

Fact Sheet



For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 24, 2006.

Permit Number: **R30-01900034-2006**
Application Received: **May 28, 2009**
Plant Identification Number: **03-54-019-00034**
Permittee: **Georgia-Pacific Wood Products LLC**
Facility Name: **Mt. Hope OSB**
Mailing Address: **79 N. Pax Avenue, Mt. Hope, West Virginia 25880**

Permit Action Number: *SM01* Revised: *December 16, 2009*

Physical Location: Mt. Hope, Fayette County, West Virginia
UTM Coordinates: 483.4 km Easting • 4194.4 km Northing • Zone 17
Directions: From I-77/I-64, take the North Beckley exit onto Highway 19. Exit at
Mt. Hope and turn left onto Pax Avenue. Take the first right into the
plant entrance.

Facility Description

Georgia-Pacific Wood Products LLC's Mt. Hope OSB Mill is a reconstituted wood products facility covered by Standard Industrial Classification (SIC) Code 2493. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of the following: Wellons Energy/Dryer System, auxiliary gas burner, pressing operations, former area, long mat trim system, two (2) paint booths, finishing area, sander dust fuel system, dry fuel system, sanding area, screen fines, storage tanks, and the screening building dedust system.

This significant modification will provide for the following changes in the operating permit, and are discussed herein in the following order:

1. Incorporate the applicable requirements of 40 C.F.R. Part 63, Subpart DDDD, *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*. Herein this rule may be termed the "PCWP MACT" or "Subpart DDDD".
2. Facility-wide Requirements Revisions
 - a. 45CSR6 Changes
 - b. 45CSR34 & 45CSR15 Changes
 - c. Removal of PCWP MACT Compliance Deadline Requirement
3. Revisions to clarify 40 C.F.R. Part 64 (CAM) Requirements for Wellons Energy System
 - a. Revise language in conditions located within subsections 5.2. and 5.4. to clarify averaging time periods in relation to parameter operating ranges.
 - b. Remove the upper limit of the ESP's secondary voltage and current parameters in condition 5.2.3. in order to provide operational flexibility
4. 40 C.F.R. Part 64 (CAM) Applicability for Board Press & Regenerative Catalytic Oxidizer
5. Revisions to incorporate permit R13-1622G.
6. Remove existing condition 6.2.2.
7. Revise structure of permit section 1.0. to include new subsections 1.1. and 1.2. to list emission units and active underlying permits, respectively.
8. Miscellaneous Corrections and Additions
 - a. Correct the citation of authority in condition 5.2.5.
 - b. Add a citation of "45CSR§30-5.1.c." to CAM requirements that do not already contain the citation.
 - c. Add the symbol "§" where it is missing in citations of authority in subsections 6.2. and 6.3.
 - d. Update EPA Test Methods
 - e. Permit Attachments
 - f. Annual Compliance Certification Submittal to U.S. EPA via Electronic Mail

Emissions Summary

The following tables sets forth the emissions associated with the proposed changes.

Pollutant	PTE Before SM01 (tpy)	PTE change due to SM01 (tpy)	PTE after SM01 (tpy)
CO	226.80	+63.5	290.3
PM ₁₀	250.10	-60.4	189.7
HCHO *	38.20	-10.0	28.2
NO _x	238.70	+28.5	267.2
VOC	143.50	-82.2	61.3

* Formaldehyde, also written as CH₂O.

The potential emissions before SM01 were taken directly from the permit renewal fact sheet since there were no emission changes associated with the two previous permitting actions AA01 and AA02. The PTE change due to SM01 was taken from Section 4 of the permittee's application for this permitting action. There is no mention in the application of any change in methanol PTE; thus, methanol PTE remains at 72.4 tpy, as written in the permit renewal fact sheet.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 290.3 tpy of CO; 189.7 tpy of PM₁₀, 267.2 tpy of NO_x; 28.2 tpy of formaldehyde; and 72.4 tpy of methanol. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year aggregate HAPs, Georgia-Pacific Wood Products' Mt. Hope OSB facility is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13 45CSR30 45CSR34	Construction permit requirement. Operating permit requirement. Emission Standards for HAPs for Source Categories pursuant to 40 C.F.R. Part 63
	40 C.F.R. 63, Subpart DDDD	NESHAPs: Plywood and Composite Wood Products
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM)
State Only:	None	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-1622H	???	
R13-2261A	February 23, 2000	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

1. **40 C.F.R. Part 63, Subpart DDDD - National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products**

Rule Applicability, Affected Sources, Compliance Timing and Notifications

The permittee manufactures a composite wood product known as oriented strand board (OSB). Thus, the facility meets the definition of a *Plywood and Composite Wood Products manufacturing facility* defined in §63.2292. The following table sets forth the amounts of HAP emissions that cause the facility to be a major source of HAPs.

Source Description	Total HAPs (THC as C) Uncontrolled (tons/yr)	Total HAPs (THC as C) Controlled (tons/yr)
5600- Three Flake Dryers/Wellons Energy System	131	13.1
7890 - Panel Press w/ RCO	142	14.2

Note: Emissions are based upon 400 MMSF/yr - 3/8" basis production capacity.

The facility has potential aggregate HAP emissions greater than 25 tpy; therefore it is a major source of HAPs. Based upon these facts, the facility meets the applicability criteria given at §§63.2231(a) and (b).

The permittee commenced construction of the facility on August 9, 1993 (R13-1622 issue date), and it has not been reconstructed, as defined by §63.2232(d). Since it is neither *new* (cf. §63.2232(c)) nor *reconstructed*, it is *existing* in accordance with §63.2232(e). The affected sources under the rule are listed at §63.2232(b). Many of the sources listed in Section 1.0 of the permit are considered affected sources under the rule. However, only the (i) rotary flake dryers (em. pt. ID 5600); the (ii) reconstituted wood product press (em. pt. ID 7890); and (iii) Group 1 miscellaneous coating operations, are subject to emission limits and/or work practice standards of the PCWP MACT.

Being an existing source, the facility must comply with the rule no later than October 1, 2007 (cf. §63.2233(b)). The Wellons Energy System controls total HAP emissions from the three (3) rotary flake dryers. This system has been complying with the applicable requirements since October 1, 2007. The facility installed a Regenerative Catalytic Oxidizer (RCO) to control total HAP emissions from the reconstituted wood products press. The West Virginia Division of Air Quality granted a one year extension for the installation of this control equipment. The RCO became operational prior to the October 1, 2008 deadline granted by the extension. The facility also implemented the Group 1 Miscellaneous Coating Operations Work Practice by the October 1, 2007 deadline. Notifications of Compliance Status were submitted in a timely manner in accordance with §63.2233(d), and compliance has been demonstrated with the applicable compliance options, operating requirements, and work practice requirements.

Compliance Options, Operating Requirements, and Work Practice Requirements

The facility is using the *Compliance options for add-on control systems* under §63.2240(b) as the means of demonstrating control of HAP emissions from the three (3) rotary flake dryers and reconstituted wood products press. Applicable requirements are listed in Subpart DDDD Tables 1B and 2, which set forth the Add-on Control System Compliance Options and Operating Requirements, respectively. The facility demonstrated initial compliance using Option (2) of Table 1B, which is to "limit emissions of total HAP, measured as THC (as carbon), to 20 ppmvd" for both the flake dryers and the reconstituted wood products press. The facility has the option and ability to use any of the six (6) available compliance options specified in Table 1B of the PCWP MACT for future compliance demonstrations. Since the permittee is using a concentration-based compliance option for the reconstituted wood products press, the facility uses a *Wood products enclosure* that meets the design criteria specified in the definition of such enclosure in §63.2292. In accordance with the

requirements for catalytic oxidizers specified in Table 2 of this subpart, the permittee maintains the 3-hour average firebox temperature greater than the minimum temperature established during the most recent performance test for the catalytic oxidizer (i.e., RCO), and periodically monitors the condition of the catalyst. Refer to permit condition 6.1.6.

According to §63.2240(b), the *Wood products enclosure* is required for a "reconstituted wood product press" or a "reconstituted wood product board cooler" that complies with an outlet concentration option at certain affected facilities. There is no requirement in Subpart DDDD for a *Wood products enclosure* for the three (3) rotary flake dryers and associated Wellons Energy System control device in order to comply with an outlet concentration option in Table 1B. Therefore, letters "a." and "b." of conditions 6.1.6. and 5.1.8. provide for the same Subpart DDDD requirements applied to the respective emission units and control devices, but there is no letter "c." in condition 5.1.8. because there is no requirement that a *Wood products enclosure* be used with the rotary flake dryers and Wellons Energy System.

The facility does not use the Production-Based (§63.2240(a)) or Emissions Averaging Compliance Options (§63.2240(c)); therefore, these are not applicable to the permittee.

§63.2241(a) requires the permittee to meet the applicable work practice requirements in Table 3 of the subpart. The facility complies with Table 3 Item (5) by ensuring only non-HAP coatings are used for all Group 1 miscellaneous coating operations. Refer to permit condition 7.1.5.

Work practice alternatives granted by EPA under §63.2241(b) do not apply to the permittee for this permitting action.

§63.2241(c) allows a permittee to designate certain dryers as other types of dryers and comply with stricter emission limits. The facility operates three (3) rotary dryers; however, none of its rotary dryers were designated as dry rotary dryers. Therefore, this section §63.2241(c) does not apply.

General Compliance Requirements

§63.2250(a) is an applicable general requirement to maintain compliance with the applicable provisions of Subpart DDDD except for periods of startup, shutdown, and malfunction. §63.2250(b) applies as a general provision from 40 C.F.R. 63 Subpart A. Finally, applicable section §63.2250(c) requires the development of a written startup, shutdown, malfunction plan (SSMP). Refer to permit condition 3.1.19. regarding the general compliance provisions. Refer to permit condition 3.1.20. regarding the SSMP.

The facility does not operate any direct-fired softwood veneer dryers; therefore, §63.2250(d) is not applicable.

§63.2251 is dedicated to the requirements for a Routine Control Device Maintenance Exemption (RCDME). Table A, below, sets forth the particular requirements for the RCDME, and a discussion of the requirements applicability to the permittee.

Table A - RCDME Requirements

Section	Discussion	Condition
§63.2251(a)	§63.2251(a) allows the permittee to request a routine control device maintenance exemption (RCDME) for a control device. The facility has requested the routine control device maintenance exemption (RCDME) for the RCO controlling emissions from the board press. The permittee submitted a RCDME request to the West Virginia Division of Air Quality (letter dated August 30, 2007), which was received by DAQ on September 5, 2007. This letter was inadvertently not responded to by DAQ, and was placed in the permittee's Subpart DDDD file. This writer was able to locate the RCDME request, and notify the proper DAQ personnel who would provide a response to the request and prepare the RCDME. As required by the RCDME plan, the permittee stated in the application that outages will be recorded and tracked against press uptime when the RCDME is approved.	6.1.8.a.
§63.2251(b)	§§63.2251(b)(1) and (2) limits the amount of time the RCDME applies for certain types sources. The RCO is controlling a "reconstituted wood product press"; therefore, (b)(2) is the applicable requirement that limits the exemption time. It is noted that §63.2251(b)(3) does not apply since emissions from the rotary dryers and press are not controlled by a single control device.	6.1.8.b.
§63.2251(c)	Applicable requirement §63.2251(c) requires the request for the RCDME to be incorporated by reference into, and attached to, the Title V permit. The proposed Title V condition refers to an Attachment E, which is the most current version of the RCDME sent by Mr. Eric Ray (WV DAQ) to Mr. Kim Casto (permittee) on October 5, 2009 for the permittee's final review.	6.1.8.c.
§63.2251(d)	Applicable requirement §63.2251(d) states that the compliance options and operating requirements do not apply during times covered under the RCDME. But, the permittee must minimize emissions during such episodes.	6.1.8.d.
§63.2251(e)	Applicable requirement §63.2251(e) requires to the extent practicable, that startup and shutdown of control systems be scheduled when process equipment is also shut down.	6.1.8.e.

Requirement §63.2252 exempts several process units at the facility since these are not subject to a compliance option or work practice standard in §63.2240. These process units include:

1. green end operations,
2. resin preparation,
3. blending and forming operations,
4. miscellaneous finishing operations (such as sanding, sawing, and other finishing operations not subject to other national emission standards for hazardous air pollutants (NESHAP)), and
5. On-site wastewater treatment operations specifically associated with OSB manufacturing.

Initial Compliance Requirements

Applicable requirement §63.2260(a) requires the permittee to conduct performance tests and establish each site-specific operating requirement in Table 2 to Subpart DDDD according to the requirements in §63.2262 and Table 4 to Subpart DDDD.

Applicable requirement §63.2260(b) requires the permittee to demonstrate initial compliance with each applicable compliance option, operating requirement, and work practice requirement according to Tables 5 and 6 to Subpart DDDD and according to §§63.2260 through 63.2269.

Applicable requirement §63.2260(c) requires the permittee to submit a Notification of Compliance Status (NOCS) containing the results of the initial compliance demonstration according to the NOCS requirements in §63.2280(d).

Applicable requirement §63.2261(a) sets the time-frame for completing performance testing. The facility completed the initial compliance demonstrations within the time frames specified for both performance tests and demonstrations that do not require performance tests. In particular, the performance test of the Wellons Energy System controlling emissions from the three (3) rotary dryers was conducted on March 13, 2008, and the performance test for the RCO controlling emissions from the reconstituted wood products press was conducted December 17, 2008. Documentation that the wood products press enclosure met the required design criteria (as defined in §63.2292) was submitted on October 30, 2008 and on February 13, 2009 as part of the RCO/Press test report. Initial compliance demonstration for the Group 1 Miscellaneous Coating Operations was completed on 10/30/07.

The requirements of §§63.2262 (a) through (l) are applicable to the permittee, with the exceptions of (d)(2), (f), (g)(2), (i) and (j), and (m) through (o). The facility's Notification of Performance Test (NOPT) was filed on January 7, 2008, for the Wellons Energy System which controls emissions from the 3 rotary dryers and on October 14, 2008 for the RCO which controls emissions from the reconstituted wood products press. The performance tests were conducted in accordance with the applicable provisions and requirements. Protocols for the performance tests submitted with the NOPT described the required test methods, operating conditions, data collection, percent reduction calculation, determination of the firebox minimum temperature, etc. Applicable requirement §63.2262(k)(2) allows the permittee to change the minimum firebox temperature for the thermal oxidizer by submitting the notification under §63.2280(g) and conducting a repeat performance test as specified in §63.2262(k)(1) that demonstrates compliance with the applicable compliance options of the PCWP MACT. The flexibility option is written as permit condition 5.1.8.b. The notification requirement is discussed below (cf. permit condition 3.5.10.b.). According to the permittee's application, the facility will file notification with the West Virginia Division of Air Quality if there is a need to change the minimum firebox temperature for the Wellons Energy System or the RCO.

As mentioned above, the provisions of §§63.2262(d)(2), (f), (g)(2), (i), (j), (m) through (o) are not applicable. This is due to the fact that the facility is not using the production-based compliance option or using a biofilter to meet the PCWP MACT standards.

The facility operates three (3) rotary dryers; however, none of the rotary dryers are designated as *dry rotary dryers*, as defined in §63.2292. Therefore, the requirements of §63.2263 are not applicable.

The requirements of §63.2264 are not applicable since the facility does not operate a hardwood veneer dryer.

The requirements of §63.2265 are not applicable since the facility does not operate a softwood veneer dryer.

The requirements of §63.2266 are not applicable since the facility does not operate a veneer redryer.

The requirements of §63.2267 are applicable since the facility operates a reconstituted wood products press with an enclosure. The facility's press enclosure meets the definition of a wood products enclosure as described in §63.2292. The facility's Notification of Compliance Status (NOCS) for the enclosure was submitted on October 30, 2008. There is no permit condition needed for this section since it is for the initial compliance demonstration, and had to be documented and reported in the NOCS. All of these requirements are fulfilled. Furthermore, the requirement to employ a *wood products enclosure* when using an outlet concentration option in Table 1B for a wood product press is already accounted for by permit condition 6.1.6.c.

The requirements of §63.2268 are not applicable since the facility does not operate a wet control device to meet the PCWP MACT standards.

Applicable section §63.2269(a) sets the general requirements for the Continuous Parameter Monitoring Systems (CPMS). In particular, the minimum polling frequency; maintenance of monitoring equipment; and associated recordkeeping are required. The CPMS are inspected and accuracy or function verified as required by the PCWP MACT. Specifically, the permittee's Quality Control Program for the Continuous Monitoring System (CMS) provides the mechanism to maintain, inspect, verify specifications and set conditions for CMS. The data acquisition system can also be used to verify the 15 minute cycle requirement of the PCWP MACT. Sections 3.0 and 3.3 of the permittee's Quality Control Program for the Continuous Monitoring System address the maintenance, inspection and calibration/validation procedures for the CMS. In addition, the permittee's maintenance planning system is used to schedule and record results of inspections and validation checks of the CPMS. Refer to permit condition 3.2.2.

Applicable section §63.2269(b) sets the requirements for firebox temperature monitoring of the Wellons Energy System and the RCO. The CPMS for the monitoring of temperature and abort damper position are installed in the Wellons Energy System/rotary dryers system and the press enclosure/RCO system. Refer to permit condition 3.2.2.

§63.2269(c) is not applicable since the facility does not have any dry rotary dryers or veneer redryers, and as such, is not required to monitor moisture in wood.

§63.2269(d) is not applicable since the facility does not operate any Continuous Emissions Monitoring (CEMs).

Continuous Compliance Requirements

§63.2270(a) is a broad applicable requirement to perform monitoring in accordance with §63.2270.

§63.2270(b) is applicable, and requires continuous monitoring while the process unit is operating. Continuous parameter monitoring systems (CPMS) for monitoring the following:

- a. minimum firebox temperature in the Wellons Energy System; and
- b. RCO (3-hour block average temperature); and
- c. abort damper contacts (damper position)

The CPMS are operated continuously at all times that the process units (rotary dryers and press) are operating.

§63.2270(c) is applicable, and describes the times and types of data that may not be used for computing 3-hour block averages. In order to comply with this, a CPMS report is printed and reviewed by facility personnel to determine trends and identify data collected during periods of SSM events, CPMS malfunctions, repairs, QA check, etc., and verify that valid data is at least 75% of the recorded readings.

§63.2270(d) is applicable, and describes when the 3-hour block averages are to be computed.

§63.2270 (e) applies to wood moisture monitoring for a dry rotary dryer or veneer redryer. The facility does not operate a dry rotary dryer or veneer redryer; therefore, this monitoring is not applicable.

§63.2270(f) is applicable, and sets the minimum amount of valid data required. As mentioned above, the permittee verifies this information on a regular schedule. Refer to permit condition 3.2.3. for applicable requirements from §63.2270.

§63.2271(a) provides a broad requirement for demonstrating continuous compliance with the compliance options, operating requirements, and work practice requirements of §63.2240 and §63.2241 that are applicable to the facility by using the methods specified in Tables 7 and 8 of Subpart DDDD. The facility is using the *Compliance options for add-on control systems* described in §63.2240(b) as the means of complying with Subpart DDDD; therefore, Tables 1B and 2 are applicable. The facility uses Option (2) in Table 1B as the

compliance option for both the rotary dryer emissions and press emissions. However, the permittee may use any of the six (6) available compliance options allowed under the PCWP MACT. To facilitate such flexibility, the permit contains language to this end for future compliance demonstrations. Item (1) in Table 7 is used for both control systems to demonstrate continuous compliance with the operating requirements. Item (4) in Table 7 is used for the press RCO relative to checking the activity level of a representative sample of the catalyst at least every 12 months and taking any necessary corrective action to ensure that the catalyst is performing within its design range. The facility uses Item (5) of Table 8 to demonstrate continuous compliance with the work practice requirements for Group 1 Miscellaneous Coating Operations. Thus, the permittee uses non-HAP coatings and performs recordkeeping to demonstrate compliance with this requirement. Refer to new permit conditions 5.2.6., 6.2.3., and 7.3.2. Note that these conditions also cite §63.2282(b). This is done for two reasons: (1) §63.2282(b) is the applicable recordkeeping requirement for these monitoring conditions; and (2) there is no good reason in this instance to separate the monitoring from recordkeeping.

§63.2271(b) requires reporting of instances of noncompliance with Subpart DDDD. The requirement then links to the reporting required under §63.2281. Accordingly, the citation of §63.2271(b) is included with condition 3.5.11.

Notifications, Reports, and Records

§63.2280(a) sets out all of the notifications required under 40 C.F.R. 63 Subpart A.

§63.2280(b) sets the deadline for submitting the Initial Notification. The facility filed its Initial Notification within 120 days after 9/28/04 as required by the rule. The Initial Notification is dated 1/10/05. This requirement is complete and no further action is required.

§63.2280(c) sets the deadline to submit a notification of intent to conduct performance testing. The facility filed a written notification of intent to conduct the performance test within 60 calendar days before the scheduled date as required by the rule. The Notification of Performance Test (NOPT) for the Wellons Energy System is dated January 7, 2008. The performance test was conducted on March 13, 2008. The NOPT for the Press RCO is dated October 14, 2008 and the performance test was conducted on December 17, 2008.

§63.2280(d) sets the deadline for submitting the Notification of Compliance Status (NOCS) for each applicable initial compliance demonstration. The facility filed a Notification of Compliance Status (NOCS) for the Wellons Energy System on April 29, 2008 and for the Press RCO on February 13, 2009. The NOCS for the Press enclosure was filed on October 30, 2008 and again on February 13, 2009 with the Press NOCS. The facility's Notification of Compliance Status (NOCS) for Group 1 Miscellaneous Coating Operations Work Practice was submitted on October 30, 2007.

§63.2280(e) sets the deadline for submitting a routine control device maintenance exemption. A Request for Control Device Maintenance Exemption (RCDME) was submitted to the West Virginia Division of Air Quality on August 30, 2007. The request was submitted in compliance with this deadline; therefore, this requirement is fulfilled and there are no ongoing requirements from §63.2280(e). The RCDME is discussed above under §63.2252.

§§63.2280(f) and (g)(2) do not apply since the facility does not use the emissions averaging compliance option under §63.2240(c).

§63.2280(g)(1) and (g)(3) are applicable reporting requirements, when and if the permittee ever makes such changes to control systems or continuous monitoring parameter(s). By way of applying these reporting requirements, the permittee stated in the application that it is cognizant of this requirement to notify the West Virginia Division of Air Quality and EPA within 30 days before modifying or replacing the control system for the press or dryers, or before changing the minimum firebox temperature set for the Wellons Energy System or the press RCO. Refer to new permit condition 3.5.10.

§63.2281(a) requires applicable reporting listed in Table 9 of Subpart DDDD, which is set forth as condition 3.5.11. The first compliance report covered the period beginning on the compliance date of 10/1/07 and ending on 6/30/08, which lasted at least 6 months, but less than 12 months as required by the rule. The Mt. Hope OSB facility filed Semi-annual Compliance Reports on July 30, 2008 and January 27, 2009. Submittal of first and

subsequent compliance reports were in accordance with the rule – e.g., postmarked no later than July 31, 2008 for first report and January 31, 2009 for second report. Subsequent compliance reports must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31, and postmarked or delivered no later than July 31 or January 31 for the semiannual reporting period ending on June 30 and December 31, respectively. The facility will notify the West Virginia Division of Air Quality about filing the required semiannual compliance report according to the dates set for the Title V permit semiannual deviation report and annual compliance certification once the PCWP MACT compliance requirements have been incorporated into the Title V permit. This section also defines the immediate startup, shutdown, malfunction report requirement specified in Table 9 of Subpart DDDD. This has been set forth as condition 3.5.13.

§63.2281(b) sets the deadlines for submitting compliance reports. The requirements under (b)(1) and (b)(2) are no longer applicable since the first compliance report has already been submitted. This requirement further allows the permittee to submit the compliance reports on the dates specified in permit condition 3.5.6., which is less stringent than the deadlines specified by §63.2281(b)(4). Refer to condition 3.5.12.

§63.2281(c) specifies the required contents of compliance reports. Refer to condition 3.5.11.a.

§63.2281(d) requires the permittee to report deviations from a compliance option or operating requirement, and for each deviation from the work practice requirements of Table 8 while *not using* a continuous monitoring system (CMS). The only affected facilities that are not using a CMS are the Group 1 miscellaneous coatings group. Therefore, this rule section is applicable to these facilities. This explains why there is an italicized explanatory note beneath condition 3.5.11.b. that limits applicability to the Group 1 miscellaneous coatings group.

§63.2281(e) requires the permittee to report deviations from a compliance option or operating requirement *while using* a continuous monitoring system (CMS). Refer to condition 3.5.11.c.

§63.2281(f) is not applicable since the facility does not use the *emissions averaging compliance option* under §63.2240(c).

§63.2281(g) requires reporting of Subpart DDDD deviations within the semiannual monitoring report (permit condition 3.5.6.), and that submitting the Subpart DDDD compliance report with the semiannual monitoring report satisfies the requirement to report all Subpart DDDD deviations.

§63.2282(a) requires various recordkeeping requirements. Refer to permit condition 3.4.7.a.

§63.2282(b) requires recordkeeping of the applicable components in Tables 7 and 8 of Subpart DDDD. These requirements apply to the monitoring under new permit conditions 5.2.6., and 6.2.3. (discussed above). New condition 7.3.2. also cites this applicable recordkeeping requirement. Refer to permit condition 3.4.7.b.

§63.2282(c) is not applicable since it requires specific recordkeeping when a facility employs a Continuous Emissions Monitoring System (CEMS). While the permittee does operate a Continuous Parameter Monitoring system, according to the application, the permittee does not operate a CEMS; therefore, this section is not applicable.

§63.2282(d) is not applicable since the facility does not use the *emissions averaging compliance option* under §63.2240(c).

§63.2282(e) requires specific recordkeeping for a facility that operates a catalytic oxidizer. Since the permittee operates a Regenerative Catalytic Oxidizer (RCO), this recordkeeping is applicable. Refer to permit condition 3.4.7.c.

§63.2283 sets general requirements for format and retention times of records. Refer to condition 3.4.7.

Other Requirements and Information

§63.2290 refers to Table 10 of Subpart DDDD, which lists the applicable general provisions in §63.1 through §63.13.

2. Facility-wide Requirements Revisions

a. 45CSR6 Changes

Permit conditions 3.1.1. and 3.1.2. have been modified to reflect the most recent language in 45CSR6.

b. 45CSR34 & 45CSR15 Changes

Permit condition 3.1.3. has been modified in the citation of authority only. In particular, the state rule has been changed to 45CSR34 since it now adopts 40 C.F.R. Part 61, and 45CSR15 has been repealed.

c. Removal of PCWP MACT Compliance Deadline Requirement

The existing content of permit condition 3.1.18. has been stricken since the PCWP MACT compliance date is past. Additionally, the permittee has submitted a complete application by the specified deadline for a significant modification to incorporate the applicable requirements of 40 C.F.R. 63, Subpart DDDD, into the Title V permit. There are no ongoing requirements in condition 3.1.18.

3. Revisions to clarify 40 C.F.R. Part 64 (CAM) Requirements for Wellons Energy System

a. Averaging Periods

The following changes are requested by the permittee to provide clarification by further defining the terms of the permit conditions. The requested changes come about from recent internal auditing performed by the permittee, and are not due to any deviation, excursion, exceedance, or other non-compliance issue. For example, the permittee's auditing personnel correctly noted that if a one-time outlier of the polled firebox temperature occurs, the source is technically out of compliance with proposed permit condition 5.2.2.a. for CO and NOx. While it could be argued that 5.2.2.b. for CO and NOx mentions a 12-hour average, it is not definitely applied within the entire permit condition to 5.2.2.a. for CO and NOx. Furthermore, letter 5.2.2.a. refers to a "master operating temperature", while 5.2.2.b. refers to the "controlling temperature." According to the permittee, these may be two different parameters depending upon operations of the Wellons Energy System. Thus, 5.2.2.a. and 5.2.2.b. for CO and NOx are two different and separate requirements. To alleviate any ambiguity, the permittee requests to clarify permit terms.

The permittee requested revising language in existing conditions 5.2.3., 5.2.4., and 5.4.2. in order to clarify averaging time periods in relation to parameter operating ranges. The changes in proposed condition 5.2.2. specify a 12-hour average temperature in letter "a." of the CO and NOx section, and 12-hour averages of voltage and current parameters in letters "a." and "b." of the PM section. Clarifying language has been added to letter "c." of the PM section as well.

Language was also added to existing condition 5.2.4. in order to clarify that it is the 12-hour average temperature that may trigger dryer shutdown.

Language in existing condition 5.4.2. does not clearly define how temperature measurements are "documented". Although averaging is not mentioned in the condition, it may be possible to assume that all of the 10-second-interval readings are used to compute a 15-minute average; but this is not the case. The permittee's data acquisition system (DAS) polls the temperature every 10 seconds, but does not record each temperature reading every 10 seconds. A discrete temperature reading is recorded every 15 minutes, and the temperature recorded is the value that the DAS polls at the 15 minute interval. It follows, then, that only four (4) temperature values are recorded during each hour. These values are used to compute the 12-hour average (an arithmetic mean of 48 values) described in condition 5.2.2.

- b. ESP Secondary Voltage & Current Parameter Range Changes in Existing Condition 5.2.3.
The permittee submitted a letter (dated June 4, 2008) to DAQ requesting that the Title V permit be administratively revised or modified, whichever is appropriate, with regard to a specific requirement for the Wellons Energy System (Em. Pt. ID 5600). While an administrative amendment would not be appropriate for this request, the change is readily made under this significant modification. The permittee requested that the upper bounds of 60 kilovolts for secondary voltage and 600 milliamps for secondary current be eliminated, and that only the minimum bounds of 20 kilovolts and 100 milliamps for secondary voltage and current be left in the permit condition. The control systems on the ESP have the ability to increase secondary voltage and current up to 100 kV and 1,250 mA, respectively. Given that an EPS's control efficiency increases proportionally with increasing secondary corona power (assuming the corona power is applied effectively; that is, by maintaining an optimum spark rate), having upper limits on the secondary voltage and secondary current may only constrain the permittee's ability to remove particulate matter from the air stream. Refer to the Particulate Matter section (specific conditions "a." and "b.") of proposed permit condition 5.2.2.

4. **40 C.F.R. Part 64 (CAM) Applicability for Board Press & Regenerative Catalytic Oxidizer**

Condition A.1. of superseded permit R13-1622C set a particulate matter emission limit of 24.30 lb/hr for the Board Pressing Area. While this R13 condition specified a "Controlled Emission Rate" limit, there was no control device for PM to meet that limit. The potential emissions of PM from the Board Press are $(24.30 \text{ lb/hr}) \times (8,760 \text{ hr/yr}) \div (2,000 \text{ lb/ton}) = 106.4 \text{ ton/yr}$. The Board Press is a major source of PM prior to add-on controls. The Board Press now has a control device, which is the Regenerative Catalytic Oxidizer (RCO) that normally operates in catalytic mode, but is also capable of operating at a higher temperature in thermal mode. The control device was installed to destroy HAPs. But one of the benefits of the control device is a reduction in PM that is allowed to pass through the RCO to atmosphere. The latest permit R13-1622G (condition 4.1.2.) sets a lower limit for PM emissions (12.1 lb/hr) from the RCO that controls emissions from the Board Press. Based upon the preceding information, a CAM applicability determination is necessary for PM emissions from the Board Press. Other pollutants will be discussed as well to demonstrate non-applicability of CAM on a pollutant-specific basis.

The first applicability criterion is §64.2(a)(1), which states that the pollutant specific emissions unit (PSEU) must be subject to emission standard or limit. The Board Press is the PSEU, and it is subject to an emission limit for PM.

The second criterion is §64.2(a)(2), which states the PSEU uses a control device to achieve compliance with the limitation. The Board Press uses the RCO to achieve compliance with the 12.1 lb/hr PM limit.

The third criterion is §64.2(a)(3), which states the PSEU has potential pre-control device emissions that are at least at the major source threshold. The Board Press has pre-control emissions of PM equal to 106.4 ton/yr; therefore, the Board Press meets this criterion and is a PSEU for PM.

None of the exemptions under §64.2(b) are applicable to the Board Press for PM. Based upon the preceding applicability determinations, the Board Press is a PSEU for particulate matter, and as such, is subject to all applicable CAM requirements.

It should be noted that the Board Press is not a PSEU for carbon monoxide (CO), nitrogen oxides (NO_x), or volatile organic compounds (VOC). The Board Press is not subject to CAM on a pollutant-specific basis for CO or NO_x since a control device is not used to meet a CO or NO_x limit or standard. It is not subject to CAM on a pollutant-specific basis for VOC since pre-control emissions (22.0 lb/hr from R13-1622C, A.1.) are less than the major source threshold ($22 \text{ lb/hr} \times 8,760 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 96.4 \text{ ton/yr} < 100 \text{ ton/yr}$) for VOC.

When the permittee performed the initial performance testing required by the PCWP MACT, the permittee also monitored the emissions of other pollutants, which included particulate matter. In particular, the permittee demonstrated compliance with PM limits over the same parameter operating range that demonstrated compliance for HAPs. Thus, using the same temperature range is convenient and simplifies the permitting associated with CAM. Table B below describes the CAM plan submitted by the permittee.

Table B - CAM Plan for Particulate Matter from the Board Press & RTO/RCO Control Device

	Indicator No.1 of 1
I. Indicator	Firebox temperature (permit condition 6.2.3.c.)
Measurement Approach	The temperature is measured with a thermocouple.
II. Indicator Range	The 3-hour block average temperature must be maintained at a minimum of 1,500°F while operating in thermal mode, and 800°F while operating in catalytic mode (permit condition 6.1.7. specifies these minimums). The averaging period is a 3-hour block average based on data collected at least once every 15 minutes (permit condition 6.2.3.).
	An <i>excursion</i> is defined as a 3-hour block average temperature value less than the minimum temperature for the respective operating mode (permit condition 6.2.4.).
	Excursions trigger an inspection and evaluation, corrective action, recordkeeping and a reporting requirement (permit conditions 3.2.5., 3.4.9., and 3.5.14.).
QIP threshold	Excursions must be no more than 5% of the Board Press operating time during a 6-month semiannual reporting period (permit condition 3.2.7.).
III. Performance Criteria	
- Data Representativeness	The temperature probes are located in the combustion chamber. Multiple temperature probes are utilized to ensure accurate readings. The probes have a minimum accuracy of $\pm 4^{\circ}\text{F}$ or ± 0.75 percent of the temperature being measured expressed in degrees Fahrenheit, whichever is greater (permit condition 3.2.2.(b)(1) and (2)).
- Verification of Operational Status	The RCO/RTO is equipped with a Programmable Logic Controller (PLC), with capability of controlling and monitoring the temperature. Recordkeeping and reporting of the indicator parameter is managed through a software-based Data Acquisition System (DAS) (permit condition 3.2.2.).
- QA/QC Practices and Criteria	Semi-annually, a validation check of the temperature sensors is conducted in which a second or redundant temperature sensor is placed nearby the process temperature sensor and must yield a reading within 30°F of the process temperature sensor reading (permit condition 3.2.2.(b)(4))
- Monitoring frequency	Temperature measurements are documented every 15 minutes. (permit condition 3.2.2.(a)(1))
- Data Collection Procedure	Temperature data is collected using a dedicated computer equipped with a relational database (such as Wonderware's Industrial SQL Server Software) that serves as the Data Acquisition System (DAS).
- Averaging Period	Temperature data is averaged over a 3-hour block period based on data collected at least every 15 minutes (permit condition 3.2.3.(d)).

Permit conditions 3.2.4. through 3.2.7. are general CAM requirements. These are set forth in Section 3.0 (facility-wide) of the permit to avoid duplicating the conditions in both Section 5.0 (Wellons Energy System) and Section 6.0 (Board Press). The parenthesis following each permit condition limits the applicability to the CAM-affected emission units and associated control devices.

5. **Revisions to incorporate permit R13-1622G**

The "Suspension of Activities" reporting requirement 2.14. is now cited in proposed Title V condition 3.1.14.

The particulate matter limits from R13-1622G, condition 4.1.1., were incorporated into Title V conditions 5.1.5. and 7.1.1. Limits were modified such that the number of digits to the right of the decimal are identical to the limits in R13-1622G, 4.1.1.

The various pollutant limits of R13 permit condition 4.1.2. were incorporated into the table in existing Title V condition 6.1.3. Other language was stricken and added to reflect the R13 permit requirements.

Conditions 4.1.3. and 4.1.4. contain the substantial requirements already contained in Title V condition 3.1.11. Therefore, the existing Title V condition has been revised.

Condition 4.1.5. is already Title V condition 5.1.3.

Condition 4.1.6. is set forth in Title V condition 5.1.7. Some of the language was modified to match the R13 permit.

Condition 4.1.7. is set forth in Title V condition 4.1.7. The existing Title V language is essentially the same as the new R13 language, and must have been made a requirement based upon the permittee proposing such requirement (cf. 45CSR§30-12.7.). Now that this is an R13 permit requirement, and to make the condition language identical between the two permits, the existing Title V language has been replaced with the R13 permit language.

Condition 4.1.8. is identical to Title V condition 6.1.4. The citation alone has been updated in the Title V.

Condition 4.1.9. is almost identical to Title V condition 6.1.5. The exception is that the R13 permit names the "OSB facility" while the Title V simply names the "facility" without the adjective. The Title V language has been updated to be identical to the R13 permit language.

Condition 4.1.10. of R13-1622G is the same as condition A.9. of R13-1622C, which is cited for Title V condition 5.1.6. However, the existing Title V condition goes on to specify the control of NO_x as the purpose of the urea injection system. Since neither version of the R13 permit mention NO_x, it can be concluded that the citation of 45CSR§30-12.7. is the authority to require control of NO_x via the urea injection system. Therefore, the requirement for control of NO_x stands independent of the R13 requirement to "control emissions". The requirement based upon authority of 45CSR§30-12.7. will remain (i.e., NO_x control will remain in Title V condition) and only the citation of the R13 permit condition will be updated.

Condition 4.1.11. contains the requirements in Title V conditions 5.1.1. and 5.1.2. Therefore, the citations of these Title V conditions have been updated.

Condition 4.1.12. is a broad requirement requiring compliance with 40 C.F.R. 63 Subpart DDDD. This R13 permit condition is cited in all Title V conditions which cite 40 C.F.R. 63 Subpart DDDD.

Condition 4.1.13. sets minimum temperature limits for the RCO/RTO when operating in thermal and catalytic modes. These requirements are now Title V condition 6.1.7.

Condition 4.1.14. sets out the compliance options available to comply with 40 C.F.R. 63 Subpart DDDD. These are set forth as Title V condition 6.1.6.a.i. through vi. The pollutant mentioned in 6.1.6.a.vi. has been corrected from "uncontrolled methanol" (likely copy-and-paste error in R13-1622G, 4.1.14.6) to "uncontrolled formaldehyde" per item (6) in Table 1B of the PCWP MACT.

Condition 4.1.15. is a general requirement for maintaining and operating air pollution control equipment listed in Section 1.0 of permit R13-1622G. All of the equipment listed in Section 1.0 of the R13 permit are listed in Title V permit subsection 1.1. Therefore, it is not necessary to specify applicability of this requirement. In fact, this requirement applies to the RCO/RTO-1 (which has applicable requirements in R13-1622G), even though the RTO/RCO-1 is not listed in Section 1.0 of R13-1622C. The R13 condition has been set forth as Title V condition 3.1.21., with the only change being to direct the reader to Section 1.1 of the Title V permit.

Condition 4.2.1. specifies testing requirements applicable to the Wellons Energy System. This requirement has been set forth in revised Title V condition 5.3.1.

Condition 4.2.2. has been set forth as revised Title V condition 5.3.3.

Condition 4.2.3. has become Title V condition 6.3.4. The catalytic mode testing is complete, as required by the first sentence of this condition. However, the second sentence of the condition requires testing within 90 days of startup in thermal mode. Since the control device normally operates in catalytic mode, and has not operated in thermal mode as yet, the thermal mode testing is yet to be completed (if it ever occurs). Rather than drop the first sentence of this condition (catalytic mode testing already complete), the R13 requirement will be kept in its entirety in Title V condition 6.3.4.

Condition 4.3.1. has been cited in the authority of existing Title V condition 3.4.1.

Conditions 4.3.2. and 4.3.3. have been set forth as new Title V conditions 3.4.5. and 3.4.6., respectively.

Condition 4.3.4. sets forth several monitoring requirements, and also contains three distinct recordkeeping requirements. The monitoring requirements of this condition are set forth in modified Title V condition 5.2.1. Condition 4.3.4.1. contains the same language as the first sentence of condition 4.3.7. of R13-1622G. Condition 4.3.7. adds language requiring the COMs to meet PS1. Rather than constructing a separate permit condition for 4.3.7., the PS1 requirement has been added as the last sentence of Title V condition 5.2.1.a. Condition 4.3.4.2. of the R13 permit is a recordkeeping requirement that refers back to "the maximum emission rate limit stated in condition 4.1.12." But R13-1622G, condition 4.1.12., is simply a general requirement to comply with all applicable requirements of 40 C.F.R. 63 Subpart DDDD, and does not specify a "maximum emission rate limit." The PCWP MACT limit is stated in condition 4.1.14. of R13-1622G, but refers to the RCO/RTO. Whether the reference is to maximum emission rate limit in 4.1.12. or 4.1.14., the limit is still that limit prescribed by the PCWP MACT. Therefore, modified Title V condition 5.4.1.a. will refer back to Title V condition 5.1.8.a. for the Wellons Energy System. The other R13 recordkeeping requirements are identical to existing Title V conditions 5.4.1.b. and 5.4.1.c.; therefore, only the citation has been updated.

Condition 4.3.5. applies to requirements located in Title V conditions 5.1.3. and 4.1.7. Therefore, this requirement is set forth in conditions 5.4.4. and 4.4.3. The R13 condition refers to "The CERTIFICATION OF DATA ACCURACY, appearing on the reverse side of Title V Permit Attachment A...." Since there will be no "reverse side", the language is changed to read as, "The CERTIFICATION OF DATA ACCURACY, in Title V Permit Attachment A...."

Condition 4.3.6. is already set forth as Title V condition 6.2.3. Only the Title V citation has been changed. Title V condition 6.4.1. cited R13-1622C, B.3. This condition B.3. is the same as 4.3.6. of R13-1622G. Therefore, the citation has been updated in Title V condition 6.4.1.

Existing Title V condition 5.4.4. is stricken as part of this action since there is no longer an underlying requirement from R13-1622G. During the revisions from R13-1622C to R13-1622G, some R13 requirements were eliminated. Only Title V conditions that have the corresponding R13 underlying requirement eliminated

will be removed from the Title V. In other words, if another authority is cited in addition to the R13 permit authority, that condition will remain in the Title V (e.g., Title V conditions 4.1.6., 6.1.1., and 6.1.2.).

The citation of R13-1622 is stricken from Title V condition 7.2.3. since R13-1622G does not provide an underlying requirement for this condition. It should be noted that R13-1622C, B.1.d. was a COMS requirement for the Wellons Energy System, and specified nothing concerning weekly VE checks for the Bark Hog, Log Debarkers, and Log Flakers. Also, according to Section 1.0 of the Title V, these emission units are not controlled by the Wellons (they have no control device), therefore the R13 requirement is not applied indirectly to these emission units via the Wellons. The citations of R13-1622 are also stricken from Title V conditions 3.1.7., 3.1.8., 3.1.9., 3.1.10., 3.1.12., 6.1.1., and 6.1.2. since this underlying permit no longer sets forth requirements from 45CSR7.

6. **Remove existing condition 6.2.2.**

Existing condition 6.2.2. requires temperature monitoring internal to the board press itself (i.e., not a control device combustion chamber temperature). This requirement has served to demonstrate compliance with CO, PM, VOC, and formaldehyde emission limitations. Upon becoming subject to the PCWP MACT, the permittee installed the RCO to control HAP emissions from the board press. According to the permittee, the initial compliance demonstration for Subpart DDDD indicates that maintaining the RCO temperature within its established range also provides for compliance with CO, PM, VOC, and formaldehyde emission limitations in condition 6.1.3. Therefore, the permittee maintains that monitoring the board press temperature is unnecessary and redundant, and so requests removal of condition 6.2.2.

7. **Revise structure of permit section 1.0.**

In keeping with current permit structuring practice in order to facilitate future revisions, new subsection headings 1.1. and 1.2. have been added to list the emission units and active underlying permits, respectively.

8. **Miscellaneous Corrections and Additions**

a. Correct citation of authority

Upon inspection of the content of existing Title V condition 5.2.5. (i.e., CEMs), and by comparing it with requirements in 40 C.F.R. §64.3, it becomes apparent that the citation should be 40 C.F.R. §64.3(d)(1) rather than 40 C.F.R. §64.3(1).

b. Add citations of authority

The citation "45CSR§30-5.1.c." normally accompanies CAM authority citations. Several existing permit conditions containing CAM requirements do not cite the state rule; therefore, the citation has been added where missing.

c. Add missing section symbol

The symbol "\$" is missing in citations of authority in subsections 4.4., 6.2., and 6.3.; therefore, the symbol has been added where missing.

d. Update EPA Test Methods

The EPA test methods for formaldehyde listed in condition 6.3.3. have been updated. The condition as a whole has been revised to be not unlike condition 5.3.2.

e. Permit Attachments

The electronic file of the current Title V permit does not contain the actual forms that are Attachments A, B, and C. It mentions them in the Table of Contents, and gives a cover page for them at the end of the permit document. But the actual attachments were not included in the electronic file. This permitting action will incorporate the electronic attachments. The hard copy of the current Title V permit in the DAQ file room contains a Certification of Data Accuracy (Attachment A) that

is for Emission Inventory submittal. However, the certification of data accuracy mentioned in condition 5.4.4. of the current permit is for certifying records fuel consumption records. Similarly, this certification of data accuracy is mentioned in current permit condition 6.2.3. (proposed condition 6.2.2.), and is not in the context of emission inventory. Therefore, the electronic version of the certification of data accuracy included as proposed Title V Attachment A is the typical form employed by the NSR permitting group.

Attachment D has been added since R13-1622G, condition 4.3.5., requires the permittee to use a form to record the fuel consumed by the Wellons. This requirement is Title V condition 5.4.4.

Attachment E has been created for the RCDME (discussed above under 40 C.F.R. 63Subpart DDDD) in accordance with §63.2251(c).

- f. Annual Compliance Certification Submittal to U.S. EPA via Electronic Mail
U.S. EPA has instructed DAQ that permittee's are to submit their annual compliance certification to U.S. EPA via e-mail only (i.e., no paper "hard copies" to U.S. EPA). The language of conditions 3.5.3. and 3.5.5. have been modified to provide for this new stipulation.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: October 22, 2009

Ending Date: November 23, 2009

All written comments should be addressed to the following individual and office:

Denton B. McDerment, P.E.
Title V Permit Engineer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478

Response to Comments

U.S. EPA Comments

None.

Public Comments

On 11/23/2009, the DAQ received the following written comments from the permittee. The corresponding DAQ responses are given below each comment. No other public comments were received.

Comment #1

Permit Condition 3.3.1.c. requires test protocols to be approved by the director. It is requested that this condition be changed to reflect that if test methods identified in the permit are being used, then approval of test protocol is not required by the director. Approval of test protocol is required only if alternate test methods not specified in the permit will be used.

Response to Comment #1

Permit condition 3.3.1.c. states, "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." This language clearly states that all tests must be conducted per the approved test protocol; therefore, a submitted, and subsequently approved test protocol, is necessary. The condition's language is also clear in that it requires submittal of a test protocol even when the tests are "specified in this permit." This clearly does not allow the permittee to forgo the submittal of a test protocol in instances when the tests are already specified in the Title V permit. The various standard test methods are, in general, acceptable for measuring emissions or concentrations of pollutants. But approval or acceptance of a standard test method for measuring emissions, even when identified in the Title V permit, neither implies approval of, nor relieves the permittee from submitting, a test protocol that employs such test methods. A test protocol will contain other pertinent information (e.g., equipment operating parameters and their ranges; ambient conditions; percent load; the proposed sequence of events; etc.) in addition to the test method(s) that will be used. Moreover, to change this "boilerplate" condition would be inconsistent with established requirements for all Title V permittees. For these reasons, the requested change will not be made in the final permit.

Comment #2

Permit Condition 5.2.1.a. states that "Said continuous monitoring system shall meet the requirements of Performance Specification 1 found in 40 CFR 60 Appendix B". PS-1 applies to your COMS if one of the following is true: (1) Your facility has a new COMS installed after February 6, 2001; or (2) Your COMS is replaced, relocated, or substantially refurbished (in the opinion of the regulatory authority) after February 6, 2001; or (3) Your COMS was installed before February 6, 2001 and is specifically required by regulatory action other than the promulgation of PS-1 to be recertified. None of these conditions are true for the COMS installed at our Mt. Hope facility. Recognizing that this condition comes directly from R13-1622G, we have submitted an administrative change request which has been received by Mr. Steven Pursley. Condition 4.3.7. in R13-1622G will be changed to reflect the requirements of PS-1 that were in effect at the time our COMS was installed. As such we request this sentence be changed to state that the PS-1 requirements are those applicable at the time the COMS was installed, replaced, relocated or substantially refurbished.

Response to Comment #2

The changes associated with condition 4.3.7 of Permit to Modify (Class I Administrative Update) R13-1622H, will be incorporated into permit condition 5.2.1.a.

Comment #3

Permit Condition 5.2.2 has a section for CO and NOx and also a section for PM. Therefore, there are two conditions 5.2.2.a and two conditions 5.2.2.b. We suggest that there should be a condition number for the CO and NOx requirements and another distinct and different condition number for the PM requirements. This will avoid confusion on certification reporting.

Response to Comment #3

The CO and NOx section will be numbered as condition 5.2.2.1., and the PM section will be numbered as condition 5.2.2.2. This will eliminate having two conditions with the number 5.2.2.b. This also provides for maintaining the numbering of subsequent conditions.

Comment #4

Permit Condition 5.2.2.b. for CO and NOx states "Temperature measurements will be documented at least 15 minutes from data collected every 10 seconds." As we discussed, the data is polled every 10 seconds but that data is not stored every 10 seconds. Please revise this condition to state "Temperature measurements will be documented at least every 15 minutes."

Response to Comment #4

The change will be made as requested in condition 5.2.2.1.b. of the final permit.

Comment #5

Permit Condition 6.1.7.a. states ".....After the initial or subsequent performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established in the most recent performance test." Recognizing that this condition comes directly from R13-1622G, we have submitted an administrative change request which has been received by Mr. Steven Pursley. This change request will modify condition 4.1.13.1.1 of R13-1622G to reflect that the minimum temperature may not have been established during the most recent performance test. Therefore, we request Title V condition 6.1.7.a. be changed to ".....After the initial performance test, the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established during the initial performance test or at a lower temperature established during a subsequent performance test where compliance with the requirements on Condition 6.1.6.a. was demonstrated....."

Response to Comment #5

The last sentence of the draft/proposed Title V condition 6.1.7.a. read, "After the initial or subsequent performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established in the most recent performance test." The changes associated with condition 4.1.13.1 of Permit to Modify (Class I Administrative Update) R13-1622H, will be incorporated into permit condition 6.1.7.a.

Comment #6

Permit Condition 6.1.7.b. states ".....After the initial or subsequent performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established in the most recent performance test." Recognizing that this condition comes directly from R13-1622G, we have submitted an administrative change request which has been received by Mr. Steven Pursley. This change request will modify condition 4.1.13.1.2 of R13-1622G to reflect that the minimum temperature may not have been established during the most recent performance test. Therefore, we request Title V condition 6.1.7.b. be changed to ".....After the initial performance test, the permittee must maintain the 3 hour block average

firebox temperature above the minimum temperature established during the initial performance test or at a lower temperature established during a subsequent performance test where compliance with the requirements on Condition 6.1.6.a. was demonstrated....."

Response to Comment #6

The second sentence of the draft/proposed Title V condition 6.1.7.b. read, "After the initial or subsequent performance test the permittee must maintain the 3 hour block average firebox temperature above the minimum temperature established in the most recent performance test." The changes associated with condition 4.1.13.2 of Permit to Modify (Class I Administrative Update) R13-1622H, will be incorporated into permit condition 6.1.7.b.

Comment #7

Permit condition 6.3.3 gives test methods for CO, PM, VOC, and formaldehyde. There should also be a test method given for methanol. The test methods specified in the PCWP MACT is Method 308, Method 320, NCASI Method CI/WP-98.01, or NCASI Method IM/CAN/WP-99.02. We also request that these methods also be added for formaldehyde since they are also allowed for determining formaldehyde emissions.

Response to Comment #7

In condition 6.3.3., a new row in the table will be made for methanol, and the methods given in the comment will be written for this pollutant. For formaldehyde, all of the methods mentioned in the comment except Method 320 and NCASI Method CI-WP-98.01 will be added to the existing row for this pollutant. Note that Method 320 is already specified for formaldehyde, and NCASI Method CI-WP-98.01 is already included as an approved method according to the footnote. The footnote will be kept to avoid renumbering subsequent footnotes.

112(j) Boiler MACT - Update to Placeholder Permit Condition 3.1.18.

On 3/17/2005, DAQ received the permittee's 3/10/2005 letter covering the Initial Notification Reports for the 45 MMBtu/hr auxiliary natural gas-fired thermal oil heater (Em. Pt. ID 3600) and the wood-fired integrated Wellons Energy System (Em. Pt. ID 5600). The permittee submitted separate reports for these two emission units since the permittee believed that the Wellons Energy System was most appropriately covered under the PCWP MACT, and, pending agency concurrence, the permittee would subsequently withdraw the Initial Notification Report for the Wellons Energy System. However, there is no documentation in DAQ files that acknowledged that the Wellons Energy System is not subject to the Boiler MACT. Further, the permittee's 3/25/2009 Boiler MACT 112(j) Part 2 Application lists the Wellons Energy System as an affected source.

On 1/15/2009, DAQ received the permittee's Part 1 112(j), "equivalent emission limitation by permit" Title V permit application dated 1/13/2009. Receipt of the Part 1 application was acknowledged in DAQ's 2/18/2009 letter to the permittee, and in this letter, the Part 2 112(j) Title V permit application deadline was specified as 3/31/2009.

On 3/27/2009, DAQ received the permittee's Part 2 112(j) application. On 5/29/2009, DAQ acknowledged via letter that the Part 2 112(j) application was received, but also informed the permittee that the application had been determined to be incomplete as detailed in the letter. DAQ requested that responses to the incomplete items be submitted after 8/15/2009, but prior to 9/30/2009. The permittee responded by requesting an extension to submit the required information.

In DAQ's 12/11/2009 letter to the permittee, the request for an extension was granted by the Director. This letter also specified the revised Title V permit condition language, which is being incorporated as part of this significant modification. While the permittee's case is not typical (*i.e.*, relatively few permittees have elected to submit Part 1 and 2 applications), DAQ's practice of revising permittees' Boiler MACT language is typical. Refer to permit condition 3.1.18.