

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 January 10, 2012.

Permit Number: **R30-03700007-2012**
Application Received: **July 31, 2015**
Plant Identification Number: **03-54-03700007**
Permittee: **Ox Paperboard, LLC**
Facility Name: **Halltown Mill**
Mailing Address: **P. O. Box 70, Halltown, WV 25423**

Permit Action Number: *SM01* Revised: *February 16, 2016*

Physical Location:	Halltown, Jefferson County, West Virginia
UTM Coordinates:	776.32 km Easting • 4356.17 km Northing • Zone 17
Directions:	From Charles Town proceed East on U.S. Route 340 to Halltown Road. Turn left off of U.S. Route 340 onto Halltown Road, the facility is located on the left approximately two (2) miles from the intersection of U.S. Route 340, Jefferson County.

Facility Description

Ox Paperboard LLC is a producer of 100% recycled paperboard from recovered papers. The facility operates under Standard Industrial Classification (SIC) Code 2631. The facility consists of one coal fired boiler, the paper mill, a carpenter shop, a waste water treatment plant, an emergency generator, truck traffic, and welding equipment.

This significant modification incorporates the changes authorized by NSR Permit R13-0622A, which limits the capacity of the boiler and notes the installation of pollution controls, which allows the facility to meet the emission standards of 40 CFR Part 63 Subpart JJJJJ.

Emissions Summary

The following table is a comparison of the boiler emissions before and after the limits on capacity and installation of pollution controls:

Pollutant	Before limits/controls	After limits/controls	Change
CO	75.0	37.5	-37.5
NO _x	165	82.5	-82.5
PM _{2.5}	10.54	8.27	-2.27
PM ₁₀	24.32	8.72	-15.6
Total PM	40.53	11.89	-28.64
VOC	0.75	0.38	-0.37
HCl	5.89	2.2	-3.69
Total HAPs	44.48	22.28	-22.20

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 481.4 tons per year of SO₂. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Ox Paperboard, LLC 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:	45CSR2	PM Emission Limits
	45CSR10	SO ₂ Emission Limits
	45CSR13	Construction Permits
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for HAPs
	40 CFR 63 Subpart JJJJJ	Industrial, Commercial, and Institutional Boilers Area Source MACT

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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)
R13-0622A	January 4, 2016	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

The following changes have been made to the Title V Permit:

- The Equipment Table in Section 1.0 was updated by adding the Dry Sorbent Injection System and Fabric Filter Baghouse as controls to the coal-fired boiler.
- Condition 3.1.11. was added to incorporate R13-0622A permit, Condition 3.1.7.
- For Condition 3.4.1. a citation was added to correspond to the R13-0622A permit, Condition 4.4.1.
- Section 4.0 was updated by incorporating the requirements from R13-0622A, including requirements to limit the capacity of the boiler and requirements from 40 CFR 63, Subpart JJJJJ (see below).

45CSR13 – Permit R13-0622A requires monitoring of, and recordkeeping for, boiler fuel consumption and coal shipment sulfur content. Additional monitoring and recordkeeping will be required for 40 CFR 63 Subpart JJJJJ. The MRR was found to be sufficient for Title V purposes.

40 CFR 63 Subpart JJJJJ – The facility is subject to the area source GACT for Industrial, Commercial, and Institutional Boilers. The existing coal-fired boiler must comply with emissions standards for mercury and carbon monoxide, work practice standards, and a one-time energy assessment. The dry sorbent injection system with a fabric filter will operate in conjunction with a bag leak detection system and must comply with Table 3 of the GACT. The facility will not be installing an oxygen trim on the boiler. In accordance with 40 CFR §63.11224(a), the facility must install and operate a continuous monitoring system for the oxygen level in the exhaust. The installation and use of an oxygen analyzer requires the facility to conduct CO emission testing and to establish an oxygen level as an operating parameter to demonstrate compliance with the CO concentration limit. The facility must conduct performance testing for mercury to demonstrate compliance with the mercury emission limit and to establish the activated carbon injection rate.

Non-Applicability Determinations

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

45CSR14 – The facility is classified as a major source under the Prevention of Significant Deterioration Program, however the changes authorized by the NSR permit are not classified as a major modification or a physical change of operation, and do not involve any emissions increase.

40 CFR 63 Subpart DDDDD – The facility had been a major source of HAPs making it subject to the Industrial Boiler MACT for Major Sources. The compliance date for the MACT is January 31, 2016. By restricting the fuel consumption of the boiler and installing controls before the compliance date, the facility will no longer be subject to this MACT, but will become subject to the Industrial Boiler GACT for Area Sources, 40 CFR 63 Subpart JJJJJ.

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: Wednesday, January 13, 2016
Ending Date: Friday, February 12, 2016

Point of Contact

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

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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.

Response to Comments (Statement of Basis)

US EPA commented that there appeared to be no monitoring to assure that the boiler capacity did not exceed 40% by limiting the annual fuel usage as required in condition 4.1.2. However, Condition 4.4.6.e. required the permittee to keep records of monthly fuel used in the boiler on a 12-month rolling total basis.

US EPA also commented on Conditions 4.4.1., 5.2.1., and 6.1.1., however these conditions were not changed for this modification and were not amended based on EPA's comments.