

# Fact Sheet



*For Draft/Proposed Renewal Permitting Action Under 45CSR30 and  
Title V of the Clean Air Act*

Permit Number: **R30-06500001-2014**  
Application Received: **June 26, 2013**  
Plant Identification Number: **03-54-065-00001**  
Permittee: **U.S. Silica Company**  
Facility Name: **Berkeley Springs Plant**  
Mailing Address: **P.O Box 187, Berkeley Springs, WV 25411**

---

Physical Location: Berkeley Springs, Morgan County, West Virginia  
UTM Coordinates: 739.59 km Easting • 4,393.48 km Northing • Zone 17  
Directions: Off of Route 522 approximately 3 miles north of Berkeley Springs

---

## **Facility Description**

Sandstone mining, quarrying, and processing facility. SIC Code - 1446.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2011 Actual Emissions</b>
Carbon Monoxide (CO)	13.75	1.04
Nitrogen Oxides (NO <sub>x</sub> )	96.35	4.159
Particulate Matter (PM <sub>2.5</sub> )	191	Not Reported
Particulate Matter (PM <sub>10</sub> )	1036	Not Reported
Total Particulate Matter (TSP)	2296	26.05
Sulfur Dioxide (SO <sub>2</sub> )	267	8.847
Volatile Organic Compounds (VOC)	1.27	0.05

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2011 Actual Emissions</b>
Total	0.1	0

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

This facility has the potential to emit 1,036 tons per year of PM<sub>10</sub> and 267 tons per year of SO<sub>2</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, U.S.Silica 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:	45CSR6	Open burning prohibited.
	45CSR7	Control of PM from Manufacturing Sources
	45CSR10	Sulfur Dioxide Emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction/modification permits
	45CSR16	NSPS Requirement
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	40 C.F.R. 60 Subpart OOO	NSPS for Non-metallic mineral processing
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart ZZZZ	RICE MACT
	40 C.F.R 64	Compliance Assurance monitoring (CAM)

	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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 ( <i>if any</i> )
R13-2595	September 20, 2004	PD10-027
R13-0715F	December 11, 2003	
R13-750	June 14, 1984	
R13-1970	August 13, 1997	
R13-991	April 12, 1988	
R13-1917	December 22, 1995	
R13-2015C	November 20, 2009	
R13-2145C	October 22, 2012	
R13-2423A	August 29, 2003	
R13-2299A	August 29, 2003	
		PD11-037
		PD12-007
		PD05-008

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**

Changes to Emission Units table, Section 1.0 of the permit: A column has been added titled PFD ID (Process Flow Diagram ID) which will make it easier to find all the equipment in the Process Flow Diagrams provided in the permit renewal application. Other changes are described in table below:

Process Flow Diagram ID	Control Device	Emission Unit ID	Emission Unit Description	Control Device Description	Comment
12.1	N/A (FE)	CONV7	30" Transfer Conveyor	FE, IMC, BE (Bldg #5)	Revised emission unit description.
19.1	N/A (FE)	SCREN1	METSO 8 x 20 Screen	FE, BE (Bldg #4), SS	Revised emission unit description and Year modified. Approved in 45CSR13, PD11-037 – no permit needed.
21	BE	WETSE1 thru WETSE5	#1-#5 Linatex Separators	BE	Corrected the Building # from Building #4 to Building #6
23.1	N/A (SS)	CLASS3 & 4	Hydrosizers	SS	Class 4/5 and 7 is identified as a separate emission unit. The plant refers to these classifiers as CLASS3 and CLASS4; therefore, the plant requested an emission unit ID change for these units.
29.1	N/A (FE)	CONV17	30" Shuttle Conveyor in Fluid Bed Drain Shed	FE, BE (Bldg #6), SS	Separated out CONV17 from the emission unit group.
29.2	N/A (FE)	CONV19	30" Shuttle Conveyor in Fluid Bed Drain Shed	FE, BE (Bldg #6), SS	Separated out CONV19 from the emission unit group.
34.1	N/A (FE)	V1BFD4	C3 Belt, Vibratory Feeder	FE	Revised emission unit description.
41.1	N/A (SS)	CYCLO2	Wet Cyclone Overrake	SS	Added existing emission unit. This equipment was not identified by the company in their previous applications.
62.1	N/A (FE)	SCREW5	Generic EUID for Screw Conveyors	FE	Added generic emission unit for general screw conveyors.
63.1	CF # 10 and #11	SCREW4	Mills #3 and #4 Screw Conveyor	FE, BE, (Bldg #11), CF #11 (Torit DFT 4-48), and CF #10 (Mikropul CFH 40T-20-B)	Changed control device description. PD12-007 authorizes changing CF# 11 from Mikropul to Torit.
66.1	CF #11	#3 Mill Feed Bin	#3 Mill Feed Bin	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	„
67.1	CF #11	#4 Mill Feed Bin	#4 Mill Feed Bin	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	„
70.1	CF #11	FEEDB3	#3 Pebble Mill Feeder Belt	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	„
71.1	CF #11	FEEDB4	#4 Pebble Mill Feeder Belt	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	„
72.1	CF #10	MILL2	#1 Pebble Mill	FE, BE, CF #10 (Mikropul CFH 40T-20-B)	Changed control device description to include CF#10. Nothing was physically changed, this was an administrative error by company in their previous applications.

Process Flow Diagram ID	Control Device Name	Emission Unit Name	Emission Unit Description	Control Device Description	Comment
73.1	CF #10	MILL3	#2 Pebble Mill	FE, BE, CF #10 (Mikropul CFH 40T-20-B)	„
74.1	CF #11	MILL4	#3 Pebble Mill	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	Changed control device description to include CF#11. Nothing was physically changed, this was an administrative error by company in their previous applications.
75.1	CF #11	MILL5	#4 Pebble Mill	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	Changed control device description to include CF#11.
78.1	CF #11	SCREW7	#3 Mill Discharge Screw Conveyor	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	Changed control device description. PD12-007 authorizes changing CF#11 from Mikropul to Torit.
79.1	CF #11	AIRSD8	Airslide for #4 Mill discharge	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	„
82.1	CF #11	ELEV8	#3 Mill Elevator	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	„
83.1	CF #11	ELEV9	#4 Mill Elevator	FE, BE (Bldg #11), CF #11 (Torit DFT 4-48)	„
102.1	CF #12	MILL7	#6 Pebble Mill	FE, BE (Bldg #11), CF #12 (Mikropul CFH 40T-20-B)	Changed control device ID and description. Nothing was physically changed, this was an administrative error by company in their previous applications.
107.1	CF #42	Microsizer #3	MS-20 Microsizer #3	CF #42 (Torit M/N DFT 2-4-155 (2C))	Changed control device ID and description. PD10-027
108	CF #41	BF1	Microsizer #3 Belt Feeder	CF #41 (Torit M/N DFT 2-4-155 (2C))	Added control device name CF #41
109.1	CF #41	ELEV22	Ground Fines Bucket Elevator #1	CF #41 (Torit M/N DFT 2-4-155 (2C))	Changed emission unit ID and added control device name CF #41.
110.1	CF #41	ELEV24	CGS Elevator #2	CF #41 (Torit M/N DFT 2-4-155 (2C))	„
112.1	CF #41	AIRSD1	Airslide 2 for Ground Fines	CF #41 (Torit M/N DFT 2-4-155 (2C))	Changed emission unit ID.
113	CF#41	AS3	Airslide 3 for Ground Fines	CF #41 (Torit M/N DFT 2-4-155 (2C))	According to company this equipment is no longer in service. Deleted this equipment from emission units table in section 1.1 of the permit.
114	CF#41	IS1	Impact Scale	CF #41 (Torit M/N DFT 2-4-155 (2C))	„
115	CF#41	Airslide 100	Airslide for CGS	CF#41 (Torit M/N 2DFT 2-4-155)	Changed control device description to include CF#41.

Process Flow Diagram ID	Control Device Name	Emission Unit Name	Emission Unit Description	Control Device Description	Comment
116	CF#41	Airslide 200	Airslide (3s) for CGS	CF#41 (Torit M/N 2DFT 2-4-155)	According to company this equipment is no longer in service. Deleted this equipment from emission units table in section 1.1 of the permit.
117	CF#41	Surge Hopper (#3 Microsizer)	#3 Microsizer Surge Hopper (4s)	CF#41 (Torit M/N 2DFT 2-4-155)	„
118	N/A	Tech Air Pumping Station	#3 Microsizer Pneumatic Pumping Station (5s)	CF#41 (Torit M/N 2DFT 2-4-155)	„
119 & 120	CF#6	BE01 and BE02	Bucket Elevators	CF#6 (Torit M/N 2DFA-155)	Added CF#6 description
121	N/A (MD)	LS01 (FE3)	Dust Suppression Hopper (DSH) System Load out Spout	ID, MD	Changed control technique description. The DSH spout is not connected to dust collection. The flow diagram in the permit application shows this. USS believes the misunderstanding occurred during the permitting process. There is a mistake in R13-2145C which shows LS01 vented to CF#6.
133.1	CF #7	SCREN10-13 & SCREN22-23 & SCREN4	SCREN10-13: #71 through #74 Rotex Screens, SCREN22-23: #61 and #62 Rotex Screens and SCREN4: Tyler Hummer Screen	Chutes and piping are totally enclosed, equipment also enclosed in Bldg. #7, M/N DFT4-32-SH Cartridge Filter	Revised emission unit description. The company is requesting the changes to correctly identify the equipment that is actually in operation. E.g. SCREEN22-23 are existing units that should have been identified in the previous submittals.
142.1	CF #12	AIRSL12	Airslide and #1 MS-20 Microsizer	FE, BE (Bldg #13), CF #12 (Mikropul CFH 40T-20-B)	Revised emission unit description and control device ID from #11 to #12. Nothing was physically changed, this was an administrative error by company in their previous applications.
143.1	CF #11	AIRSL13	Airslide and #2 MS-20 Microsizer	FE, BE (Bldg #13), CF #11 (Torit DFT 4-48)	Revised emission unit description and control device ID from #12 to #11. Nothing was physically changed, this was an administrative error by company in their previous applications.
146.1	CF #11	PNEU4	#2 Macawber Pneumatic Pumping Station	FE, BE, CF #11 (Torit DFT 4-48)	Changed control device description. PD12-007 authorizes changing CF# 11 from Mikropul to Torit.
149 & 150	CF#11 and 12	#1 and #2 Microsizer Feed Bins			These bins are now eliminated

Process Flow Diagram ID	Control Device Name	Emission Unit Name	Emission Unit Description	Control Device Description	Comment
151.1	CF #11	ELEV16	5 Micron Feed Elevator (7S)	FE, BE, CF #11 (Torit DFT 4-48)	Changed control device description. PD12-007 authorizes changing CF# 11 from Mikropul to Torit.
153	BE	AIRSE 8-16, 18-19	Air Separators	BE	Corrected the Building # from Building #12 to Building #9
156.1	CF #38	BIN4	Bulk Storage Loading Bin and Loadout Spout (2S)	CF #38 (Mikropul M/N CFH 18-20-V-B (1C))	Revised emission unit description.
Process Flow Diagram ID	Control Device Name	Emission Unit Name	Emission Unit Description	Control Device Description	Comment
157.1	CF #38	MIN-U-SIL Bagger Bin	Bagger Bin (4S)	FE, BE, CF #38 (Mikropul M/N CFH 18-20-V-B (1C))	Revised emission unit name and description.
158.1	CF #38	PACKR7	MIN-U-SIL Bagger (5S)	FE, BE, CF #38 (Mikropul M/N CFH 18-20-V-B (1C))	Revised emission unit description.
159.1	CF #13	ELEV23	PEMCO Elevator/CGS Tanks and Bulk Loadout Spout (3S1)	FE, CF #13 (Torit DF-T3-24)	Changed emission unit ID and description.
161.1	CF #20	PACKR3	#1 Autobagger and Feed Bin	FE, BE (Bldg #14), CF #20 (Torit DF-T4-16)	Revised emission unit description.
163.1	CF #7	Tanks #7 & #15	Storage Tank #15 intervented to Tank #7 at the New Screen Tower	particle size, PE, CF #7 (M/N DFT4-32-SH)	Recharacterization of tanks #7 and #15. No physical changes have resulted from this revision.
163.2	CF #7	Tanks #8 & #16	Storage Tank #16 intervented to Tank #8 at the New Screen Tower.	particle size, PE, CF #7 (M/N DFT4-32-SH)	Recharacterization of tanks #8 and #16. Existing Tank #16 has been added to Attachment D. No physical changes have resulted from this revision.
164.1	CF #7	Tanks #13 & #17	Storage tank #17 intervented to #13 at the New Screen Tower	particle size, PE, CF #7 (M/N DFT4-32-SH)	Recharacterization of tanks #13 and #17. No physical changes have resulted from this revision.
166.1	CF #7	Tanks #14 & #18	Storage Tank #18 intervented to Tank #14 at the New Screen Tower	particle size, PE, CF #7 (M/N DFT4-32-SH)	Recharacterization of tanks #14 and #18. No physical changes have resulted from this revision. This equipment has existed and been vented to CF#7 since pre- 1973. PD05-008.
168.1	CF #13	CGSTank	CGS Tank	FE, CF #13 (Torit DF-T3-24)	Changed emission unit ID and description. This is simply a product name change to course ground special.

Process Flow Diagram ID	Control Device Name	Emission Unit Name	Emission Unit Description	Control Device Description	Comment
172.1	CF #28	MIN-U-SIL storage silos #6 and #7 (6e and E1)	#6 and #7 Silo	FE, CF #28 (Torit DF-2D-F4)	Separated out Silos #6 and #7 from the emission unit group. 172.1 & 172.2 - These were split into two separate sources to show the correct process flow in the process flow diagram (Figure 9). Specifically, only silo #8 receives product from ELEV14.
172.2	CF #28	MIN-U-SIL storage silo #8 (6e and E1)	#8 Silo	FE, CF #28 (Torit DF-2D-F4)	Separated out Silo #8 from the emission unit group.
173.1	CF #9	ISTANK18	Concrete Tank at the Float Plant	FE, CF #9 (Torit 4 DFT 32-155)	Revised emission unit ID.
177.1	CF #34	SPOUT3	DCL Loadout Spout (SPOUT3)	FE, CF #34 (Torit DF-2D-F4(1C))	Changed control device and description. Spout3 is collected from #34 not #27 and is addressed in a permit determination – PD 98-250 (page 2 notes).
180.1	CF #13	SPOUT6	CGS/DCL Loadout System (SPOUT6)	PE, MD, CF #13 (Torit DF-T3-24)	Changed emission unit description.
181.1	N/A (MD)	QROK SPOUTS (1)	Q ROK Bulk Loading Spouts (1)	MD, ID, Inherent design lowers fugitive emissions	Revised emission unit name and control device description. Company made a mistake before claiming these spouts vented to CF#6.
181.2	N/A (MD)	QROK SPOUTS (2)	Q ROK Bulk Loading Spouts (2)	MD, ID, Inherent design lowers fugitive emissions	Added existing emission unit.
203.1	N/A (BE)	#1 Stone Tank	#1 Stone Tank (Inside Building)	BE	Added existing emission unit.
204.1	N/A (BE)	#2 Stone Tank	#2 Stone Tank (Inside Building)	BE	Added existing emission unit.

Process Flow Diagram ID	Control Device Name	Emission Unit Name	Emission Unit Description	Control Device Description	Comment
205.1	N/A (FE)	AIRSD1-GENERIC	Generic EUID for Air Slides	FE	Added generic emission unit for air slides. The generic airslides identified under emission unit ID AIRSD1 are a group of slides with similar design features and have interchangeable parts. The other airslides that are specifically identified in the equipment list are unique in design; USS believes this is why they have their own emission unit identifiers.
206.1	CF #12	ELEV15	#9 Bucket Elevator	FE, BE (Bldg #11), CF #12 (Mikropul CFH 40T-20-B)	Added existing emission unit. Nothing was physically changed, this was an administrative error by company in their previous applications.
207.1	CF #12	BIN2	Surge Bin	FE, BE (Bldg #11), CF #12 (Mikropul CFH 40T-20-B)	Added existing emission unit to Attachment D. Nothing was physically changed, this was an administrative error by company in their previous applications.
208.1	CF #42	PNEU1 (Tech Air Pumping System (station))	#3 Macawber Pneumatic Pumping Station (#3 Microsizer)	CF #42 (DFT3-6), BE (Bldg #11)	Added existing emission unit. PNEU1 is not new – see R13-2595. The #3 microsizer was originally permitted under R13-2595, then was approved for a location change and an addition of a dust collector in PD 10-027. This was mentioned in the permit determination request.
21, 45, 46, 54-56, 61, 64, 65, 68, 69, 76, 77, 80, 81, 91-95, 97, 100, 101, 103, 104, 111, 144, 145, 147, 148, 152-155.					Added Building number to Control Device Description.

Note: Emission Unit ID's AS3, IS1, Airslide 200, Surge Hopper and Tech Air Pumping station (PFD ID's 113, 114, 116, 117 & 118) under "Milling Process" in the existing permit are eliminated.

Emission Unit ID's #1 & #2 Microsizer Feed Bins under "Classification (10/15/30/40 Micron)" in the existing permit are eliminated.

Boilerplate changes: The following changes have been made due to boilerplate changes:

- a. Section 2.1.4 has been changed to reflect boilerplate change.
- b. Section 3.5.3 is changed to include new mailing address for EPA.

Section 3.0 changes:

- a. Section 3.2.1 – If any visible emission is observed, visible emission observation according to 45CSR7A shall be conducted as soon as practicable, but no later than 24 hrs (instead of 1 month in the existing permit).
- b. Section 3.2.2 of the existing permit is deleted because this contradicts with section 3.2.1.
- c. Section 3.2.3 of the existing permit is now section 3.2.2.
- d. New sections 3.2.3 and 3.2.4 are added to add CAM general requirements 40 C.F.R. §§64.7 and 64.8 applicable to sections 4, 5 & 6 of the permit.

Sections 4.1.15, 5.1.11, 6.1.2 & 6.1.3 – The following has been added: “The monitoring device is to be certified to be accurate within  $\pm 0.1$  inch water gauge”.

Section 5.1.1 of the existing permit is now changed to sections 5.1.1.1 and 5.1.1.2 to better reflect the 40 C.F.R. 60 Subpart OOO requirements for affected facilities before April 22, 2008 and affected facilities on or after April 22, 2008. Building # 11 (Classification) is added because it is subject to NSPS.

Section 5.1.7.1 (d) – DSH Loadout spout I.D. LS01 is added.

Sections 5.1.10.1, 5.1.10.2, 5.1.10.3, 5.2.3 and 5.2.4 – Microsizer # 3 and Tech Air Pumping Station (now called PNEU1) vent to CF#42 and emissions are emitted from Stack # 42 – these changes were approved by PD 10-027. Airslide 200 and Surge Hopper permitted in R13-2595C are deleted because according to the permittee they were eliminated.

Sections 5.1.10.4, 5.1.10.5, 5.2.2 and 5.2.4 – Baghouses 1C & 3C are replaced by CF#42.

Section 5.1.11 – According to the manufacturer’s data (submitted by the permittee), indicator range for pressure drop (in H<sub>2</sub>O) is changed to 0.5–6.0. Control device #6 is added because it is subject to NSPS. New control device CF#42 is also added.

Sections 5.4.12, 5.4.13, 5.4.14, 5.5.2 – Stacks # 6 & 42 are added because they are subject to CAM.

Section 5.5.1 – the requirement is deleted because the regulation has changed and 40 C.F.R. §60.676 is incorporated in sections 5.1.1.1 and 5.1.1.2.

Section 6.1.1 – Stack # 6 is taken out and moved to section 5.0 because it is a NSPS source. Description of emission units in the table are changed according to section 1.0 table.

Section 6.1.2 - According to the manufacturer’s data (submitted by the permittee), indicator range for pressure drop (in H<sub>2</sub>O) is changed to 0.5–6.0. Stack # 6 is taken out and moved to section 5.0 because it is a NSPS source.

Section 7.0 – The requirements of 7.1.1 and 7.1.2 are deleted because they are duplication of section 3.2.1. Section 7.0 does not have any other requirements, hence section 7.0 is reserved.

According to section 4.3.3 requirement in the existing permit, the Fluid bed Dryer and Rotary dryer were tested for PM on December 18-19, 2012. Following are the test results from the Fluid bed Dryer and Rotary dryer compared to the permit limit:

Rotary Dryer:

	Test results in lbs/hr	Permit limit in lbs/hr
PM	4.1	9.0

Fluid Bed Dryer:

	Test results in lbs/hr	Permit limit in lbs/hr
PM	7.3	12.8

40CFR64 (CAM) – CAM plans for control devices Wsc#2, Wsc#8, Wsc#3, CF#1, CF#6, CF#7, CF#9, CF#10, CF#11, CF#12, CF#13, CF#20, CF#25, CF#27, CF#28, CF#29, CF#33, CF#34, CF#36, CF#37, CF#38, CF#39, CF#40 and CF#41 were included in the previous renewal.

Control device CF#42 was installed in 2010 according to PD10-027. CF#42 is subject to CAM for PM emissions because the Pollutant Specific Emission Units (PSEU's) (which has the control device) are a major source of PM emissions (greater than 100 tons per year of PM emissions) before control. After the control device these PSEU's are not major sources of PM emissions. According to 40 C.F.R. § 64.3(b)(4)(iii), PSEU's of this type may have a data collection frequency of once per 24-hour period. Following is the CAM plan for the control device CF#42:

<b>Table 1A – NSPS Sources – Fabric Filters - CAM PLAN</b>			
<b>Cartridge Filter # 42</b>			
	<b>4c) Indicator No. 1:</b> visible emissions	<b>4d) Indicator No. 2:</b> pressure drop	<b>4e) Indicator No. 3:</b> maintenance program
<b>5a) GENERAL CRITERIA</b> Monitoring Approach	Weekly visible emissions observations using Method 22 and Method 7A. Monitoring methods in accordance with Title V permit Section 3.2.1.	Pressure drop across the fabric filter is measured with a differential pressure gauge in accordance with Title V permit Section 5.1.11.	Monthly inspections are conducted in accordance with Title V permit Section 5.4.13.
<u>Indicator Range</u>	Presence of no visible emissions using Method 22.	0.5 to 6.0 (in H <sub>2</sub> O)	NA
<b>5b) PERFORMANCE CRITERIA</b> <u>Specifications for obtaining representative data</u>	Observations are made at the control device stack exhaust.	Pressure taps are located at the inlet and outlet of the control device.	Inspections conducted of control device and associated equipment in accordance with Title V permit Section 5.4.13.
<u>Quality assurance and quality control (QA/QC) practices</u>	The observer will be familiar with the cartridge filter operations and visible emissions methodology (Methods 9 and/or 22).	Monthly visual inspections and routine maintenance in accordance with Title V permit Section 5.4.13.	Qualified personnel perform maintenance and inspections in accordance with Title V permit Section 5.4.13.
<u>Monitoring frequency</u>	Weekly observations during operation of the emission unit in accordance with Title V permit Section 3.2.1.	Continuous operation of the pressure gauge during operation of the emission unit according to Title V permit Section 5.1.11.	Monthly inspections are conducted in accordance with Title V permit Section 5.4.13.
<u>Data collection procedures</u>	Documentation of required weekly visible emission observations in accordance with Title V permit Section 3.4.4.	The pressure drop is monitored at a minimum of once per day during operation in accordance with Title V permit Section 5.4.12.	Records are maintained to document monthly maintenance inspections in accordance with Title V permit Section 5.4.13.

Section 8.0 – A new section is added for 40 C.F.R. 63 Subpart ZZZZ requirements for one emergency engine at the facility.

One emergency generator [Generator] is an existing SI stationary emergency engine < 500 HP located at an area source of HAPs, constructed before June 12, 2006. Following are the 40 C.F.R. 63 Subpart ZZZZ requirements for this engine:

Compliance date is October 19, 2013.

Operating Limitations: 40 C.F.R. §63.6603(a), Table 2d.

Fuel Requirements: No Requirements.

Performance Tests: No Requirements.

Monitoring, Installation, Collection, Operation and Maintenance Requirements: 40 C.F.R. §§63.6625(e), (f), (h) and (j).

Initial Compliance: No requirements.

Continuous Compliance: 40 C.F.R. §§63.6605, 63.6640.

Notification Requirements: No requirements.

Recordkeeping Requirements: 40 C.F.R. §63.6655, except §63.6655 (c).

Reporting Requirements: Footnote 2 of table 2d.

General Provisions (40 CFR part 63) - Table 8: Yes, except per 40 C.F.R. §63.6645(a)(5), the following do not apply: §§ 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

### **Non-Applicability Determinations**

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

N/A

### **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: February 5, 2014  
Ending Date: March 7, 2014

### **Point of Contact**

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

U.K.Bachhawat  
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. 1256 • Fax: 304/926-0478  
Udyot.k.bachhawat@wv.gov

### **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)**

Not applicable.