MSES consultants, inc.

609 West Main Street • P.O. Drawer 190 • Clarksburg, WV 26302-0190
304.624.9700 • 304.622.0981 • 304.842.3325 • http://www.msesinc.com
Office Fax 24 Hour World Wide Web

February 8, 2016
Project No. 16-027

RECEIVED
FEB 11 2016
WV DEP / DIV OF AIR QUALITY

Ms. Carrie McCumbers
Title V Program Manager
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, S.E.
Charleston, West Virginia 25304

Renewal of Title V Permit R30-02300015-2011
JPC Limited Liability Company
Allegheny Wood Products, Inc.
Plant 8
Petersburg, West Virginia

Dear Ms. McCumbers:

Please find enclosed two (2) signed copies of the Title V renewal application package for JPC, Limited Liability Company Allegheny Wood Products, Inc. Plant #8. In accordance with the Title V Completeness Checklist we are requesting a permit shield.

Should you have any questions or require additional information, please advise.

Sincerely,

Lori Steele

Lori Steele
Senior Environmental Scientist

Cc: Tom Plaugher – Allegheny Wood Products, Inc.

enclosures

February 2016
Project No. 16-027

REGULATION 30 PERMIT RENEWAL APPLICATION

PERMIT NUMBER R30-02300015-2011

JPC LIMITED LIABILITY COMPANY
ALLEGHENY WOOD PRODUCTS, INC.
PLANT # 8
PETERSBURG, WEST VIRGINIA

PREPARED BY:

MSES Consultants, Inc.
P.O. Drawer 190
Clarksburg, West Virginia 26302-0190
(304) 624-9700

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I. Application

II. Attachments

III. CD

LIST OF ATTACHMENTS

Attachment	Description
A	Area Map
B	Plot Plan
C	Process Flow Diagram(s)
D	Title V Equipment Table
E	Emission Unit Forms
G	Air Pollution Control Device Form
H	Compliance Assurance Monitoring (CAM) Plan Form

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

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):**	**2. Facility Name or Location:**
JPC Limited Liability Company	Plant # 8 Petersburg, WV
3. DAQ Plant ID No.:	**4. Federal Employer ID No. (FEIN):**
0 2 3 — 0 0 0 1 5	2 7 2 8 9 5 2 3 3

5. **Permit Application Type:**

☐ Initial Permit — When did operations commence? MM/DD/YYYY
☒ Permit Renewal — What is the expiration date of the existing permit? 10/03/2016
☐ Update to Initial/Renewal Permit Application

6. Type of Business Entity:

☒ Corporation ☐ Governmental Agency ☐ LLC
☐ Partnership ☐ Limited Partnership

7. Is the Applicant the:

☐ Owner ☐ Operator ☒ Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

_____
_____
_____

8. Number of onsite employees:

97

9. Governmental Code:

☒ Privately owned and operated; 0
☐ Federally owned and operated; 1
☐ State government owned and operated; 2
☐ County government owned and operated; 3
☐ Municipality government owned and operated; 4
☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☒ No

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: P.O. Box 130		
City: Petersburg	**State:** WV	**Zip:** 26847-
Telephone Number: (304) 257-1082	**Fax Number:** (304) 257-9246	

12. Facility Location		
Street: 108 Airport Road	**City:** Petersburg	**County:** Grant
UTM Easting: 660.643 km	**UTM Northing:** 4,317.058 km	**Zone:** ☒ 17 or ☐ 18
Directions: From the intersection of US Route 220 and State Route 28 in Petersburg follow 220 South to Fish Hatchery Road (220/2). Turn right onto Fish Hatchery Road. Follow to Airport Road. Turn right. Plant 8 is the second facility on the right.		
Portable Source? ☐ Yes ☒ No		
Is facility located within a nonattainment area? ☐ Yes ☒ No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? ☒ Yes ☐ No		**If yes, name the affected state(s).** Virginia Maryland
Is facility located within 100 km of a Class I Area[1]? ☒ Yes ☐ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☐ No		**If yes, name the area(s).** Dolly Sods Wilderness Otter Creek Wilderness Shenandoah National Park

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: E. Thomas Plaugher		**Title:** VP Operations
Street or P.O. Box: P.O. Box 130		
City: Petersburg	**State:** WV	**Zip: 26847-**
Telephone Number: (304) 257-1082	**Fax Number:** (304) 257-9246	
E-mail address: tplaugher@alleghenywood.com		
Environmental Contact: Brian Booth		**Title:** Mill Manager
Street or P.O. Box: P.O. Box 130		
City: Petersburg	**State:** WV	**Zip: 26847-**
Telephone Number: (304) 257-9103	**Fax Number:** (304) 257-9655	
E-mail address: bbooth@alleghenywood.com		
Application Preparer: Lori Steele		**Title:** Senior Environmental Scientist
Company: MSES Consultants, Inc.		
Street or P.O. Box: P.O. Drawer 190		
City: Clarksburg	**State:** WV	**Zip: 26302-0190**
Telephone Number: (304) 624-9700	**Fax Number:** (304) 622-0981	
E-mail address: lsteele@msesinc.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Lumber Drying Kilns	Kiln Dried Hardwood Lumber	321113	2421
Planing Mill	Dimensional Lumber	321113	2421
Boiler	Process Steam for Kilns	321113	2421

Provide a general description of operations.

JPC Limited Liability Company is a lumber/wood products facility which operates a woodworking facility, and processes scrap wood for use as fuel in the boiler. There is one (1) pre-dryer and three (3) drying kilns at the facility that operate with steam heat generated from the boiler.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☐ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☒ Section 111 NSPS	☒ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☒ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☒ Compliance Assurance Monitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR40)
☐ CAIR SO_2 Trading Program (45CSR41)	

19. Non Applicability Determinations
List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.
40CFR60, Subpart Dc. The main boiler #2 is not subject to the SO_2 and PM standards because it is under 30 mmbtu/hr heat input.
☒ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

Open burning prohibited. 45CSR6-3.1.

Open burning exemptions. 45CSR6-3.2.

Asbestos. Inspect facility prior to demolition or renovation. Notification of agencies. 40CFR61 and 45CSR15.

Odor prohibited. 45CSR4-3.1. State-Enforceable only.

Standby plan for reducing emissions. 45CSR11-5.2.

Emission inventory. WV Code 22-5-4(a)(14).

Ozone-depleting substances. 40CFR82, Subpart F.

Risk Management Plan. 40CFR68.

Fugitive particulate emissions from manufacturing processes and storage structures. 45CSR7-5.1., R13-1154, §(B).

Control of fugitive particulate emissions. 45CSR7-5.2., R13-1154, §(B).

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Stack testing as required by the Director. WV Code §§ 22-5-4(a)(14-15), 45CSR2, 45CSR10, 45CSR7 and 45CSR13 Pewrmit R13-1154.

Keep records of monitoring information. 45CSR30-5.1.c.2.A.

Retain records of required monitoring data for at least five (5) years. 45CSR30-5.1.c.2.B.

Odors. Maintain a record of all odor complaints received, any investigation, and any response. 45CSR30-5.1.c. State-enforceable only.

Maintain records of dust suppressants or other dust control measures. 45CSR30-5.1.c.

Responsible official shall certify reports submitted to DAQ and/or USEPA. 45CSR30-4.4. and 5.1.c.3.D.

Certified emissions statement. Submit a certified emission statement and pay fees annually. 45CSR30-8.

Compliance certification. Submit to WVDAQ and USEPA annually by March 15th. 45CSR30-5.3.e.

Semi-annual monitoring reports. Submit by March 15th and September 15th. 45CSR30-5.1.c.3.A.

Deviations. Submit reports and notices due to emergency or upset conditions. 45CSR30-5.7.

New applicable requirements. 45CSR30-4.3.h.1.B.

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements *(Continued)* - *Attach additional pages as necessary.*

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

☐ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/ reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all facility-wide applicable requirements? ☐ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
R13-1154	10/31/1999	NA
CO-R30-E-2000-36	10/18/2000	NA
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22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
None	MM/DD/YYYY	
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Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	80.59
Nitrogen Oxides (NO_X)	10.51
Lead (Pb)	0.0032
Particulate Matter ($PM_{2.5}$)[1]	17.74
Particulate Matter (PM_{10})[1]	10.51
Total Particulate Matter (TSP)	65.15
Sulfur Dioxide (SO_2)	0.66
Volatile Organic Compounds (VOC)	7.88
Hazardous Air Pollutants[2]	Potential Emissions
HAPs from Combustion	0.73
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Carbon Dioxide	12,812
Nitrous Oxide	0.85
Methane	1.38

[1] $PM_{2.5}$ and PM_{10} are components of TSP.
[2] For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)		
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☒	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☒	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☒	4.	Bathroom/toilet vent emissions.
☒	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☒	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☒	8.	Boiler water treatment operations, not including cooling towers.
☒	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☒	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☒	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☒	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☒	14.	Demineralized water tanks and demineralizer vents.
☐	15.	Drop hammers or hydraulic presses for forging or metalworking.
☒	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☒	18.	Emergency road flares.
☐	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☒	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☒	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☒	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☒	26.	Fire suppression systems.
☒	27.	Firefighting equipment and the equipment used to train firefighters.
☒	28.	Flares used solely to indicate danger to the public.
☒	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☒	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☒	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☒	34.	Indoor or outdoor kerosene heaters.
☒	35.	Internal combustion engines used for landscaping purposes.
☒	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☒	37.	Laundry activities, except for dry-cleaning and steam boilers.
☒	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☐	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.

24. Insignificant Activities (Check all that apply)		
☒	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
☒	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☒	43.	Process water filtration systems and demineralizers.
☒	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☒	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☒	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☒	50.	Space heaters operating by direct heat transfer.
☒	51.	Steam cleaning operations.
☒	52.	Steam leaks.
☐	53.	Steam sterilizers.
☒	54.	Steam vents and safety relief valves.
☒	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☒	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☐	57.	Such other sources or activities as the Director may determine.
☒	58.	Tobacco smoking rooms and areas.
☒	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D.**
26. Emission Units
For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E.**
For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.
27. Control Devices
For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. 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.

Responsible official (type or print)

Name: E. Thomas Plaugher	Title: VP of Operations

Responsible official's signature:

Signature: E. Thomas Plaugher Signature Date: 2/5/2016

(Must be signed and dated in blue ink)

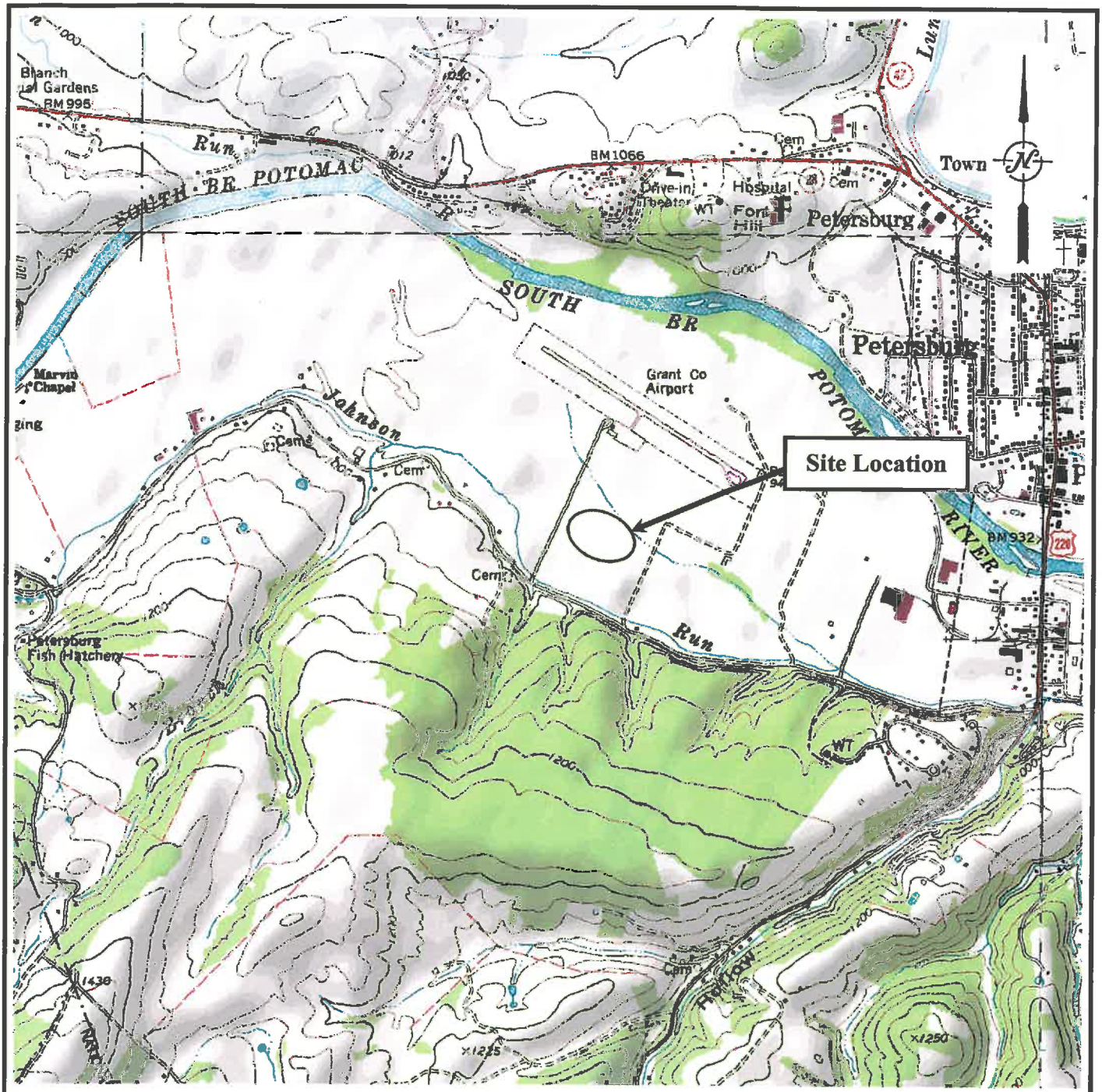
Note: Please check all applicable attachments included with this permit application:

☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☒	ATTACHMENT D: Equipment Table
☒	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☒	ATTACHMENT G: Air Pollution Control Device Form(s)
☒	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

ATTACHMENT A

Area Map



Reference:
3-D TopoQuads © DeLorme, Yarmouth, Me 04096
Source Data:
7.5 Minute USGS Topographic Quadrangles
Petersburg West, WV
Petersburg East, WV
Rig, WV
Maysville, WV

Area Map

Scale 1" = 2000'

MSES Consultants, Inc.
Clarksburg, West Virginia

JPC Limited Liability Company
Allegheny Wood Products, Inc. Mill #8

Regulation 30 Permit Renewal Application

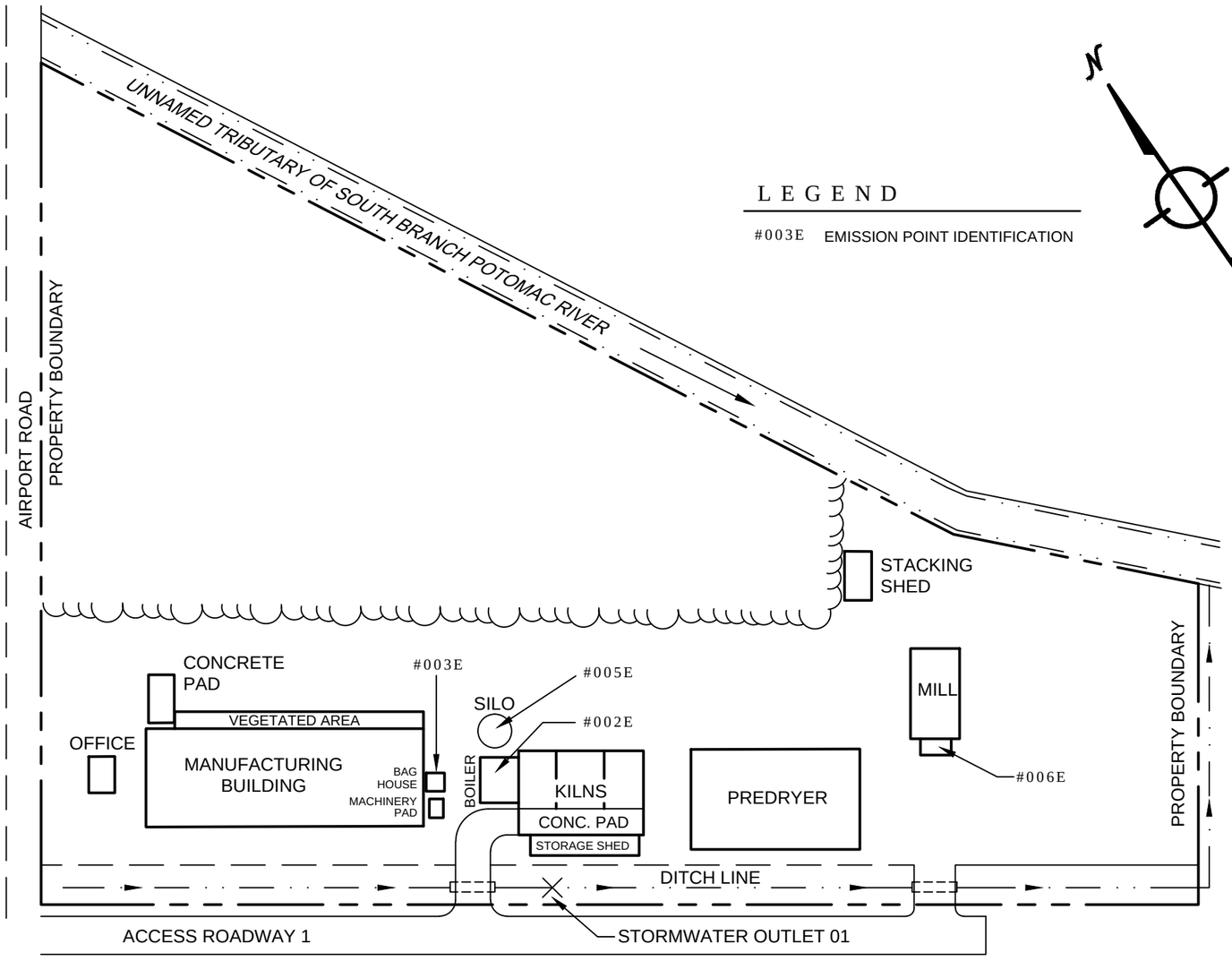
Project No. 16-027

Attachment A

ATTACHMENT B

Plot Plan(s)

MILROY DISTRICT
GRANT COUNTY
WEST VIRGINIA



L E G E N D

#003E EMISSION POINT IDENTIFICATION

N

NO SCALE

Allegheny Wood Products, Inc.

PLANT #8
PETERSBURG, WV

REGULATION 30 APPLICATION

PLOT PLAN

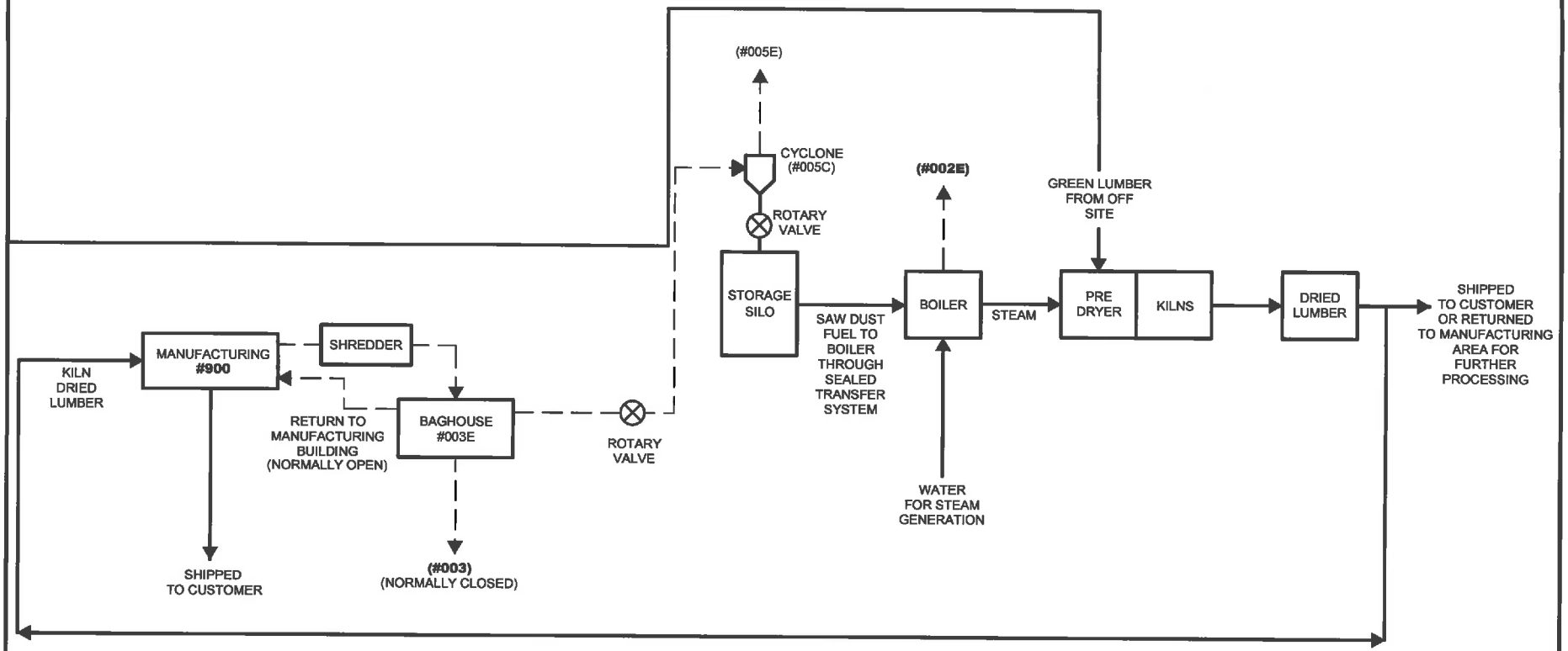
MSES
environmental & engineering consultants

MSES CAD FILE NO. 16-027-1

ATTACHMENT C

Process Flow Diagram(s)

MSES CAD FILE NO. 16-027-1



LEGEND

PRODUCT FLOW

EMISSION

VIRTUAL EMISSION

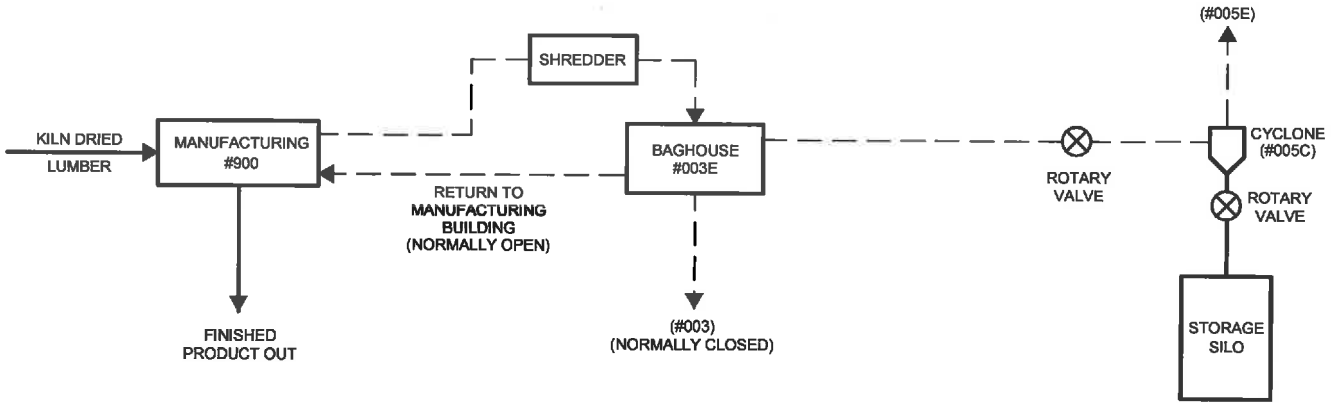
FIGURE 3
Allegheny Wood Products, Inc.
PLANT #8
PETERSBURG, WV

REGULATION 30 APPLICATION

FACILITY
PROCESS FLOW DIAGRAM

MSES consultants, inc.

MSES CAD FILE NO. 16-027-1



LEGEND

- PRODUCT FLOW
- EMISSION
- VIRTUAL EMISSION

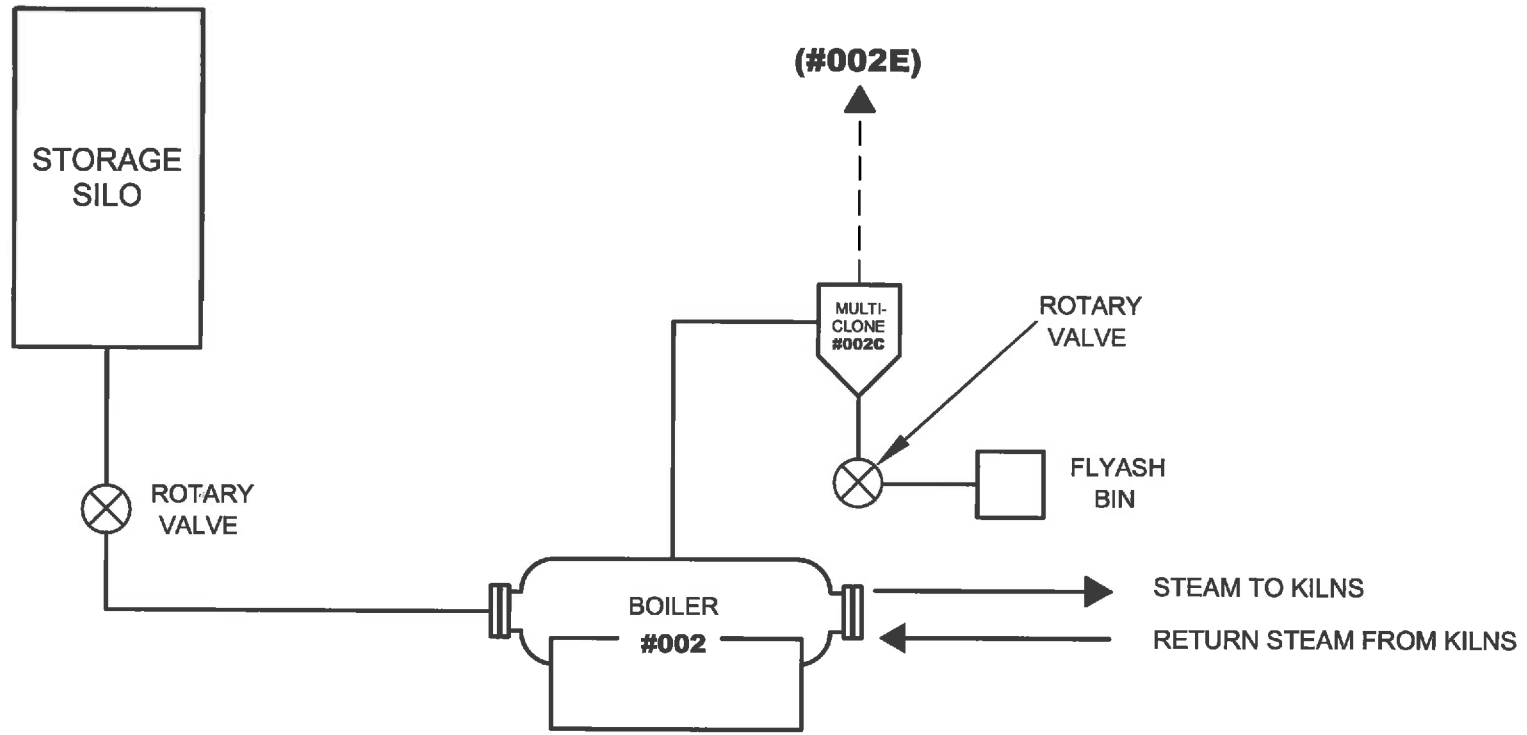
FIGURE 4
Allegheny Wood Products, Inc.
PLANT #8
PETERSBURG, WV

REGULATION 30 APPLICATION

MANUFACTURING
PROCESS FLOW DIAGRAM

MSES consultants, inc.

MSES CAD FILE NO. 16-027-1



LEGEND

PRODUCT FLOW

EMISSION

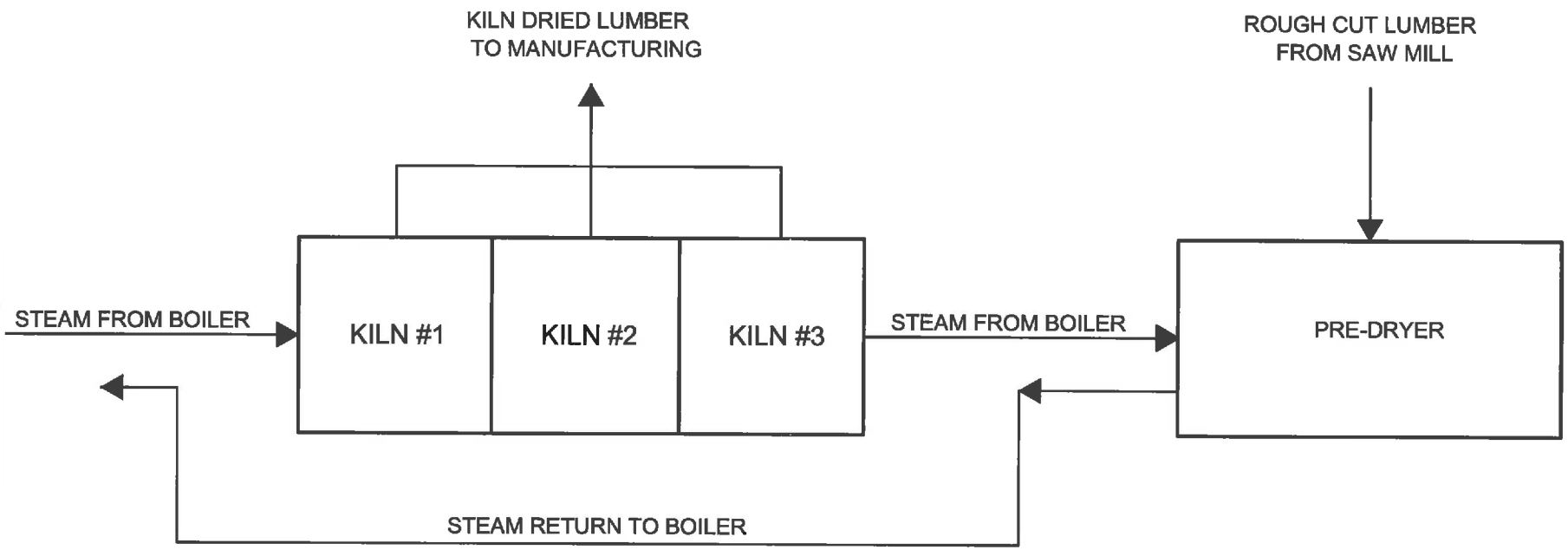
FIGURE 5
Allegheny Wood Products, Inc.
PLANT #8
PETERSBURG, WV

REGULATION 30 APPLICATION

BOILER
PROCESS FLOW DIAGRAM

MSES consultants, inc.

MSES CAD FILE NO. 16-027-1



LEGEND

PRODUCT FLOW

EMISSION

FIGURE 6
Allegheny Wood Products, Inc.
PLANT #8
PETERSBURG, WV

REGULATION 30 APPLICATION

PRE-DRIER / KILNS
PROCESS FLOW DIAGRAM

MSES consultants, inc.

ATTACHMENT D

Title V Equipment Table

ATTACHMENT D - Emission Units Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
002S	002E	Wood Fired Boiler ; Superior Boiler Works, Model # 3-SF-1788-515-M	1989	15.0 mmbtu/hr	Multiclone 002C
003S	003E	Manufacturing Building/Woodworking Machinery; Includes saws, lathes, sanders, and a moulder. This equipment is used to cut, shape, and finish wood products.	1989	N/A	Baghouse 003C
005S	005E	Storage silo (stores wood chips for use as fuel for the boiler)	N/A	N/A	Cyclone 005C

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E

Emission Unit Form(s)

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
002S	Wood Fired Boiler Superior Boiler	Multiclone 002C

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

15.0 mmbtu/hr DHI wood waste fueled boiler.

Manufacturer:	**Model number:**	**Serial number:**
Superior	3-SF-1788-S15-M	N/A
Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	01/01/1989	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1,980 lb/hr wood waste

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
9,830 lb/hr steam	86,110,800 lb steam	8760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __X__ Yes ___ No	**If yes, is it?** __X__ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: 15.0 mmbtu/hr	**Type and Btu/hr rating of burners:** Under feed stoker, variable speed

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

1,980 lb/hr and 8,762.4 tons/year of wood waste

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Wood waste	57.1 mg/Kg	0.69 wt%	5,012 Btu/lb

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	18.4	80.59
Nitrogen Oxides (NO_X)	2.4	10.51
Lead (Pb)	0.00072	0.0032
Particulate Matter ($PM_{2.5}$)	2.4	10.51
Particulate Matter (PM_{10})	4.05	17.74
Total Particulate Matter (TSP)	4.5	19.71
Sulfur Dioxide (SO_2)	0.15	0.66
Volatile Organic Compounds (VOC)	1.8	7.88
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
HAPs from Combustion	0.17	0.73
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Carbon Dioxide	2,925	12,812
Nitrous Oxide	0.20	0.85
Methane	0.32	1.38

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

R13-1154 allowable emission rates and AP-42 Emission factors Chapter 1.6 Tables 1.6-3 and 1.6-4, July 2001

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Operate the boiler in accordance with the Operations Manual approved by WVDAQ on February 6, 2001. CO-R-E-2000-36, §III.1.
Shall only use wood waste as fuel. Not more than 1,980 lb/hr or 8,672.4 tpy of wood waste consumed. 45CSR13 – Permit R13-1154 §A..
Minimize emissions at all times including start-up, shutdowns, and malfunctions. 45CSR2-9.2., 45CSR13 – Permit R13-1154 §B.
Visible emissions shall not exceed ten percent (10%) opacity based on a six (6) minute block average. 45CSR2-3.1., 45CSR13 – Permit R13 – R13-1154 §B.
Visible emission standards apply at all times except start-ups, shutdowns and malfunctions. 45CSR2-9.1., 45CSR13 – R13-1154 §B.1.
PM emissions shall not exceed 3.8 lb/hr (14.9 tpy). 45CSR13 – Permit R13-1154 §A.1.
Addition of sulfur oxides to exit gas stream is prohibited unless approved by the Secretary. 45CSR2-4.4., 45CSR13 – Permit R13-1154 §B.
Control fugitive emissions associated with ash and fuel handling. 45CSR2-5., 45CSR13 – Permit R13-1154 §B.
Sulfur dioxide limit of 0.15 lb/hr (0.66 tpy). 45CSR13 – Permit R13-1154 §A.1.
No owner or operator subject to the provisions of 45CSR10 shall build, erect, install, modify or use any article, machine, equipment or process, the use of which purposely conceals an emission which would otherwise constitute a violation of an applicable standard. 45CSR10-11.1.
Nitrogen oxides limit of 2.4 lb/hr (10.51 tpy). 45CSR13 – Permit R13-1154 §A.1.
Volatile organic compound limit of 1.8 lb/hr (7.88 tpy). 45CSR13 – Permit R13-1154 §A.1.
Carbon monoxide limit of 18.4 lb/hr (80.59 tpy). 45CSR13 – Permit R13-1154 §A.1.
Particulate matter emissions from the cyclone (005E) controlling the sawmill silo shall not exceed 10 lb/hr. 45CSR13 Permit R13-1154 §A.3.
No person shall cause, suffer, allow, or permit any source of fugitive particulate matter to operate that is not equipped with a fugitive particulate matter control system. This system shall be operated and maintained in such a manner as to minimize the emission of fugitive particulate matter. Sources of fugitive particulate matter associated with fuel burning units shall include , but not be limited to, the following:
a. Stockpiling of ash or fuel either in the open or in enclosures such as silos;
b. Transport of ash in vehicles or on conveying systems, to include spillage, tracking, or blowing of particulate matter from or by such vehicles or equipment; and
c. Ash or fuel handling systems and ash disposal areas. 45CSR13 Permit R13-1154 §B.
One-time energy assessment performed by March 21, 2014. 45CSR34, 40CFR63.11196(a)(3), 63.11201(b), and 63.11210(c).
Biennial performance tune-up. 45CSR34, 4040CFR63.11196(a)(1), 63.11201(b), 63.11210(c), and 63.11223.
Minimize startup and shutdown periods following manufacturer's recommended procedures. 45CSR34, 40CFR63.11201(b), and 63.11210(d).
Operate and maintain the boiler and associated air pollution control equipment to minimize emissions. 45CSR34, 40CFR63.11205(a).

_X_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Daily Method 22-like visible emission checks. 45CSR30-5.1.c., 40CFR64.3(a), 64.3(b), 64.6(c)(2), and 64.7(d).
Respond to excursions or exceedances. 45CSR30-5.1.c., 40CFR64.7(d).
Document need for improved monitoring. 45CSR30-5.1.c., 40CFR64.7(e).
Conduct a stack test once every 5 years ± 12 months. 45CSR30-5.1.c., 45CSR2-8.1.b., 40CFR64.3(a), 64.3(b), and 64.6(c)(2).
Keep records of operating schedule and quantity and quality of fuel consumed. 45CSR2-8.3.c., 45CSR2A-7.1.a., 7.1.a.3., 45CSR16, 40CFR60.48c(g).
The permittee shall inspect the cyclone (005C) controlling the sawmill silo monthly to ensure that it is operated and maintained in conformance with its design. Records of all schedule and non-scheduled maintenance shall be maintained on site and shall state any maintenance or corrective actions taken as a result of the monthly inspections, the times the cyclone was inoperable and any corrective actions taken. 45CSR30-5.1.c.
Maintain records to document conformance with the work practices, emission reduction measures, and management practices. 45CSR34, 40CFR63.11225(c).
Keep required records for 5 years. Keep records onsite for at least 2 years. 45CSR34, 40CFR63.11225(d).
Maintain records of monitoring data, corrective actions taken, and any written quality improvement plan required per CAM rule, and other supporting information. 45CSR30-5.1.c., 40CFR64.9(b).
Report any malfunction which results in any excess particulate matter emissions or excess opacity. 45CSR2-9.3., 45CSR13 – Permit R13-1154 §B.
Report excess opacity or excess particulate matter emissions resulting from a malfunction except excess opacity less than 30 minutes or less than 40%. 45CSR2-9.3.a., 45CSR13 – Permit R13-1154 §B.
Report any malfunction which results in excess particulate matter emissions or opacity by the end of the next business day after becoming aware of such condition. Submit a certified written report concerning the malfunction within 30 days. 45CSR2-9.3.b., 45CSR13 – Permit R13-1154 §B.
Submit signed Notification of Compliance Status for tune-up and energy assessment report. 45CSR34, 40CFR63.11214(b) and (c).
Report fuel switch. 45CSR34, 40CFR63.11225(g).
Submit CAM monitoring reports. 45CSR30-5.1.c., 40CFR64.9(a).
Submit Initial Notification and Notification of Compliance Status in accordance with schedule. 45CSR34, 40CFR63.11225(a).
Prepare annual compliance certification report by March 1 of each year and submit by March 15 if requested. 45CSR34, 40CFR63.11225(b).
A quarterly report, detailing the daily and monthly fuel consumption, shall be submitted to the Director within fifteen (15) days of the end of the calendar quarter. Consent Order CO-R-E2000-36, §III.2. State-Enforceable only.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
003S	Woodworking Machinery	Baghouse 003C

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Saws, lathes, sanders, and a moulder.

Manufacturer:	**Model number:**	**Serial number:**
N/A	N/A	N/A
Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	08/01/1989	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
		8760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes _X__ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	**Type and Btu/hr rating of burners:** N/A

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
None	N/A	N/A	N/A

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)	0.375	1.643
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Best engineering estimate (R13 permit application October 1989) and AP42 Table 10.3-1.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Visible emissions shall not exceed twenty percent (20%) opacity. 45CSR7-3.1., 45CSR13 – Permit R13 – R13-1154 §B.

Visible emission standards shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty percent (40%) opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. 45CSR7-3.2., 45CSR13 – R13-1154 §B.

Particulate matter emissions from the stack venting the baghouse (003E) shall not exceed 2.5 pounds per hour. 45CSR13 – Permit R13-1154 §(A)(2).

Stack shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. 45CSR7-4.12., 45CSR13 – Permit 13-1154, §B.

Excess emissions may be permitted by the Director for up to ten (10) days due to unavoidable malfunction. 45CSR7-9.1., 45CSR13 – Permit R13-1154 §B.

_X___ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Conduct monthly Method 22-like visible emission checks during periods of normal facility operation and appropriate weather conditions for a sufficient time interval not less than one (1) minute. 45CSR7A-2.1., 45CSR30-5.1.c.

Inspect baghouse to ensure operation and maintenance with design. Keep records of all maintenance and corrective actions taken. 45CSR30-5.1.c.

Keep records of all monitoring data required. 45CSR30-5.1.c.

Are you in compliance with all applicable requirements for this emission unit? _X__ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
005S	Storage Silo	Cyclone 005C

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Storage silo for wood chips/sawdust used as fuel for the boiler.

Manufacturer:	**Model number:**	**Serial number:**
N/A	N/A	N/A
Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	N/A	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): N/A

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
2,000 lb/hr	17,520,000 lb/year	8760 hr/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes _X__ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	**Type and Btu/hr rating of burners:** N/A

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
None	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)	10	43.80
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Best engineering estimate (R13 permit application February 1995) and AP42 Chapter 10.4 Table 10.4-2 (July 1979)

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Particulate emissions shall not exceed 10 lb/hr. 45CSR13 – Permit R13-1154 §(A)(3).

No person shall cause, suffer, allow, or permit any source of fugitive particulate matter to operate that is not equipped with a fugitive particulate matter control system. This system shall be operated and maintained in such a manner as to minimize the emission of fugitive particulate matter. Sources of fugitive matter associated with fuel burning units shall include, but no be limited to, the following:
a. Stockpiling of ash or fuel either in the open or in enclosures such as silos;
b. Transport of ash in vehicles or on conveying systems, to include spillage, tracking, or blowing of particulate matter from or by such vehicles or equipment; and
c. Ash or fuel handling systems and as disposal areas. 45CSR2-5., 45CSR13 – Permit R13-1154 §(B).

_X___ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. The permittee shall also inspect all fugitive dust control systems monthly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of all scheduled and non-scheduled maintenance and shall state any maintenance or corrective actions taken as a result of the monthly inspections, the times the fugitive dust control system(s) were inoperable and any corrective actions taken. 45CSR30-5.1.c.

Are you in compliance with all applicable requirements for this emission unit? _X__ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

ATTACHMENT G

Air Pollution Control Device Form

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 002C	**List all emission units associated with this control device.** 002S Wood Fired Boiler (Superior Boiler)	
Manufacturer: Zurn	**Model number:** MTSA-10-9 CYT-A-STD	**Installation date:** 01/01/1989

Type of Air Pollution Control Device:

__ Baghouse/Fabric Filter	___ Venturi Scrubber	_X_ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	100%	90%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

7,140 acfm at 500 deg F and 0.09 PSIA;

Collected material to be disposed of with other refuse.

Is this device subject to the CAM requirements of 40 C.F.R. 64? _X_ Yes __ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Visible emissions using a Method 22-like procedure.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 003C	**List all emission units associated with this control device.** 003S Manufacturing Building/Woodworking Machinery: Includes saws, lathes, sanders, planers.	
Manufacturer: Nordfab	**Model number:** NFK 6HW/1BL	**Installation date:** 01/01/1989

Type of Air Pollution Control Device:

_X_ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
Seven (7) compartments containing 288 cotton bags;
30,120 acfm at 70 deg F and 0.1 PSIA;
pressure drop = 2.5 inches water
Reverse air cleaning, one module at a time.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** The pre-control potential to emit is below levels subject to CAM.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Visible emissions using Method 22-like procedures.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 005C	**List all emission units associated with this control device.** 005S Storage Silo	
Manufacturer: Northfab	**Model number:** Model No. NC700	**Installation date:** 01/01/1989

Type of Air Pollution Control Device:

__ Baghouse/Fabric Filter	___ Venturi Scrubber	__ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	_X_ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
PM/PM10/PM2.5	90%	85%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

2,800 acfm at 70 deg F and 0.216 PSIA;

The cyclone air outlet has a high velocity cap exhausting to the atmosphere. The material exits directly into the storage silo.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.** Pre-control potential to emit is below levels subject to CAM.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Visible emissions using a Method 22-like procedure.

ATTACHMENT H

Compliance Assurance Monitoring (CAM) Plan Form

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☒ YES ☐ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☒ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) [a] BACKGROUND DATA AND INFORMATION

Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
Boiler 002S	Wood Fired Boiler	PM	Multiclone 002C	45CSR§2-4.1.c. and 45CSR13 Permit R13-1154, §A 3.8 lb/hr	Daily Method 22-like emissions checks during normal facility operations and appropriate weather conditions. Maintain and operate control device. Stack test once per permit term
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone. Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.

4a) PSEU Designation: Boiler 002S	**4b) Pollutant:** PM	**4c) [a] Indicator No. 1:** Stack test once per permit term..	**4d) [a] Indicator No. 2:** Visible Emissions
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		Method 5 stack test	Visible emissions from the multiclone exhaust will be monitored daily using EPA Reference Method 22-like procedures.
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			The indicator level is no visible emissions.
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		Approved stack test protocol per 45CSR2A	Measurements are made at the emission point and are indicitive of good operation and maintenance of the multiclone.
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		NA	NA
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		Method 5 QA/QC procedures and 45CSR2A QA/QC procedures	The observer will be educated on the general procedures (Method 22-like) for determining the presence of visible emissions.
[d] Provide the MONITORING FREQUENCY:		Once per permit term or 5 years	One time per day during dayight and normal operations
Provide the DATA COLLECTION PROCEDURES that will be used:		Per 45CSR2A	Per Method 22
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:		Hourly	6 minutes in an hour.

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:	6b) Regulated Air Pollutant:
Boiler 002	PM

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

Visible emissions was selected as a performance indicator for this control device. Experience indicates that given proper operation and maintenance, there should be no visible emissions when observed by individuals trained (but not necessarily certified) in Method 22-like observations. The presence of visible emissions therefore indicates the possibility of a malfuction in the control device.

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.

- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.

- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

JPC Limited Liability Company selected no visible emissions when observed by an individual trained (but not necessarily certified) in Method 22-like observations. No visible emissions were selected because: 1) It does not require quantitative assessment by the observer as to the degree of opacity; 2) Is clearly inidicative of a potential malfuction of the control device.

The performance test once per permit term provides verification that the boiler and multiclone are operating within design parameters.

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