

Fact Sheet



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

Permit Number: **R30-03700007-2006**
Application Received: **February 10, 2006**
Plant Identification Number: **037-00007**
Permittee: **Halltown Paperboard Company**
Facility Name: **Halltown Mill**
Mailing Address: **P. O. Box 10, Halltown, WV 25423**

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

Halltown Paperboard Company 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 (1) coal fired boiler, paper mill, carpenter shop, waste water treatment plant, an emergency generator, truck traffic, and welding equipment.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2004 Actual Emissions
Carbon Monoxide (CO)	91.8	25.24
Nitrogen Oxides (NO _x)	251.6	55.53
Particulate Matter (PM ₁₀)	13.4	4.5
Total Particulate Matter (TSP)	22.32	3.09
Sulfur Dioxide (SO ₂)	698	339.56
Volatile Organic Compounds (VOC)	9.0	0.37

PM₁₀ is a component of TSP.

Title V Program Applicability Basis

This facility has the potential to emit 698 tons per year of SO₂ and 251.6 tons per year of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant Halltown Paperboard 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:	45CSR2	Control of Particulate Matter Emissions From Indirect Heat Exchangers
	45CSR6	Open burning prohibited
	45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
	45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	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 draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 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>)
R13-0622	September 1, 1981	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The changes to the July 27, 2001 Title V Permit and Fact Sheet consists of the deletion of the oil fired boiler (Blr1) which has been dismantled and removed from the facility, and the following:

45CSR7 -To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations

The carpenter shop (*PM2*) consists primarily of non-commercial carpenter tools which are used on an as-needed basis for construction of pallets and facility maintenance. Although there is a control device associated with the carpenter shop, it is primarily in place for employee comfort and not necessarily for controlling particulate matter (PM) emissions. The potential PM emissions are estimated at 0.02 lb/hr and 0.088 tpy. Since the PM emissions are less than 1lb/hr and 1000 lb/yr, the carpenter shop is exempt from 45CSR7 PM limits pursuant to 45CSR§7-10.5. Because the PM emissions are insignificant no visible emission checks will be required. Any testing will be required at the Directors request as per permit condition 3.3.1.

40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

This facility has a pollutant specific emissions unit (PSEU) meeting the applicability requirements of 40 C.F.R. §64.2 and therefore has submitted a CAM plan in accordance with the CAM rule

The submitted plan meets the requirements of the CAM rule for the Baghouse "C-1" controlling particulates mass emissions of the coal fired boiler 001 (BLR2) which has a 17.78 lb/hr limit, regulated pursuant to 45CSR§2-4.1.c. Monitoring will be as follows:

Indicator No. 1 - Pressure Drop Across Baghouse: Differential pressure drop across each of the four baghouse compartments with a selected range of 4" – 6" of water column will be collected once per hour and recorded by manual log entries. The hourly readings will be averaged over a 4-hour period. Excursions are defined as a 4-hour average outside of the selected indicator range. The indicator gauges will be examined weekly to ensure that they are

functioning properly. The use of differential pressure is justified by the manufactures recommendations and supported by test data.

Indicator No. 2 – Inspection and Maintenance of Baghouse: Visible Emissions (VE) reading will be taken once per week during normal operations of the boiler by certified individuals using 40 C.F.R. part 60 Appendix A Method 9 procedures and recorded by manual log entries. The range will be $\leq 10\%$ opacity based on a six minute block average of 15-second readings. An excursion outside this range will require a 60-minute test. The VE readings are justified by standard industry practice and supported by test data.

Non-Applicability Determinations

The changes to the July 27, 2001 Title V Permit and Fact Sheet consists of the deletion of 45CSR§2-3.02. taken from a previous SIP version of Rule 2 which has been replaced by a new SIP version of Rule 2.

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

45 CSR 1 – *NOx Budget Trading Program as a Means of Control and Reduction of Nitrogen Oxides from Non-Electric Generating Units.* The coal-fired boiler 001 (BLR-2) at Halltown Paperboard Company (“Halltown”) has a maximum design heat input less than 250 mmBtu/hr, and therefore pursuant to Section 4.1.b.1 of 45 CSR 1, the boiler at Halltown is not a NOx Budget unit and 45 CSR 1 is not applicable to the boiler.

40 CFR 68 – *Chemical Accident Prevention Provisions.* Halltown does not use in a process, any regulated substance listed in 40 CFR 68.130 in an amount above the threshold quantities listed under 40 CFR 68.115.

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: June 30, 2006
Ending Date: July 31, 2006

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

Frederick Tipane
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

As a result of comments received from the USEPA a table outlining the “CAM Plan Summary of Requirements” was added at the end of Section 4.2. of the permit.