burdensome and sufficient reason for the granting of alternative monitoring methods. The

alternative monitoring method based on USEPA Method 9 visible emission readings is described below.

- Primary Monitoring Method: As an alternative to COMS monitoring, a Method 9 reading will be conducted one time per month provided the following conditions are met: 1) The auxiliary boiler has operated at normal, stable load conditions for at least 24 consecutive hours and 2) weather/lighting conditions are conducive to taking proper Method 9 readings. Because the Amos auxiliary boilers do not utilize post-combustion particulate emissions controls, operating parameters of control equipment are nonexistent and are therefore unable to be monitored.

3. Recordkeeping:

a. **Operating Schedule and Quality/Quantity of Fuel Burned**

45 CSR 2A §7.1.a. *The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule, and the quality and quantity of fuel burned in each fuel burning unit as specified in paragraphs 7.1.a.1 through 7.1.a.6, as applicable.*

The applicable paragraph for the Amos Plant auxiliary boilers follows:

> **§7.1.a.2:** *For fuel burning unit(s) which burn only distillate oil, such records shall include, but not be limited to, the date and time of start-up and shutdown, the quantity of fuel consumed on a monthly basis and a BTU analysis for each shipment.*

As such, the date and time of each startup and shutdown for each auxiliary boiler will be maintained. The quantity of fuel oil burned on a monthly basis, as well as the Btu content will be maintained. The fuel oil analysis will generally be one that is provided by the supplier for a given shipment but in some cases, we may use independent sampling and analyses. The quantity of fuel oil burned on a monthly basis may be maintained on a facility wide basis.

b. **Record Maintenance**

45 CSR 2A §7.1.b. *Records of all required monitoring data and support information shall be maintained on-site for a period of at least five (5) years from the date of monitoring, sampling, measurement or reporting. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.*

Records of all required monitoring data and support information will be maintained on-site for at least five (5) years. In the case of the auxiliary boilers, strip chart recordings, etc are generally not available.

4. Exception Reporting:

   Pursuant to 45 CSR 2, Section 8.4.a and 8.4.a.1, Amos Plant previously petitioned the Office of Air Quality (OAQ) Chief for alternative testing, monitoring, and reporting requirements for the auxiliary boilers and associated stacks.

   a. **Particulate Mass Emissions** – As an alternative to the testing and exception reporting requirements for particulate mass emissions from the auxiliary boiler, the following was previously proposed and approved. Based on an average heat content of approximately 139,491 Btu/gallon (calendar year 2000 data for Aux. 1) and 139,748 Btu/gallon (calendar year 2000 data for Aux. 3) and an AP-42 based particulate mass emissions emission factor of 2 lbs/thousand gallons, the calculated particulate mass emissions of the auxiliary boilers are 0.01 lb/mmBtu. As such, the fuel analysis records maintained under the fuel quality analysis and recordkeeping section of this plan provide sufficient evidence of compliance with the particulate mass emission limit. For the purpose of meeting exception reporting requirements, any fuel oil analysis indicating a heat content of less than 25,000 Btu per gallon will be reported to the OAQ to fulfill the requirement for a periodic exception report under subdivision 8.3.b. or 45 CSR 2 – 45 CSR 2A, §7.2.a. A heat content of 25,000 Btu/gal and a particulate emissions factor of 2 lbs/thousand gallons would result in calculated particulate mass emissions of approximately 90% of the applicable 45 CSR 2 standard.

   b. **Opacity** – As an alternative to the exception reporting requirements for opacity emissions from the auxiliary boilers, the following was previously proposed and approved. We will maintain a copy of each properly conducted (correct weather/lighting conditions, etc.) Method 9 evaluation performed. Any properly conducted Method 9 test which indicates an exceedance shall be submitted to the OAQ on a quarterly basis (within 30 days of the end of the quarter) along with an accompanying description of the excursion cause, any corrective action taken, and the beginning and ending times for the excursion.

      To the extent that an excursion is due to a malfunction, the reporting requirements in section 9 of 45CSR2 shall be followed – 45 CSR 2A, §7.2.d.

   If no exceptions have occurred during the quarter, then a report will be submitted to the OAQ stating so. This report will identify periods in which no method 9 tests were conducted (e.g. unit out of service) or when no fuel oil was received.

II. 45 CSR 10 Monitoring Plan:

In accordance with Section 8.2.c of 45 CSR 10, following is the proposed plan for monitoring compliance with the sulfur dioxide weight emission standards expressed in Section 3 of that rule:

A. Main Stacks

1. Applicable Standard:

45 CSR 10, §3.2.a. *For fuel burning units of the John Amos Plant of Appalachian Power Company, located in Air Quality Control Region IV, the product of 1.6 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour.*

45 CSR 10, §3.8. *Compliance with the allowable sulfur dioxide emission limitations from fuel burning units shall be based on continuous twenty-four (24) hour averaging time...A continuous twenty-four (24) hour period is defined as one (1) calendar day.*

A new SO_2 limit will be effectively established as a result of the installation of the flue gas desulfurization system/new stack configuration and the subsequent NAAQS compliance demonstration modeling. Because the new SO_2 limit is more stringent than the current limit expressed in 45 CSR 10, Appalachian Power Company is believes that compliance with the limits should be streamlined such that compliance with the new limit is sufficient to deem compliance with the existing 45 CSR 10 limit.

Appalachian Power Company believes that the new limit should be described as follows: "Sulfur Dioxide emissions from the Unit 1 (1E), Unit 2 (2E) and Unit 3 (3E) flue gas stacks shall not exceed a heat input weighted average of 1.0 lbs SO_2/mmBTU on a 3-hour block average basis, with SO_2 emissions not to exceed an average of 29,428 lbs SO_2/hr, also on a 3-hour block average basis. Compliance with this limitation will assure compliance with the 45 CSR 10 limitation of 1.6 lb SO_2/mmBTU."

2. Monitoring Method:

45 CSR 10, §8.2.c.1. *The installation, operation and maintenance of a continuous monitoring system meeting the requirements 40 CFR Part 60, Appendix B, Performance Specification 2 (PS2) or Performance Specification 7 (PS7) shall be deemed to fulfill the requirements of a monitoring plan for a fuel burning unit(s), manufacturing process source(s) or combustion source(s). CEMS meeting the requirements of 40 CFR Part 75 (Acid Rain) will be deemed to have satisfied the requirements of PS2.*

   a. Primary Monitoring Method: The primary method of monitoring SO_2 mass emissions from the two new stacks (one stack with dual flues and the other with a single flue) will be Continuous Emissions Monitors (CEMS). Data used in evaluating the performance of the Amos Units with the applicable standard will be unbiased, unsubstituted data as specified in

definition 45 CSR 10A, §6.1.b.1. Data capture of more than 50% constitutes sufficient data for the daily mass emissions to be considered valid. The CEMS are installed, maintained and operated in compliance with requirements of 40 CFR Part 75. Because each of the three generating units discharge through separate flues and all three are "Type a" fuel burning units as defined in 45 CSR 10, the plant wide limit is calculated by summing the limits for the three flues.

b. Other Credible Monitoring Method(s): While Amos Plant will use CEMS as the primary method of monitoring SO_2 mass emissions from the three flues, we are also reserving the right to use other appropriate methods that would produce credible data. These "other monitoring methods" will generally be used in the absence of CEMS data or as other credible evidence used in conjunction with CEMS data.

3. Recordkeeping:

a. **Operating Schedule and Quality/Quantity of Fuel Burned:**

45 CSR 10A, §7.1.a. *Fuel burning units - The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule and the quality or quantity of fuel burned in each unit...*

45 CSR 10A, §7.1.c. *The owner or operator of a fuel burning unit or combustion source which utilizes CEMS shall be exempt from the provisions of subdivision 7.1.a. or 7.1.b, respectively.*

As such, Amos plant will not maintain records of the operating schedule and the quality and quantity of fuel burned in each unit for purposes of meeting the requirements for a monitoring plan under 45 CSR 10. While fuel sampling and analysis may continue to be performed at this facility, it is done so at the discretion of the owner/operator and is not required by this monitoring plan for the purposes of indicating compliance with SO_2 standards.

b. **Record Maintenance**

45 CSR 10A, §7.1.d. *For fuel burning units, manufacturing process sources, and combustion sources, records of all required monitoring data as established in an approved monitoring plan and support information shall be maintained on-site for a period of at least five (5) years from the date of monitoring, sampling, measurement or reporting. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.*

As such, CEMS records at Amos Plant will be maintained for at least five years.

4. Exception Reporting:

45 CSR 10A, §7.2.a. *CEMS - Each owner or operator employing CEMS for an approved monitoring plan, shall submit a "CEMS Summary Report" and/or a "CEMS Excursion and Monitoring System Performance Report" to the Director quarterly; the Director may, on a case-by-case basis, require more frequent reporting if the Director deems it necessary to accurately assess the compliance status of the source. All reports shall be postmarked no later than forty-five (45) days following the end of each calendar quarter. The CEMS Summary Report shall contain the information and be in the format shown in Appendix A unless otherwise specified by the Director.*

45 CSR 10A, §7.2.a.1. *Submittal of 40 CFR Part 75 data in electronic data (EDR) format to the Director shall be deemed to satisfy the requirements of subdivision 7.2.a.*

As such, Amos Plant will submit the 40 CFR 75 quarterly electronic data reports (EDRs) to the OAQ to meet the requirements for a CEMS Summary Report and the CEMS Excursion and Monitoring System Performance Report. The EDR reports will be submitted to the OAQ no later than 45 days following the end of the quarter.

When no excursions of the 24-hour SO_2 standard have occurred, such information shall be stated in the cover letter of the EDR submittal.

B. Aux. Stacks (aux 1 and aux 3)

1. Applicable Standard:

45 CSR 10, §3.1.e. *For type 'b' and Type 'c' fuel burning units, the product of 1.6 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour.*

45 CSR 10, §3.8. *Compliance with the allowable sulfur dioxide emission limitations from fuel burning units shall be based on continuous twenty-four (24) hour averaging time...A continuous twenty-four (24) hour period is defined as one (1) calendar day.*

2. Monitoring, Recordkeeping, Exception Reporting Requirements:

45 CSR 10, §10.3. *The owner or operator of a fuel burning unit(s) which combusts natural gas, wood or distillate oil, alone or in combination, shall be exempt from the requirements of section 8.*

As such, the Amos Plant auxiliary boilers (auxiliary stacks) are exempt from Testing, Monitoring, Recordkeeping, and Reporting requirements found in 45 CSR 10, Section 8 because the fuel burning source combusts only distillate oil. 45 CSR 10, Section 8 also contains the requirement for the development of a monitoring plan. The simple nature of burning distillate oil results in an SO_2 emission rate well below the standard.

While fuel sampling and analysis may continue to be performed at this facility, it is done so at the discretion of the owner/operator and is not required by this monitoring plan for the purposes of indicating compliance with SO_2 standards.

Revisions of Monitoring Plan:

Amos Plant reserves the right to periodically revise the conditions of this monitoring plan. Any revised plan will become effective only after approval by the OAQ.

Implementation of Monitoring Plan:

Implementation of this revised monitoring plan will occur concurrently with the installation and operation of the new stacks for Units 1, 2, and 3 at Amos Plant.

Attachment P

Public Notice

AIR QUALITY PERMIT PUBLIC NOTICE NOT REQUIRED

A Public Notice is not required for a Class 1 administrative amendment to a 45 CSR 13 air permit.

John E. Amos Plant is requesting a 10% annual capacity limit on auxiliary boiler Aux 1 and Aux 3. Because the auxiliary boilers currently are not subject to an annual capacity limit, the permit amendment would be more stringent than current requirements for the two sources and would result in a decreased annual potential to discharge regulated pollutants.

In accordance with 45 CSR 13, a change in a permit condition to incorporate any new more stringent requirements related to an applicable rule promulgated after the existing permit was issued and that do not result in a physical change in or change in the method of operation of the source can be process as a Class 1 administrative amendment, not subject to public notice requirements.

Attachment S

Title V Permit and NSR Permit Revision Information

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS (Subpart(s)_____)	☐ Section 112(d) MACT standards (Subpart(s)_____)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64) [1]
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)

[1] If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

Not applicable

2. Non Applicability Determinations
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. Not applicable
☐ **Permit Shield Requested** *(not applicable to Minor Modifications)*
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.

See following pages in Attachment S

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
R30-07900006-2010	12/28/2010	New Conditions to be added
R13-2663	/ /	New Conditions
R13-480	/ /	Not Affected

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
Decrease in all potential emissions due to the fact that	
the permittee is requesting a 10% annual heat input	
capacity limit for AUX 1 and AUX 3	

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):	David D. Wickline *(Please use blue ink)*	Date:	3 / 30 / 2015 *(Please use blue ink)*
Named (typed):	*David D. Wickline*	Title:	*Plant Manager*

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

☐	Compliance Assurance Monitoring Form(s)
☒	Suggested Title V Draft Permit Language

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

Attachment S

Reg 13 and Title V Suggested Permit Revision Language Details on Following pages:

In order for the two auxiliary boilers to be considered limited use oil fired industrial boilers under 40 CFR 63 Subpart DDDDD, each boiler must have a federally enforceable permit requirement limiting the annual heat input capacity to 10%. The suggested Reg 13 language on the following pages will accomplish this requirement.

Further, the Title V permit will eventually need to be revised to reflect not only this 10% annual heat input capacity limit, but will also need to incorporate, monitoring, recordkeeping and reporting requirements for limited use boilers under 40 CFR 63 Subpart DDDDD. We have also included complete Title V language implementing all monitoring, recordkeeping and reporting requirements for limited use oil fired industrial boiler under 40 CFR 63 Subpart DDDDD. This language was previously used in the Kentucky Power Co. Title V permit for the auxiliary boiler at Mitchell Plant.

Heat capacity limit: 10% capacity of annual potential or

For Aux 1: 642 mmBTU/hr x 876 hrs = 562,392 mmBtu/yr

For Aux 3: 600 mmBTU/hr x 876 hrs = 525,600 mmBtu/yr

To address the voluntary 10% annual heat input capacity limit, the plant will monitor the gallons burned per month using existing flow monitoring and utilize the heat capacity of the oil to determine the monthly heat input. This heat input will be summed with the monthly values from the 11 preceding months to provide a total annual heat input. The annual heat input will be calculated monthly with the first twelve months beginning January 31, 2016.

Any occurrence of an exceedance of the annual limit will trigger a need to report a deviation in accordance with Title V requirements and will potentially require initiation of the notification and permitting requirements of the IB MACT.

Regulation 13 Permit R13-2663

(Numbering is for example only and will need to be specific for the permit)

Limitations and Standards

4.1.22

The permittee shall limit the annual capacity of auxiliary boiler AUX1 and AUX 3 to no more than 10 percent by limiting the annual average heat input of the boilers to 562,392 MMBtu per year and 526,600 MMBtu per year, respectively. Compliance with this limit shall allow the two auxiliary boilers to be designated as limited use boilers under 40 C.F.R. 63 Subpart DDDDD requirements. The permittee must comply with the requirements no later than January 31, 2016, except as provided in 40 C.F.R. §63.6(i).

[[40 C.F.R. §63.7495(b); 45CSR34] ***(AUX 1and AUX 3) This requirement is subject to the compliance date in condition 4.1.22.***

Monitoring

4.2.2 To determine compliance with requirement 4.1.22, the permittee shall maintain records of the monthly fuel feed rate and fuel heat content for AUX 1 and AUX 3. These records shall be maintained on site for a period of not less than five (5) years and certified records shall be made available to the Director or a duly authorized representative of the Director upon request.

Title V Permit: R30-07900006-2010

(Numbering is for example only and will need to be specific for the permit)

Limitations and Standards

4.1.22

The permittee shall limit the annual capacity of auxiliary boiler AUX1 and AUX 3 to no more than 10 percent by limiting the annual average heat input of the boilers to 562,392 MMBtu per year and 526,600 MMBtu per year, respectively. Compliance with this limit shall allow the two auxiliary boilers to be designated as limited use boilers under 40 C.F.R. 63 Subpart DDDDD requirements. The permittee must comply with the requirements no later than January 31, 2016, except as provided in 40 C.F.R. §63.6(i).

[[40 C.F.R. §63.7495(b); 45CSR34] ***(AUX 1and AUX 3) This requirement is subject to the compliance date in condition 4.1.22.***

4.1.23

Compliance Date for 40 C.F.R. 63 Subpart DDDDD. If you have an existing boiler or process heater, you must comply with 40 C.F.R. 63 Subpart DDDDD no later than January 31, 2016, except as provided in 40 C.F.R. §63.6(i).
[40 C.F.R. §63.7495(b); 45CSR34] ***(AUX 1 and AUX 3)***

4.1.24

Initial and Periodic Tune-ups under 40 C.F.R. 63 Subpart DDDDD. If your boiler meets the definition of limited-use boiler or process heater in 40 C.F.R. §63.7575, you must conduct a tune-up of the boiler or process heater every 5 years as specified in paragraphs (a)(10)(i) through (vi) of 40 C.F.R. §63.7540 (paragraphs (i) through (vi) of this condition) to demonstrate continuous compliance. You may delay the burner inspection specified in paragraph (i) of this condition until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months.

(i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

(ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

(iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown).

(iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_X requirement to which the unit is subject;

(v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and

(vi) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (vi)(A) and (B) of this condition.

(A) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;

(B) A description of any corrective actions taken as a part of the tune-up.

- If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
- Each 5-year tune-up specified in §63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up.
- You must complete an initial tune-up by following the procedures described in paragraphs (i) through (vi) of this condition no later than the compliance date specified in 40 C.F.R.§63.7495(b) (condition 4.1.13.), except as specified in paragraph (j) of 40 C.F.R.§63.7510.
  [40 C.F.R. §§ 63.7500(c), 63.7540(a)(10), 63.7540(a)(12), 63.7540(a)(13), 63.7505(a), 63.7510(e), 63.7515(d); 45CSR34] ***(AUX 1 and AUX 3)***

Monitoring

4.2.2 To determine compliance with requirement 4.1.22, the permittee shall maintain records of the monthly fuel feed rate and fuel heat content for AUX 1 and AUX 3. These records shall be maintained on site for a period of not less than five (5) years and certified records shall be made available to the Director or a duly authorized representative of the Director upon request.

Testing

[Reserved]

Recordkeeping Requirements

4.4.4 The permittee shall maintain records of the monthly fuel feed rate and fuel heat content using existing fuel feed rate measurement techniques and sampling practices. These records shall be maintained on site for a period of not less than five (5) years and certified records shall be made available to the Director or a duly authorized representative of the Director upon request.
[40 C.F.R. §63.7555(a); 45CSR34] ***(AUX 1 and AUX 3) This requirement is subject to the compliance date in condition 4.1.23.***

4.4.5. You must keep records according to paragraphs (1) and (2) of this condition.

(1) A copy of each notification and report that you submitted to comply with 40 C.F.R. 63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that you submitted, according to the requirements in 40 C.F.R. §63.10(b)(2)(xiv).

(2) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40 C.F.R. §63.10(b)(2)(viii).
[40 C.F.R. §63.7555(a); 45CSR34] ***(AUX 1and AUX 3) This requirement is subject to the compliance date in condition 4.1.23.***

4.4.6. You must maintain records of the calendar date, time, occurrence and duration of each startup and shutdown.
[40 C.F.R. §63.7555(i); 45CSR34] ***(AUX 1and AUX 3) This requirement is subject to the compliance date in condition 4.1.23.***

4.4.7. You must maintain records of the type(s) and amount(s) of fuels used during each startup and shutdown.
[40 C.F.R. §63.7555(j); 45CSR34] ***(AUX 1and AUX 3) This requirement is subject to the compliance date in condition 4.1.23.***

4.4.8. **Format and Retention of Records for 40 C.F.R. 63 Subparts DDDDD**

(a) Your records must be in a form suitable and readily available for expeditious review, according to 40 C.F.R. §63.10(b)(1).

(b) As specified in 40 C.F.R. §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 C.F.R. §63.10(b)(1). You can keep the records off site for the remaining 3 years.
[40 C.F.R. §§63.7560(a), (b), and (c); 45CSR34] ***(AUX 1and AUX 3) This requirement is subject to the compliance date in condition 4.1.23.***

4.4.9. For each unit that meets the definition of limited-use boiler or process heater, you must keep fuel use records for the days the boiler or process heater was operating.
[40 C.F.R. §63.7525(k); 45CSR34] ***(AUX 1and AUX 3) This requirement is subject to the compliance date in condition 4.1.23.***

REPORTING

4.5.7. **Notification of Compliance Status for 40 C.F.R. 63 Subpart DDDDD**. You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in 40 C.F.R. §63.7545(e).

(1) A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by you or the EPA through a petition process to be a non-waste under § 241.3 of this chapter, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of § 241.3 of this chapter, and justification for the selection of fuel(s) burned during the compliance demonstration.

(2) If you had a deviation from the work practice standard (condition 4.1.14.), you must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report.

(3) In addition to the information required in 40 C.F.R. §63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the required initial tune-up according to the procedures in 40 C.F.R. §63.7540(a)(10)(i) through (vi)." (condition 4.1.14.(i) through (vi)).

(iii) "No secondary materials that are solid waste were combusted in any affected unit."

The notification must be sent to the Director (and a copy to U.S. EPA) before the close of business on the 60th day following the completion of the initial tune-up.

[40 C.F.R. §§ 63.7530(f), 63.7545(a), 63.7545(e)(1), (7), (8)(i) and (iii); 40 C.F.R. §§63.9(a)(4)(ii) and 63.9(h)(2)(ii); 45CSR34; 45CSR13, ***(AUX 1 and AUX 3) This requirement is subject to the compliance date in condition 4.1.23.***

4.5.8. You must report each instance in which you did not meet each work practice standard in Table 3 to 40 C.F.R. 63 Subpart DDDDD that applies to you. These instances are deviations from the work practice standards in 40 C.F.R. 63 Subpart DDDDD. These

deviations must be reported according to the requirements in 40 C.F.R. §63.7550 (condition 4.5.9.).
[40 C.F.R. §63.7540(b); 45CSR34] (*AUX 1 and AUX 3*) *This requirement is subject to the compliance date in condition 4.1.23.*

4.5.9. You must submit a Compliance report for 40 C.F.R. 63 Subpart DDDDD containing:

a. The information in §63.7550(c)(5)(i) through (iv) and (xiv), which is:

(i) Company and Facility name and address.

(ii) Process unit information, emissions limitations, and operating parameter limitations.

(iii) Date of report and beginning and ending dates of the reporting period.

(iv) The total operating time during the reporting period.

(xiv) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a 5-year tune-up according to 40 C.F.R. §63.7540(a)(12). Include the date of the most recent burner inspection if it was not done annually and was delayed until the next scheduled or unscheduled unit shutdown.

b. If there are no deviations from the requirements for work practice standards in Table 3 to 40 C.F.R. 63 Subpart DDDDD that apply to you (condition 4.1.14.), a statement that there were no deviations from the work practice standards during the reporting period.

You must submit the report every 5 years according to the requirements in 40 C.F.R. §63.7550(b), which are:

(1) The first compliance report must cover the period beginning on the compliance date that is specified for each boiler or process heater in 40 C.F.R. §63.7495 (condition 4.1.13.) and ending on July 31 or January 31, whichever date is the first date that occurs at least 5 years after the compliance date that is specified for your source in 40 C.F.R. §63.7495 (condition 4.1.13.).

(2) The first 5-year compliance report must be postmarked or submitted no later than January 31.

(3) Each subsequent 5-year compliance report must cover the 5-year periods from January 1 to December 31.

(4) Each subsequent 5-year compliance report must be postmarked or submitted no later than January 31.

You must submit all reports required by Table 9 of 40 C.F.R. 63 Subpart DDDDD electronically using CEDRI that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to 40 C.F.R. 63 Subpart DDDDD is not available in CEDRI at the time that the report is due the report you must submit the report to the Administrator at the appropriate address listed in 40

C.F.R. §63.13. At the discretion of the Administrator, you must also submit these reports, to the Administrator in the format specified by the Administrator.

[40 C.F.R. §§63.7550(a), Table 9, Items # 1.a. and # 1.b.; 40 C.F.R. §§63.7550(b), and (c)(1); 40 C.F.R. §63.7550(h)(3); 45CSR34; 45CSR13.] (*AUX 1 and AUX 3*) *This requirement is subject to the compliance date in condition 4.1.23.*

Application Fee:
Not Applicable for Class 1 Administrative Amendments