

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 October 27, 2009.

Permit Number: **R30-07300003-2009 (Part 3 of 4)**
Application Received: **May 1, 2013**
Plant Identification Number: **03-54-073-00003**
Permittee: **CYTEC Industries Inc.**
Facility Name: **Willow Island Plant – Site Services**
Mailing Address: **#1 Heilman Avenue, Willow Island, WV 26134**

Permit Action Number: *SM01* Revised: *September 10, 2013*

Physical Location: Willow Island, Pleasants County, West Virginia
UTM Coordinates: 473.42 km Easting • 4,356.22 km Northing • Zone 17
Directions: Facility is located on State Route 2, two miles south of Belmont, WV.

Facility Description

Site Services (Part 3 of 4) supports the manufacturing processes at the CYTEC facility. Site Services is comprised of steam-generating boilers, the on-site Wastewater Treatment Plant (WWTP), the Equalization/Neutralization (E/N) wastewater unit operation, the analytical operations conducted in on-site laboratories, miscellaneous non-process equipment and storage tanks, emergency diesel engines, plantwide maintenance activities, fuels storage (gasoline and diesel), and equipment that uses chlorofluorocarbons (CFC)/ozone-depleting substances (ODS).

This significant modification was requested for the following changes in the permit:

1. Revisions to Section 1.1. – Minor changes to emission units (i.e., two replacement emergency fire pump engines).
2. Revisions to Section 6.0 – Add the revised Boiler MACT (40 C.F.R. 63 Subpart DDDDD) requirements that are applicable to the two steam generating boilers 830X and 831X.
3. Revisions to Section 7.0 – Add the RICE MACT (40 C.F.R. 63 Subpart ZZZZ) requirements that are applicable to the existing emergency generator engine, and specify that the two replacement emergency fire pump engines E02E and E03E are subject to 40 C.F.R. 60 Subpart IIII.

Emissions Summary

According to Section 4 of the application general forms, this modification will result in the following facility-wide PTE decreases.

Pollutant	Decrease (tpy)
NO _x	0.12
CO	0.02
SO ₂	0.01
PM ₁₀	0.04
TOC/VOC	0.01

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants (VOCs), over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, CYTEC Industries Inc. 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:	45CSR16	Standard of Performance for New Stationary Sources
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for HAPs
	40 C.F.R. 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

40 C.F.R. 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
40 C.F.R. 63, Subpart ZZZZ	National Emission Standards For Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)

State Only: None

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>)
R13-0936B	June 11, 2009	
R13-2560E	September 18, 2006	

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

- Permit Section 1.1.** The installation date and horsepower rating for the engines E02E and E03E are revised to reflect the replacement of the 220-hp engines with the 183-hp engines which was accomplished during the revised installation dates.
- 40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.** The compliance schedule language in current permit condition 6.1.8 has been replaced with the applicable compliance date requirement for the boilers 830X and 831X. Both units were installed in 2004, do not utilize any type of air pollution control device, and each are capable of combusting natural gas (97.9 MMBtu/hr) and distillate oil (93.6 MMBtu/hr). According to technical correspondence¹, both units are equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio. When the units combust natural gas, they are in the *Unit designed to burn gas 1 subcategory* of §63.7499(l) and defined in §63.7575. Whenever the units combust distillate oil in a manner that is not in accordance with the definition for *Unit designed to burn gas 1 subcategory* of §63.7499(l) and defined in §63.7575, the units will be considered to be in the *Unit designed to burn light liquid subcategory* of §63.7499(u) and defined in §63.7575. Based on their construction dates, the units are considered existing in accordance with §63.7490(d). The units do not meet any of the exemption criteria of §§63.7491(a) through (m). Table DDDDD below lists the sections of Subpart DDDDD and their applicability (and non-applicability where necessary) to the units, and discusses how applicable requirements are incorporated into the revised operating permit.

¹ Email dated 6/14/2013 from Mr. John Pitner, Sr. Environmental Engineer for the permittee.

Table DDDDD

Subpart DDDDD Section	Title V	Discussion
§63.7495(b)	6.1.8.	The placeholder language of current condition is replaced by the applicable compliance date requirement. Since the date is future at the time of this modification, all additional applicable requirements in the permit will include a statement following the citation of authority indicating that the requirement is subject to the compliance date.
§63.7500(a)	6.1.9., 6.1.10., 6.1.11.	<p><u>Firing Natural Gas</u> §63.7500(a)(1) requires the permittee to meet each limit and standard in Tables 1 through 3, and 11 through 13 of Subpart DDDDD. However, while burning gas 1, the units are not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4 in accordance with the last sentence in §63.7500(e) (discussed below). Therefore, only Table 3 work practice standards must be examined for burning gas 1. Item #1 of Table 3 is applicable to the units, which requires a 5-year tune-up (condition 6.1.9). Additionally, the one-time energy assessment prescribed in item #4 of Table 3 is applicable since the units are existing; are located at a major source of HAP; and are not limited use units (condition 6.1.10.).</p> <p><u>Firing Distillate Oil</u> According to technical correspondence, distillate oil has not been combusted in the units except for annual testing periods (less than 8 hours per calendar year) when the original MACT standard was applicable. Distillate oil has not been combusted since the permittee ceased stack testing following the original MACT vacature. Further, the permittee stated that any combustion of distillate oil was done for periodic testing, and none has been combusted during any periods of gas curtailment or gas supply interruption.</p> <p>Considering that natural gas is normally and predominantly combusted, and distillate oil has in recent years not been combusted except for periodic testing, it is not necessary for this permitting action to include in the permit requirements of Subpart DDDDD that are specific to <i>Unit designed to burn light liquid subcategory</i>. However, in consideration that the permittee may combust distillate oil in accordance with underlying permit terms (e.g., condition 6.1.2.), the reporting requirements in §§63.7545(f) and 63.7545(h) (conditions 6.5.6. and 6.5.7.) will ensure that the permittee notifies the Director of such change</p> <p><u>Status at Issuance of Significant Modification SM01:</u> Each of the boilers 830X and 831X are defined as a <i>Unit designed to burn gas 1 subcategory</i> which includes any boiler or process heater that burns only natural gas, refinery gas, and/or other gas 1 fuels. Gaseous fuel boilers and process heaters that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Gaseous fuel boilers and process heaters that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition. If and when either boiler combusts distillate oil in such a way that the boiler does not meet the definition of a <i>Unit designed to burn gas 1 subcategory</i> in 40 C.F.R. §63.7575, the boiler will be defined as a <i>Unit designed to burn light liquid subcategory</i> while combusting distillate oil that calendar year. In</p>

Subpart DDDDD Section	Title V	Discussion
		<p>such case the permittee must comply with all applicable requirements for a <i>Unit designed to burn light liquid subcategory</i> while the affected boiler is combusting distillate oil. Within 60 days of becoming subject to the requirements for a <i>Unit designed to burn light liquid subcategory</i> the permittee should submit to the Director a complete application for a significant modification of the Title V permit to incorporate all applicable requirements of 40 C.F.R. 63 Subpart DDDDD for a <i>Unit designed to burn light liquid subcategory</i>.</p> <p><u>General Duty Requirement</u> The requirement in §63.7500(a)(3) is applicable and is therefore included in the revised permit as condition 6.1.11.</p>
§63.7500(b)	None	The application does not mention any request (or intent to request) alternative work practice standards; therefore, this requirement is not applicable.
§63.7500(c)	None	This requirement is not applicable to the units since they are not limited use boilers.
§63.7500(d)	None	<p>This requirement is not applicable to the units since they have a design heat input (DHI) greater than 5 MMBtu/hr.</p> <p>Note: This writer interprets the requirement to apply to gas 2 (other) fuel subcategory units less than or equal to 5 MMBtu/hr, and light liquid fuel subcategory units less than or equal to 5 MMBtu/hr. The requirement is not for gas 2 (other) units less than or equal to 5 MMBtu/hr, and light liquid units of any DHI. In other words, this requirement applies to both subcategories less than or equal to 5 MMBtu/hr DHI. This interpretation is substantiated by two facts: (1) there are emission limitations (as opposed to only work practice standards) for existing light liquid fuel subcategory units in Table 2 (Item #16) to Subpart DDDDD; and (2) Item #1 of Table 3 to Subpart DDDDD states “If your unit is...A new or existing boiler...or a heat input capacity of less than or equal to 5 million Btu per hour in any of the following subcategories...” Consequently, the regulation had to be examined to determine if there are different requirements for burning light liquid fuel, which has been discussed above regarding §63.7500(a)</p>
§63.7500(e)	None	The units do not qualify for the ranges of design heat input (DHI) in this requirement. However, this requirement does provide that while burning gas 1, the units are not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4.
§63.7500(f)	None	This section requires compliance with the standards at all times the affected unit is operating, except during periods of startup and shutdown during which time the permittee must comply only with Table 3 to Subpart DDDDD. However, the startup and shutdown requirements of Table 3 (items #5 and #6) are not applicable since they pertain to standards in Tables 1 or 2 or 11 through 13 of Subpart DDDDD. Moreover, the requirement to conduct a tune-up and energy assessment is not affected whether the units are normally operating, or are in startup or shutdown. Thus, this section of the regulation does not apply.
§63.7505(a)	6.1.9., 6.1.10.	This section requires compliance with the emission limits, work practice standards, and operating limits in Subpart DDDDD. The section is cited with the conditions for work practice standards.

Subpart DDDDD Section	Title V	Discussion
§63.7530(a)	None	This section regarding initial performance tests and fuel analyses is not applicable since the boilers are not subject to emission limits.
§63.7530(b)	None	This section regarding performance testing and fuel analyses is not applicable since the boilers are not subject to emission limits, and thereby are not subject to Subpart DDDDD testing and fuel analyses.
§63.7530(c)	None	This section regarding fuel analyses is not applicable since the boilers are not subject to emission limits.
§63.7530(d)	6.5.2.	Since the units are in the <i>Unit designed to burn gas 1 subcategory</i> , this requirement to submit a signed statement in the NOCS report that the permittee conducted the tune-up is applicable. Non-applicable language regarding units less than 10 MMBtu/hr heat input capacity is not included in the permit condition.
§63.7530(e)	6.5.3.	This applicable requirement is included in the permit with a reference to the permit condition for the one-time energy assessment.
§63.7530(f)	6.5.4.	This requirement states the NOCS must contain the results of the initial compliance demonstration according to §63.7545(e). Since the boilers are not subject to initial compliance demonstration using either performance testing or fuel analyses according to §63.7530, only the last sentence in §63.7545(e) is applicable to the boilers, which is: “If you are not required to conduct an initial compliance demonstration as specified in §63.7530(a), the Notification of Compliance Status must only contain the information specified in paragraphs (e)(1) and (8).” However, only items (1), (6), (7), and (8) are applicable since the units are not subject to emission limits; are not subject to performance testing or fuel analyses; and do not utilize CEMS. Note that §63.7545(e)(8)(iii) is not applicable since the boilers burn only natural gas and do not combust secondary materials that are solid waste.
§63.7533	None	The boilers are not complying using the alternative equivalent output-based emission limits.
§63.7535	None	The boilers are not subject to a Subpart DDDDD requirement to monitor and collect data pursuant to this section.
§63.7540(a)(10)	None	The annual frequency for tune-ups in this section does not apply since the boilers are equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio.
§63.7540(a)(11)	None	This section does not apply since the boilers are greater than 10 MMBtu/hr heat input.
§63.7540(a)(12)	6.1.9.	This section is applicable, and refers to requirements specified in §§63.7540(a)(10)(i) through (vi). These requirements are the details of the 5-year tune-up required by §63.7500(a)(1), Table 3, Item #1 (condition 6.1.9.). Therefore, these specific tune-up requirements are added to condition 6.1.9.
§63.7540(a)(13)	6.1.9.	This requirement allows a 30-day delay for the tune-up if the unit is not operating the day the tune-up is scheduled. Since this pertains to the tune-up it is written with condition 6.1.9.
§63.7540(b)	6.5.5.	The purpose of this requirement is to report deviations to applicable requirements. While the requirement reads that it pertains to emission limits and operating limits (to which the units are not subject), it also pertains to those requirements in Tables 1 through 4 or 11 through 13. The units are subject to work practice standards in Table 3 (conditions 6.1.9. and 6.1.10.). Therefore, the condition has been written to refer to work practice standards in Table 3.
§63.7540(c)	None	This section is not applicable since the boilers are not subject to Subpart DDDDD mercury limitations or standards.

Subpart DDDDD Section	Title V	Discussion
§63.7540(d)	None	This section is not applicable since item #5 in Table 3 applies to units subject to emission limits in Table 1 or 2 or 11 through 13 to Subpart DDDDD, to which the boilers are not subject.
§63.7545(a)	6.5.4.	§§63.7(b) and (c) are not applicable since the boilers are not subject to Subpart DDDDD performance testing. §63.8(e) is not applicable since no CMS is utilized. §§63.8(f)(4) and (6) are not applicable since neither an alternative monitoring method, nor an alternative to the relative accuracy test is utilized. Among §§63.9(b) through (h), only the NOCS requirement of §63.9(h) is applicable. Therefore, this section is cited in condition 6.5.4.
§63.7545(b)	None	This permitting action is past the 120-day period after January 31, 2013; therefore, no permit condition is required.
§63.7545(c)	None	This section is not applicable since the boilers were constructed prior to January 31, 2013.
§63.7545(d)	None	This section is not applicable since the boilers are not subject to a Subpart DDDDD performance testing requirement.
§63.7545(e)	6.5.4.	This requirement has been discussed under §63.7530(f).
§63.7545(f)	6.5.6.	This requirement is applicable since the permittee may combust distillate oil (i.e., <i>Unit designed to burn light liquid subcategory</i>).
§63.7545(g)	None	This section is not applicable since the boilers will not combust solid waste.
§63.7545(h)	6.5.7.	This requirement is applicable since the permittee may combust distillate oil (i.e., <i>Unit designed to burn light liquid subcategory</i>).
§63.7550(a)	6.5.8.	This section points to Table 9 of Subpart DDDDD, which requires a compliance report. The requirements in Table 9 are based on items that can vary as to applicability. Therefore, the condition is written based on applicable requirements in Table 9. Non-applicable language (e.g., emission limits, operating limits, and CMS-related) is excluded from the condition. Furthermore, since the boilers are subject to the 5-year frequency for tune-ups, the compliance report frequency will be submitted at the same frequency.
§63.7550(b)	6.5.8.	The requirements of this section are referenced by §63.7550(a), Table 9. Since the units are on a 5-year tune-up frequency, the applicable language of §63.7550(b)(1) through (4) are included in condition 6.5.8.
§63.7550(c)	6.5.8.a.	The requirements of this section are referenced by §63.7550(a), Table 9. Only certain sections of the requirements in §63.7550(c)(1) through (5) are applicable. Requirement §63.7550(c)(2) is not applicable since fuel analyses is not utilized. Requirement §63.7550(c)(3) is not applicable since there are no applicable emission limits and performance testing is not utilized. Requirement §63.7550(c)(4) is not applicable since there are no applicable emission limits and a CMS is not utilized. Only §63.7550(c)(1) is applicable, which references §63.7550(c)(5).
§63.7550(d)	None	This section is not applicable since the boilers are not subject to Subpart DDDDD emission limits.
§63.7550(e)	None	This section is not applicable since the boilers are not subject to Subpart DDDDD emission limit, operating limit, or CMS requirement.
§63.7550(f)	None	This section is reserved.
§63.7550(g)	None	This section is reserved.
§63.7550(h)(1)	None	This requirement is not applicable since no Subpart DDDDD performance test is required.
§63.7550(h)(2)	None	This requirement is not applicable since no CEMS is utilized or required by Subpart DDDDD.

Subpart DDDDD Section	Title V	Discussion
§63.7550(h)(3)	6.5.8.	Since this requirement pertains to the report required by Table 9 of Subpart DDDDD, then it is also written with the compliance report condition 6.5.8.
§63.7555(a)	6.4.4.	This applicable requirement is set forth as a permit condition.
§63.7555(b)	None	This section is not applicable since CEMS, COMS, and CMS are not utilized.
§63.7555(c)	None	None of the requirements in this section, or Table 8 that it references, are applicable since the boilers are not subject to emission limitations and are not equipped with air pollution control devices.
§63.7555(d)	None	This section is not applicable since the boilers are not subject to emission limitations and operating limitations in Tables 1, 2, or 11 through 13 of Subpart DDDDD.
§63.7555(e)	None	This section is not applicable since the boilers are not subject to emission limitations, and thus emissions averaging is not applicable.
§63.7555(f)	None	This section is not applicable since efficiency credits are not being utilized.
§63.7555(g)	None	This section is not applicable since the units are not required to meet the specification for mercury.
§63.7555(h)	6.4.5.	This requirement is applicable since the permittee may combust distillate oil (i.e., <i>Unit designed to burn light liquid subcategory</i>).
§63.7555(i)	6.4.6.	This applicable requirement is set forth as a permit condition.
§63.7555(j)	6.4.7.	This applicable requirement is set forth as a permit condition.
§63.7560	6.4.8.	These applicable requirements are set forth as a permit condition.

Other requirements in Subpart DDDDD are not applicable to the units for one or more of the following reasons:

- The units are not new or reconstructed, as these terms are specified in §§63.7490(b) and (c).
- The units are not subject to pollutant emission limits pursuant to 40 C.F.R. 63 Subpart DDDDD.
- The units are not EGUs.
- The units are not equipped with an air pollution control device.
- The fuel subcategory for the requirement does not apply to the units.
- The heat input range for the requirement does not apply to the units.
- The units are not limited-use, as this term is defined in §63.7575.
- The units do not combust another gas 1 fuel.
- The units are not equipped with a CEMS.

3. **40 C.F.R. 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.** This regulation establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. The facility is a major source of HAP that utilizes RICE. For this permitting action, emission units E02E, E03E, and E04E are evaluated to determine Subpart ZZZZ applicability to them, and applicable requirements will be written in the modified operating permit. Finally, although not mentioned in the significant modification application, the requirements of engine 65BL will be reviewed as well to determine applicability of requirements in the permit. Such review of 65BL is also in keeping with the applicability of current condition 7.1.1.2. to 65BL.

Emergency Compression Ignition Stationary Fire Pump Engines E02E and E03E

For permitting purposes, the replacement engines E02E and E03E are identical, with the exception of their installation dates (E02E in 2012, and E03E in 2013). Engines E02E and E03E are each rated at 183-bhp. The replaced engines were installed in 1989 and each were rated at 220-hp. Thus, the installation date of the replacement engines is critical to determining the applicable requirements of the regulation.

The current operating permit specifies that condition 7.1.1.2. (i.e., May 3, 2013 compliance date) is applicable to the replaced engines. Specifically for the replaced engines, §63.6595(a)(1) was applicable since they were considered existing stationary CI RICE rated less than 500-bhp at a major source of HAP emissions (cf. §63.6590(a)(1)(ii)).

Based on their construction dates and horsepower rating, the replacement engines are considered *New stationary RICE* in accordance with §63.6590(a)(2)(ii). The replacement engines do not meet any of the criteria in §63.6590(b) for stationary RICE subject to limited requirements.

While only one criterion must be met, the replacement engines meet the criteria of both §§63.6590(c)(6) and (7); therefore, the replacement engines E02E and E03E must meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60 Subpart III. This requirement was covered by current permit condition 7.1.1.1. Therefore, the emission unit IDs of the replacement engines are added to this condition. Since the engines E02E and E03E were existing, but have been replaced, and are now considered new for the regulation, their emission unit IDs have been deleted from the parenthetical list following condition 7.1.1.2.

Table III below lists the sections of NSPS Subpart III and their applicability (and non-applicability) to the engines E02E and E03E, and discusses how applicable requirements are incorporated into the revised operating permit.

Table III

Subpart III Section	Title V	Discussion
§60.4201	None	This section is non-applicable since engines are emergency type.
§60.4202	None	This section is non-applicable to the engines since it applies to engine manufacturers.
§60.4203	None	This section is non-applicable to the engines since it applies to engine manufacturers.
§60.4204	None	This section is non-applicable since engines are emergency type.
§60.4205(a)	None	This section is non-applicable since engines are not pre-2007 year CI RICE.
§60.4205(b)	None	This section is non-applicable since the CI RICE are fire pump engines.
§60.4205(c)	7.1.2.1.	This section is applicable since the CI RICE are fire pump engines with a displacement less than 30 liters per cylinder. Thus, applicable standards of Table 4 to Subpart III for a 183-bhp fire pump engine of model year 2009 and later are 3.0 g/HP-hr for NMHC + NO _x and 0.15 g/HP-hr for PM. These limitations are already set forth in the current permit; however, the current condition is specifically written for E04E. Therefore, the condition has been modified to specify applicability also to E02E and E03E under 7.1.2.
§60.4205(d)	None	This section is non-applicable since the CI RICE have a displacement less than 30 liters per cylinder.
§60.4205(e)	None	This section is non-applicable since the permittee is not conducting performance tests in-use.
§60.4205(f)	None	This section is non-applicable since the CI RICE are not modified or reconstructed.
§60.4206	7.1.2.6.	This section is applicable and has been written in the revised permit. Since §60.4204 is non-applicable it has been excluded from the condition language.

Subpart III Section	Title V	Discussion
§60.4207(a)	None	This section is non-applicable since §60.4207(b) supersedes it due to the applicability date and the displacement being less than 30 liters per cylinder.
§60.4207(b)	7.1.2.2.	This section is applicable and is contained in the current permit. However, the numeric standards of 40 C.F.R. §80.510(b) were not included in the permit. Said standards are now included in the revised operating permit. Note that non-applicable language “Beginning June 1, 2010” and “LM” are excluded for the permit.
§60.4207(c)	None	Section is reserved.
§60.4207(d)	None	This section is non-applicable since the CI RICE have a displacement less than 30 liters per cylinder.
§60.4207(e)	None	This section is non-applicable since the CI RICE do not have a national security exemption.
§60.4208	None	This section is non-applicable since the CI RICE are not imported or previous model year engines.
§60.4209(a)	7.2.1.	This section is applicable and is contained in the current permit. The language is revised in order to reflect the current regulation.
§60.4209(b)	None	This section is non-applicable since the CI RICE are not equipped with any add-on air pollution control device, specifically a diesel particulate filter.
§60.4210	None	This section is non-applicable to the engines since it applies to engine manufacturers.
§60.4211(a)	7.1.2.3.	This section is applicable and is contained in the current permit. However, it has been revised to reflect the current regulation.
§60.4211(b)	None	This section is non-applicable since the engines are not pre-2007 model year stationary CI ICE.
§60.4211(c)	7.1.2.4.	This section is applicable and is contained in the current permit.
§60.4211(d)	None	This section regarding performance testing and parametric monitoring is non-applicable since compliance with the applicable emissions standards in §60.4205(c) is achieved by purchasing an engine certified to meet the standards.
§60.4211(e)	None	This section is non-applicable since the engines are not modified or reconstructed CI ICE.
§60.4211(f)	7.1.2.5.	This section is applicable and updated regulation language is written in the modified permit to supersede former language.
§60.4211(g)	7.1.2.7.	While this is a conditional requirement, this section is potentially applicable and is therefore written in the modified permit. Due to the horsepower rating of the ICE, the specific requirement of §60.4211(g)(2) is applicable. Without substantive change, the language from the regulation has been modified in order to produce coherent language for this case.
§60.4212	None	This section is non-applicable to the engines since it pertains to performance testing, which is not required by the regulation for the engines.
§60.4213	None	This section is non-applicable to the engines since it pertains to performance testing, which is not required by the regulation for the engines.
§60.4214(a)	None	This section is non-applicable since the engines are not pre-2007 model year engines.
§60.4214(b)	7.4.1.	This section is applicable, but most recent language was not contained in the current permit. Additional regulation language is written in the modified permit. This new regulation language is essentially the recordkeeping in current permit condition 7.4.2. that was added using the authority of 45CSR§30-5.1.c. Since this state rule language is no

Subpart III Section	Title V	Discussion
		longer necessary, the current condition 7.4.2. has been deleted from the modified permit.
§60.4214(c)	None	This section is non-applicable since the CI RICE are not equipped with any add-on air pollution control device, specifically a diesel particulate filter.
§60.4214(d)	None	This section is non-applicable since the CI RICE are not operated for generating electricity and thereby are not subject to the requirements in §§60.4211(f)(2)(ii) or (iii).
§60.4215	None	This section is non-applicable to the engines since they are not used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands.
§60.4216	None	This section is non-applicable to the engines since they are not used in Alaska.
§60.4217	None	This section is non-applicable to the engines since the engines do not combust special fuels.

Emergency Compression Ignition Stationary Fire Pump Engine E04E

RICE E04E was installed in 2010 and is rated at 175-bhp. Based on the construction date and horsepower rating, the engine is considered *New stationary RICE* in accordance with §63.6590(a)(2)(ii). The RICE E04E does not meet any of the criteria in §63.6590(b) for stationary RICE subject to limited requirements. RICE E04E meets both criteria of §§63.6590(c)(6) and (7); therefore, E04E must meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60 Subpart III. Fire pump engine E04E is subject to the same requirements as fire pump engines E02E and E03E discussed in the preceding table.

Emergency Compression Ignition Stationary Generator Engine 65BL

RICE 65BL was installed in 1988 and is rated 355-bhp. Thus, 65BL is an *Existing stationary RICE* in accordance with §63.6590(a)(1)(ii). The engine does not meet any of the criteria in §63.6590(b) for stationary RICE subject to limited requirements. Further, being an existing stationary RICE, the engine does not meet any of the criteria in §§63.6590(c)(1) through (7) for stationary RICE subject to regulations under 40 C.F.R. part 60. Table ZZZZ below lists the sections of Subpart ZZZZ and their applicability (and non-applicability) to the engine 65BL, and discusses how applicable requirements are incorporated into the revised operating permit.

Table ZZZZ

Subpart ZZZZ Section	Condition	Discussion
§63.6595(a)(1)	7.1.1.2.	65BL is an “existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.” Therefore, the compliance date is May 3, 2013. The compliance date is now past; however, it will be retained in the permit indicating that 65BL must now be in compliance with the MACT.
§63.6600	None	This section is not applicable since 65BL is rated less than 500 brake HP.
§63.6601	None	This section is not applicable since 65BL is existing.
§63.6602	7.1.1.3.	This section is applicable since 65BL is existing, and is rated less than 500 brake HP, and is located at a major source. This section refers to applicable emissions limitations in Table 2c to Subpart ZZZZ. In Table 2c, the applicable requirements are for an emergency CI RICE, and are given in item #1 of the table. None of the other requirements in items 2 through 12 of Table 2c are applicable to 65BL.

Subpart ZZZZ Section	Condition	Discussion
		Since 65BL is not subject to non-startup emission limitations, this non-applicable language is not included in the last paragraph of the permit condition.
§63.6603	None	This section is not applicable since 65BL is located at a major source.
§63.6604	None	This section is not applicable since 65BL is an emergency unit.
§63.6605(a)	None	This section is not applicable since 65BL is not subject to emission limitations and operating limitations of Subpart ZZZZ.
§63.6605(b)	7.1.1.4.	This general duty requirement is included in the permit.
§63.6610	None	This section is not applicable since 65BL is rated less than 500 brake HP.
§63.6611	None	This section is not applicable since 65BL is existing.
§63.6612	None	<p>This section is applicable since 65BL is existing, and rated less than 500 brake HP at a major source. However, no specific requirements in §63.6612 apply to 65BL, as is demonstrated below.</p> <p>§63.6612(a) refers to applicable requirements in Table 4 to Subpart ZZZZ. Row 1 of Table 4 can apply to CI stationary RICE that are complying with the requirement to reduce CO emissions. However, 65BL is not subject to any requirement to reduce CO emissions; therefore, §63.6612(a) does not apply.</p> <p>§63.6612(b) applies in the case when testing has already been performed. This requirement is not applicable to 65BL.</p>
§63.6615	None	This section is not applicable since 65BL is not subject to emission limitations and operating limitations under Subpart ZZZZ.
§§63.6620(a) through (i)	None	This section is not applicable since 65BL is not subject to emission limitations and operating limitations under Subpart ZZZZ.
§63.6625(a)	None	This section is not applicable since there is no CEMS for 65BL.
§63.6625(b)	None	This section is not applicable since there is no CPMS for 65BL.
§63.6625(c)	None	This section is not applicable since 65BL does not fire landfill gas or digester gas.
§63.6625(d)	None	This section is not applicable since 65BL is an existing CI RICE.
§63.6625(e)	7.1.1.5.	65BL meets the criteria of §63.6625(e)(2), and is therefore required to comply with this section. The language of both §63.6625(e) and §63.6625(e)(2) have been combined for the permit condition.
§63.6625(f)	7.1.1.6.	65BL meets the criteria of §63.6625(f), and is therefore subject to the requirement. The non-applicable language “or an existing emergency stationary RICE located at an area source of HAP emissions” has not been included in the condition.
§63.6625(g)	None	This section is not applicable since 65BL is an emergency CI RICE.
§63.6625(h)	7.1.1.3.	This section is applicable to 65BL, and has already been included in the requirements of §63.6602, Table 2c, item # 1. Thus, this section is cited along with §63.6602 rather than writing a separate and redundant condition.

Subpart ZZZZ Section	Condition	Discussion
§63.6625(i)	7.1.1.7.	The oil analysis program is an option mentioned in footnote 2 to Table 2c of Subpart ZZZZ. The oil analysis program is set forth in a separate permit condition with non-applicable language not included.
§63.6625(j)	None	This section is not applicable since 65BL is not a SI RICE.
§§63.6630(a) through (c)	None	§63.6630(a) is not applicable since 65BL is not subject to emission and operating limitations from Subpart ZZZZ. §63.6630(b) is not applicable since 65BL is not subject to operating limitations from Subpart ZZZZ. The NOCS requirement of §63.6630(c) is not applicable since none of the requirements in §§63.6630(a) through (b) are applicable.
§§63.6635(a) through (c)	None	§63.6635(a) is not applicable since 65BL is not subject to emission and operating limitations from Subpart ZZZZ. §§63.6635(b) and (c) are not applicable since 65BL is not subject to any continuous monitoring in Subpart ZZZZ.
§63.6640(a)	7.1.1.5.	Since 65BL is subject to requirements of Table 2c of Subpart ZZZZ, this section requires compliance with applicable methods in Table 6 to Subpart ZZZZ. In Table 6, the requirements of item # 9 are applicable to 65BL. However, it is the same language as in §63.6625(e). Rather than writing a separate and redundant condition, this section it is cited with condition 7.1.1.5.
§63.6640(b)	7.5.1.	This applicable requirement requires the permittee to report deviations from the applicable requirements of a Table 2c to Subpart ZZZZ. Non-applicable language in the regulation has not been included in this permit condition. Since the engine is not subject to an emission limitation, this language has been replaced with “work practice” in the first sentence. Due to the requirement to report according to §63.6650, a parenthetical reference to the corresponding permit condition has been added at the end of the permit condition.
§63.6640(c)	None	This section is not applicable since 65BL is neither a 4SLB, nor a 4SRB, stationary RICE.
§63.6640(d)	None	This section is not applicable since 65BL is existing.
§63.6640(e)	7.5.2.	This section requires reporting when an applicable requirement in Table 8 to Subpart ZZZZ is not met. 65BL does not meet any of the criteria for exemptions given in this section; therefore, a permit condition has been written.
§§63.6640(f)(1), (2), and (3)	7.1.1.8.	These sections apply to 65BL since it is an emergency stationary RICE, and particularly since the unit generates electricity.
§63.6640(f)(4)	None	This section is not applicable since 65BL is located at a major source of HAP.
§63.6645(a)(5)	None	This section provides an exemption to the notification requirements (including the NOCS under 40 C.F.R. §63.9(h)) for an existing stationary emergency RICE. Since 65BL meets these criteria, the notifications under §63.6645 do not apply.

Subpart ZZZZ Section	Condition	Discussion
§63.6645(b)	None	This section is not applicable since 65BL is rated less than 500 brake HP.
§63.6645(c)	None	This section is not applicable since 65BL is existing and rated less than 500 brake HP.
§63.6645(d)	None	This section is not applicable since an initial notification is not required. Requirements for initial notification are in §63.9(b), which is not applicable, in accordance with the determination regarding §63.6645(a)(5).
§63.6645(e)	None	This section is not applicable since 65BL is existing.
§63.6645(f)	None	This section is not applicable since an initial notification is not required.
§§63.6645(g) and (h)	None	These sections are not applicable to 65BL since no performance tests or initial compliance demonstrations are required under Subpart ZZZZ.
§§63.6650(a) and (b)	None	These sections are not applicable to 65BL since it meets none of the criteria in Table 7 to Subpart ZZZZ.
§63.6650(c)	None	This section is not applicable since it pertains to Compliance Reports, which are not required for 65BL since it meets none of the criteria in Table 7 to Subpart ZZZZ.
§§63.6650(d) and (e)	None	This section is not applicable since no CMS is employed for 65BL.
§63.6650(f)	7.5.3.	This section is an applicable requirement to report deviations (as defined in 40 C.F.R. §63.6675). This requirement is modified for insertion into the permit.
§63.6650(g)	None	This section is not applicable since 65BL is existing and does not fire landfill gas or digester gas.
§63.6655(a)	None	This section does not apply since 65BL is not subject to emission and operating limitations.
§63.6655(b)	None	This section does not apply since neither CEMS nor CPMS are employed for 65BL.
§63.6655(c)	None	This section is not applicable since 65BL is existing and does not fire landfill gas or digester gas.
§63.6655(d)	None	This section does not apply since 65BL is not subject to emission and operating limitations.
§63.6655(e)	7.4.2.	This section requires demonstration of continuous compliance using recordkeeping of the information required by §63.6625(e) and §63.6625(e)(2). 65BL is an existing stationary emergency RICE; therefore, it meets the criteria of §63.6655(e)(2). Hence, this recordkeeping requirement has been written in the permit. The regulation language “any of the following stationary RICE” in the last sentence has been replaced with the applicable language “an existing stationary emergency RICE.”
§63.6655(f)	7.4.3.	65BL meets the criteria of §63.6655(f)(1); therefore, this section is applicable. The language of both §63.6655(f) and §63.6655(f)(1) have been combined to create one coherent and applicable condition.
§63.6660(a), (b), and (c)	7.4.4.	These applicable requirements have been written in the permit.

The purpose of current permit condition 7.1.1.3. was to require the permittee to incorporate into the permit the applicable Subpart ZZZZ requirements within 180 days prior to the May 3, 2013, compliance date. This requirement has been fulfilled, and aside from 45CSR30, there is no other underlying authority that would necessitate retaining this condition in the permit. Therefore, current condition 7.1.1.3. has been stricken. Note that the condition has been replaced with a modified condition 7.1.1.3. to set forth the substantive Subpart ZZZZ requirements for RICE 65BL (as discussed in Table ZZZZ above).

Non-Applicability Determinations

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

None.

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

Beginning Date: July 24, 2013
Ending Date: August 23, 2013

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)

No comments were received from either the public or U.S. EPA.