

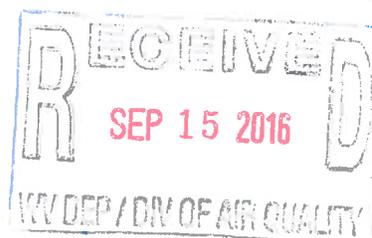


DEPARTMENT OF VETERANS AFFAIRS
Medical Center
Huntington, WV 25704

August 29, 2016

In Reply Refer To: 581/EGen-Brac

Assistant Director for Permitting
WV DEP/Division of Air Quality
601 57th Street, SE
Charleston, WV 25304



SUBJ: SUBJ: BRAC Natural Gas Emergency Generator
Plant ID No. 099 00007

1. The Huntington VA Medical Center respectfully requests a modification to its Reg. 13 permit (#2290 L). The facility will be installing a new Caterpillar Olympian Model G150LG6, 150 KW natural gas emergency generator, at newly acquired property adjoin the the Medical Center. We respectfully request the hours of operation be limited to 500 per year, which coincides with the other emergency generators we currently have on our Reg. 13 permit.
2. Please find enclosed the following:
 - *Application for NSR Permit & Title V Permit Revision*
 - *Attachment I- Emission Units Table*
 - *Attachment J - Emission Points Summary Sheets*
 - *Attachment R – Authority of Governmental Agency*
 - *Equipment Listing*
 - *Copy of the legal ad to be run in the Huntington Herald Dispatch*
 - *2015 EPA Certificate of Conformity .*
 - *Map Location*
 - *Emergency Generator Technical Data Sheet*
 - *Emissions Calculation*
 - *G60 –C form (p 15-21)*
 - *A check for \$2000.00 to cover administrative fees*
3. The “Certificate of Affidavit” for the legal ad will be forward to your office once received from the Herald Dispatch.

4. Should you have any questions or require additional information, please contact George Disney, GEMS Coordinator, at (304) 429-6755 Ext. 2381.

Respectfully



John Klim

Chief, Engineering Service

**Attachment J
EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data

Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type ¹	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS ³ (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions ⁴ 500 hours		Maximum Potential Uncontrolled Emissions 8760 hours		Emission Form or Phase (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used ⁶	Emission Concentration ⁷ (ppmv or mg/m ⁴)
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
E-Gen BRAC (150 kW)	BRAC			N/A				NOx	0.29	0.07		1.29			
								CO	0.66	0.16		2.95			
								THC	0.01	0.002		0.045			

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

- Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.
- Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).
- List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. DO NOT LIST H₂, H₂O, N₂, O₂, and Noble Gases.
- Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).
- Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).
- Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10).

Attachment R
AUTHORITY OF GOVERNMENTAL AGENCY

TO: The West Virginia Department of Environmental Protection,
Division of Air Quality

DATE: August 29, 2016

ATTN: Director

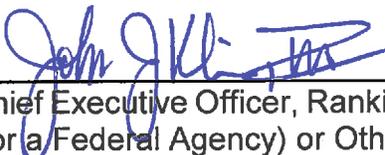
Agency's Federal Employer I.D. Number 55-0357745

The undersigned hereby files with the West Virginia Department of Environmental Protection, Division of Air Quality, a permit application.

Further, the agency certifies as follows:

(1) John Klim is the chief executive officer, a ranking elected official, or an authorized representative and in that capacity may represent the interests of the agency and may obligate and legally bind the agency. (In the case of a federal agency, "chief executive officer" includes the head of geographical area having responsibility for the overall operations of a principal geographic unit of the agency.)

(2) If the agency changes its authorized representatives then the agency shall notify the Director of the West Virginia Department of Environmental Protection, Division of Air Quality, immediately upon such change.



Chief Executive Officer, Ranking Elected Official, a Head of Geographical Area
(for a Federal Agency) or Other Authorized Officer

(If not the Chief Executive Officer, Ranking Elected Official or a Head of Geographical Area (for a Federal Agency), then the agency must submit a Resolution or other legal document stating legal authority of other authorized officer to bind the agency.)

Department of Veterans Affairs Medical Center - Huntington

Governmental Agency Name



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
 601 57th Street, SE
 Charleston, WV 25304
 (304) 926-0475
www.dep.wv.gov/daq

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

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):
 CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):
 ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION
 IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

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

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): VA Medical Center – Huntington		2. Federal Employer ID No. (FEIN): 55-0357745	
3. Name of facility (if different from above):		4. The applicant is the: <input checked="" type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input type="checkbox"/> BOTH	
5A. Applicant's mailing address: 1540 Spring Valley Drive, Huntington, WV 25704		5B. Facility's present physical address: 1540 Spring Valley Drive, Huntington, WV 25704	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input type="checkbox"/> YES <input type="checkbox"/> NO – If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A. – If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A.			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation:			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the proposed site? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, please explain: Federal facility – If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Installation of a new Caterpillar Olympian 150 KW natural gas emergency generator		10. North American Industry Classification System (NAICS) code for the facility: 62211	
11A. DAQ Plant ID No. (for existing facilities only): 099-00007		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2290 Rev L	

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

<p>12A.</p> <ul style="list-style-type: none"> For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road; For Construction or Relocation permits, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a MAP as Attachment B. <p>From Huntington, WV – Rt. 60 W to Carson Street. Left on Carson St to Spring Valley Dr. Turn right and proceed to VA entrance</p>								
12.B. New site address (if applicable):	12C. Nearest city or town:	12D. County:						
12.E. UTM Northing (KM): 42448491.68633	12F. UTM Easting (KM): 367444.96508	12G. UTM Zone: 17						
<p>13. Briefly describe the proposed change(s) at the facility: Installation of a new Caterpillar Olympian 150 KW natural gas emergency generator</p>								
<p>14A. Provide the date of anticipated installation or change: 01/31/17</p> <ul style="list-style-type: none"> If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: / / 		<p>14B. Date of anticipated Start-Up if a permit is granted: 2/28/17</p>						
<p>14C. Provide a Schedule of the planned Installation of/Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved).</p>								
<p>15. Provide maximum projected Operating Schedule of activity/activities outlined in this application:</p> <table border="0"> <tr> <td>Hours Per Day</td> <td>Days Per Week</td> <td>Weeks Per Year</td> </tr> <tr> <td></td> <td>*****</td> <td>LESS THAN 500 HOURS PER YEAR</td> </tr> </table>			Hours Per Day	Days Per Week	Weeks Per Year		*****	LESS THAN 500 HOURS PER YEAR
Hours Per Day	Days Per Week	Weeks Per Year						
	*****	LESS THAN 500 HOURS PER YEAR						
<p>16. Is demolition or physical renovation at an existing facility involved? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p>								
<p>17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U. S. EPA Region III.</p>								
<p>18. Regulatory Discussion. List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as Attachment D.</p>								
<p>Section II. Additional attachments and supporting documents.</p>								
<p>19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).</p>								
<p>20. Include a Table of Contents as the first page of your application package.</p>								
<p>21. Provide a Plot Plan, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance).</p> <ul style="list-style-type: none"> Indicate the location of the nearest occupied structure (e.g. church, school, business, residence). 								
<p>22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F.</p>								
<p>23. Provide a Process Description as Attachment G.</p> <ul style="list-style-type: none"> Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable). 								
<p><i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i></p>								

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.

– For chemical processes, provide a MSDS for each compound emitted to the air.

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

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

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

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

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

X General Emission Unit, specify Tier 3 100 Kw Emergency Generator

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

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

- | | | |
|---|---|--|
| <input type="checkbox"/> Absorption Systems | <input type="checkbox"/> Baghouse | <input type="checkbox"/> Flare |
| <input type="checkbox"/> Adsorption Systems | <input type="checkbox"/> Condenser | <input type="checkbox"/> Mechanical Collector |
| <input type="checkbox"/> Afterburner | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |

Other Collectors, specify

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

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

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

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

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES X NO

➤ If YES, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's **"Precautionary Notice – Claims of Confidentiality"** guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

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

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

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

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

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

Certification of Truth, Accuracy, and Completeness

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

Compliance Certification

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

SIGNATURE _____


(Please use blue ink)

DATE: _____

09-12-2016

(Please use blue ink)

35B. Printed name of signee: **John Klim**

35C. Title: **Chief, Engineering Service**

35D. E-mail: **John.Klim,@va.gov**

36E. Phone: **304 429-6755 Ext 2374**

36F. FAX: **304 429-7597**

36A. Printed name of contact person (if different from above): **George Disney**

36B. Title: **GEMS Coordinator**

36C. E-mail: **George.disney@va.gov**

36D. Phone: **304 429-6755 Ext 2381**

36E. FAX: **304 429-7597**

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

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

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

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

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

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

	Gr/hp-HR	hp	#/hr	hours	T/yr	8760 TPY
THC	0.02	230	0.01	500	0.002535	0.045432
NOX	0.57	230	0.29	500	0.072255	1.294815
CO	1.3	230	0.66	500	0.164793	2.953086

AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that the Department of Veterans Affairs Medical Center - Huntington has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a modification to its Reg. 13 permit (#2290), located at 1540 Spring Valley Drive in Wayne County West Virginia. The facility plans to install a new Caterpillar Olympian 150 KW natural gas emergency generator. The latitude and longitude coordinates are: 82.517763 W and 38.383677N respectively.

The applicant estimates potential air emission discharges of the following Regulated Air Pollutants to be: Nitrogen Oxide (NO_x) = 0.07 TPY; CO = 0.16 TPY; THC = 0.002 TPY

Installation is expected to start October 1, 2016 with a final startup planned to begin on or about February 1, 2016. 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 29th day of August, 2016.

By: Department of Veterans Affairs Medical Center
J. Brian Nimmo
Medical Center Director
1540 Spring Valley Drive
Huntington, WV 25704

Equipment Listing

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Boiler 1		Boiler - Johnston	1989	400 hp	NA
Boiler 2		Boiler - Kewanee	1999	350 hp	NA
Boiler 3		Boiler - Kewanee	1999	300 hp	NA
Boiler 4		Boiler – Clever Brook	1981	250 hp	NA
E-Gen 25		Emergency generator- Cummins	1996	275kW	NA
E-Gen 23R		Emergency generator - Caterpillar	1995	440kW	NA
E-Gen 3a		Emergency generator – John Deere	1998	80kW	NA
E-Gen 3b		Emergency generator - Onan	2001	125 kW	NA
E-Gen 2		Emergency generator - Onan	2006	125kW	NA
E-Gen 1S		Emergency generator – Onan	2009	900KW	NA
E-Gen Mobile		Emergency generator - Cummins	2011	400 KW	NA
E-Gen 5		Emergency generator- Caterpillar	2011	350 KW	NA
E-Gen 16		Emergency Generator - Caterpillar	2014	100 KW	NA
E-Gen Mobile 2	Trailers 1-2	Emergency generator - Cummins	2014	100 KW	NA
E-Gen Mobile 3	Trailers 3-5	Emergency generator - Cummins	2014	150 KW	NA
E-Gen Bldg. 52	Bldg 52	Emergency generator- Caterpillar	2015	600 KW	NA
E-Gen BRAC	BRAC	Emergency Generator – Caterpillar	2017	150 KW	NA