

Fact Sheet



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

Permit Number: **R30-03100030-2017**
Application Received: **May 2, 2016**
Plant Identification Number: **03-054-031-00030**
Permittee: **American Woodmark Corporation**
Facility Name: **South Branch Plant**
Mailing Address: **587 Robert C. Byrd Industrial Park Road, Moorefield, WV 26836**

Revised: N/A

Physical Location:	Moorefield, Hardy County, West Virginia
UTM Coordinates:	677.73 km Easting • 4,327.129 km Northing • Zone 17
Directions:	From Town of Moorefield at intersection of Route 28 and Route 55, take Route 55 East (Winchester Ave.) approximately 2.2 miles to Robert C. Byrd Industrial Park Road on left. Plant is approximately 0.5 miles from Route 55 East on Robert C. Byrd Industrial Park Road.

Facility Description

The main process of the facility is the manufacture and finishing of wood doors and frames for shipment to American Woodmark Corporation facilities across the nation for final assembly into finished kitchen and vanity cabinets. Primary processes include dimensioning of kiln-dried wood; assembly of parts to create either doors or frames; and finishing of doors, frames and miscellaneous parts.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions¹	2015 Actual Emissions²
Carbon Monoxide (CO)	50.85	2.49
Nitrogen Oxides (NO _x)	76.96	2.94
Particulate Matter (PM _{2.5})	162.32	5.45
Particulate Matter (PM ₁₀)	162.32	5.45
Total Particulate Matter (TSP)	162.32	5.45
Sulfur Dioxide (SO ₂)	3.19	0.76
Volatile Organic Compounds (VOC)	249.4	104.07
Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Formaldehyde	0.62	Not available
Methanol	46.75	14.4
Ethyl Benzene	6.86	3.8
Toluene	15.62	2.6
Xylenes	37.12	16.3
Aggregate HAPs	111.56	37.7

¹ Potential emissions are based upon information provided by the permittee's consultant in an Excel® spreadsheet e-mailed to the writer on 3/07/2017 less the amounts for boiler B4 which has been removed from service. The updated PTE values are different than those values accounted for by the 2011 Renewal Fact Sheet, and the PTE changes document in the Fact Sheets for Significant Modifications SM01 and SM02 that occurred during the permit term. The PTEs have changed for the following reasons: (a) All paint calculations were updated based on current coatings usage. Therefore, particulate, VOCs and HAP values have changed; (b) The natural gas combustion emissions were different because the emission factor used for PM was 1.9 lb/MMCF versus 7.6 lb/MMCF for PM₁₀. The PM emission factor has now been set equal to PM₁₀; (c) certain pollutant PTEs in the 2011 Renewal Fact Sheet Emission Summary were incorrect due to using incorrect values in the spreadsheet that was used by the permittee and/or consultant to sum the emissions; and (d) CO and NO_x values in SM02 were incorrect.

² Actual emissions are from the State and Local Emissions Inventory System (SLEIS).

Title V Program Applicability Basis

This facility has the potential to emit 162.32 tpy of PM₁₀, 249.4 tpy of VOC, 46.75 tpy of methanol, 15.62 tpy of toluene, 37.12 tpy of xylenes, and 111.57 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, American Woodmark Corporation's South Branch Plant 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	Opacity and PM limits for boilers
	45CSR6	Open burning prohibited.
	45CSR7	PM and Opacity limits for manufacturing sources
	45CSR7A	Compliance Test Procedures for 45CSR7
	45CSR10	Sulfur dioxide limits for boilers
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits to construct/modify
	45CSR16	Standards of performance for new stationary sources pursuant to 40 CFR Part 60
	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 HAPs
	40 C.F.R. 60 Subparts A and Dc	NSPS for Small Steam Generating Units
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63 Subpart JJ	NESHAPs-MACT Standards for Wood Furniture Manufacturing
	40 C.F.R. 63 Subpart ZZZZ	RICE MACT
	40 C.F.R. 63 Subpart DDDDD	Boiler MACT for major sources of HAP
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM)
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR27	Emissions of Toxic Air Pollutants

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>
R13-2571M	June 8, 2015	

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

1. **Decommissioned Auxiliary Boiler B4.** This 1.22 MMBtu/hr natural gas-fired auxiliary boiler B4 (Em. Pt. ID: E-B4) has been removed from service according to 12/9/2016 technical correspondence received from the permittee. Consequently, the following changes have been made in the renewal permit:
 - a. The emission unit data has been deleted from the table in permit subsection 1.1.
 - b. The references to B4 in the permit shield paragraphs 3.7.2.b. and g. have been deleted.
 - c. The emission point ID has been deleted from the heading of section 5.0.
 - d. The current Title V condition 5.1.3. embodying applicable emission limits from permit R13-2571M, 4.1.3., has been deleted.
 - e. The current Title V condition 5.1.6. embodying applicable natural gas throughput limits from permit R13-2571M, 4.1.6., has been deleted.
 - f. The current Title V condition 5.1.15. embodying the substantive requirements in 40 C.F.R. 63 Subpart DDDDD that applied to B4, has been deleted.

2. **45CSR27 - To Prevent and Control the Emissions of Toxic Air Pollutants.** Before this 2017 renewal the potential formaldehyde emissions (0.20 tpy or 400 lbs/yr) from the facility have been below the applicability threshold of 1,000 pounds per year and were, therefore, exempt from 45CSR27. However, in technical correspondence the permittee provided the revised controlled facility-wide PTE of formaldehyde as 0.62 tpy. This value is the sum of 0.39 tons from Finishing Line 3, 0.15 tons from the Spray Booths, 0.01 tons from the thermal oxidizer, and 0.06 tons from the wood-fired boiler B1. The definition of “Plant” in 45CSR§27-2.7 means all chemical processing units existing on one or more contiguous or adjacent properties, which are owned by or under the control of the same person or persons. The South Branch facility meets this definition. The definition of “Chemical Processing Unit” in 45CSR§27-2.4 specifically includes surface coating equipment or similar equipment utilizing a toxic air pollutant as a solvent or for other purposes. The South Branch plant’s Finishing Line 3 and Spray Booths meet the definition of chemical processing unit, and the plant may discharge more than 1,000 lb/yr of formaldehyde. Therefore, the applicable requirement in 45CSR§27-3.1. requires the owner or operator of a plant that discharges or may discharge into the open air in excess of 1,000 lb of formaldehyde to employ “Best Available Technology” (BAT) at all chemical processing units emitting the toxic air pollutant. However, the requirement provides that any source or equipment specifically subject to a federal regulation or standard shall not be required to comply with provisions more stringent than such regulation or standard. The permittee’s coating operations, including Finishing Line 3 and Spray Booths, are subject to the federal regulation 40 C.F.R. 63, Subpart JJ, which is incorporated into the renewal permit. Therefore, compliance with applicable Subpart JJ requirements will satisfy certain BAT requirements in 45CSR27.

The following applicable requirements have been incorporated into the renewal permit as condition 3.1.30.:

- Section 3.1. – The requirements of this section have been included as permit condition 3.1.30. with a streamlining note since BAT is not required to be more stringent than the federal regulation (40 C.F.R. 63 Subpart JJ) to which the Finishing Line 3 and Spray Booths are subject.
- Section 5.1 is applicable; however, compliance with the requirement in 63.803(g) ensures compliance with this requirement. Therefore, a streamlining note has been added.

- Section 7.1. is applicable for unloading from railcars or tank trucks.
- Sections 10.1. and 10.2. for testing at the Director’s discretion is applicable.
- Section 10.4. is applicable for reporting formaldehyde releases in excess of 50 pounds as specified in 45CSR§27-10.4.c.

The following requirements are not applicable:

- Sections 4.1. and 10.3. are not applicable because none of the equipment is in “toxic air pollutant service” as defined in 45CSR§27-2.11.
 - Section 6.1. is not applicable because there is no wastewater treatment plant.
3. **45CSR30 – Title V Operating Permit Reporting and Monitoring Requirements.** The content of permit conditions 3.5.3., 3.5.5., and 3.5.6. has been modified to include new instructions and e-mail addresses for electronic submittal of information specified in the conditions. The authority of 45CSR§30-5.1.c. has been added to condition 5.1.3. to require the 12-month rolling total.
 4. **45CSR13, Permit No. R13-2571M.** The requirements of this permit have already been incorporated into the operating permit prior to this renewal. However, certain requirements that have been deemed non-applicable and included in the permit shield in current permit section 3.7.2.i. were reviewed during this 2017 renewal and certain ones have been determined to be applicable. The underlying requirements 4.1.50., and 4.4.5. have been added to the citations of authority for renewal permit conditions 5.1.12. and 5.4.5., respectively. Underlying requirement 4.5.3. has been added to the citation of authority for permit condition 5.5.7.
 5. **40 C.F.R. 63 Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations.** The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, §63.2. The permittee is subject to this regulation and applicable requirements have already been incorporated into the operating permit in prior permitting actions. During the current permit term, on November 21, 2011, U.S. EPA amended this subpart as published in the Federal Register at 76 FR 72071¹. The following Table JJ summarizes how the revisions, as well as any applicable requirements not already included in the permit, have been incorporated into this renewal permit. Sections designated in bold font in Table JJ are those that have been added to the permit since they were inadvertently not included in the prior renewal and initial permit.

Table JJ

Subpart JJ	Title V	Discussion
§63.800(d) (12/28/98 version)	3.4.7. 5.5.3. 9.5.1.	This paragraph has been redesignated as §63.800(e).
§63.800(d)	None	This new paragraph grants exemptions to sources subject to other NESHAPs-MACT subparts, none of which apply to the permittee. Therefore, no permit condition is warranted for this paragraph.
§63.800(g)	None	This new paragraph applies to existing sources. Since the permittee’s facility is a new source, this paragraph is not applicable.
§63.800(j)	3.1.26.	This new paragraph prescribes the requirements to assert an affirmative defense. Since the permittee utilizes a control device as a means of limiting emissions, the introductory paragraph has been incorporated into the renewal permit.

¹ The amendments were accessed at <https://www.gpo.gov/fdsys/pkg/FR-2011-11-21/pdf/2011-29457.pdf> by this writer on 2/14/2017.

Subpart JJ	Title V	Discussion
§63.801	3.1.27.	The definition of “Low-formaldehyde” from this section has been included in the formaldehyde limit condition discussed below. This definition has been included since it prescribes the allowable product concentration, which is an applicable limit.
§63.802(b)(4)	3.1.27.	This paragraph is the new formaldehyde limit, which has been incorporated into the renewal permit. The permittee maintains records of formaldehyde emissions and the 12-month rolling total to ensure compliance with the limit of 400 pounds per rolling 12-month period. According to 3/3/2017 technical correspondence from the permittee, the latest 12-month rolling total (3/1/2016 through 2/28/2017) was 84.8 pounds, which yields a 79% compliance margin.
§63.802(c)	3.1.28.	This paragraph is the new general duty requirement, which has been incorporated into the renewal permit.
§63.803(h)	3.1.22.	This condition has been completely revised to reflect the new requirement that conventional air spray guns shall not be used except when all emissions from the finishing application station are routed to a functioning control device. According to 3/3/2017 technical correspondence from the permittee, all of their spray guns are used with a control device (three RTOs).
§63.804(e)	3.1.29.	This requirement has been incorporated into this renewal permit since the requirements of §63.802(b)(2) in condition 3.1.15. refer to this requirement.
§63.804(g)(7)	3.5.12.	This continuous compliance certification requirement has been added to the citation of authority for the new condition for semi-annual reports.
§63.804(g)(8)	3.5.12.	This continuous compliance certification requirement has been added to the citation of authority for the new condition for semi-annual reports.
§63.804(g)(9)	3.2.5.	This continuous compliance requirement has been added to the renewal permit.
§63.804(h)	3.4.12.	This paragraph sets the calculations to demonstrate compliance with the new formaldehyde limit, which has been incorporated into the renewal permit.
§63.805	None	The redesignation of paragraph (a) as paragraph (a)(1) and adding paragraph (a)(2) does not affect the permit; therefore, no change is required.
§63.806(b)(4)	3.4.8.(4)	This recordkeeping requirement for formaldehyde content has been incorporated into the renewal permit with the condition already embodying requirements of §63.806(b).
§63.806(e)(4)	3.4.10.(4)	The recordkeeping requirement regarding conventional air spray guns has been removed and the condition number has been reserved to reflect the current regulation.
§63.806(k)	3.4.13.	This recordkeeping requirement has been incorporated into the renewal permit.
§63.807(a)	None for Boiler B1	The current permit incorrectly includes §63.807(a) as a requirement for the wood-fired boiler B1. This error was in the initial operating permit. Subpart JJ does not apply to boiler B1; therefore, this requirement has been removed for this renewal.
§63.807(c)	3.5.12.	Semi-annual report was not included in the current permit. In addition, its requirements were revised by USEPA on 11/21/2011. The semi-annual report requirement has been incorporated into the renewal operating permit.
§63.807(d)	3.5.13.	This reporting requirement has been incorporated into the renewal permit since the permittee monitors the temperature operating parameter of its RTOs.

6. **40 C.F.R. 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.** The diesel-powered fire protection water pump engine (Em. Unit ID: FP1) is subject to this regulation and the applicable requirements are in the current Title V permit section 11.0. However, the compliance date which is now passed was yet future when the requirements were incorporated into the permit. To account for this, a note followed each Subpart ZZZZ permit condition stating that the requirement is subject to the compliance date in condition 11.1.1. This note, as well as the compliance date in current permit condition 11.1.1., have been removed for this renewal Title V permit. Language in renewal permit condition 11.1.5. has been changed from “2 days” to “2 business days” to reflect the current regulation. Language in renewal permit condition 11.1.6. has been updated to reflect the current regulation.
7. **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 boilers B1 and B2 are subject to this subpart. Until removed from service, the auxiliary boiler B4 was subject to Subpart DDDDD. However, since it has been removed from service the regulation will not be evaluated for applicability to boiler B4. Current permit conditions 5.1.13. through 5.1.15. are placeholder conditions specifying the compliance date for the boilers and the applicable standards for each boiler. For the renewal, condition 5.1.11. will specify the compliance date applicable to both B1 and B2. Condition 5.1.12. will specify the applicable emission limits for B1. Condition 5.1.13. will specify the tune-up requirement for B1. Condition 5.1.14. will specify the tune-up requirement for B2. Condition 5.1.15. will specify the one-time energy assessment requirement applicable for both B1 and B2. The following table gives relevant information for evaluating the applicability of Subpart DDDDD requirements.

Em. Unit	Description	Fuel	Design Heat Input	Control Device	Installation Date
B1	600 HP Boiler	Wood	28.8 MMBtu/hr	Multiclone C1	2004
B2	500 HP Boiler	Natural Gas	20.9 MMBtu/hr	N/A	2004

Compliance Plan

During the technical review period for this renewal it was determined that additional information was required from the permittee to determine which specific requirements in Subpart DDDDD are applicable to boilers B1 and B2. After receiving responses to several questions via e-mail, this writer concluded that the permittee was not providing information based upon the current final rule. This writer contacted the permittee and directed the permittee to the current final rule. The permittee determined that applicable requirements in the current regulation had not been performed and completed. The permittee subsequently began to schedule the required performance testing (B1) and one-time energy assessment (B1 and B2).

In 3/8/2017 technical correspondence, the permittee confirmed that the tune-ups the permittee performs meets all of the criteria in 40 C.F.R. §§63.7540(a)(10)(i) through (vi) for both B1 and B2. The permittee also stated that tune-ups were completed in August 2015 and May 2015 for B1 and B2, respectively. Therefore, the permittee had completed the initial tune-ups for both units before January 31, 2016, as required by §63.7510(e). Consequently, tune-ups are not included in the compliance plan requirements.

According to 3/8/2017 technical correspondence, the permittee is about to begin work on the wood dust silo, which will not allow the permittee to operate boiler B1. Consequently, the permittee has scheduled the performance stack testing for the week of May 22, 2017. The permittee stated that its stack testing contractor has begun writing the test protocol, which will be submitted to DAQ. The due date for the test protocol submittal has been included in the compliance plan for B1.

A compliance plan with the scheduled dates for each of these items has been incorporated into renewal permit subsection 5.6. Separate conditions have been established for B1 and B2 since B1 is also subject to emission limitation and performance testing. The requirement in 45CSR§30-4.3.h.2. to submit monthly progress reports is applicable.

Incorporation of Applicable Requirements into Renewal Permit

Table DDDDD below lists the sections of Subpart DDDDD and their applicability (and non-applicability where necessary) to the affected emission units B1 and B2, and discusses how the applicable requirements are incorporated into the renewal operating permit. Based upon U.S. EPA guidance², the permit will include all applicable emission limitations and standards, and all applicable monitoring and reporting to assure compliance with the limitations and standards. Monitoring, recordkeeping, reporting, and all other applicable requirements necessary to assure compliance with the permit terms will not be IBR. Paraphrasing of regulation language will not be utilized. However, as much as practicable, non-applicable regulatory language has been excluded from permit conditions for precision and disambiguation of the permit terms. Finally, regulatory language “this subpart” has been replaced by “40 C.F.R. 63 Subpart DDDDD” except in sub-conditions that have an introductory paragraph where this change can be made and the context of the condition allows for “this subpart” to be understood in the sub-conditions (e.g., permit condition 5.3.3.).

Table DDDDD

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
§63.7495(b)	B1 B2	5.1.11.	The applicable compliance date requirement for existing sources is January 31, 2016. The substantive requirements for the boilers are discussed below in §63.7500(a). In accordance with §63.7510(e), initial compliance with the substantive requirements must be complete no later than 180 days after the compliance date. Typically, this writer does not include compliance dates that are past in a renewal Title V permit. However, since there are other MACT subparts that apply to sources at the facility, the compliance date has been incorporated into the Title V permit.
§63.7495(d)	B1 B2	5.5.4. 5.5.5. 5.5.6.	This section requires the notifications in §63.7545. Therefore, any applicable specific requirement in §63.7545 incorporated into the renewal permit also cites §63.7495(d) as authority.
Limitations and Standards			
§63.7499	B1 B2	None	Boiler B1 is considered a Stokers/sloped grate/other units designed to burn kiln dried biomass/bio-based solid as specified in §63.7499(d). Boiler B2 is considered a Unit designed to burn gas 1 fuels as specified in §63.7499(l). No permit condition is warranted for this section since it defines the boiler subcategories and does not require action by the permittee.
§63.7500(a)(1)	B1 B2	5.1.12. 5.1.13. 5.1.14. 5.1.15. 5.1.16. 5.1.17.	<u>Work Practice Standards:</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, which are: ▪ B1 – Table 2, item #1 emission limitations for pollutants HCl and Mercury since B1 burns solid fuel; Table 2, item #8 emission limitations for pollutants CO and filterable PM (or TSM) since B1 is considered a stoker/sloped grate/others designed to burn kiln-dried

² U.S. EPA’s White Paper Number 2 for Improved Implementation of the Part 70 Operating Permit Program (March 5, 1996), located at <https://www.epa.gov/sites/production/files/2015-08/documents/wtppr-2.pdf> and accessed by the writer on November 17, 2016.

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
			<p>biomass fuel; Table 3, item #1 5-year frequency tune-ups since B1 has a continuous oxygen trim system that maintains an optimum air to fuel ratio; Table 3, item #4 one-time energy assessment; and Table 3, items #5 and #6 for startup and shutdown, respectively. As noted in §63.7500(a)(1), the alternative output-based emission limits have been excluded since B1 is not utilized to produce electricity.</p> <ul style="list-style-type: none"> ▪ B2 – Table 3, item #3 annual frequency tune-ups because the unit does not utilize a continuous oxygen trim system to maintain an optimum air to fuel ratio per 1/20/2017 technical correspondence from the permittee; and Table 3, item #4 one-time energy assessment. <p>Note that gas 1 unit B2 is 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).</p>
§63.7500(a)(2)	B1	5.1.18.	<p>This paragraph requires the permittee to meet each operating limit in Table 4 to this subpart that applies. The permittee has elected to demonstrate compliance using performance testing, which is item #7 in Table 4.</p> <p>Furthermore, since the permittee is complying with the PM limit by performance testing, it is not complying using a PM CPMS under Subpart DDDDD. §63.7505(c) sets out the options for demonstrating compliance, and since CMS (i.e., PM CPMS) is not being utilized, then item #6 in Table 4 is also applicable. This item requires the permittee to maintain the opacity at or below 10 percent or the highest hourly average opacity reading measured during the performance test run demonstrating compliance with the PM limit.</p> <p>The permittee is already required to meet a 10 percent opacity standard under 45CSR§2-3.1. (condition 5.1.6.). The State rule requirement is based upon a 6-minute block average, whereas the MACT standard is a daily block average. The MACT standard also allows for a higher opacity operating limit based upon a performance test that demonstrates compliance with the PM mass rate; however, the State rule is strictly set at 10 percent. Based upon these facts, a streamlining note has been added to permit condition 5.1.18.</p>
§63.7500(a)(3)	B1 B2	5.1.19.	<p>The general duty requirement in §63.7500(a)(3) is applicable and is therefore included in the permit.</p>
§63.7500(b)	None	None	<p>The application does not mention any request (or intent to request) alternative work practice standards; therefore, this requirement is not applicable.</p>
§63.7500(c)	None	None	<p>This requirement is not applicable to the units since they are not limited use.</p>
§63.7500(d)	None	None	<p>This requirement is not applicable to the units since they are not in either the Gas 2 or light liquid fuel subcategories.</p>
§63.7500(e)	None	None	<p>This paragraph applies only to units designed to burn gas 1 fuels subcategory. However, since B2 is rated greater than 10 MMBtu/hr, there is no applicable requirement in this paragraph. The paragraph does provide that due to burning gas 1, the unit B2 is not subject to the emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4, which has already been considered in the discussion of §63.7500(a).</p>

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
§63.7500(f)	B1	5.1.12.	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. This applicable requirement has been added to the permit condition that contains the applicable emission standards for boiler B1. This paragraph does not apply to B2 since it is only subject to annual tune-ups and the one-time energy assessment.
§63.7505(a)	B1 B2	5.1.12. 5.1.13. 5.1.14. 5.1.15.	This section requires compliance with the emission limits, work practice standards, and operating limits in Subpart DDDDD. The section is cited with such permit conditions.
§63.7505(c)	B1	5.3.2.	This paragraph specifies the options for demonstrating compliance with emission limits. The parenthetical sentence for gaseous fuels has been excluded from the permit condition since B1 does not combust such fuels and B2 is not subject to emission limits from this subpart.
§63.7505(d)	B1	5.2.15.	This monitoring requirement has been incorporated into the permit since the permittee will use performance testing to establish the applicable operating limits (<i>i.e.</i> , opacity and operating load) required by items 6 and 7 of Table 4 to this subpart. After establishing the operating limit by performance testing, until the next performance test the permittee must comply with the operating limits (cf. §63.7520(c)) by not exceeding 10% opacity and 110% of the highest hourly average operating load recorded during the performance test. In this case, the permittee must monitor the opacity and fuel feed parameter for boiler B1 (cf. §63.7540(a)(1), Table 8, Items 1 and 10) to demonstrate continuous compliance with the emission limits, which are a COMS and CPMS, respectively.
§63.7505(e)	None	None	According to 2/10/2017 technical correspondence, the permittee is utilizing the paragraph (1) definition of startup. Since this paragraph applies when utilizing the paragraph (2) definition, this requirement is not applicable.
Initial Compliance Requirements			
§63.7510(a)	B1	5.3.3.	Since the permittee desires the option to demonstrate compliance with stack testing, this applicable requirement has been incorporated into the renewal permit.
§63.7510(b)	B1	5.3.4.	Since the permittee desires the option to demonstrate compliance with fuel analysis, this applicable requirement has been incorporated into the renewal permit.
§63.7510(c)	B1	5.3.5.	Since B1 is subject to a CO limit, this applicable requirement has been incorporated into the renewal permit.
§63.7510(d)	B1	5.3.6.	Since B1 is subject to a PM limit, this applicable requirement has been incorporated into the renewal permit.
§63.7510(e)	B1	5.3.7.	This section states when the initial compliance demonstrations must be complete, and is therefore included in the renewal permit.
§63.7515(a)	B1	5.3.8.	This paragraph specifies that performance testing be conducted annually, except as specified in other paragraphs in §63.7515.
§63.7515(b)	B1	5.3.9.	This paragraph specifies criteria for when performance testing may be conducted less frequently than annually.
§63.7515(c)	B1	5.3.10.	This paragraph provides instructions for when performance testing results indicate either an emission limit is exceeded or 75 percent of the emission limit is exceeded.

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
§63.7515(d)	B1 B2	5.1.13. 5.1.14.	This section requires the tune-ups to be no more than 13 months and 61 months after the previous tune-up for annual and 5-year frequency tune-ups, respectively. Therefore, the respective applicable requirement has been included in the permit conditions as the first bullet statement.
§63.7515(e)	B1	5.3.11.	This paragraph specifies requirements for fuel analysis, which the permittee wants as a compliance option in the permit.
§63.7515(f)	B1	5.3.12.	This requirement is to report the results of performance tests and fuel analyses within 60 days after their completion. Since applicable reporting requirement 63.7550(h)(1) for performance testing has been incorporated into the reporting subsection 5.5. as discussed below, this requirement in the testing section of the rule (i.e., §63.7515) will be included in permit subsection 5.3.
§63.7515(g)	B1 B2	5.3.13.	This requirement applies to B1 for compliance with emission limits and the tune-up work practice. It applies to B2 for its tune-up work practice. Parenthetical references to appropriate permit condition numbers have been added.
§63.7515(h)	None	None	Neither of the units burn light liquid; therefore, this paragraph is not applicable.
§63.7515(i)	None	None	Compliance with the CO limit applicable to B1 will be demonstrated by stack testing rather than a CO CEMS; therefore, this requirement is not applicable.
§63.7520	B1	5.3.14.	<p>This applicable section has been included in the renewal permit. The content of Table 5 is various test methods that have been IBR. However, Table 7, item #5 is applicable, and specifies the frequency of obtaining operating load data, averaging load data, and the 110% load multiplier. In addition, the establishing of the opacity is an applicable requirement under item 1.c., but any opacity higher than 10% that would demonstrate compliance with the Subpart DDDDD PM limit is streamlined by the 10% opacity standard from 45CSR2. The applicable content of Table 7 has therefore been included in the permit condition.</p> <p>It should be noted that while the permittee is not required to continuously monitor oxygen content to demonstrate continuous compliance during the interim between performance tests as provided in Table 8, item #9 (oxygen trim system exemption), this permit condition 5.3.14. prescribes what must be done for performance testing, which the permittee has elected as its means of demonstrating continuous compliance. This performance testing requirement includes monitoring the oxygen since the unit is subject to a CO limit. Furthermore, the oxygen level must be established during the performance testing as required by §63.7525(a)(7) discussed below (permit condition 5.2.17.).</p>
§63.7521(a)	B1	5.3.15.	This requirement has been included in the renewal permit since B1 combusts solid fuel. However, non-applicable language concerning gaseous and liquid fuels has been excluded.
§63.7521(b)	B1	5.3.16.	This requirement has been included in the renewal permit since the permittee desires the flexibility to utilize fuel analysis under §63.7510(b).
§63.7521(c)	B1	5.3.17.	This requirement has been included in the renewal permit since the permittee desires the flexibility to utilize fuel analysis.
§63.7521(d)	B1	5.3.18.	This applicable requirement has been included in the renewal permit since it pertains to fuel analysis.

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
§63.7521(e)	B1	5.3.19.	This applicable requirement has been included in the renewal permit since it pertains to fuel analysis. The specific equations have not been written in the permit since calculation methodologies may be IBR in accordance with section E.2.c. of the previously cited U.S. EPA guidance.
§63.7521(f)	None	None	B1 does not combust gaseous fuel of any type; therefore, this paragraph is not applicable. B2 does not combust any fuel other than natural gas; therefore, this paragraph is not applicable.
§63.7521(g)	None	None	B1 does not combust other gas 1 fuels; therefore, this paragraph is not applicable. B2 does not combust other gas 1 fuels; therefore, this paragraph is not applicable.
§63.7521(h)	None	None	B1 does not combust gaseous fuels; therefore, this paragraph is not applicable. As a unit that burns only natural gas, B2 is a gas 1 fuel subcategory unit subject only to the tune-up work practice and one-time energy assessment, and is not subject to Subpart DDDDD emission limitations or standards. Therefore, this fuel sample requirement for fuel specification is not required for B2.
§63.7521(i)	None	None	B1 does not combust gaseous fuels; therefore, this paragraph is not applicable. As a unit that burns only natural gas, B2 does not combust other gas 1 fuel; therefore, this paragraph is not applicable.
§63.7522	None	None	The permittee operates only one boiler that is subject to emission limits in §63.7500; therefore, this paragraph regarding emissions averaging for more than one existing unit is not applicable.
§63.7525(a)	B1	5.2.16.	This requirement is applicable since B1 is subject to a CO emission limit in Table 2 to Subpart DDDDD. Since B1 utilizes a continuous oxygen trim system, and these are included in the regulation's definition of <i>Oxygen analyzer system</i> in §63.7575, then the CEMS requirements in the last half of the introductory paragraph of §63.7525(a), as well as §§63.7525(a)(1) through (6), are not applicable and have been excluded from the permit condition. Applicable paragraph §63.7525(a)(7) has been included in the condition. Note that §63.7525(a)(7) states that the oxygen trim system must operate with the oxygen level set no lower than the lowest hourly average oxygen concentration measured during the most recent CO performance test. This requirement confirms that oxygen must be monitored during performance tests as prescribed by Item 4 in Table 7 to Subpart DDDDD which is required by §63.7520(c) (permit condition 5.3.14.).
§63.7525(b)	None	None	Neither of the units are in the unit designed to burn coal/solid fossil fuel subcategory or the unit designed to burn heavy liquid subcategory; therefore, this paragraph is not applicable.
§63.7525(c)	B1	5.2.17.	B1 is demonstrating compliance with the numerical emission limitations using performance testing, which is in item #7 of Table 4 to Subpart DDDDD. As such, the permittee is not demonstrating compliance by PM CPMS, PM CEMS, or a BLDS. Further, the boiler B1 is subject to an opacity limitation as discussed above concerning §63.7500(a)(2). Consequently, this requirement is applicable to the monitoring of opacity from B1.
§63.7525(d)	B1	5.2.18.	The permittee intends to demonstrate compliance with the emission limits by performance stack testing and/or fuel analysis. However, part of the performance stack testing is to establish (or reestablish during subsequent tests) any applicable operating limit that must be complied

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
			with during the period between stack tests. In this case, the opacity and boiler operating load are the applicable operating limits that must be monitored in the interim between stack tests. Finally, because this paragraph applies to use of a CMS other than a PM CPMS or COMS, it does not apply to the monitoring of the opacity operating limitation. Since monitoring boiler operating load is neither PM CPMS nor COMS, it qualifies as an affected CMS under this paragraph. Based upon these facts, the requirements have been incorporated into the renewal permit.
§63.7525(e)	None	None	The applicable operating limits in items #6 and #7 of Table 4 to Subpart DDDDD does not require the use of a flow monitoring system since the permittee monitors the amount of wood fuel administered to the boiler B1; therefore, this paragraph does not apply.
§63.7525(f)	None	None	The applicable operating limits in items #6 and #7 of Table 4 to Subpart DDDDD does not require the use of a pressure monitoring system since the permittee monitors the amount of wood fuel administered to the boiler B1; therefore, this paragraph does not apply.
§63.7525(g)	None	None	The applicable operating limits in items #6 and #7 of Table 4 to Subpart DDDDD does not require the use of a pH monitoring system since the permittee monitors the amount of wood fuel administered to the boiler B1; therefore, this paragraph does not apply.
§63.7525(h)	None	None	The applicable operating limits in items #6 and #7 of Table 4 to Subpart DDDDD does not require a secondary electric power monitoring system for an electrostatic precipitator (ESP) operated with a wet scrubber; therefore, this paragraph does not apply.
§63.7525(i)	None	None	The applicable operating limits in items #6 and #7 of Table 4 to Subpart DDDDD does not require the use of a monitoring system to measure sorbent injection rate; therefore, this paragraph does not apply.
§63.7525(j)	None	None	The permittee does not utilize a fabric filter bag leak detection system; therefore, this paragraph does not apply.
§63.7525(k)	None	None	Neither B1 nor B2 are limited use units; therefore, this paragraph does not apply.
§63.7525(l)	None	None	The permittee has elected to demonstrate compliance through performance testing instead of CEMS; therefore, this paragraph does not apply.
§63.7525(m)	None	None	The permittee does not utilize an acid gas wet scrubber or dry sorbent injection control technology and has not elected to use an SO ₂ CEMS to demonstrate continuous compliance with the HCl emission limit; therefore, this paragraph does not apply.
§63.7530(a)	B1	5.3.20.	This applicable requirement has been incorporated into the renewal permit.
§63.7530(b)	B1	5.3.21.	<p>This applicable requirement for stack testing and establishing applicable operating limits has been incorporated into the renewal permit. However, the specific test procedures and equations in this paragraph have been IBR.</p> <p>§63.7530(b)(4)(i) through (vii) and (ix) are not applicable since the permittee does not utilize any control device for which this requirement is applicable. The operating limit in Table 4 subject to this paragraph is item #7, which is the 110% boiler operating load limit. §63.7530(b)(4)(viii) regarding minimum oxygen level for performance testing is applicable.</p>

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
§63.7530(c)	B1	5.3.22.	This applicable requirement for fuel analysis has been incorporated into the renewal permit. The specific test procedures and equations in this paragraph have been IBR.
§63.7530(e)	B1	5.5.6.	This applicable requirement specifies a component of the NOCS; therefore, this requirement has been included in the NOCS reporting requirement discussed below in §63.7545(e).
§63.7530(f)	B1	5.5.6.	This applicable requirement specifies that the NOCS containing the results of the initial compliance demonstration must be submitted as required by §63.7545(e). Therefore, this requirement has been included in the NOCS reporting requirement discussed below in §63.7545(e). This paragraph does not apply to B2 since it is not subject to an initial compliance demonstration in §63.7530(a).
§63.7530(g)	None	None	Neither B1 nor B2 will combust another gas 1 fuel as defined in 63.7575; therefore, this requirement is not applicable.
§63.7530(h)	B1	5.1.13. 5.1.15. 5.1.16. 5.1.17.	This requirement applies to a unit that is subject to emission limits in Tables 1 or 2 or 11 through 13. Only B1 is subject to an emission limit, which is in Table 2. Therefore, this requirement to meet Table 3 work practices has been cited in the permit conditions containing Table 3 work practices for B1 only.
§63.7530(i)	None	None	The permittee has not elected to comply with the alternative SO ₂ CEMS operating limit in Tables 4 and 8 of Subpart DDDDD; therefore, this requirement is not applicable.
§63.7533	None	None	The units are not complying using the alternative equivalent output-based emission limits instead of heat input-based limits in Table 2; therefore, this requirement is not applicable.
Continuous Compliance Requirements			
§§63.7535(a), (b), (c), (d)	B1	5.2.19.	<p>These paragraphs are for demonstrating continuous compliance. While the permittee must monitor oxygen during each performance test to establish (or subsequently verify) the oxygen level to be set for the continuous oxygen trim system, the oxygen level does not have to be continuously monitored between performance tests in order to demonstrate continuous compliance with the CO limit (cf. exemption in Table 8, item 9.a.).</p> <p>However, for any pollutant for which compliance is demonstrated by a performance test, the permittee is required to demonstrate continuous compliance with the emission limitations by monitoring the boiler operating load, collecting the load data, and computing 30-day rolling averages in accordance with Table 8, item 10 (cf. condition 5.2.20.). Based upon these facts, this section applies to monitoring of operating load for boiler B1 and has been incorporated into the renewal permit.</p> <p>Finally, since B1 is subject to the opacity standard, this paragraph is applicable to its compliance demonstration.</p> <p>This section does not apply to B2 since it is subject only to annual tune-ups and the one-time energy assessment, and as such does not utilize a CMS or other monitoring.</p>
§§63.7540(a) and (a)(1)	B1	5.2.20. 5.2.21.	§63.7540(a) requires compliance with applicable emission limits (Table 2), work practice standards (Table 3), and operating limits (Table 4) according to the methods in Table 8 and in paragraphs (a)(1) through (19) of §63.7540. Table 8 has been addressed in this discussion of §63.7540(a)(1), and each subsequent paragraph (2) through (19) are discussed below.

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
			<p>Within Table 8, the following items are applicable:</p> <ul style="list-style-type: none"> ▪ Item 1 – Opacity; ▪ Item 8 – Emission limits using fuel analysis; and ▪ Item 10 – Boiler or process heater operating load. <p>Note that Item 1 for opacity monitoring does apply for reasons discussed above concerning §63.7500(a)(2). Item 9 for oxygen content monitoring does not apply in accordance with the exemption granted to units that utilize an oxygen trim system.</p> <p>§63.7540(a)(1) defines a deviation from operating limits and requires that operating limits be confirmed or reestablished during performance tests. Therefore, this paragraph has been included in the renewal permit as condition 5.2.21.</p>
§63.7540(a)(2)	B1	5.4.5.	<p>This requirement has been combined with the requirement in §63.7555(d) for one streamlined requirement. In order to assimilate §63.7555(d) into this requirement, the language “on a monthly basis” has been added to the language of this paragraph from §63.7540(a)(2).</p> <p>This requirement is not applicable to B2 since it is not subject to an emission limit in Tables 1, 2, or 11 through 13 of Subpart DDDDD, which is the criteria given in §63.7555(d) (see discussion of that paragraph below).</p>
§63.7540(a)(3)	B1	5.3.23.	<p>Since B1 is subject to an HCl limit, and the permittee desires the flexibility to demonstrate compliance using fuel analysis for the solid fuel B1 combusts, this requirement has been included in the renewal permit.</p>
§63.7540(a)(4)	B1	5.3.24.	<p>Since B1 is subject to an HCl limit, and the permittee desires the flexibility to demonstrate compliance using performance testing, this requirement has been included in the renewal permit.</p>
§63.7540(a)(5)	B1	5.3.25.	<p>Since B1 is subject to a Hg limit, and the permittee desires the flexibility to demonstrate compliance using fuel analysis, this requirement has been included in the renewal permit.</p>
§63.7540(a)(6)	B1	5.3.26.	<p>Since B1 is subject to a Hg limit, and the permittee desires the flexibility to demonstrate compliance using performance testing, this requirement has been included in the renewal permit.</p>
§63.7540(a)(7)	None	None	<p>B1 is not controlled by a fabric filter; therefore, this requirement is not applicable. Further, B2 is not subject to a Subpart DDDDD PM limit and does not utilize a control device; therefore, this requirement is not applicable.</p>
§63.7540(a)(8)	None	None	<p>The permittee intends to demonstrate compliance with the CO limit by performance testing that will establish oxygen level monitoring as in applicable requirement 63.7520(c), Table 7, item 4, in permit condition 5.3.14. As such, the permittee does not intend to utilize a CO CEMS to which this paragraph applies. Therefore, no permit condition is warranted for this paragraph.</p>
§63.7540(a)(9)	None	None	<p>The permittee intends to demonstrate compliance with the PM limit by performance testing. As such, the permittee does not intend to utilize a PM CPMS or a PM CEMS to which this paragraph applies. Therefore, no permit condition is warranted for this paragraph.</p>
§63.7540(a)(10)	B1 B2	5.1.13. 5.1.14.	<p>This paragraph requiring annual tune-ups is directly applicable to boiler B2 because its MDHI is greater than 10 MMBtu/hr. In addition, since it does not utilize a continuous oxygen trim system that maintains an optimum air to fuel ratio, it is subject to this requirement based upon criteria in applicable item 3 in Table 3 to Subpart DDDDD.</p>

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
			Even though boiler B1 is subject to tune-ups every five (5) years, this paragraph is indirectly applicable to boiler B1 because the applicable requirement in §63.7540(a)(12) refers to the tune-up requirements in paragraphs (a)(10)(i) through (vi) of §63.7540. Therefore, this paragraph is cited in condition 5.1.13.
§63.7540(a)(11)	None	None	This paragraph does not apply to B1 because it has a continuous oxygen trim system that maintains an optimum air to fuel ratio and therefore is subject to §63.7540(a)(12) even though it is rated greater than 5 MMBtu/hr. This paragraph does not apply to B2 because it is rated greater than 10 MMBtu/hr and does not meet the exception in §63.7540(a)(12) for units with a continuous oxygen trim system.
§63.7540(a)(12)	B1	5.1.13.	This paragraph requiring a tune-up every five (5) years is applicable to B1 since it has a continuous oxygen trim system that maintains an optimum air to fuel ratio.
§63.7540(a)(13)	B1 B2	5.1.13. 5.1.14.	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 all tune-ups, regardless of their frequency, it has been written as the second bullet statement in the permit conditions.
§63.7540(a)(14)	None	None	The permittee does not intend to utilize a CEMS to measure Hg emissions, to which this paragraph applies. Therefore, no permit condition is warranted for this paragraph.
§63.7540(a)(15)	None	None	The permittee does not intend to utilize a CEMS to measure HCl emissions, to which this paragraph applies. Therefore, no permit condition is warranted for this paragraph.
§63.7540(a)(16)	B1	5.3.27.	Since B1 is subject to an alternative TSM limit, and the permittee intends to perform stack testing, this requirement has been included in the renewal operating permit. This section does not apply to B2 since it is subject only to annual tune-ups and the one-time energy assessment, and as such is not required to meet a TSM limit.
§63.7540(a)(17)	B1	5.3.28.	Since B1 is subject to an alternative TSM limit, and the permittee desires the flexibility to perform fuel analysis for its solid fuel, this requirement has been included in the renewal operating permit. This section does not apply to B2 since it is subject only to annual tune-ups and the one-time energy assessment, and as such is not required to meet a TSM limit.
§63.7540(a)(18)	None	None	The permittee does not intend to utilize a PM CPMS. Instead, performance stack testing will be utilized to demonstrate compliance with the PM limit. Therefore, this paragraph is not applicable.
§63.7540(a)(19)	None	None	The permittee does not intend to utilize a PM CEMS. Instead, performance stack testing will be utilized to demonstrate compliance with the PM limit. Therefore, this paragraph is not applicable.
§63.7540(b)	B1 B2	5.5.7. 5.5.8.	The purpose of this requirement is to report deviations from applicable requirements. Clearly, this paragraph applies to B1 since it is subject to emission limitations. It also applies to B2 even though the requirement reads that it pertains to emission limits and operating limits (to which B2 is not subject). It also pertains to those requirements in Tables 1 through 4 or 11 through 13. B2 is subject to a work practice standard in Table 3 (conditions 5.1.14.). Therefore, the requirement applies to B2. This paragraph requires reporting in accordance with §63.7550;

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
			therefore, it has been cited with permit conditions from §63.7550 that contain specific requirements about reporting deviations.
§63.7540(c)	None	None	This section is not applicable to B1 since it does not combust gas 1 fuel. It is not applicable to B2 since it is not subject to a mercury limitation.
§63.7540(d)	B1	5.1.16. 5.1.17.	This paragraph requires meeting the startup and shutdown work practice standards in items 5 and 6 of Table 3. Therefore, this paragraph has been added to the citation of authority for those permit conditions for B1. This requirement does not apply to B2 since it is not subject to Subpart DDDDD emission limits.
Notifications, Reports, and Records			
§63.7545(a)	B1 B2	5.5.4. 5.5.5.	<p>This requirement is to submit all the notifications in specified sections of Subpart A, which are discussed below.</p> <p>§§63.7(b) and (c) are applicable to B1 since it subject to Subpart DDDDD performance testing.</p> <p>§63.8(e) is applicable to B1 since a CMS is utilized for monitoring oxygen content and boiler operating load (cf. permit condition 5.2.20.).</p> <p>§§63.8(f)(4) and (6) are not applicable since neither an alternative monitoring method, nor an alternative to the relative accuracy test has been requested by the permittee.</p> <p>Among §§63.9(b) though (h), the following apply:</p> <p>§63.9(b) is the initial notification, which has passed. Therefore, this is not included in the permit condition.</p> <p>§63.9(c) is to request a compliance extension. Neither the application nor any technical correspondence indicates that this has been requested; therefore, this has been excluded from the permit condition.</p> <p>§63.9(d) is notification that the source is subject to special compliance requirements. Neither the application nor any technical correspondence indicates that this has been requested; therefore, this has been excluded from the permit condition.</p> <p>§63.9(e) is notification of performance test, which is applicable to B1. This Subpart A requirement will be cited with the Subpart DDDDD requirement from §63.7545(d) in permit condition 5.5.5.</p> <p>§63.9(f) is notification of opacity and VE observations. Since B1 is subject to a Subpart DDDDD opacity limitation, this requirement is applicable.</p> <p>§63.9(g) is additional notification requirements for sources with CMS, which is applicable to B1.</p> <p>§63.9(h) is the NOCS requirement, which is applicable to both B1 and B2. Therefore, both §63.9(h) and §63.7545(a) have been cited with the NOCS permit condition 5.5.6.</p>

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
			§63.7495(d) has been included in the citation of authority since it requires the permittee to meet the notification requirements in §63.7545.
§63.7545(b)	B1 B2	None	This operating permit renewal is past the 120-day period after January 31, 2013; therefore, no permit condition is required,
§63.7545(c)	None	None	This section is not applicable since the units were constructed prior to January 31, 2013.
§63.7545(d)	B1	5.5.5.	<p>This paragraph is applicable to B1 since it is subject to performance testing.</p> <p>This paragraph is not applicable to B2 since it is not subject to a Subpart DDDDD performance testing requirement.</p> <p>§63.7495(d) has been included in the citation of authority since it requires the permittee to meet the notification requirements in §63.7545.</p>
§63.7545(e)	B1 B2	5.5.6.	<p>This paragraph specifies the requirements for the NOCS which is applicable to both B1 and B2. However, as noted in the introductory text of §63.7545(e), units that 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 (1) and (8) of §63.7545(e). Boiler B2 is not subject to the initial compliance demonstration requirements specified in §63.7530(a) (i.e., performance tests, fuel analyses, and establishing operating limits). Since only paragraphs (1) and (8) of §63.7545(e) apply to B2, the citation of authority has been structured to indicate this distinction.</p> <p>For clarity and precision, only applicable Table 2 has been mentioned in the permit condition from §63.7545(e)(3).</p> <p>§63.7545(e)(5) has been excluded because the permittee cannot perform emissions averaging since only one unit is subject to Subpart DDDDD emission limitations.</p> <p>Both §63.9(h) and §63.7545(a) have been cited with the NOCS permit condition.</p> <p>§63.7495(d) has been included in the citation of authority since it requires the permittee to meet the notification requirements in §63.7545.</p>
§63.7545(f)	None	None	This requirement is not applicable to B1 since it does not combust any of the fuels listed in the first sentence of this requirement. This requirement is not applicable to B2 since the permittee does not intend to use a fuel other than natural gas in B2.
§63.7545(g)	None	None	This section is not applicable since the units will not combust solid waste.
§63.7545(h)	None	None	This requirement is not applicable since neither the application nor technical correspondence from the permittee indicates an intention to combust any fuel other than wood type material in B1 and natural gas in B2. If such a change were to be made, the permittee will become subject to this requirement.

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
§63.7550(a)	B1 B2	5.5.7. 5.5.8.	<p>This paragraph 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. This paragraph accounts for requirements a. through d. in permit condition 5.5.7.</p> <p>Since B1 is subject to emission limits, operating limits, and is on a 5-year tune-up frequency, but B2 is subject only to annual tune-ups, two Compliance report conditions have been written to manage the requirements that apply to each unit, even though some information required in the report is common to both units.</p> <p>Items c. and d. in Table 9 are not included in permit condition 5.5.8. since B2 is not subject to emission limitations and does not utilize a CMS. Item b. in Table 9 has been incorporated into the permit conditions.</p>
§63.7550(b)	B1 B2	5.5.7. 5.5.8.	The schedule for submitting compliance reports has been incorporated into the renewal permit.
§63.7550(c)	B1 B2	5.5.7. 5.5.8.	§63.7550(c)(1) through (5) have been included in condition 5.5.7. for B1. §63.7550(c)(1) and applicable parts of (c)(5) have been included in condition 5.5.8. for B2.
§63.7550(d)	B1	5.5.7.	This requirement is applicable to B1, but not to B2. Therefore, it has been included in the permit condition for B1.
§63.7550(e)	B1	5.5.7.	This requirement is applicable to B1, but not to B2. Therefore, it has been included in the permit condition for B1.
§63.7550(f) §63.7550(g)	None	None	These paragraphs are reserved; therefore, no permit condition is needed.
§63.7550(h)(1)	B1	5.5.7.	This reporting requirement pertaining to performance testing is applicable to B1, but not to B2. Therefore, it has been included in the permit condition for B1.
§63.7550(h)(2)	None	None	Compliance for B1 will not be demonstrated with CEMS; therefore, this requirement is not applicable to B1. Furthermore, B2 is not subject to an applicable standard that would require CEMS; therefore, this requirement is not applicable to B2.
§63.7550(h)(3)	B1 B2	5.5.7. 5.5.8	Since this requirement pertains to the report required by Table 9 of Subpart DDDDD, then it is also written with the compliance report condition.
§63.7555(a)	B1 B2	5.4.6.	This applicable recordkeeping requirement is set forth as a permit condition. The language in this paragraph refers to semiannual compliance reports. The permittee is required to submit a compliance report semiannually for B1 and annually for B2. To clarify this, an italicized note has been added in the permit condition.
§63.7555(b)	B1	5.4.7.	<p>While the permittee does not operate a CEMS, it is required to operate a continuous monitoring system (CMS) to monitor operating the load of boiler B1 during the period between performance tests and the opacity from B1 using COMS. Therefore, this requirement has been incorporated into the permit for boiler B1.</p> <p>This section is not applicable to B2 since it is not required by Subpart DDDDD to utilize a CEMS, COMS, or a CMS.</p>

Subpart DDDDD Section	Affected Emission Unit	Title V	Discussion
§63.7555(c)	B1	5.4.8.	This paragraph requires recordkeeping of applicable information in Table 8 to Subpart DDDDD, which are embodied in permit condition 5.2.20. Non-applicable regulation language regarding pressure drop, and pH are excluded from the condition for clarity and precision. None of the requirements in this section, or Table 8 that it references, are applicable to B2 since it is not subject to Subpart DDDDD emission limitations and is not equipped with air pollution control devices.
§63.7555(d)(1)	B1	5.4.9.	This monthly fuel use recordkeeping requirement applies to B1. None of the requirements in §63.7555(d)(1) through (11) apply to B2 since it is not subject to an emission limit in Tables 1, 2, or 11 through 13 to this subpart.
§63.7555(d)(2)	None	None	B1 does not combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) and (2) of this chapter; therefore, this requirement does not apply to B1.
§63.7555(d)(3)	B1	5.4.10.	This maximum chlorine fuel input recordkeeping requirement applies to B1.
§63.7555(d)(4)	B1	5.4.11.	This maximum mercury fuel input recordkeeping requirement applies to B1.
§63.7555(d)(5)	B1	5.4.12.	This recordkeeping requirement for change in frequency of stack testing frequency applies to B1.
§63.7555(d)(6)	B1	5.4.13.	This recordkeeping requirement for occurrences of malfunctions applies to B1.
§63.7555(d)(7)	B1	5.4.14.	This recordkeeping requirement for actions taken in response during malfunctions applies to B1.
§63.7555(d)(8)	B1	5.4.15.	This recordkeeping requirement for maximum TSM fuel input calculations applies to B1.
§63.7555(d)(9)	B1	5.4.16.	This recordkeeping requirement for startups and shutdowns applies to B1.
§63.7555(d)(10)	B1	5.4.17.	This recordkeeping requirement for fuels used during startups and shutdowns applies to B1.
§63.7555(d)(11) through (13)	None	None	These requirements are not applicable since the permittee will utilize the paragraph (1) definition of “startup” in §63.7575.
§63.7555(e)	None	None	The permittee is not utilizing emissions averaging as it only operates one unit subject to Subpart DDDDD numerical emission limitations; therefore, no permit condition is warranted.
§63.7555(f)	None	None	This section is not applicable since efficiency credits are not being utilized.
§63.7555(g)	None	None	This section is not applicable to B1 since it is not in the units designed to burn gas 1 subcategory. This section is not applicable to B2 since it is not required to meet the specification for mercury.
§63.7555(h)	None	None	This section is not applicable to B1 since it is not in the units designed to burn gas 1 subcategory. This section is not applicable to B2 since it does not combust any alternative fuel other than natural gas.
§§63.7560(a) through (c)	B1 B2	5.4.18.	These applicable recordkeeping requirements are set forth as a permit condition.

Non-Applicability Determinations

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

- a. **40 C.F.R. 60 Subparts K, Ka, Kb - *Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978; after May 18, 1978, and prior to July 23, 1984; after July 23, 1984, respectively.*** The permittee utilizes thirty-five (35) tanks at the facility. Regardless of the construction date, these New Source Performance Standards (NSPS) are applicable to tanks with capacities of at least 20,000 US gallon or 40,000 US gallon. The permittee's tanks T1 through T35 do not satisfy this requirement since the largest capacity tanks at the facility are 5,500 US gallon each. Therefore the tanks T1 through T35 are not subject to 40CFR60 Subparts K, Ka, Kb.
- b. **40 C.F.R. 60 Subpart Db - *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.*** The permittee currently operates two (2) boilers at the facility. The wood-fired Boiler B1 has a design capacity of 28.8 MMBtu/hr. The natural gas-fired boiler B2 has a design capacity of 20.9 MMBtu/hr. The boilers listed above were constructed after June 19, 1984, which satisfies part of the applicability criteria. However, the boilers listed above have a design heat input capacity less than 100 MMBtu/hr. The rule requires that both the construction date and the design heat input capacity criteria be met in order to be applicable to a source. Therefore the boilers listed are not subject to 40 C.F.R. 60 Subpart Db.
- c. **45CSR21 - *Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.*** 45CSR21 applies to sources located in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. American Woodmark's South Branch facility is located in Hardy County; therefore, it is not subject to 45CSR21.
- d. **45CSR29 - *Rule Requiring the Submission of Emission Statements for Volatile Organic Compound Emissions and Oxides of Nitrogen Emissions.*** 45CSR29 applies to stationary sources in Putnam, Kanawha, Cabell, Wayne, Wood, and Greenbrier Counties. American Woodmark's South Branch facility is located in Hardy County; therefore, it is not subject to 45CSR29.
- e. **45CSR13, R13-2571M, 4.1.43.** This construction permit condition is only applicable when the emissions from at least two emission units vent through the same stack (i.e., emission point). None of the boilers are installed and operated in this fashion. Therefore, this particular construction permit condition will not be included in the Title V permit.
- f. **45CSR13, R13-2571M, 4.1.45.** The construction permit condition 45CSR13, R13-2571M, 4.1.45. is based upon 45CSR§10-8.2.a. In the Exemptions and Recommendations set forth in 45CSR§10-10.3., all fuel burning units which combusts natural gas, wood or distillate oil, alone or in combination, shall be exempt from the testing, monitoring, recordkeeping, and reporting requirements set forth in 45CSR§10-8. Since boiler B1 combusts wood and B2 combusts natural gas, they are exempt from 45CSR§10-8 and the construction permit condition 45CSR13, R13-2571M, 4.1.45., is not applicable and will not be included in the Title V permit.
- g. **45CSR13, R13-2571M, 4.1.46.** This construction permit condition states, "At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Secretary thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Secretary may specify shall be conducted to determine compliance." This construction permit condition is not an applicable requirement for Title V permitting. Therefore, this condition will not be included in the permittee's Title V permit. Any testing required will be permitted in accordance with 3.3. of the permit, and other specific test requirements that may be set forth in each section of the permit.

- h. **45CSR13, R13-2571M, 4.1.49.** This requirement to develop an SSM plan is based upon a vacated version of NESHAPs-MACT Subpart DDDDD. Furthermore, §63.7505(e) in the current regulation applies only when using the paragraph (2) definition of “startup” in §63.7575. Since the permittee is using the paragraph (1) definition, this requirement is not applicable. For these reasons, the underlying permit requirement is not applicable and has been excluded from the renewal permit.
- i. **45CSR13, R13-2571M, 4.1.51.** This maintenance requirement is based upon a vacated version of §63.7505(b). Furthermore, §63.7505(b) is reserved in the current regulation; therefore, this underlying permit requirement is not applicable.
- j. **45CSR13, R13-2571M, 4.1.52. and 4.1.53.** These requirements for seven selected metals and manganese are based upon a vacated version of NESHAPs-MACT Subpart DDDDD. Furthermore, §63.7507(b) does not exist in the current regulation; therefore, this underlying permit requirement is not applicable.
- k. **45CSR13, R13-2571M, 4.1.54. and 4.1.55.** The emission limitations for HCl and Hg are based upon a vacated version of NESHAPs-MACT Subpart DDDDD. Furthermore, the HCl and Hg limits in the underlying permit requirements are not those in the current regulation; therefore, this underlying permit requirement is not applicable.
- l. **45CSR13, R13-2571M, 4.1.56.** This requirement pertaining to SSM operation is based upon a vacated version of §63.7540(c). Furthermore, §63.7540(c) in the current regulation pertains to demonstrating compliance with the mercury standard for units designed to burn gas 1 subcategory; therefore, this underlying permit requirement is not applicable.
- m. **45CSR13, R13-2571M, 4.3.2.** This fuel analysis requirement is based upon a vacated version of §63.7515(f). Furthermore, §63.7515(f) in the current regulation pertains to reporting results of performance tests within 60 days of their completion; therefore, this underlying permit requirement is not applicable.
- n. **45CSR13, R13-2571M, 4.5.4.** This reporting requirement is based upon a vacated version of §63.7515(g). Furthermore, §63.7515(g) in the current regulation pertains to performance testing within 180 days of re-starting a source that has not been operating; therefore, this underlying permit requirement is not applicable.
- o. **40 C.F.R. 60 Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.*** This subpart applies to manufacturers, owners, and operators of stationary compression ignition internal combustion engines that have been constructed, reconstructed, or modified after various dates, the earliest of which is July 11, 2005. The fire water pump engine (FP1) is a compression ignition engine; however, it was constructed in 2004. Since FP1 does not meet the applicability criteria, the requirements of this subpart do not apply.
- p. **40 C.F.R. 60 Subpart JJJJ – *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.*** This subpart applies to manufacturers, owners, and operators of stationary spark ignition internal combustion engines that have been constructed, reconstructed, or modified after various dates, the earliest of which is June 12, 2006. The fire water pump engine (FP1) is a compression ignition engine; therefore, FP1 does not meet the applicability criteria and the requirements of this subpart do not apply.

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: March 15, 2017
Ending Date: April 14, 2017

Point of Contact

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

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
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Charleston, WV 25304
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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 the public, which includes the permittee.

In an e-mail dated 4/25/2017, Mr. Paul Wentworth with USEPA Region III stated that he has reviewed the source-specific limits and applicable requirements, and the monitoring, testing, and recordkeeping requirements, and finds no reason for EPA to object to the issuance of this permit.