

# Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on August 27, 2007.

Permit Number: **R30-05700008-2007**  
Application Received: **January 20, 2009**  
Plant Identification Number: **03-54-05700008**  
Permittee: **Luke Paper Company**  
Facility Name: **Luke Paper Company West Virginia Operations**  
Mailing Address: **300 Pratt Street**  
**Luke, MD 21540**

Permit Action Number: *MM01*      Revised: *August 17, 2009*

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Physical Location:                      Beryl, Mineral County, West Virginia  
UTM Coordinates:                      667.00 km Easting • 4371.00 km Northing • Zone 17  
Directions:      On left side of State Route 46 approximately 150 yards from the Potomac River Bridge at Beryl, WV

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### Facility Description

Lime kiln and woodyard which supply supporting operations for pulp and paper mill. SIC Codes: 2621; 3274

This Minor Modification is based on Permit R13-0511C, and allows an increase of a sulfur content of petcoke products from 6 % to up to 10 % because these products are offered by suppliers with varying sulfur content. Also, 45CSR10 Monitoring Plan (Appendix A) was replaced with a revised version approved on April 28, 2009.

### Emissions Summary

There will be the following increase in emissions associated with proposed change:

Regulated Pollutants	Annual, TPY
SO <sub>2</sub>	2.77

### Title V Program Applicability Basis

This facility maintains the potential to emit 177 TPY CO, 200 TPY NO<sub>x</sub>, 680 TPY PM<sub>10</sub>, 1,968.77 TPY SO<sub>2</sub>, 10.12 TPY Acetaldehyde, 18.47 TPY Methanol, 12.60 TPY Methyl Ethyl Ketone, and 71.24 TPY total HAP's. Due to this facility's potential to emit over 100 tons per year of CO, NO<sub>x</sub>, PM<sub>10</sub>, and SO<sub>2</sub>, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAP's, Luke Paper Company 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for Construction, Modification, Relocation, and Operation of Stationary Sources of Air Pollutants
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)
R13-0511C	June 17, 2009	

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 Justification**

As the result of the R13-0511C modification the following conditions of this Permit were revised: 4.1.16 (Scrubber 001 SO<sub>2</sub> limits), 4.1.18 (maximum sulfur content of petcoke) and 4.4.11 (petcoke sulfur content compliance demonstration).

45CSR10 Monitoring Plan approved on August 22, 2001 was replaced with a revised version approved on April 28, 2009 (Appendix A).

### **Non-Applicability Determinations**

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: N/A

Ending Date: N/A

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

Natalya Chertkovsky  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
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**

Natalya Chertkovsky  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

Not applicable.