

Permit Writer	Edward S. Andrews, P.E.
Email Address	edward.s.andrews@wv.gov
Company Name	Ox Paperboard LLC
Company ID	037-00007
Facility Name	Halltown Paperboard Mill
Permit Number	R13-0622A
County	Jefferson
Newspaper	Spirit of Jefferson <i>email ok ad will publish 11/10 am</i>
Company Contact & Email	Martin Weller 'mweller@oxpaperboard.com'
Consultant Email Address	Wilson, Rick <RWilson@trcsolutions.com>
Regional Office (if applicable)	Joe Kreger - EPRO

*Publish wed NOV 18
30 days Fri Dec 18*



Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Ox Paperboard, LLC	Facility:	Halltown
Region:	10	Plant ID:	037-00007
Application #:	13-0622A		
Engineer:	Andrews, Edward S.	Category:	Paper
Physical Address:	164 Eystev Road Halltown WV 25423	SIC: [2631] PAPER AND ALLIED PRODUCTS - PAPERBOARD MILLS NAICS: [322130] Paperboard Mills	
County:	Jefferson		
Other Parties:	VICE PRES - Wallace, Mark 717-698-3329		

Information Needed for Database and AIRS
 No required information is missing.

Regulated Pollutants		
CO	Carbon Monoxide	37.500 TPY
HCL	Hydrochloric acid	2.200 TPY
PM10	Particulate Matter < 10 um	8.720 TPY
SO2	Sulfur Dioxide	484.500 TPY
VOC	Volatile Organic Compounds (Reactive organic gases)	0.380 TPY
NOX	Nitrogen Oxides (including NO, NO2, NO3, N2O3, N2O4, and N2O5)	82.500 TPY

Summary from this Permit 13-0622A		
Air Programs	Applicable Regulations	
TITLE V	02 10 34	
Title V/Major		
Fee Program	Fee	Application Type
	\$3,500.00	MODIFICATION

Notes from Database
 Permit Note: This action is to limit the fuel usage of the boiler to 15,000 tons of coal per year and installation of DSI system, which makes the facility a area source of HAPs. Thus the boiler becomes subject to Subpart JJJJJJ of Part 63 (Boiler GACT).

Activity Dates	
APPLICATION RECEIVED	07/31/2015
APPLICATION FEE PAID	07/31/2015
ASSIGNED DATE	07/31/2015
APPLICANT PUBLISHED LEGAL AD	08/05/2015
APPLICATION DEEMED COMPLETE	08/31/2015

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 037-00007
 Company: Ox Paperboard, LLC
 Printed: 10/28/2015
 Engineer: Andrews, Edward S.

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name Ox Paperboard

Permitting Action Number R13-622A Total Days 89 DAQ Days 58

Permitting Action:

- Permit Determination
- General Permit
- Administrative Update
- Temporary
- Relocation
- Construction
- Modification
- PSD (Rule 14)
- NNSR (Rule 19)

Documents Attached:

- Engineering Evaluation/Memo
- Draft Permit
- Notice
- Denial
- Final Permit/General Permit Registration
- Completed Database Sheet
- Withdrawal
- Letter
- Other (specify) _____

Date	From	To	Action Requested
10/28	Ed	Bw	Please Review
11/4	Bw	Ed	See comments - Addition - Proto notice

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On July 31, 2015, Ox Paperboard LLC applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to modify a boiler at the Halltown Paperboard Mill located at 164 Eyster Road, Halltown, Jefferson County, WV at latitude 39.313379 and longitude -77.798783. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-0622A.

The following potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, 8.72 tons per year (TPY); Particulate Matter, 11.89 TPY; Sulfur Dioxide, 484.50 TPY; Oxides of Nitrogen, 82.50 TPY; Carbon Monoxide, 37.50 TPY; Volatile Organic Compounds, 0.38 TPY; Carbon Dioxide Equivalent, 41,090.99 TPY; and Total Hazardous Air Pollutants, 3.38 TPY of which 2.20 TPY is hydrochloric acid.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on **TBD by Sandra**. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all state and federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Edward S. Andrews, PE
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1214
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx

West Virginia Department of Environmental Protection
Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit to Modify



R13-0622A

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Ox Paperboard LLC
Haltown Paperboard Mill
037-00007

William F. Durham
Director

Issued: DRAFT

This permit will supercede and replace Permit R13-0622.

Facility Location: 163 Eyster Road
Halltown, Jefferson County, West Virginia

Mailing Address: P.O. Box 70
Halltown, WV 25423

Facility Description: Paperboard Mill

NAICS Codes: 322160

UTM Coordinates: 258.70 km Easting • 4,355.29 km Northing • Zone 18

Permit Type: Modification

Description of Change: This action is to limit the annual heat input to the permitted boiler to about 40% by limiting annual fuel usage to 15,000 tons of coal per year, and install a sorbent injection system with fabric filter baghouse to control HCl and mercury emissions from the facility below major source threshold levels, which means the boiler is no longer subject to Boiler MACT (Subpart DDDDD to Part 63) but is subject as an existing coal-fired boiler under the Boiler GACT (Subpart JJJJJ to Part 63).

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
001	BLR-2	Coal-fired Boiler Mfg. Keeler/Dorr Oliver Model: MKB	1986	112 MMBtu/hr	C-3 & C-4
Control Devices					
C-3	BLR-2	Dry Sorbent Injection System Mfg. Amec Foster Wheeler	2015	44,400 acfm	N/A
C-4	BLR-2	Fabric Filter Baghouse Mfg. Amec Foster Wheeler Model: 144 Jet III	2015	44,400 acfm	N/A

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5 µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	Pph	Pounds per Hour
DAQ	Division of Air Quality	Ppm	Parts per Million
DEP	Department of Environmental Protection	Ppm_v or ppmv	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	Psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcft/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-0662. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-0622, R13-0622A, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by

improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]
- 3.1.7. The potential to emit of hazardous air pollutants (HAPs) from the facility shall not exceed 25 tons per year with no single HAP be greater than 10 tons. Compliance with this limit is satisfied by complying with Condition 4.1.1. of this permit.

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. The following conditions and requirements are specific to the boiler:
- a. The permittee shall limit the annual capacity of the boiler to no more than 40 percent by limiting the annual fuel usage of the boiler to 15,000 tons on 12-month rolling total.
 - b. Particulate Matter (PM) emissions from Emission Point BLR-2 shall not exceed 6.82 pounds per hour based on a six hour average.
[45 CSR §2-4.1.d., and §2-9.1.]
 - c. Visible emissions from Emission Point BLR-2 shall not exceed 10 percent opacity based on a six minute block average. Continuous compliance with this limit is satisfied by operating and maintained the fabric filter control device (C-4) such that the bag leak detection system alarm does not sound more than 5 percent of the operating time during each 6-month period.
[45 CSR §2-3.1, and §2-9.1.]
 - d. Sulfur dioxide emission from Emission Point BLR-2 shall not exceed 277.78 pound per hour and 484.50 tons per year.
[45 CSR §10-3.1.e.]
 - e. Hydrochloric acid emissions from Emission Point BLR-2 shall not exceed 1.26 pounds per hour nor 2.20 tons per year.
 - f. Carbon monoxide emissions from Emission Point BLR-2 shall not exceed a concentration level of 420 ppm on a dry basis corrected to 3 percent oxygen. During performance testing that demonstrated compliance with this CO limit, the permittee shall developed minimum oxygen content in accordance with row 3 of Table 6 to Subpart JJJJJ of Part 63 – Establishing Operating Limits. Compliance with this limit is satisfied by maintaining the 30-day rolling average oxygen content at or above the minimum oxygen level established during the most recent CO performance test.
[40 CFR §63.11201(a) and row 6 of Table 1 to Subpart JJJJJ of Part 63 – Emission Limits]
 - g. Mercury emissions from Emission Point BLR-2 shall not exceed 2.2E-5 pounds per MMBtu of heat input on a 30 day rolling average basis.
[40 CFR §63.11201(a) and row 6 of Table 1 to Subpart JJJJJ of Part 63 – Emission Limits]
 - h. For the purpose of complying with the SO₂ allowable in 45 CSR §10-3.1.d., and the emission limit in item d of this condition, the boiler shall not consume more than 4.3 tons of coal per hour nor more than 15,000 tons per year. The permittee is limited to burning coal with a sulfur content no greater than 1.7 % by weight.
[45 CSR §10-10.2.]
 - i. The permittee shall install and operate an activated carbon injection system to control mercury emissions. Prior to establishing minimum activated carbon injection operating limit, the minimum injection rate of activated carbon shall not be less than 5 lb of activated carbon per 112 MMBtu of heat input (which equates to 0.045 lb of activated carbon per MMBtu) on a 30 day rolling average basis. The minimum activated carbon injection rate means the load faction multiplied by the lowest hourly average activated carbon injection rate measured according to Table 6 to this subpart during the most recent performance stack test

demonstrating compliance with the applicable emission limit. Following the date on which the initial compliance demonstration is completed or is required to be completed under Condition 4.3.2., whichever date comes first, the permittee must continuously monitor the operating parameters. Operation below the established minimum operating limits specified in this requirement constitutes a deviation from operating limits established under Subpart JJJJJJ, except during performance tests conducted to determine compliance with the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests.

[40 CFR §63.11211(b)(3), §63.11222(a)(1)]

- j. The permittee shall install and operate a dry sorbent injection system on or before January 31, 2016 to meet the hourly and annual HCl emission limits in item e of this condition. Prior to establishing a 30-day rolling minimum dry sorbent injection rate in accordance with Condition 4.3.1., the hourly hydrated lime injection rate shall be 60 pounds per hour. Following the date on which the initial compliance demonstration is completed or is required to be completed under Condition 4.3.2., whichever date comes first, the permittee must continuously monitor the operating parameters. Operation below the established minimum operating limits specified in this requirement constitutes an exceedance of the limits in item e of this condition, except during performance tests conducted to determine compliance with the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests.
[40 CFR §63.11211(b)(3), §63.11222(a)(1)]
- k. The permittee must conduct an initial boiler tune-up in accordance with 40 CFR §63.11223(b) prior to conducting the initial compliance test as required in Condition 4.3.1.
[40 CFR §63.11214]
- l. The permittee shall develop and submit to the Director a site specific monitoring plan for the Continuous Parameter Monitoring System (CPMS) for the oxygen analyzer, activated carbon injection and dry sorbent injection systems. This plan shall include a means to measure the amount of heat input or load produced by the unit. Such plan shall be submitted 60 days prior to conducting the required testing in Condition 4.3.1 according to the following requirements.
 - i. Installation of the continuous measuring system (CMS) sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);
 - ii. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and
 - iii. Performance evaluation procedures and acceptance criteria (e.g., calibrations).
 - iv. Ongoing operation and maintenance procedures in accordance with the general requirements of 40 CFR §63.8(c)(1)(ii),
 - v. Ongoing data quality assurance procedures in accordance with the general requirements of 40 CFR §63.8(d); and
 - vi. Ongoing recordkeeping and reporting procedures in accordance with the general requirements of 40 CFR §63.10(c) (as applicable in Table 8 to Subpart JJJJJJ), (e)(1), and (e)(2)(i).

[40 CFR §§63.11205(c) & (c)(1) through (c)(3), and 45 CSR §123-5.11.]

- m. The permittee must conduct a performance evaluation of each CMS in accordance with the site-specific monitoring plan as required in item l of this condition.
[40 CFR §§63.11205(c)(2) and 45 CSR §13-5.11.]
- n. The permittee shall minimize the boiler's startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures, if available. If manufacturer's recommended procedures are not available, the permittee shall follow the recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available.
[40 CFR §63.11223(g)]
- o. The permittee shall conduct a onetime energy assessment performed by a qualified energy assessor. The energy assessment must include the following with the extent of the evaluation for the items (1) to (4) appropriate for the on-site technical hours listed in 40 CFR §63.11237:
 - i. A visual inspection of the boiler system;
 - ii. An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints;
 - iii. An inventory of major energy use systems consuming energy from the boiler and which are under control of the permittee;
 - iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - v. A list of the energy conservation measures that are within the permittee's control;
 - vi. A list of the energy savings potential of the energy conservation measures identified; and
 - vii. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
[40 CFR §§63.11201(b) & 63.11214(c); and row 16 of Table 2 to Subpart JJJJJJ of Part 63—Work Practice Standards]

4.1.2. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

- 4.2.1. The permittee shall conduct fuel analysis of each coal shipment received at the facility to demonstrate that the coal meets the sulfur specification of item h. of Condition 4.1.1. Such records shall be maintained in accordance with Condition 3.4.1.
[45 CSR §10-8.2.c.3.]
- 4.2.2. The permittee shall conduct fuel (coal) analysis in accordance with the following procedures:

- a. At a minimum, the permittee must obtain three composite coal samples according to the procedures in 40 CFR §63.11213(b) or ASTM D2234/D2234M or equivalent method for coal. During performance testing for mercury, each composite sample must consist of a minimum of three samples collected at approximately equal intervals during a test run period.
 - b. The composited fuel samples must be prepared in accordance with ASTM D2013/D2013M or equivalent method for coal.
 - c. Determine the heat content of the fuel type in accordance with ASTM D5865 or equivalent method for coal.
 - d. Determine the moisture content of the fuel type in accordance with ASTM D3173 or ASTM E871 or equivalent method for coal.
 - e. Measure the mercury concentration in the fuel sample using ASTM D6722 or equivalent method for coal.
 - f. Convert the concentration of mercury in the fuel in units of pounds per million Btu of each composite sample.
[40 CFR §63.11213 and Table 5 to Subpart JJJJJ of Part 63-Fuel Analysis Requirements]
- 4.2.3. If the permittee demonstrates compliance with the mercury emission limit based on fuel analysis, the fuel analysis must be in accordance with Condition 4.2.2. Records of such analysis shall be maintained in accordance with Condition 3.4.1.
- The permittee must conduct a fuel analysis according to 40 CFR §63.11213 for each type of fuel burned as specified in paragraphs (c)(1) and (2). If you plan to burn a new type of fuel or fuel mixture, you must conduct a fuel analysis before burning the new type of fuel or mixture in your boiler. The permittee must recalculate the mercury emission rate using Equation 1 of 40 CFR §63.11211. The recalculated mercury emission rate must be less than the applicable emission limit.
- a. When demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are measured to be equal to or less than half of the mercury emission limit, The permittee do not need to conduct further fuel analysis sampling but must continue to comply with all applicable operating limits and monitoring requirements.
 - b. When demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are greater than half of the mercury emission limit, the permittee must conduct quarterly sampling.
[40 CFR §63.11220(c)]
- 4.2.4. For the purpose of demonstration compliance with the CO limit in Condition 4.1.1f., the permittee calibrate, operate, and maintain an oxygen analyzer system, as defined in 40 CFR §63.11237, according to the manufacturer's recommendations and 40 CFR §§63.11224(a)(7). Such system must be operational prior to the initial performance testing as required in Condition 4.3.1. Oxygen monitors must be installed to monitor oxygen in the boiler flue gas, boiler firebox, or other appropriate intermediate location.
[40 CFR §§63.11224(a), (a)(7), and (d)]
- 4.2.5. The permittee shall install, calibrate, maintain, and continuously operate a fabric filter bag detection system in accordance with the following and the site-specific monitoring plan as required in Condition 4.1.1.1.:

- a. The permittee must install and operate a bag leak detection system each outlet of control device C-4.
- b. Each bag leak detection system must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations and in accordance with EPA-454/R-98-015 (incorporated by reference, see 40 CFR §63.14).
- c. The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligrams per actual cubic meter or less.
- d. The bag leak detection system sensor must provide output of relative or absolute particulate matter loadings.
- e. The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor. The bag leak detection system must be equipped with an audible or visual alarm system that will activate automatically when an increase in relative particulate matter emissions over a preset level is detected. The alarm must be located where it is easily heard or seen by plant operating personnel.

[40 CFR §63.11224(f) and 45 CSR §2-8.2.a.]

4.2.6. The permittee shall install, calibrate, maintain, and continuously parameter monitoring system (CPMS) in accordance with the following and the site-specific monitoring plan for the oxygen analyzer, the activated carbon and dry sorbent injection systems:

- a. The CPMS must complete a minimum of one cycle of operation every 15 minutes. The permittee must have data values from a minimum of four successive cycles of operation representing each of the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CMS calibration, quality assurance, or maintenance activities are being performed, to have a valid hour of data.
- b. The permittee must calculate hourly arithmetic averages from each hour of CPMS data in units of the operating limit and determine the 30-day rolling average of all recorded readings, except as provided in §63.11221(c). Calculate a 30-day rolling average from all of the hourly averages collected for the 30-day operating period using the following equation.

$$30 - day\ average = \frac{\sum_{i=1}^n Hpvi}{n}$$

Where:

$Hpvi$ = the hourly parameter value for hour i

n = the number of valid hourly parameter values collected over 30 boiler operating days

- c. For purposes of collecting data, the permittee must operate the CPMS as specified in §63.11221(b). For purposes of calculating data averages, the permittee must use all the data collected during all periods in assessing compliance, except that the permittee must exclude certain data as specified in §63.11221(c) (monitoring system malfunctions or out-of-control periods or repairs to associated with monitoring system malfunctions). Periods when CPMS data are unavailable may constitute monitoring deviations as specified in §63.11221(d).
- d. Records the results of each inspection, calibration, and validation check.
[40 CFR §§63.11224(c) & (d) & 45 CSR §13-5.11]

4.3. Testing Requirements

- 4.3.1. The permittee shall conduct performance testing on or before July 30, 2016. Such testing shall determine compliance with the CO limit of Condition 4.1.1.f., PM limit of Condition 4.1.1.b., visible emissions limit of Condition 4.1.1.c., the HCl limit of Condition 4.1.1.e. and mercury limit of Condition 4.1.1.g. and establish operating limits for the oxygen content, injection of activated carbon and dry sorbent as required in items i. and j. of Condition 4.1.1. This testing shall be conducted in accordance with 45 CSR 2 Appendix, Row 2 of Table 4 to Subpart JJJJJ of Part 63, U.S. EPA Method 29 for HCl, and Condition 3.3.1.

The permittee must conduct performance stack tests at the representative operating load conditions while burning the type of fuel or mixture of fuels that have the highest emissions potential for mercury and HCl emissions, and the permittee must demonstrate initial compliance and establish operating limits based on these performance stack tests. For subcategories with more than one emission limit, these requirements could result in the need to conduct more than one performance stack test. Following each performance stack test and until the next performance stack test, the permittee must comply with the operating limit for operating load conditions specified in (Table 3 to Subpart JJJJJ of Part 63).

The permittee must conduct a minimum of three separate test runs for each performance stack test required in this section, as specified in 40 CFR §63.7(e)(3) and in accordance with the provisions in Table 4 to Subpart JJJJJ.

To determine compliance with the emission limits, the permittee must use the F-Factor methodology and equations in sections 12.2 and 12.3 of EPA Method 19 of appendix A-7 to part 60 of this chapter to convert the measured mercury concentrations that result from the performance test to pounds per million Btu heat input emission rates.

[45 CSR §§2-8.1.a & 8.1.b., .40 CFR §§63.11210(a), (i) , §63.11212, Table 4 to Subpart JJJJJ of Part 63 – Performance (Stack) Testing Requirements]

- 4.3.2. On a triennial basis after completion of the initial testing as required in Condition 4.3.1., the permittee shall conduct subsequent testing to demonstration compliance with the CO and mercury limits in items f and g respectively of Condition 4.1.1. Such testing shall be conducted no more than 37 months after the previous performance test and in accordance with applicable procedures and methods as outline in Conditions 3.3.1. and 4.3.1.

[40 CFR §63.11220(a)]

- 4.3.3. Within 60 days after the date of completing each performance test for mercury as required by Conditions 4.3.1. or 4.3.2., the permittee must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to EPA's WebFIRE database by using CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see <http://www.epa.gov/ttn/chief/ert/index.html>). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, the permittee must also submit these reports, including CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator

shall submit the results of the performance test in paper submissions to the Administrator at the appropriate address listed in §63.13.
[40 CFR §63.11225(e)(1)]

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. The permittee shall keep the following records in accordance with 40 CFR §63.11223(b)(6) as required in Condition 4.1.1.k.

- 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 using a portable combustion analyzer
- b. A description of any corrective actions taken as a part of the tune-up; and
- c. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period.

[40 CFR §§63.11223(b)]

4.4.5. The permittee must the records information specified in the following:

- a. As required in 40 CFR §63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted.
- b. The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR §63.11214 and 40 CFR §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.
- c. Records must identify each boiler, the date of initial tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- d. The permittee must keep a copy of the energy assessment report.
- e. The permittee must also keep records of monthly fuel (coal) use by the boiler, including the type(s) of fuel and amount(s) used.
- f. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- g. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- h. The permittee must keep the records of all inspection and monitoring data required by Conditions 4.2.4., 4.2.5., and 4.2.6. (§40 CFR §63.11221 and 63.11222), and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.
- i. For the bag leak detection system, the permittee must keep the following records:
 - i. Records of the bag leak detection system output.
 - ii. Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings.
 - iii. The date and time of all bag leak detection system alarms, and for each valid alarm, the time the permittee initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

[40 CFR §63.11225(c), 45 CSR §2-8.3.c., & 45 CSR §10-8.3.c.]

4.5. Reporting Requirements

- 4.5.1. The permittee shall submit a "Notification of Compliance Status" for Auxiliary Boiler to the Director before the close of business on the sixtieth (60th) day after completion of the initial compliance demonstration as required in Condition 4.3.2. Such "Notification of Compliance Status" shall be in accordance with the following (40 CFR §63.11225(a)(4)(i) through (vi)) and signed by a responsible official in accordance with Condition 3.5.1.
- a. The permittee must submit the information required in 40 CFR §63.9(h)(2), except the information listed in 40 CFR §63.9(h)(2)(i)(B), (D), (E), and (F). If the permittee conduct any performance tests or CMS performance evaluations, the permittee must submit that data as specified in paragraph (e). If the permittee conduct any opacity or visible emission observations, or other monitoring procedures or methods, the permittee must submit that data to the Administrator at the appropriate address listed in 40 CFR §63.13. contain the information specified in 40 CFR §40 CFR §63.7545(e)(1), and (8), which included a statement the initial tune-up for boiler was completed.
 - b. "This facility complies with the requirements in 40 CFR §63.11214 to conduct an initial tune-up of the boiler."
 - c. "This facility has had an energy assessment performed according to 40 CFR §63.11214(c)."
 - d. For units that install bag leak detection systems: This facility complies with the requirements in 40 CFR §63.11224(f)."
 - e. "No secondary materials that are solid waste were combusted in any affected unit."
 - f. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR §63.13
[40CFR§63.11225(a)(4)]
- 4.5.2. The permittee shall submit "Annual Compliance Reports" to the Director for the boiler with the first report being submitted by no later than March 15, 2017 and subsequent reports are due every March 15 from thereafter for the previous calendar year. Such reports shall contain the information specified in 40 CFR §§63.11225(b)(1) through (4) which are:
- a. Permittee and facility name, and address;
 - b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The permittee notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official.
 - i. "No secondary materials that are solid waste were combusted in any affected unit."
 - ii. "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

- c. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- d. The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by the permittee or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

[40CFR §63.11225(b)]

- 4.5.3. The permittee shall submit quarterly visible emission report to the Director. Such reports shall be post marked 30 days of the end of the quarter. This report shall identify any instance that a visible emission observation indicated an exceedance of the standard in Condition 4.1.1.c. A description of the excursion or cause of the exceedance, any corrective action taken, and the beginning and ending times for the exceedance shall be included in the report.

To the extent that an exceedance is due to a malfunction, the reporting requirement of 45 CSR §2-9.3. shall be followed.

In the event that no exceedance of the standard occurred or the no observations were taken, the permittee shall state that in the report. Such reports shall be submitted in accordance with Condition 3.5.1.

[45 CSR §2A-7.2c.]

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name & Title _____ Title _____
(please print or type) Name

Telephone No. _____ Fax No. _____

- ¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.



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Randy C. Huffman, Cabinet Secretary
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ENGINEERING EVALUATION/FACT SHEET

B BACKGROUND INFORMATION

Application No.:	R13-0622A
Plant ID No.:	037-00007
Applicant:	Ox Paperboard LLC
Facility Name:	Halltown Paperboard Mill
Location:	Halltown
NAICS Code:	322130
Application Type:	Modification
Received Date:	July 31, 2015
Engineer Assigned:	Edward S. Andrews, P.E.
Fee Amount:	\$3,500.00
Date Received:	July 31, 2015
Complete Date:	August 31, 2015
Due Date:	November 29, 2015
Applicant Ad Date:	August 5, 2015
Newspaper:	Spirit of Jefferson Advocate
UTM's:	Easting: 258.70 km Northing: 4,355.29 km Zone: 18
Description:	The application request is to limit the annual capacity of the boiler and install controls to meet the emission standards of Subpart JJJJJ to Part 63.

DESCRIPTION OF PROCESS

The Ox Paperboard LLC (Ox) operates the Halltown Paperboard Mill, which is located at 163 Eyster Road, in Halltown, WV. The mill manufactures recycled paperboard products from recovered papers. To support the manufacturing operations at the mill, an industrial boiler is used to generate steam energy to support the mill operations.

This boiler is a coal fired unit that is designed to generate 80,000 pounds of steam per hour. To meet this steam demand, the unit has a maximum design heat input of 112 MMBtu/hr. This particular boiler was manufactured in 1984 and installed in 1985.

The mill's current demand for steam has been averaging 15,000 pounds per hour with peak demands at 30,000 pounds per hour.

This application is not seeking a physical modification, instead, Ox is requesting a federally enforceable limit for the hazardous air pollutants (HAPs) being emitted from the mill to below 25 tons per year with no single HAP being greater than 10 tons. This boiler at the facility is the single source of HAPs from the mill. To limit these emissions of HAPs below these major source threshold levels, Ox has proposed to limit the boiler's annual capacity to 40%, which would reduce the potential of 44.48 tpy of HAPs to 22.28 tpy. The sorbent system will be injecting lime as the sorbent for HCl control and activated carbon for the mercury control. However, the facility's potential is nearly all hydrochloric acid (HCl).

Thus, Ox proposes to install a dry absorbent injection (DSI) system with a new fabric filter (FF) control device. This system is projected to remove nearly 76% of the HCl and 61% of the mercury generated from the combustion of the coal in the boiler.

SITE INSPECTION

On May 7, 2014, Mr. Joseph Kreger, an inspector assigned to the Eastern Panhandle Regional Office, conducted a regular compliance inspection of Halltown Paperboard Mill. During this inspection, Mr. Kreger concluded that the facility was operating in compliance with all applicable rules and regulations. Thus, no site inspection of the facility was required for this review.

ESTIMATE OF EMISSION BY REVIEWING ENGINEER

The applicant supplied emissions estimates for the auxiliary boiler. The proposed annual emissions from the boiler are based on a 40% heat input capacity limit, which equates to a fuel usage rate of 15,000 tons of coal annually. The emissions listed in the following tables are estimates using the emission factors from AP-42, Chapter 1.3:

Table #1 – Boiler Emissions		
Pollutant	Hourly Rate (lb/hr)	Annual Rate @ 40% Capacity (TPY)
Particulate Matter (PM)	6.83	11.89
Particulate Matter Less Than 10 microns (PM ₁₀)	5.01	8.72

Engineering Evaluation of R13-0622A
Ox Paperboard LLC
Halltown Paperboard Mill
Non-confidential

Particulate Matter less than 2.5 microns (PM _{2.5})	4.76	8.27
Sulfur Dioxide (SO ₂)	277.78	484.50
Oxides of Nitrogen (NO _x)	47.30	82.50
Carbon Monoxide (CO)	21.50	37.50
Volatile Organic Compounds (VOCs)	0.22	0.38
Total Hazardous Air Pollutants (HAPs)	1.94	3.38
Hydrochloric Acid (HCl)*	1.26	2.20
Carbon Dioxide Equivalent (CO ₂ e)	23559.5	41,090.99

* - HCL is a HAP and is included with the Total HAPs.

REGULATORY APPLICABILITY

The Halltown Paperboard Mill is classified as a major source under Rule 14 (Prevention of Significant Deterioration Program) and Rule 30 (Title V Operating Permit Program). In addition, the station is classified as a major source of hazardous air pollutants (HAPs). The company has proposed a restriction to fuel usage of 15,000 tons per year of coal coupled with the installation of controls (DSI with FF). These restrictions would limit the mill's potential to emit of HAPs below the major source threshold values as defined in 40 CFR Part 63.

This fuel restriction request is not classified as a major modification or physical change of operation under Rule 14 (45 CSR §14-2.40). The installation of the proposed controls would not increase any emissions that are classified as a New Source Review pollutant under 45 CSR 14. Thus, a PSD review is not required for this particular application.

The Industrial Boiler MACT for Major Sources was published in the Federal Register on January 31, 2013. Boilers and process heaters at major Sources of Hazardous Air Pollutants (HAPS) are affected by this regulation. The compliance date for this regulation is January 31, 2015. So, Ox can avoid complying with the requirements of this subpart if the following is met prior to January 31, 2015:

- The fuel restriction for boiler and proposed controls (DSI with FF) are in a federally enforcement document.
- The proposed controls are installed and in operation.

These changes will change the classification of the mill as an "area source" of HAPs. Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Source would be applicable to the boiler as an existing coal-fired boiler. Under 40 CFR §63.11201(a), an existing coal-fired boiler must meet the following emission standards:

Engineering Evaluation of R13-0622A
Ox Paperboard LLC
Halltown Paperboard Mill
Non-confidential

- 2.2E-05 (0.000022) lb of mercury per MMBtu of Heat Input
- Carbon monoxide concentration of less than 420 ppm by volume on a dry basis corrected to 3 percent oxygen

The following are the applicable work practice standards for this particular unit, which is from Table 2 to Subpart JJJJJ of Part 63.

- Minimize startup and shutdown periods in accordance with manufacturer's recommended procedures.
- Conduct a onetime energy assessment of the boiler.

Ox proposes to install and operate a bag leak detection system in conjunction with the dry sorbent injection system with a fabric filter control device. Under this regulation, the unit would be subject to the following operating limits of Table 3 to Subpart JJJJJ of Part 63:

- In lieu of the 10% opacity limit, the bag leak detection and fabric filter can be operated in such a manner that the bag leak detection alarm does not sound more than 5% of the operating time during each 6 month period.
- Maintain the 30-day rolling average activated carbon injection rate at or above the minimum rate.

Ox did not propose to install an oxygen trim on the existing boiler. According to 40 CFR §63.11224(a), the permittee must install and operate a continuous monitoring system oxygen level in the exhaust. The installation and use of oxygen analyzer requires the source to conduct CO emission testing and to establish an oxygen level as operating parameter to demonstration compliance with the CO concentration limit.

The permittee will be required to conduct performance testing for mercury to demonstrate compliance with the mercury emission limit and to establish the activated carbon injection rate.

These changes do not affect the applicability of Rule 2 & 10 for this boiler. The same applicable requirements are still in effect towards this boiler. However, monitoring compliance for these emission requirements will be discussed in the Monitoring of Operations Section of this evaluation.

The permittee filed a complete application, paid the filing & NESHAP fees, and published a legal ad in the *Spirit of Jefferson Advocate* on August 18, 2015. Under 45 CSR §13-8.5., this application triggers the Notice Level C requirements of Rule 13 because Ox has proposed to limit the operational capacity of the boiler to below major stationary source thresholds of Part 63 for HAPs. Thus, Ox will be required to publish a commercial ad in accordance with 45 CSR §13-8.4a and post a sign in accordance with 45 CSR §13-8.5a. The applicant also filed a request for a Significant Modification to the Facility's Title V Operating Permit in conjunction with this application.

Engineering Evaluation of R13-0622A
 Ox Paperboard LLC
 Halltown Paperboard Mill
 Non-confidential

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The potential release of hazardous air pollutants from the boiler will be reduced to less than 4 tons per year, which is significantly below the Rule 13 trigger threshold of 2 pounds per hour or 5 tons per year. Therefore, no information about the toxicity of the HAPs is presented in this evaluation.

AIR QUALITY IMPACT ANALYSIS

The writer deemed that an air dispersion modeling study or analysis was not necessary, because the proposed modification does not meet the definition of a major modification of a major source as defined in 45CSR14.

MONITORING OF OPERATIONS

The writer recommends the following monitoring requirements:

- Track the fuel usage (coal consumed for each month and determine the total 12 month rolling heat input. Fuel usage recordkeeping is required by Rules 2, 10 and Subpart JJJJJ. This is currently required in the Facility's Title V Permit.
- Maintain records of each shipment of coal to not exceed the maximum sulfur content of 1.7 % sulfur by weight. This is currently required in the Facility's Title V Permit.
- Conduct quarterly fuel analysis for mercury per Subpart JJJJJJ.
- Monitor the fabric filter baghouse with a Bag Leak Detection System that meets the criteria of Subpart JJJJJJ to Part 63. This is required under Subpart JJJJJJ to Part 63.
- Establish operating parameters for the DSI system of the hydrated lime and activated carbon injection rates that correlates to a compliance demonstration for respective pollutants.
- Monitor and record the amount of line (sorbent) and activated carbon is injected.
- Oxygen analyzer. This is required under Subpart JJJJJJ to Part 63 for demonstrating compliance with the CO requirement.
- Maintain records indicating that the start-up and shutdown periods are minimized. This is required under Subpart JJJJJJ to Part 63.

Engineering Evaluation of R13-0622A
Ox Paperboard LLC
Halltown Paperboard Mill
Non-confidential

The unit is subject to Rules 2 & 10. The applicable PM, and visible emissions limits were incorporated into the permit. The unit's allowable PM rate under Rule 2 is 17.7 pounds per hour. The applicant proposed a PM rate of 6.82 pounds per hour, which is 38.5 % of the allowable for this unit under Rule 2.

The Boiler GACT specifies that a Bag Leak Detection System (BLDS) must be capable of detecting particulate matter emissions at concentrations of 10 milligrams per cubic meter or less. At this specification, the PM rate from the boiler after the bag house would be 1.65 pounds per hour when the system would activate. The Boiler GACT notes that satisfactory operation of the fabric filter control baghouse if the bag leak detection system does not activate (sound off) for more than 5% of the operating time during a 6-month period.

Under the Boiler GACT, a source could elect not to use a bag leak detection system. Then, the unit would be subject to a 10% opacity limit and be required to use a continuous opacity monitoring system (COMS) to demonstrate compliance. In general, one may view that EPA has determined that BLDS is an equivalent monitoring means to COMS.

Rule 2 requires the permittee to develop and implement a monitoring plan under 45 CSR §2-8.2.a. The writer considers the use of a BLDS in accordance with Boiler GACT to satisfy this requirement under Rule 2. Therefore, no additional monitoring is necessary for the visual emission standard of Rule 2.

Rule 2A establishes a testing schedule for a Rule 2 source for periodic testing for the purpose of demonstrating compliance with the weight emission standards of 45 CSR §2-4. Based on this schedule, this particular unit would be on a 3 year cycle (Cycle 3- 45 CSR §2A-5.2.). This unit is being permitted to operate at 40% of its designed capacity on an annual basis with a PM rate of just 38% of its allowable. With the sensitivity level of less than the proposed emission rate, the writer recommends conducting an initial performance test for PM to ensure that the additional loading of sorbent and activated carbon does not exceed the proposed PM rate and follow-up testing conducted based on the Director's discretion.

Rule 10 sets an allowable sulfur dioxide rate for this unit at 347.2 pounds per hour. Ox had an emission limit set based on maximum sulfur content of 1.7% sulfur and firing rate of 4.3 tons of coal per hour, which equates to 277.78 pounds of sulfur dioxide per hour. Tracking fuel usage and sulfur content of the coal consumed is sufficient for demonstrating compliance with the SO₂ emission limitation being established in the permit, which satisfies Rule 10.

CHANGES TO PEMRIT R13-0622

Permit R13-0622 was issued on June 4, 1982. This permit did not establish any specific conditions or requirements for this unit. The writer recommends converting the permit into the agency's current permit format. The applicable emission standards from Rule 2 and 10 will be incorporated into the permit as well as the applicable requirements of Subpart JJJJJ to Part 63 (Boiler GACT).

Engineering Evaluation of R13-0622A
Ox Paperboard LLC
Halltown Paperboard Mill
Non-confidential

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates the proposed modification of the boiler at the Halltown Paperboard Mill will meet all the requirements of the applicable rules and regulations when operated in accordance with the permit application. Therefore, the writer recommends granting Ox Paperboard LLC a Rule 13 modification permit for the proposed changes at the Halltown Paperboard Mill, which is located in Halltown, WV.



Edward S. Andrews, P.E.
Engineer

November 9, 2015
Date

Engineering Evaluation of R13-0622A
Ox Paperboard LLC
Halltown Paperboard Mill
Non-confidential

Andrews, Edward S

From: Andrews, Edward S
Sent: Tuesday, November 10, 2015 7:40 AM
To: 'Wilson, Rick'
Subject: RE: Public Notice level C for R13-0662

Rick,

The ad is acceptable. I will go ahead and have our ad schedule to run on the November 18 as well.

Thanks,
Ed

Edward S. Andrews, P.E.
Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
304.926.0499 ext. 1214

ID # 37-7
Reg R13-0622A
Company Ox Paperboard
Facility Nalton Initials EW
Paperboard Mill

From: Wilson, Rick [<mailto:RWilson@trcsolutions.com>]
Sent: Monday, November 09, 2015 5:50 PM
To: Andrews, Edward S
Cc: Martin Weller (mweller@oxindustries.com)
Subject: RE: Public Notice level C for R13-0662

Ed,

Attached is a draft copy of OX Paperboard's Commercial Display Advertisement public notice for publication in the Wednesday November 18 edition of the *Spirit of Jefferson Advocate*. Please let us know if the attached is acceptable.

Thanks,
Rick

Rick Wilson
Principal Consultant
TRC Environmental



One Kenton Drive, Suite 200, Charleston, WV 25311
C: 304-476-7037 | F: 304-346-2591

[LinkedIn](#) | [Twitter](#) | [Blog](#) | www.trcsolutions.com

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From: Andrews, Edward S [<mailto:Edward.S.Andrews@wv.gov>]
Sent: Monday, November 09, 2015 8:54 AM
To: Wilson, Rick <RWilson@trcsolutions.com>
Subject: Public Notice level C for R13-0662

Rick: Bev has given me permission to release R13-0622 for public comment. This application will need to go through Public Notice Level C (45CSR-13-8.5), which requires posting of the 2'x2' sign (45CSR13-8.5.a.) and publish of a commercial ad (45CSR13-8.4a.). Bev reads that timing requirements of 45 CSR 13-8.5 means that the DAQ's intent to approve legal ad and the applicant's commercial must be published at the same time. Given that the *Spirit of Jefferson Advocate* is a Wednesday Publication, I would like to suggest that we set a publication date of November 18. Please let me know if is feasible with your client.

Should you have any questions about this email, please contact me.

Sincerely,

Edward S. Andrews, P.E.
Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
304.926.0499 ext. 1214

Andrews, Edward S

From: Wilson, Rick <RWilson@trcsolutions.com>
Sent: Thursday, November 12, 2015 2:12 PM
To: Andrews, Edward S
Cc: mwallace@oxpaperboard.com; Martin Weller (mweller@oxindustries.com); mark shapton; Clayton Staley; Kayla Cook; Kratz, Richard
Subject: RE: WV DAQ NSR Permit Application Complete for Ox Paperboard LLC, Haltown Paperboard Mill
Attachments: 037-00007_PERM_R13-0622A_predraft - Ox Paperboard suggested revisions 11-12-15.docx

Hi Ed,

Ox Paperboard appreciates the opportunity to review the pre-draft permit R13-0622A which you provided. Attached is Ox Paperboard's suggested revisions to the pre-draft permit, utilizing Track Changes in the Word document. Ox Paperboard's boiler will use an oxygen analyzer system to comply with Subpart JJJJJ Boiler MACT, not a CO CEMS.

Please let us know if you have any questions about our suggested revisions to the pre-draft permit.

Thanks,
Rick

Rick Wilson
Principal Consultant
TRC Environmental



One Kenton Drive, Suite 200, Charleston, WV 25311
C: 304-476-7037 | F: 304-346-2591

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ID # 37-7
Reg R13-622A
Company Ox Paperboard
Facility Haltown Paperboard Mill Initials Ed

From: Wilson, Rick
Sent: Monday, November 02, 2015 6:39 PM
To: 'Andrews, Edward S' <Edward.S.Andrews@wv.gov>
Cc: mwallace@oxpaperboard.com; Martin Weller (mweller@oxindustries.com) <mweller@oxindustries.com>; mark shapton <mshapton@oxindustries.com>; 'Clayton Staley' <cstaley@oxindustries.com>; Kratz, Richard <RKratz@trcsolutions.com>
Subject: RE: WV DAQ NSR Permit Application Complete for Ox Paperboard LLC, Haltown Paperboard Mill

Hi Ed,

We will review the pre-draft permit and get comments/questions to you by November 16, 2015.

Thanks,
Rick

Rick Wilson
Principal Consultant
TRC Environmental

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One Kenton Drive, Suite 200, Charleston, WV 25311
C: 304-476-7037 | F: 304-346-2591

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From: Andrews, Edward S [<mailto:Edward.S.Andrews@wv.gov>]
Sent: Monday, November 02, 2015 8:02 AM
To: mwallace@oxpaperboard.com
Cc: mweller@oxpaperboard.com; Wilson, Rick <RWilson@trcsolutions.com>; Kreger, Joseph A <Joseph.A.Kreger@wv.gov>
Subject: WV DAQ NSR Permit Application Complete for Ox Paperboard LLC, Haltown Paperboard Mill

**RE: Application Status: Complete
Ox Paperboard LLC
Permit Application R13-0622A
Plant ID No. 037-00007**

Mr. Wallace:

Your application for a modification permit for a boiler was received by this Division on July 31, 2014 and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on August 31, 2015.

I have enclosed a pre-draft of the permit for your review. Should you have any comments, questions, or suggestions concerning the pre-draft, please submit them no later than November 16, 2015.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 1214 or reply to this email.

Sincerely,

Edward S. Andrews, P.E.
Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
304.926.0499 ext. 1214

This permit will supersede and replace Permit R13-0622A.

Facility Location: 163 Eyster Road
Halltown, Jefferson County, West Virginia

Mailing Address: P.O. Box 70
Halltown, WV 25423

Facility Description: Paperboard Mill

NAICS Codes: 322160

UTM Coordinates: 258.70 km Easting • 4,355.29 km Northing • Zone 18

Permit Type: Modification

Description of Change: This action is to limit the annual heat input to the permitted boiler to about 40% by limiting annual fuel usage to 15,000 tons of coal per year, and install a sorbent injection system with fabric filter baghouse to control HCl and mercury emissions from the facility below major source threshold levels, which means the boiler is no longer subject to Boiler MACT (Subpart DDDDD to Part 63) but is subject as an existing coal-fired boiler under the Boiler GACT (Subpart JJJJJJ to Part 63).

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
001	BLR-2	Coal-fired Boiler Mfg. Keeler/Dorr Oliver Model: MKB	1986	112 MMBtu/hr	C-3 & C-4
Control Devices					
C-3	BLR-2	Dry Sorbent Injection System Mfg. Amec Foster Wheeler	2015	44,400 acfm	N/A
C-4	BLR-2	Fabric Filter Baghouse Mfg. Amec Foster Wheeler Model: 144 Jet III	2015	44,400 acfm	N/A

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5 µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	Pph	Pounds per Hour
DAQ	Division of Air Quality	Ppm	Parts per Million
DEP	Department of Environmental Protection	Ppm_v or ppm_v	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	Psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-0622. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-0622, R13-0622A, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; [45CSR§§13-5.11 and 10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by

improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]
- 3.1.7. The potential to emit of hazardous air pollutants (HAPs) from the facility shall not exceed 25 tons per year with no single HAP be greater than 10 tons. Compliance with this limit is satisfied by complying with Condition 4.1.1. of this permit.

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.

- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Operating Fee**

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. The following conditions and requirements are specific to the boiler:

- a. ~~The permittee shall limit the annual capacity of the boiler to no more than 40 percent by limiting the annual fuel usage of the boiler to 15,000 tons on 12-month rolling total.~~
- b. ~~Particulate Matter~~ Particulate Matter (PM) emissions from Emission Point BLR-2 shall not exceed 6.82 pounds per hour based on a six hour average.
[45 CSR §2-4.1.d., and §2-9.1.]
- c. Visible emissions from Emission Point ~~M54~~ BLR-2 shall not exceed 10 percent opacity based on a six minute block average. Continuous compliance with this limit is satisfied by operating and maintain the fabric filter control device (C-4) ~~that the and its bag leak detection system, detector does not sound more than~~
- d. Sulfur dioxide emission from Emission Point BLR-2 shall not exceed 277.78 pound per hour and 484.50 tons per year.
[45 CSR §10-3.1.e.]
- e. Hydrochloric acid emissions from Emission Point BLR-2 shall not exceed 1.26 pounds per hour nor 2.20 tons per year.
- f. Carbon monoxide emissions from Emission Point BLR-2 shall not exceed a concentration level of 420 ppm on a dry basis corrected to 3 percent oxygen on a 10 day rolling average basis.
[40 CFR §63.11201(a) and row 6 of Table 1 to Subpart JJJJJ of Part 63 – Emission Limits]
- g. Mercury emissions from Emission Point BLR-2 shall not exceed 2.2E-5 pounds per MMBtu of heat input on a 30 day rolling average basis.
[40 CFR §63.11201(a) and row 6 of Table 1 to Subpart JJJJJ of Part 63 – Emission Limits]
- h. For the purpose of complying with the SO₂ allowable in 45 CSR §10-3.1.d., and the emission limit in item d of this condition, the boiler shall not consume more than 4.3 tons of coal per hour nor more than 15,000 tons per year. The permittee is limited to only burning coal with a sulfur content of no greater than 1.7 % by wt.
[45 CSR §10-10.2.]
- i. The permittee shall install and operate an activated carbon injection system to control mercury emissions. Prior to establishing minimum activated carbon injection operating limit, the minimum injection rate of activated carbon shall not be less than 5 lb of activated carbon per 112 MMBtu of heat input (which equates to 0.045 lb of activated carbon per MMBtu) on a 30 day rolling average basis. The minimum activated carbon injection rate means the load faction multiplied by the lowest hourly average activated carbon injection rate measured according to Table 6 to this subpart during the most recent performance stack test demonstrating compliance with the applicable emission limit. Following the date on which the initial compliance demonstration is completed or is required to be completed under Condition 4.3.2., whichever date comes first, the permittee must continuously monitor the operating parameters. Operation below the established minimum operating limits specified in

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this requirement constitutes a deviation from operating limits established under Subpart JJJJJJ, except during performance tests conducted to determine compliance with the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests.

[40 CFR §63.11211(b)(3), §63.11222(a)(1), & ~~§63.11227~~]

- j. The permittee shall install and operate a dry sorbent injection system on or before January 31, 2016 to meet the hourly and annual HCl emission limits in item e of this condition. Prior to establishing a 30-day rolling minimum dry sorbent injection rate in accordance with Condition 4.3.1., the hourly hydrated lime injection rate shall be 60 pounds per hour. Following the date on which the initial compliance demonstration is completed or is required to be completed under Condition 4.3.2., whichever date comes first, the permittee must continuously monitor the operating parameters. Operation below the established minimum operating limits specified in this requirement constitutes a exceedance of the limits in item e of this condition, except during performance tests conducted to determine compliance with the emission and operating limits or to establish new operating limits. Operating limits are confirmed or reestablished during performance tests.

[40 CFR §63.11211(b)(3), §63.11222(a)(1)]

- k. The permittee must conduct initial boiler tune-up in accordance with 40 CFR §63.11223(b) prior to conducting the initial compliance test as required in Condition 4.3.1.

[40 CFR §63.11214]

1. The permittee shall develop and submit to the Director a site specific monitoring plan for ~~the CO-CEMs, and~~ the Continuous Parameter Monitoring System (CPMS) for the oxygen analyzer, activated carbon injection and dry sorbent injection systems. This plan shall include means to measure amount of heat inputted or load produced by the unit. Such plan shall be submitted 60 days prior to conducting the required testing in Condition 4.3.1 according to the following requirements.
 - i. Installation of the continuous measuring system (CMS) sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);
 - ii. Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and
 - iii. Performance evaluation procedures and acceptance criteria (e.g., calibrations).
 - iv. Ongoing operation and maintenance procedures in accordance with the general requirements of 40 CFR §63.8(c)(1)(ii),
 - v. Ongoing data quality assurance procedures in accordance with the general requirements of 40 CFR §63.8(d); and
 - vi. Ongoing recordkeeping and reporting procedures in accordance with the general requirements of 40 CFR §63.10(c) (as applicable in Table 8 to Subpart JJJJJJ), (e)(1), and (e)(2)(i).

[40 CFR §§63.11205(c) & (c)(1) through (c)(3), and 45 CSR §123-5.11.]

- m. The permittee must conduct a performance evaluation of each CMS in accordance with the site-specific monitoring plan as required in item l of this condition.
[40 CFR §§63.11205(c)(2) and 45 CSR §123-5.11.]
- n. The permittee shall minimize the boiler's startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures, if available. If manufacturer's recommended procedures are not available, the permittee shall follow the recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available.
[40 CFR §63.11223(g)]
- o. The permittee shall conduct a onetime energy assessment performed by a qualified energy assessor. The energy assessment must include the following with the extent of the evaluation for the following items items (1) to (4) appropriate for the on-site technical hours listed in §63.11237.
- i. A visual inspection of the boiler system;
- ii. An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints;
- iii. An inventory of major energy use systems consuming energy from the boiler and which are under control of the permittee;
- iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
- v. A list of the energy conservation measures that are within the permittee's control;
- vi. A list of the energy savings potential of the energy conservation measures identified and
- vii. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
[40 CFR §§63.11201(b)(1) & 63.11214(c); §63.7505(a); §63.7510(c); §63.7515(d); §63.7540(a)(10), (11) & (12); and row 16 of Table 2 to Subpart ~~DDDD~~ JJJJ of Part 63—Work Practice Standards]

4.1.2. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

[~~45 CSR §§10-8.2.c.3., & 8.3.c. and 40 CFR §63.7555(d)(3)~~]

- 4.2.1. The permittee shall conduct fuel analysis of each ~~the~~ coal shipment received at the facility to demonstrate that the coal meets sulfur specification of ~~in~~ in item ~~eh~~ of Condition 4.1.1. Such records shall be maintained in accordance with Condition 3.4.1.
[45 CSR §10-8.2.c.3.]

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- 4.2.2. The permittee shall conduct fuel (coal) analysis in accordance with the following procedures:
- At a minimum, the permittee must obtain three composite coal samples according to the procedures in 40 CFR §63.11213(b) or ASTM D2234/D2234M or equivalent method for coal. During performance testing for mercury, each composite sample must consist of a minimum of three samples collected at approximately equal intervals during a test run period.
 - The composited fuel samples must be prepared in accordance with ASTM D2013/D2013M or equivalent method for coal.
 - Determine the heat content of the fuel type in accordance with ASTM D5865 or equivalent method for coal.
 - Determine the moisture content of the fuel type in accordance with ASTM D3173 or ASTM E871 or equivalent method for coal.
 - Measure the mercury concentration in the fuel sample using ASTM D6722 or equivalent method for coal.
 - Convert the concentration of mercury in the fuel in units of pounds per million Btu of each composite sample.
[40 CFR §63.11213 and Table 5 to Subpart JJJJJ of Part 63-Fuel Analysis Requirements]

- 4.2.3. ~~The If the permittee shall conduct quarterly fuel analysis demonstrates compliance with the mercury emission limit based on fuel analysis, the fuel analysis must be in accordance with 63.11220(c) and Condition 4.2.2. Records of such analysis shall be maintained in accordance with Condition 3.4.1.~~

The permittee must conduct a fuel analysis according to §63.11213 for each type of fuel burned as specified in paragraphs (c)(1) and (2) of this section. If you plan to burn a new type of fuel or fuel mixture, you must conduct a fuel analysis before burning the new type of fuel or mixture in your boiler. You must recalculate the mercury emission rate using Equation 1 of §63.11211. The recalculated mercury emission rate must be less than the applicable emission limit.

(1) When demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are measured to be equal to or less than half of the mercury emission limit, you do not need to conduct further fuel analysis sampling but must continue to comply with all applicable operating limits and monitoring requirements.

(2) When demonstrating initial compliance with the mercury emission limit, if the mercury constituents in the fuel or fuel mixture are greater than half of the mercury emission limit, you must conduct quarterly sampling.

[40 CFR §63.11220(c)(2)]

- 4.2.4. ~~The permittee, in order to demonstrate compliance with the CO emission limit in Condition 4.1.1.f, shall install, operate, and maintain a CEMS for CO and oxygen according to the following and the site specific monitoring plan as required in Condition 4.1.1.f: calibrate, operate, and maintain an oxygen analyzer system, as defined in §63.11237, according to the manufacturer's recommendations and paragraphs (a)(7) and (d) of this section, as applicable, by the compliance date specified in §63.11196. Oxygen monitors and oxygen trim systems must be installed to monitor oxygen in the boiler flue gas, boiler firebox, or other appropriate intermediate location:~~
- ~~Each CO CEMS must be installed, operated, and maintained according to the applicable procedures under Performance Specification 4, 4A, or 4B at 40 CFR Part 60, appendix B, and each oxygen CEMS must be installed, operated, and maintained according to~~

~~Performance Specification 3 at 40 CFR part 60, appendix B. Both the CO and oxygen CEMS must also be installed, operated, and maintained according to the site specific monitoring plan developed according to paragraph (e) of this section. You must operate the oxygen analyzer system at or above the minimum oxygen level that is established as the operating limit according to Table 6 to this subpart when firing the fuel or fuel mixture utilized during the most recent CO performance stack test. Operation of oxygen trim systems to meet these requirements shall not be done in a manner which compromises furnace safety.~~

- ~~b. The permittee must conduct a performance evaluation of each CEMS according to the requirements in 40 CFR §63.8(e) and according to Performance Specifications 3 and 4, 4A, or 4B at 40 CFR part 60, appendix B.~~
- ~~c. Each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) every 15 minutes. The permittee must have CEMS data values from a minimum of four successive cycles of operation representing each of the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CEMS calibration, quality assurance, or maintenance activities are being performed, to have a valid hour of data.~~
- ~~d. The CEMS data must be reduced as specified in 40 CFR §63.8(g)(2).~~
- ~~e. The permittee must calculate hourly averages, corrected to 3 percent oxygen, from each hour of CO CEMS data in parts per million CO concentrations and determine the 10-day rolling average of all recorded readings, except as provided in 40 CFR §63.11221(e). Calculate a 10-day rolling average from all of the hourly averages collected for the 10-day operating period using the following equation:~~

$$10\text{-day average} = \frac{\sum_{i=1}^n Hpvi}{n}$$

~~Where:~~

~~Hpvi – the hourly parameter value for hour i~~

~~n – the number of valid hourly parameter values collected over 10 boiler operating days~~

- ~~f. For purposes of collecting CO data, the permittee must operate the CO CEMS as specified in 40 CFR §63.11221(b). For purposes of calculating data averages, the permittee must use all the data collected during all periods in assessing compliance, except that the permittee must exclude certain data as specified in 40 CFR §63.11221(e) (monitoring system malfunctions or out-of-control periods, repairs to associated with monitoring system malfunctions). Periods when CO data are unavailable may constitute monitoring deviations as specified in 40 CFR §63.11221(d).~~
- ~~g. Within 60 days after the date of completing each CEMS performance evaluation test as defined in 40 CFR §63.2, the permittee must submit relative accuracy test audit (RATA) data to EPA's CDX by using CEDRI in accordance with 40 CFR 63.11225(e)(1). Only RATA pollutants that can be documented with the ERT (as listed on the ERT Web site) are subject to this requirement. For any performance evaluations with no corresponding RATA pollutants listed on the ERT Web site, the owner or operator shall submit the results of the performance evaluation in paper submissions to the Administrator and Director in accordance with Condition 3.5.1.~~

~~[40 CFR §§63.11224(a)(1) through (a)(6); 63.11224(a)(7) and §63.11225(e)(2) 63.11224(d)]~~

- 4.2.5. The permittee shall install, calibrate, maintain, and continuously operate a fabric filter bag detection system in accordance with the following and the site-specific monitoring plan as required in Condition 4.1.1.1.:
- a. The permittee must install and operate a bag leak detection system each outlet of control device C-4.
 - b. Each bag leak detection system must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations and in accordance with EPA-454/R-98-015 (incorporated by reference, see 40 CFR §63.14).
 - c. The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligrams per actual cubic meter or less.
 - d. The bag leak detection system sensor must provide output of relative or absolute particulate matter loadings.
 - e. The bag leak detection system must be equipped with a device to continuously record the output signal from the sensor. The bag leak detection system must be equipped with an audible or visual alarm system that will activate automatically when an increase in relative particulate matter emissions over a preset level is detected. The alarm must be located where it is easily heard or seen by plant operating personnel.

[40 CFR §63.11224(gf) and 45 CSR §2-8.2.a.]

- 4.2.6. The permittee shall install, calibrate, maintain, and continuously parameter monitoring system (CPMS) in accordance with the following and the site-specific monitoring plan for the oxygen analyzer, the activated carbon and dry sorbent injection systems:
- a. The CPMS must complete a minimum of one cycle of operation every 15 minutes. The permittee must have data values from a minimum of four successive cycles of operation representing each of the four 15-minute periods in an hour, or at least two 15-minute data values during an hour when CMS calibration, quality assurance, or maintenance activities are being performed, to have a valid hour of data.
 - b. The permittee must calculate hourly arithmetic averages from each hour of CPMS data in units of the operating limit and determine the 30-day rolling average of all recorded readings, except as provided in §63.11221(c). Calculate a 30-day rolling average from all of the hourly averages collected for the 30-day operating period using the following equation.

$$30 - \text{day average} = \frac{\sum_{i=1}^n Hpvi}{n}$$

Where:

Hpvi = the hourly parameter value for hour i

n = the number of valid hourly parameter values collected over 30 boiler operating days

- c. For purposes of collecting data, the permittee must operate the CPMS as specified in §63.11221(b). For purposes of calculating data averages, the permittee must use all the data collected during all periods in assessing compliance, except that the permittee must exclude certain data as specified in §63.11221(c) (monitoring system malfunctions or out-of-control periods or repairs to associated with monitoring system malfunctions). Periods when CPMS data are unavailable may constitute monitoring deviations as specified in §63.11221(d).

- d. Records the results of each inspection, calibration, and validation check.
[40 CFR §§63.11224(c) & (d) & 45 CSR §13-5.11]

4.3. Testing Requirements

- 4.3.1. The permittee shall conduct performance testing on or before July 30, 2016. Such testing shall determine compliance with the PM limit of Condition 4.1.1.b., visible emissions limit of Condition 4.1.1.c., the HCl limit of Condition 4.1.1.e. and mercury limit of Condition 4.1.1.g. and establish operating limits for the injection of activated carbon and dry sorbent as required in items i. and j. of Condition 4.1.1. This testing shall be conducted in accordance with 45 CSR 2 Appendix, Row 2 of Table 4 to Subpart JJJJJJ of Part 63, U.S. EPA Method 29 for HCl, and Condition 3.3.1.

The permittee must conduct performance stack tests at the representative operating load conditions while burning the type of fuel or mixture of fuels that have the highest emissions potential for mercury and HCl emissions, and the permittee must demonstrate initial compliance and establish operating limits based on these performance stack tests. For subcategories with more than one emission limit, these requirements could result in the need to conduct more than one performance stack test. Following each performance stack test and until the next performance stack test, the permittee must comply with the operating limit for operating load conditions specified in (Table 3 to Subpart JJJJJJ of Part 63).

The permittee must conduct a minimum of three separate test runs for each performance stack test required in this section, as specified in 40 CFR §63.7(e)(3) and in accordance with the provisions in Table 4 to Subpart JJJJJJ.

To determine compliance with the emission limits, the permittee must use the F-Factor methodology and equations in sections 12.2 and 12.3 of EPA Method 19 of appendix A-7 to part 60 of this chapter to convert the measured mercury concentrations that result from the performance test to pounds per million Btu heat input emission rates.

The permittee shall conduct fuel analysis in accordance with Condition 4.2.2.
[45 CSR §§2-8.1.a & 8.1.b., 40 CFR §§63.11210(a), (i), §63.11212, Table 4 to Subpart JJJJJJ of Part 63 – Performance (Stack) Testing Requirements]

- 4.3.2. On a triennial basis after completion of the initial testing as required in Condition 4.3.1., the permittee shall conduct subsequent testing to demonstration compliance with the mercury limit in item g in Condition 4.1.1. Such testing shall be conducted no more than 37 months after the previous performance test and in accordance with applicable procedures and methods as outline in Conditions 3.3.1. and 4.3.1.

[40 CFR §63.11220(a)]

- 4.3.3. Within 60 days after the date of completing each performance test for mercury as required by Conditions 4.3.1. or 4.3.2., the permittee must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to EPA's WebFIRE database by using CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see <http://www.epa.gov/ttn/chieff/ert/index.html>). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic

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storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, the permittee must also submit these reports, including CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test in paper submissions to the Administrator at the appropriate address listed in §63.13.

[40 CFR §63.11225(e)(1)]

4.4. Recordkeeping Requirements

4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.

- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.4.4. The permittee shall keep the following records in accordance with 40CFR§63.7555 ~~63.11223(b)(6)~~. ~~This includes but not limited to the following information during the tune-up as required in Condition 4.1.1.g. and 40 CFR §63.7540~~Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section:

- 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. If concentrations of NO_x were taken during the tune-up of the unit, record of such measurements shall be included. 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 using a portable combustion analyzer.~~

b. A description of any corrective actions taken as a part of the tune-up; and.

- ~~b.c. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.~~

~~[40 CFR §§ 63.11223(b)(6)63.7540(a)(10)(vi) and 63.7555]~~

4.4.4~~5~~. The permittee must the records information specified in the following:

- a. As required in 40 CFR §63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted.
- b. The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR §63.11214 and 40 CFR §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.
- c. Records must identify each boiler, the date of initial tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- d. The permittee must keep a copy of the energy assessment report.
- e. The permittee must also keep records of monthly fuel (coal) use by the boiler, including the type(s) of fuel and amount(s) used.
- f. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- g. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- h. The permittee must keep the records of all inspection and monitoring data required by Conditions 4.2.4., 4.2.5., and 4.2.6. (§40 CFR §63.11221 and 63.11222), and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.

- i. For the bag leak detection system, the permittee must keep the following records:
 - i. Records of the bag leak detection system output.
 - ii. Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings.
 - iii. The date and time of all bag leak detection system alarms, and for each valid alarm, the time the permittee initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

[40 CFR §63.11225(c), 45 CSR §2-8.3.c., & 45 CSR §10-8.3.c.]

4.5. Reporting Requirements

- 4.5.1. The permittee shall submit a "Notification of Compliance Status" for Auxiliary Boiler to the Director before the close of business on the sixtieth (60th) day after completion of the initial compliance demonstration as required in Condition 4.3.2. ~~(40 CFR §63.7530(f)).~~ Such "Notification of Compliance Status" shall be in accordance with the following (40 CFR §63.11225(a)(4)(2)(i) through (vi)) and signed by a responsible official in accordance with Condition 3.5.1.

- a. ~~The permittee must submit the information required in 40 CFR §63.9(h)(2), except the information listed in 40 CFR §63.9(h)(2)(i)(B), (D), (E), and (F). If the permittee conduct any performance tests or CMS performance evaluations, the permittee must submit that data as specified in paragraph (e) of this section. If the permittee conduct any opacity or visible emission observations, or other monitoring procedures or methods, the permittee must submit that data to the Administrator at the appropriate address listed in 40 CFR §63.13. contain the information specified in 40 CFR §40 CFR §63.7545(e)(1), and (8), which included a statement the initial tune-up for boiler was completed. You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.~~
- b. "This facility complies with the requirements in 40 CFR §63.11214 to conduct an initial tune-up of the boiler."
- c. "This facility has had an energy assessment performed according to 40 CFR §63.11214(c)."
- d. ~~For units that install bag leak detection systems:~~ "This facility complies with the requirements in 40 CFR §63.11224(f)."
- e. "No secondary materials that are solid waste were combusted in any affected unit."
- f. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR §63.13

[40 CFR §63.11225(a)(4) ~~63.7530(d), and 63.7545(e)~~]

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4.5.2. The permittee shall submit "Annual Compliance Reports" to the Director for the boiler with the first report being submitted by no later than March 15, 2017 and subsequent reports are due every March 15 from thereafter for the previous calendar year. Such reports shall contain the information specified in 40 CFR §§63.11225(b)(1)(~~i~~) through ~~(4)(iv) and (xiv)~~ which are:

- a. Permittee and facility name, and address;
- b. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The permittee notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official.
 - i. "No secondary materials that are solid waste were combusted in any affected unit."
 - ii. "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
- c. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- d. The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by the permittee or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

~~[40CFR §§63.11225(b), 63.7550(b), (b)(1), (c)(1), & (c)(5)(i) though (iv) and (xiv)]~~

4.5.3. The permittee shall submit quarterly visible emission reports to the Director. Such reports shall be post marked 30 days of the end of the quarter. This report shall identify any instance that a visible emission observation indicated an exceedance of the standard in Condition 4.1.1.c. A description of the excursion or cause of the exceedance, any corrective action taken, and the beginning and ending times for the exceedance shall be included in the report.

To the extent that an exceedance is due to a malfunction, the reporting requirement of 45 CSR §2-9.3. shall be followed.

In the event that no exceedance of the standard occurred or the no observations were taken, the permittee shall state that in the report. Such reports shall be submitted in accordance with Condition 3.5.1.

[45 CSR §2A-7.2e.]

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name & Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.

Andrews, Edward S

From: Andrews, Edward S
Sent: Monday, November 02, 2015 8:02 AM
To: 'mwallace@oxpaperboard.com'
Cc: 'mweller@oxpaperboard.com'; Wilson, Rick (RWilson@trcsolutions.com); Kreger, Joseph A
Subject: WV DAQ NSR Permit Application Complete for Ox Paperboard LLC, Haltown Paperboard Mill
Attachments: 037-00007_PERM_R13-0622A_predraft.docx

**RE: Application Status: Complete
Ox Paperboard LLC
Permit Application R13-0622A
Plant ID No. 037-00007**

Mr. Wallace:

Your application for a modification permit for a boiler was received by this Division on July 31, 2014 and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on August 31, 2015.

I have enclosed a pre-draft of the permit for your review. Should you have any comments, questions, or suggestions concerning the per-draft, please submit them no later than November 16, 2015.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Ed Andrews at (304) 926-0499 ext. 1214 or reply to this email.

Sincerely,

Edward S. Andrews, P.E.
Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
304.926.0499 ext. 1214

Entire Document
NON-CONFIDENTIAL

Andrews, Edward S

From: Null, Gregory L
Sent: Monday, August 03, 2015 3:54 PM
To: Andrews, Edward S
Subject: Ox Paperboard LLC (Halltown) Permit Application Fee

The is the receipt for payment received from

Ox Paperboard LLC, check# 7593, dated 7/24/15, \$3,500
Halltown, R13-0622A, id 037-00007

OASIS Deposit CR 1600012554 August 3, 2015

Entire Document
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August 13, 2015

WV Department of Environmental Protection
Division of Air Quality
Attention: Ed Andrews
601 57th Street, SE
Charleston, WV 25304



**Ox Paperboard, LLC
Halltown Paperboard Mill
WVDAQ ID# 037-00007**

REFERENCE: Permit R13-0622 (Issued September 1, 1981)

**SUBJECT: Original affidavit of publication of Class I legal advertisement for
Modification of R13-0622**

Dear Mr. Andrews:

Ox Paperboard, LLC hereby submits the enclosed original affidavit of publication of the Class I legal advertisement Public Notice for the modification of permit R13-0622.

Should you have additional questions regarding this submittal please contact me at 304/725-2076, ext 142 or mweller@oxpaperboard.com, or contact our consultant Rick Wilson, TRC Environmental Corporation, at 304/476-7037 or rwilson@trcsolutions.com.

Very truly yours,

Ox Paperboard, LLC

Martin Weller,
General Manager

Enclosure

Entire Document
NON-CONFIDENTIAL

AIR QUALITY PERMIT NOTICE
Notice of Application

Notice is given that Ox Paperboard, LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Modification to Permit R13-0622 for its existing Halltown Mill located near Halltown at 619 Halltown Road, in Jefferson County, West Virginia at latitude 39.313379 and longitude -77.798783.

The applicant estimates, as a result of the modification, the facility's potential to discharge Regulated Air Pollutants will be increased as follows:

Regulated Pollutant	Increased Potential Annual Emissions in tons per year (tpy)
Sulfur Dioxide	3.10

The applicant estimates, as a result of the proposed modification, the facility's potential to discharge Regulated Air Pollutants will be decreased as follows:

Regulated Pollutant	Decreased Potential Annual Emissions in tons per year (tpy)
Carbon Monoxide	-37.70
Nitrogen Oxides	-83.20
Particulate Matter (PM)	-40.51
PM-10	-22.38
PM-2.5	-2.27
Volatile Organic Compounds	-0.93
Hydrogen Chloride	-42.07
Total Regulated Hazardous Air Pollutants	-43.25
Total Carbon Dioxide Equivalent	-29,325

Operations at the existing facility are on-going. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the 3rd day of August, 2015.

By: Ox Paperboard, LLC
 Mark Wallace, Vice President of Operations
 PO Box 70, Halltown, WV 25423

8/5/11

My Commission Expires January 27, 2019

Notice of Publication
IG COMPANY, INC., Publisher
JEFFERSON ADVOCATE

Charleston, W. Va. August 5 20 15

City Permit Notice

_____ successive weeks, in the Spirit of Jefferson

_____ wn, Jefferson County, West Virginia, in the issues of

_____, 20 15,

[Signature]

Editor/Manager, Spirit of Jefferson Advocate

WDS

_____, Editor/Manager

that the above certificate is true and correct.

Ced D. Young

Notary Public

ERIS 12-1-34 (November 2, 2015) Incremental

OWR/HPU - Corrected a saving problem on the 'Enter Paper' screen.

ERIS 12-1-34 (November 2, 2015)

OWR - Change request for the Stormwater cover letters has been completed.

OWR - Corrected a validation and display problem with the download of manual entry data from eDMR.

OWMS - Corrected timing issue with dropdown filtering for Inspection compliance status. Compliance status selection will now auto-check the select for faster entry. Fixed post-save default shifting focus to tab 1 to retain the last tab that had focus.