

**TITLE V PERMIT RENEWAL APPLICATION**

**PERMIT NUMBER R30-04900026-2014**

**American Bituminous Power Partners, L.P.  
Grant Town Power Plant  
Grant Town, West Virginia**

**Prepared by:**

The Thrasher Group, Inc.  
600 White Oaks Boulevard  
Bridgeport, West Virginia 26330

January 2019  
101-070-0531

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

Form with 10 sections: 1. Name of Applicant, 2. Facility Name or Location, 3. DAQ Plant ID No., 4. Federal Employer ID No. (FEIN), 5. Permit Application Type, 6. Type of Business Entity, 7. Is the Applicant the: Owner, Operator, Both, 8. Number of onsite employees, 9. Governmental Code, 10. Business Confidentiality Claims.

<b>11. Mailing Address</b>		
<b>Street or P.O. Box:</b> P.O. Box 159		
<b>City:</b> Grant Town	<b>State:</b> WV	<b>Zip:</b> 26574-
<b>Telephone Number:</b> (304) 278-7449	<b>Fax Number:</b> (304) 278-7437	

<b>12. Facility Location</b>		
<b>Street:</b> 228 ABPP Drive	<b>City:</b> Grant Town	<b>County:</b> Marion
<b>UTM Easting:</b> 561.832 km	<b>UTM Northing:</b> 4,421.140 km	<b>Zone:</b> <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
<b>Directions:</b> From Fairmont take US Route 19 north to Rivesville. Turn left onto County Route 17. Follow CR 17 approximately 4 miles to plant entrance on the right.		
<b>Portable Source?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>Is facility located within a nonattainment area?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, for what air pollutants?</b>	
<b>Is facility located within 50 miles of another state?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, name the affected state(s).</b> Pennsylvania Maryland	
<b>Is facility located within 100 km of a Class I Area<sup>1</sup>?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, name the area(s).</b>	
<b>If no, do emissions impact a Class I Area<sup>1</sup>?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<sup>1</sup> Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

<b>13. Contact Information</b>		
<b>Responsible Official:</b> Steve Friend		<b>Title:</b> Plant Manager
<b>Street or P.O. Box:</b> 228 ABPP Drive P.O. Box 159		
<b>City:</b> Grant Town	<b>State:</b> WV	<b>Zip:</b> 26574-
<b>Telephone Number:</b> (304) 278-7449	<b>Fax Number:</b> (304) 278-7437	
<b>E-mail address:</b> sfriend@ambitwv.com		
<b>Environmental Contact:</b> Don Drennen		<b>Title:</b> Compliance Specialist
<b>Street or P.O. Box:</b> 228 ABPP Drive P.O. Box 159		
<b>City:</b> Grant Town	<b>State:</b> WV	<b>Zip:</b> 26574-
<b>Telephone Number:</b> (304) 278-6103	<b>Fax Number:</b> (304) 278-7437	
<b>E-mail address:</b> ddrennen@ambitwv.com		
<b>Application Preparer:</b> Lori Steele		<b>Title:</b> Senior Air Quality Specialist
<b>Company:</b> The Thrasher Group, Inc.		
<b>Street or P.O. Box:</b> 600 White Oaks Blvd.		
<b>City:</b> Bridgeport	<b>State:</b> WV	<b>Zip:</b> 26330-
<b>Telephone Number:</b> (304) 848-6498	<b>Fax Number:</b> (304) 624-7831	
<b>E-mail address:</b> lsteele@thethrashergroup.com		

**14. Facility Description**

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Coal Refuse Fired CFB Boilers	Total output of 80 MWe	221112	4911

**Provide a general description of operations.**

American Bituminous Grant Town Power Plant is a coal refuse-fired electric generation facility with a total output of 80 MWe and operates under SIC 4911 and NAICS 221112. The facility consists of two (2) 551.9 MMBtu per hour coal refuse-fired circulating fluidized bed boilers and various supporting operations such as coal handling, ash handling, limestone handling, and various tanks with insignificant emissions. The boilers are designed to accommodate a variety of fuels, but the primary fuel is coal refuse (gob) supplemented with pond fines. Natural gas is used as a start-up fuel. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

- 15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.
- 16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."
- 17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

**Section 2: Applicable Requirements**

<b>18. Applicable Requirements Summary</b>	
Instructions: Mark all applicable requirements.	
<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input type="checkbox"/> Minor source NSR (45CSR13)	<input checked="" type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS	<input type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input checked="" type="checkbox"/> CSAPR NO <sub>x</sub> Ozone Season Trading Program (45CSR40)	<input type="checkbox"/>
<input type="checkbox"/>	

<b>19. Non Applicability Determinations</b>
<p><b>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</b></p> <p>45CSR5 – The facility is subject to 45CSR2 in lieu of 45CSR5.            45CSR7 – The facility is subject to 45CSR2 in lieu of 45CSR7.            45CSR33 – The facility is not subject to the Acid Rain Program Requirements of 40 CFR 72, 73, 74, 76, 77, and 78.            40 CFR 60, Subparts D, Db, and Dc. Subpart Da applies to the facility.            40 CFR 60, Subparts K, Ka, and Kb. All volatile organic liquid storage tanks are below 10,567 gallons capacity.            40 CFR 60, Subpart Q. The facility does not use chromium-based water treatment chemicals.</p>
<input checked="" type="checkbox"/> Permit Shield

**20. Facility-Wide Applicable Requirements**

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

- 45CSR6-3.1. and 3.2. Open burning.
- 40 C.F.R. 61.145(b) and 45CSR34. Asbestos.
- 45CSR4-3.1 State-Enforceable only. Odor.
- 45CSR11-5.2. Standby plan for reducing emissions.
- W. Va. Code 22-5-4(a)(14). Emission inventory.
- 40 C.F.R. 82, Subpart F. Ozone-depleting substances.
- 40 C.F.R. 68. Risk Management Plan.
- 45CSR40-5.1. Limit NOx emissions during ozone season.
- R14-0005, B.1, B.2, and B.13; 45CSR2-5.1. Fugitive Particulate Matter Control.
- R14-0005, A.5. Fugitive Particulate Matter Control on unpaved roads.
- R14-0005, A.6. Fugitive Particulate Matter Control on paved roads.

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 45CSR45CSR6-3.1. and 3.2. Open burning is generally not conducted as a best practice.
- 40 C.F.R. 61.145(b) and 45CSR34. The Grant Town Power Plant complies with 40 C.F.R. 61 as applicable.
- 45CSR4-3.1 State-Enforceable only. Maintain a record of all odor complaints received per 45CSR30-5.1.c.
- 45CSR11-5.2. Standby plan for reducing emissions will be prepared if required.
- W. Va. Code 22-5-4(a)(14). Grant Town Power Plant submits a timely annual air emission inventory.
- 40 C.F.R. 82, Subpart F. The Grant Town Power Plant complies with 40 C.F.R. 82 as applicable.
- 40 C.F.R. 68. The Grant Town Power Plant complies with 40 C.F.R. 68 as applicable.
- 45CSR40-6.1. Operate a certified continuous emissions monitor system. Record and report NOx mass emissions.
- R14-0005, A.5. Fugitive Particulate Matter Control on unpaved roads. Maintain records of dust control measures per 45CSR30-5.1.c.
- R14-0005, A.6. Fugitive Particulate Matter Control on paved roads. Maintain records of dust control measures per 45CSR30-5.1.c.

Are you in compliance with all facility-wide applicable requirements?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

**20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.**

**List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.**

W. Va. Code 22-5-4(a)(14-15). Stack Testing.  
45CSR30-5.1.c.2.A. Monitoring information.  
45CSR30-5.1.c.2.B. Retention of records.  
45CSR30-4.4 and 5.1.c.3.D. Responsible official.  
45CSR30-5.1.c.3.E. Confidential information.  
45CSR30-8. Certified emissions statement.  
45CSR30-5.3.c. Compliance certification.  
45CSR30-5.1.c.3.A. Semi-annual monitoring reports.  
45CSR30-5.1.c.3.C. Deviations.  
45CSR30-5.1.c.3.B. Deviations.  
45CSR30-4.3.h.1.B. New applicable requirements.

Permit Shield

**For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

W. Va. Code 22-5-4(a)(14-15). Grant Town Power Plant conducts emissions tests as required.  
45CSR30-5.1.c.2.A. Monitoring information is maintained per the requirements.  
45CSR30-5.1.c.2.B. Records are maintained for a minimum of five (5) years.  
45CSR30-5.1.c. Maintain records of dust control measures.  
45CSR30-4.4 and 5.1.c.3.D. Required submittals are signed by the responsible official.  
45CSR30-5.1.c.3.E. Confidential information will be requested as appropriate per 45CSR31.  
45CSR30-8. Certified emissions statement and fees are submitted annually.  
45CSR30-5.3.c. Compliance certification is submitted annually.  
45CSR30-5.1.c.3.A. Semi-annual monitoring reports are submitted by March 15<sup>th</sup> and September 15<sup>th</sup> each year.  
45CSR30-5.1.c.3.C. Deviations will be reported in accordance with the regulations.  
45CSR30-5.1.c.3.B. Deviations reports will include probable cause(s) and corrective action(s).  
45CSR30-4.3.h.1.B. Grant Town Power Plant will comply with new applicable requirements as appropriate.

**Are you in compliance with all facility-wide applicable requirements?**  Yes  No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.





**Section 3: Facility-Wide Emissions**

<b>23. Facility-Wide Emissions Summary [Tons per Year]</b>	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	821.89
Nitrogen Oxides (NO <sub>x</sub> )	1,933.86
Lead (Pb)	0.59
Particulate Matter (PM <sub>2.5</sub> ) <sup>1</sup>	
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	159.3
Total Particulate Matter (TSP)	
Sulfur Dioxide (SO <sub>2</sub> )	1,994.62
Volatile Organic Compounds (VOC)	38.68
Hazardous Air Pollutants <sup>2</sup>	Potential Emissions
Hydrogen Chloride	541
Hydrogen Fluoride	53.6
Mercury	0.087
Beryllium Compounds	0.000395
Regulated Pollutants other than Criteria and HAP	Potential Emissions

<sup>1</sup>PM<sub>2.5</sub> and PM<sub>10</sub> are components of TSP.  
<sup>2</sup>For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

**Section 4: Insignificant Activities**

<b>24. Insignificant Activities (Check all that apply)</b>	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input checked="" type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO <sub>2</sub> lasers, used only on metals and other materials which do not emit HAP in the process.
<input type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input checked="" type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input checked="" type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO <sub>x</sub> , SO <sub>2</sub> , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.  Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:  <u>Sources include diesel and gasoline storage tanks for on-site vehicles, the diesel engine connected to the boiler feed water pump (emergency use only), turbine lube oil vent and deicing compound usage.</u>  _____ _____ _____ _____ _____ _____

**24. Insignificant Activities (Check all that apply)**

<input checked="" type="checkbox"/>	20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.  Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:  _____ _____ _____ _____ _____
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input checked="" type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.

<b>24. Insignificant Activities (Check all that apply)</b>	
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input checked="" type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

*Section 5: Emission Units, Control Devices, and Emission Points*

**25. Equipment Table**

Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.

**26. Emission Units**

For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.

For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

**27. Control Devices**

For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

**Section 6: Certification of Information**

**28. Certification of Truth, Accuracy and Completeness and Certification of Compliance**

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

**a. Certification of Truth, Accuracy and Completeness**

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

**b. Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

**Responsible official (type or print)**

Name: Steve Friend

Title: Plant Manager

**Responsible official's signature:**

Signature: 

Signature Date: 1/24/2019

(Must be signed and dated in blue ink)

**Note: Please check all applicable attachments included with this permit application:**

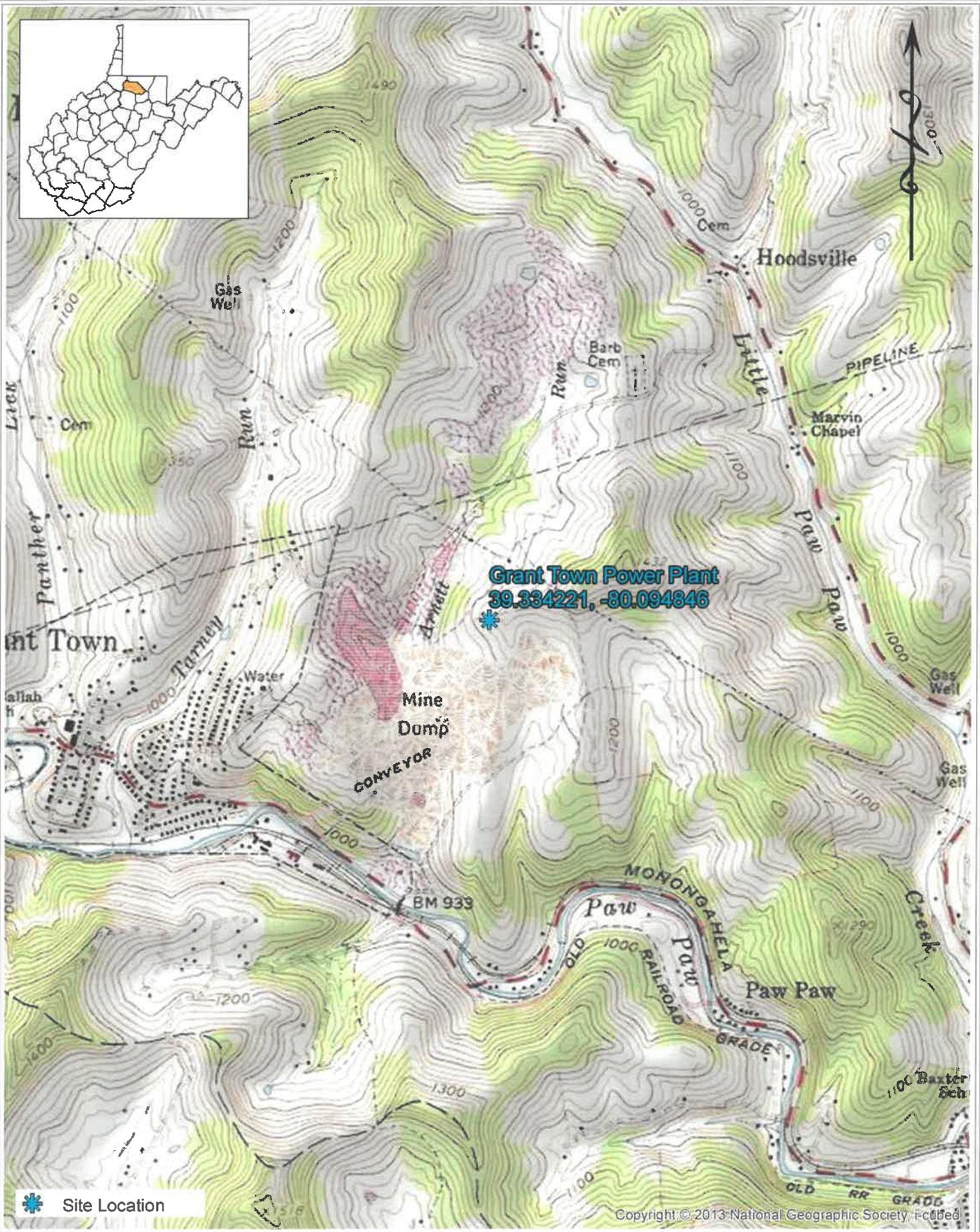
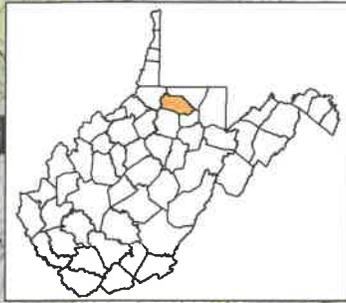
<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input type="checkbox"/>	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

**All of the required forms and additional information can be found and downloaded from, the DEP website at [www.dep.wv.gov/daq](http://www.dep.wv.gov/daq), requested by phone (304) 926-0475, and/or obtained through the mail.**

# ATTACHMENT A

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## **Area Map**



 Site Location

Copyright © 2013 National Geographic Society. Fictified

Document Path: R:\070-053-TITLE V PERMITTING-AMBIT-IGIS\MXD\Grant\_Town\_Power\_Plant.mxd

By: eanglin



Attachment A: Area Map  
American Bituminous Power Partners, L.P.  
Grant Town - West Virginia



1 inch = 1,500 feet

11/28/2018

# ATTACHMENT B

---

## **Plot Plan(s)**

## Attachment B – Plot Plan

### Point Sources Legend

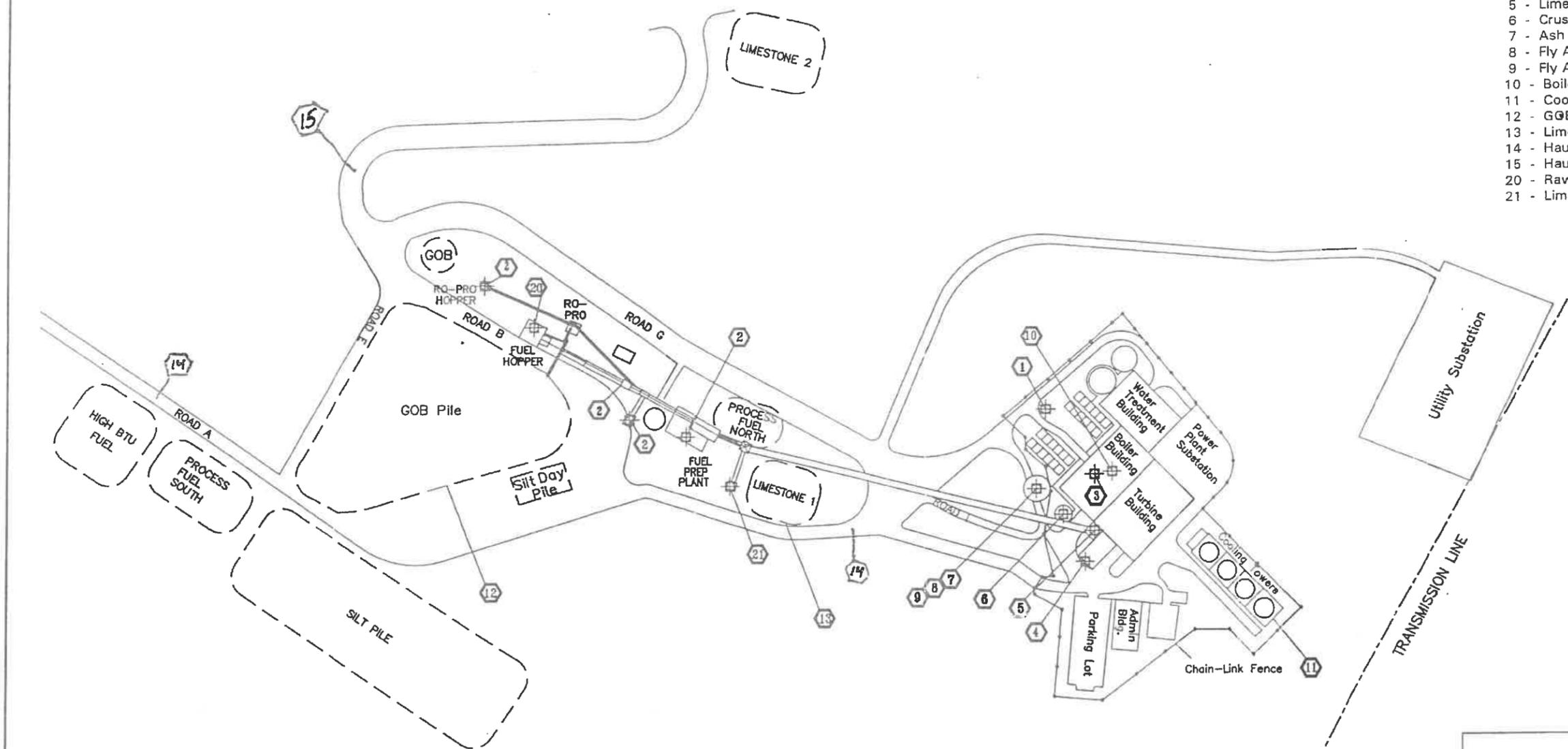
Drawing ID Number	AIR4 ID Number	Description
1	1E	Main Stack
2	4S, 4C, 4E	Fuel Prep/Transport
3	5S, 5C, 4E	Fuel Storage Bins
4	6S, 003-06, 6C, 5E	Limestone Mill
5	7S, 7C, 6E	Limestone Hopper/Conveyor
6	8S, 8C, 7E	Crushed Limestone Silo
7	9S, 9C, 8E	Ash Silo
8	14S, 14C, 13E	Flyash Conveyor #1
9	15S, 15C, 14E	Flyash Conveyor #2
10	1S, 2S, 1C, 2C, 007-07	Boilers
11	007-01	Cooling Tower
12	16S, 16C, 15E	Gob Pile
13	10S, 10C, 9E	Limestone Pile
20	3S, 3C, 2E, 007-08, 00H	Raw Gob Hopper
21	17S, 17C, 16E	Limestone Unloading Hopper

Note: Transportation sources (13S, 13C, 12E, 12S, 12C and 11E) are not shown.

# MINING ACTIVITY

## MAP ID #

- 1 - Main Stack
- 2 - Fuel Prep/Transfer
- 3 - Fuel Storage Bins
- 4 - Limestone Mill
- 5 - Limestone Bulk Storage Silo
- 6 - Crushed Limestone Silo
- 7 - Ash Silo
- 8 - Fly Ash #1
- 9 - Fly Ash #2
- 10 - Boilers
- 11 - Cooling Tower
- 12 - GOB Pile
- 13 - Limestone Pile
- 14 - Haul Road (Paved)
- 15 - Haul Road (Unpaved)
- 20 - Raw GOB Hopper
- 21 - Limestone Unloading Hopper



**FIGURE 1**

**POINT SOURCES  
AMERICAN BITUMOUS  
GRANT TOWN, WEST VIRGINIA**

**CE&E ENVIRONMENTAL AND ENERGY SERVICES**  
2211 JERDMANTOWN ROAD, SUITE 500  
 FAIRFAX, VIRGINIA 22030

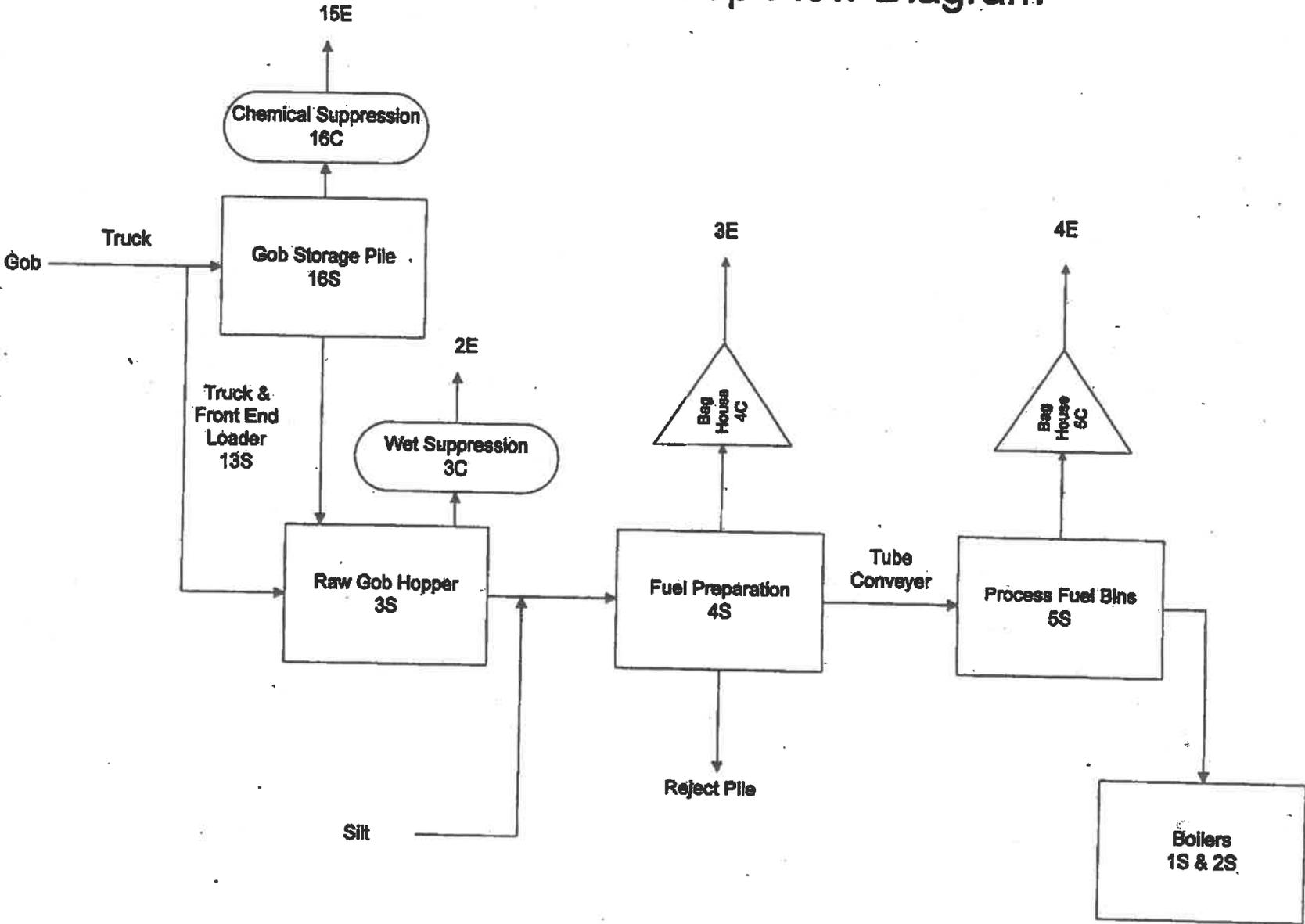
DRAWN BY: <b>JPB</b>	CHECKED BY: <b>RTM</b>	PUBLISH STATUS: <b>DRAFT</b>
DATE: <b>17APR96</b>	PROJECT NUMBER: <b>UNKNOWN</b>	

# ATTACHMENT C

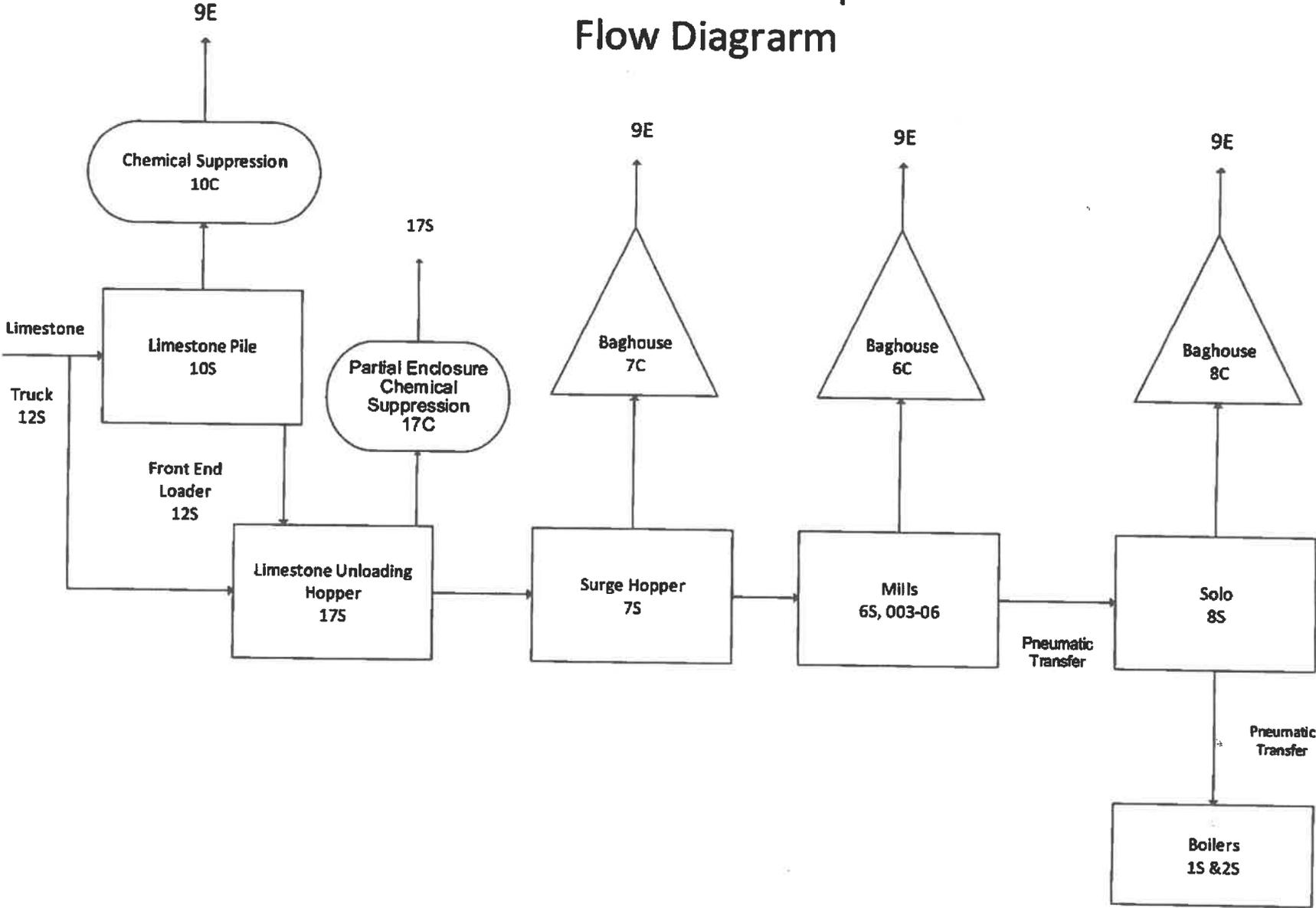
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## **Process Flow Diagram(s)**

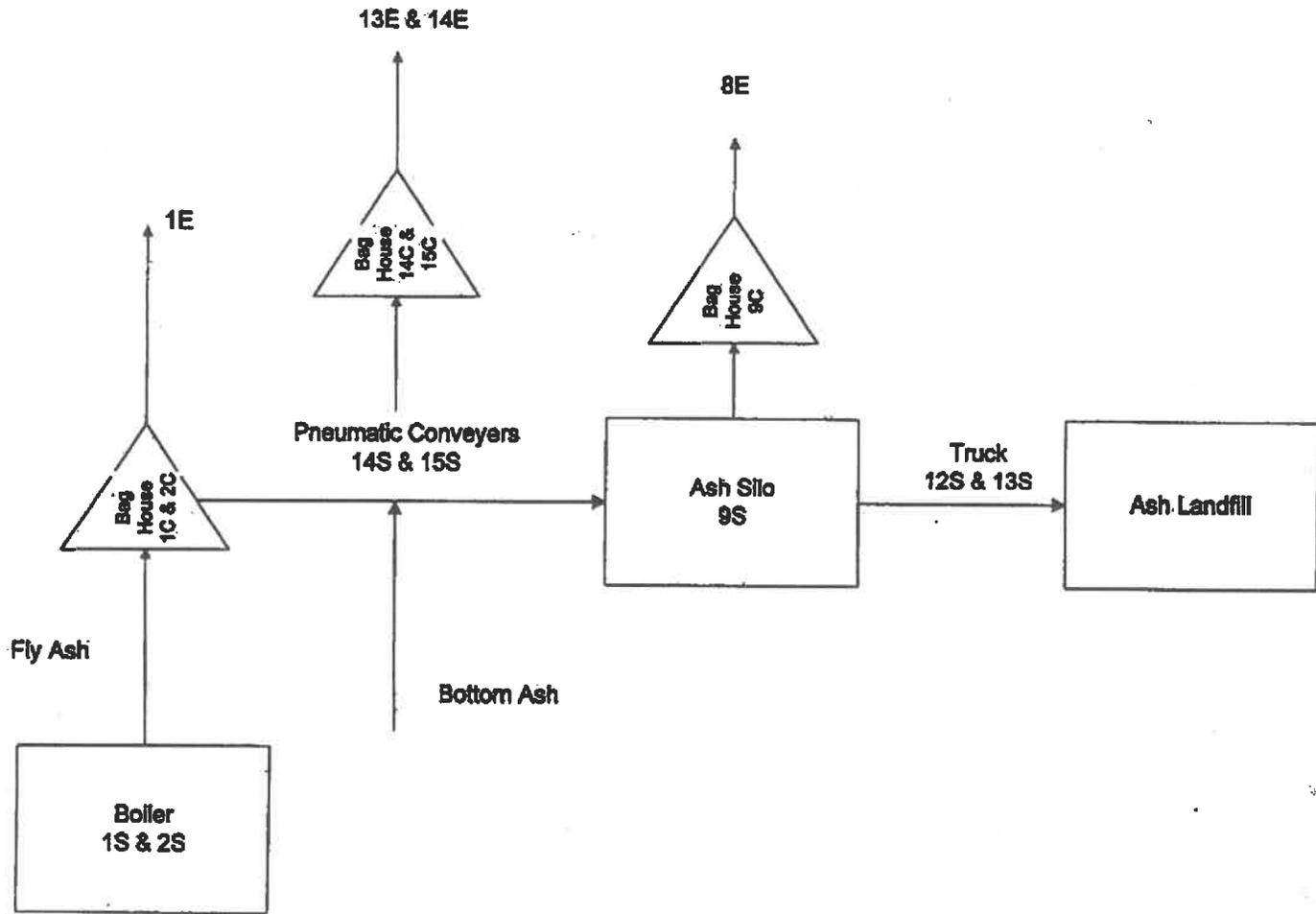
# Fuel Group Flow Diagram



# Limestone Group Flow Diagram

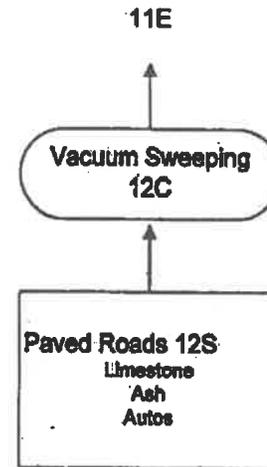
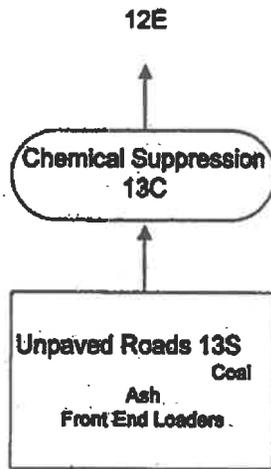


# Ash Group Flow Diagram





# Transport Group Flow Diagram



# ATTACHMENT D

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## **Equipment Table**

**ATTACHMENT D - Title V Equipment Table**  
**(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)**

Emission Point ID <sup>1</sup>	Control Device <sup>1</sup>	Emission Unit ID <sup>1</sup>	Emission Unit Description	Design Capacity	Year Installed/Modified
<b>Boilers</b>					
1E	Baghouse 1C	1S	Boiler 1A: Ahlstrom Pyropower Coal Refuse-Fired Circulating Fluidized Bed Combustion Unit	551.9mmBtu/hr	1992
1E	Baghouse 2C	2S	Boiler 1B: Ahlstrom Pyropower Coal Refuse- Fired Circulating Bed Combustion Unit	551.9mmBtu/hr	1992
<b>Fuel Group</b>					
2E	Common Wind Enclosure Wet/Chemical Suppression 3C	3S A	Raw Gob Hopper w/Vibratory Feeder	36 Ton	1992
2E	Common Wind Enclosure Wet / Chemical Suppression 3 C	3S B	Raw Gob Hopper w/ Vibratory Feeder	36 Ton	1992
2E	Common Wind Enclosure Wet / Chemical Suppression 3 C	3S C	Gob Fines Hopper w/ Vibratory Feeder (Currently Not In Use)	5 cu. Yds	1992
2E	Hemispherical Rain / Wind Enclosure	3S D	Raw Gob Conveyor FH-BC-1 (36") and Transfer Points (from Raw Gob Hoppers to Fuel Prep Building)	280 TPH	1992
18E	Common Wind Enclosure	19S A	Silt Feed Hopper	12 Tons	1992
18E	Partial Enclosure	19S B	Silt Feed Conveyor FH-BC-8 (24") and Transfer Points (from Conveyor FH-BC-9)	150 TPH	1992
18E	Partial Enclosure	19S C	Silt Feed Conveyor FH-BC-9 (24"), Shredder, and Transfer Points (from Conveyor FH-BC-9 to Conveyor FH-BC-10)	150 TPH	1992
18E	None	19S D	Silt Screen	150 TPH	1992
17E	None	18S A	Ro-Prop Hopper	20 Ton	1995
17E	Partial Enclosure	18S B	Ro-Pro Feed Conveyor FH-BC-11 (36") and Transfer Points (from Ro-Pro Hopper to Ro-Pro Scalping Screen)	200 TPH	1995
17E	Full Enclosure	18S C	Ro-Pro Scalping Screen	200 TPH	1995
17E	Full Enclosure	18S D	Gundlach Ro-Pro Unit (Rotating Probability Screen)	140 TPH	1995
17E	Full Enclosure	18S F	Ro-Pro Reversing Conveyor FH-BC-12 (30") and Transfer Points (from Gundlach Ro-Pro unit to Ro-Pro Hammermill, Radial Stacking Conveyor, and Ro-Pro Coarse Transfer Conveyor)	85 TPH	1995

17E	Full Enclosure	18S G	Ro-Pro Reversible Hammermill	85 TPH	1992/1996
17E	Partial Enclosure	18S H	Radial Stacking Conveyor FH-BC-14 (32") and Transfer Points (from Ro-Pro Reversing Conveyor to Stockpile)	200 TPH	1995
17E	Partial Enclosure	18S I	Ro-Pro Coarse Transfer Conveyor FH-BC-13 (30") and Transfer Points (from Ro-Pro Reversing Conveyor to Raw Gob Hoppers)	200 TPH	1995
17E	Partial Enclosure	18S J	Ro-Pro Processed Fuel Transfer Conveyor FH-BC-15 (36") and Transfer Points (from Gundlach Ro-Pro Unit and Ro-Pro Hammermill to FH-BC-10 and Boiler Day Bins)	200 TPH	1995
18E	Partial Enclosure	19S E	Conveyor FH-BC-10 (24") and Transfer Points (from Silt Feed Hopper and Ro-Pro Building FH-BC-15 to Conveyor FH-BC-2)	200 TPH	1992
3E	Full Enclosure*	4S A	Double Deck Screen	230 TPH	1992
3E	Full Enclosure	4S B	Coarse Gob Impactor	90 TPH	1992
3E	Full Enclosure Baghouse 4C	4S C	Final Product Belt Conveyor FH-BC-2 (24") and Transfer Points (from Fuel Prep Building to Transfer House)	160 TPH	1992
3E	Full Enclosure	4S D	Reversible Hammermill "A"	85 TPH	1992
3E	Full Enclosure Baghouse 4C	4S E	Final Product Belt Conveyor FH-BC-2 (24") and Transfer Points (from Fuel Prep Building to Transfer House)	160 TPH	1992
3E, 6E	Full Enclosure, Baghouse 4C, 7C	4S F	Fuel Storage Belt Conveyor FH-BC-3 (24") and Transfer Points (from Transfer House to Boiler Day Bins)	280 TPH	1992
3E	Baghouse 4C	4S G	Fuel Prep Stack Out Conveyor FH-BC-16 (24") and Transfer Points (from Transfer House Discharging to Ground)	200 TPH	1992
4E	Full Enclosure Baghouse 5C	5S A	Weigh Belt Scale FH-BC-4 (24") and Transfer Points (from Covered Tube Conveyors to Cross Conveyor FH-BC-5)	280 TPH	1992
4E	Full Enclosure Baghouse 5C	5S B	Cross Conveyor FH-BC-5 (24") and Transfer Points (from Weigh Belt Scale to Day Bin #1 and FH-BC-6)	280 TPH	1992
4E	Full Enclosure Baghouse 5C	5S C	Cross Conveyor FH-BC-6 (24") and Transfer Points (from FH-BC-5 to Day Bin #2 and FH-BC-7)	280 TPH	1992
4E	Full Enclosure Baghouse 5C	5S D	Cross Conveyor FH-BC-7 (24") and Transfer Points (from FH-BC-6 to Day Bin #3)	280 TPH	1992
4E	Full Enclosure Baghouse 5C	5S E	Boiler Day Bin #1	950 Tons	1992

\*Gob is immersed in water upon entering the Fuel Preparation Building.

4E	Full Enclosure, Baghouse 5C	5S F	Boiler Day Bin #2	950 Tons	1992
4E	Full Enclosure Baghouse 5C	5S G	Boiler Day Bin #3	300 Tons	1992
15E	Chemical Suppression 16C	16S A	Gob Storage Pile	170,000 Tons	1992/1995
15E	Chemical Suppression 16C	16S B	Process Fuel N Pile	4,000 Tons	1992/1995
15E	Chemical Suppression 16C	16S C	Process Fuel S Pile	11,000 Tons	1992/1995
15E	Chemical Suppression 16C	16S D	High BTU Pile	10,000 Tons	1992/1995
15E	Chemical Suppression 16C	16S E	Silt Pile	70,000 Tons	1992/1995
15E	Chemical Suppression 16C	16S F	Fines Day Pile	3,000 Tons	1992/1995
<b>Limestone Group</b>					
3E	Enclosure Baghouse 4C	7S A	Limestone Reclaim Conveyor LH-BC-1 (24") (from Unloading Hopper to Transfer Building)	300 TPH	1992
3E, 6E	Enclosure Baghouse 4C, 7C	7S B	Limestone Storage Belt Conveyor LH-BC-2 (24") (from Transfer Building to Surge Hopper – Limestone Prep Building)	300 TPH	1992
6E	Baghouse 7C	7S C	Surge Hopper (Uncrushed Limestone prior to Injection into Mills) – Two Feed Cones each w/ Vibratory Feeder	1,200 Tons	1992
5E	Baghouse 6C	6S A	Limestone Mill (DFM Mill)	70 TPH	1992
5E	Baghouse 6C	6S B	Limestone Mill (Backup Hammermill)	70 TPH	1992
6E	N/A	7S D	003-06 Limestone Mill Heater (Indirect Contact Heat used to Dry Limestone)	N/A	1992
7E	Baghouse 8C	8S A	Pneumatic Conveyor (from Limestone Mills to Limestone Storage Silo)	70 TPH	1992
7E	Baghouse 8C, Bin Vent Filter	8S B	Silo (Stores Crushed Limestone prior to Injection into Boilers)	3,600 Tons	1992
7E	Full Enclosure	8S C	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1A) w/ Volumetric Feeder	50 TPH	1992
7E	Full Enclosure	8S D	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1A) w/ Volumetric Feeder	50 TPH	1992
7E	Full Enclosure	8S E	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1B) w/ Volumetric Feeder	50 TPH	1992
7E	Full Enclosure	8S F	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1B) w/ Volumetric Feeder	50 TPH	1992

10S A	Wet/Chemical Suppression 10C	9E	Limestone Pile #1	5,000 Tons	1992/1995
10S B	Wet/Chemical Suppression 10C	9E	Limestone Pile #2	10,000 Tons	1992/1995
17S	Partial Enclosure, Wet/Chemical Suppression 17C	16E	Limestone Unloading Hopper (stores uncrushed limestone prior to being fed to Surge Hopper)	25 Tons	1992
<b>Ash Group</b>					
9S A	Enclosure Baghouse 9C Bin Vent Filter	8E	Ash Silo (stores ash from boiler baghouses)	3,100 Tons	1992
9S B	Vent Fan, Baghouse 9C, Bin Vent Filter	8E	Ash Telescoping Dry Unloader Chute (Emergency Unloading)	86.9 TPH	1992
9S C	N/A	8E	Wet Ash Rotary Unloader System (Dustless Unloader includes a Wetting Step prior to Discharge to Trucks)	86.9 TPH	1992
9S D	Enclosure Baghouse 9C Bin Vent Filter	8E	Vacuum Pneumatic Conveyor (Fly Ash Handling System from Boiler #1A to Silo)	40 TPH	1992
9S E	Enclosure Baghouse 9C Bin Vent Filter	8E	Vacuum Pneumatic Conveyor (Fly Ash Handling System from Boiler #1B to Silo)	40 TPH	1992
14S A	Enclosure Cyclone Separator 14-C/A Baghouse 14C	13E	Pressurized Pneumatic Conveyor (Bottom Ash Handling System from Boiler #1A to Silo)	40 TPH	1992
14S B	Enclosure Cyclone Separator 14-C/A Baghouse 14C	13E	Back up Pressurized Pneumatic Conveyor (Bottom Ash Handling System from Boiler #1A to Silo)	40 TPH	1992
15S A	Enclosure Cyclone Separator 14-C/A Baghouse 14C	14E	Pressurized Pneumatic Conveyor (Bottom Ash Handling System from #1B to Silo)	40 TPH	1992
15S B	Enclosure Cyclone Separator 15-C/A Baghouse 15C	14E	Backup Pressurized Pneumatic Conveyor (Bottom Ash Handling System from Boiler #1B to Silo)	40 TPH	1992
<b>Transport Group</b>					
12S	Vacuum Sweeping 12C/Chemical	11E	Paved Roads (Limestone Trucks, Ash Trucks, Autos)	N/A	1992

13S	Chemical Suppression 13C	12E	Unpaved Roads (Coal Trucks, Ash Trucks, Front End Loaders)	N/A	1992
<b>Support Group</b>					
20S	N/A	002	Aqua Ammonia 8% Usage (007-07) to Boiler Feed Water	N/A	1992
21S	N/A	002	Cooling Tower Operations (007-01)a	N/A	1992
Tank #1	N/A	Tank #1	Kerosene Storage Tank – Fuel Prep	1000 gal	1992
Tank #2	N/A	Tank #2	Kerosene Storage Tank – Fuel Prep	1000 gal	1992
Tank #3	N/A	Tank #3	Kerosene Storage Tank – Fuel Prep	500 gal	1992
Tank #4	N/A	Tank #4	Kerosene Storage Tank – Fuel Prep	2000 gal	1992
Tank #5	N/A	Tank #5	Kerosene Storage Tank – Cooling Tower	500 gal	1992
Tank #6A	N/A	Tank #6A	Gasoline Storage Tank – Cooling Tower	500 gal	1992
Tank #6B	N/A	Tank #6B	Diesel Storage Tank – Cooling Tower	500 gal	1992
Tank #7	N/A	Tank #7	Diesel Storage Tank – Diesel Fire Pump	250 gal	1992
Tank #11	N/A	Tank #11	Diesel Storage Tank – Site Civil Contractor	4,000 gal	2001
Tank #12	N/A	Tank #12	Diesel Storage Tank – Site Civil Contractor	1,000 gal	2001
DFP	N/A	DFP	Emergency Diesel Feed Pump	235 HP	1992
DFP2	N/A	DFP2	Diesel Fire Pump	350 HP	1992

<sup>1</sup>For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

# ATTACHMENT E

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## **Emission Unit Form(s)**

**ATTACHMENT E - Emission Unit Form**

***Emission Unit Description***

<b>Emission unit ID number:</b> 1S and 2S	<b>Emission unit name:</b> Boiler # 1A and 1B	<b>List any control devices associated with this emission unit:</b> Baghouse 1C and 2C
--	--	---

**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
Coal refuse-fired circulating fluidized bed (CFB) combustion units.

<b>Manufacturer:</b> Alstrom Pyropower	<b>Model number:</b> Unknown	<b>Serial number:</b> Unknown
---	---------------------------------	----------------------------------

<b>Construction date:</b> 1992	<b>Installation date:</b> 11/1/1992	<b>Modification date(s):</b> N/A
-----------------------------------	--	-------------------------------------

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
551.9 MMBtu/hr each

<b>Maximum Hourly Throughput:</b> 48 ton/hr each	<b>Maximum Annual Throughput:</b> 403,200 tons each	<b>Maximum Operating Schedule:</b> 8760 hr/yr
---	--	--

***Fuel Usage Data (fill out all applicable fields)***

<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>If yes, is it?</b> <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

<b>Maximum design heat input and/or maximum horsepower rating:</b> 551.9 MMBtu/hr each	<b>Type and Btu/hr rating of burners:</b> 551.9 MMBtu/hr each circulating fluidized bed
---	--

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**

Coal refuse:  
48 tons/hour each boiler  
840,960 tons/year for both boilers = [(2\*48 tons/hr)\*8760 hours/year]

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Coal refuse	4.4 %	51.05 %	6,400 Btu/lb

***Emissions Data***

American Bituminous Power Partners LLC – Grant Town Power Plant

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	187.6	787.92
Nitrogen Oxides (NO <sub>x</sub> )	441.5	1,854.30
Lead (Pb)	0.136	0.5712
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		139.02
Total Particulate Matter (TSP)	33.1	139.02
Sulfur Dioxide (SO <sub>2</sub> )	915.84	1,990
Volatile Organic Compounds (VOC)	8.8	36.96
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Beryllium	0.00009	0.000378
Mercury	0.02	0.06
Fluorides	0.671	2.818
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p><b>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</b></p> <p>Potential emissions were calculated using the following emission factors:                      0.83 lb SO<sub>2</sub>/MMBtu (controlled), 0.03 lb PM/MMBtu (controlled), 0.17 lb CO/MMBtu, 1.8x10<sup>-5</sup> lb Hg/MMBtu,                      6.08x10<sup>-4</sup> lb F/MMBtu</p>		

**Applicable Requirements**

**List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.**

45CSR14; R14-0005, B.1, B.2, and B.6; 45CSR2-3.1; 45CSR16; 40 CFR 60.42Da(b) – Visible Emissions  
45CSR14, R14-0005, B.1 and B.2; 45CSR2-3.2, 45CSR2A-6 – Visible Emissions  
45CSR14, R14-0005, A.1, B.1, and B.6; 45CSR2-4.1.a; 45CSR16; 40 CFR 60.42Da(a)(1), 60.43Da(a)(1), 60.43Da(g), 60.44Da(a), and 60.44Da(a)(1) – Emission Limits  
45CSR14, R14-0005, A.9, B.1, and B.6; 45CSR16; 40 CFR 60.43Da(a) – SO<sub>2</sub> Emission Limits  
45CSR14, R14-0005, B.1 and B.2; 45CSR2-4.4 – Addition of SO<sub>2</sub> to exhaust prohibited  
45CSR14, R14-0005, B.1 and B.2; 45CSR2-9.1 – Visible Emissions  
45CSR14, R14-0005, B.1 and B.2; 45CSR2-9.2; 45CSR16; 40 CFR 60.11(d) – Minimize Emissions  
45CSR14, R14-0005, B.1 and B.6; 45CSR16; 40 CFR 60.42Da(a)(2) – Particulate Matter Control  
45CSR14, R14-0005, B.1 and B.6; 45CSR16; 40 CFR 60.44Da(a) – PM Emission Limit  
45CSR14, R14-0005, B.1 and B.6; 45CSR16; 40 CFR 60.48Da(c) – PM and NO<sub>x</sub> Emission Limits  
45CSR34; 40 CFR 63; Subpart UUUUU; 45CSR30-6.5.b. – Initial Performance Testing

Permit Shield

**For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)**

45CSR14; R14-0005, B.1, B.2, and B.6; 45CSR2-3.1 and 3.2; 45CSR2A-6; 45CSR16; 40 CFR 60.42Da(b) – Compliance with the visible emission requirements for emission point 1E shall be monitored as outlined in Air Emissions Monitoring Plan.  
45CSR14, R14-0005, B.1, B.6, and B.11; 45CSR16; 40 CFR 60.13, 40 CFR 60.4Da(a)(1), 60.49Da – The owner or operator shall install, calibrate, certify, operate, maintain, and record the output from continuous monitoring systems that measure all opacity, SO<sub>2</sub>, and O<sub>2</sub> or CO<sub>2</sub> emissions from emission point 1E.  
45CSR14, R14-0005, B.14 – The owner or operator shall install, calibrate, maintain, and operate a continuous nitrogen oxide monitoring system.  
45CSR30-5.1.c. – Monitor the baghouse system in accordance with the Baghouse Inspection & Maintenance Plan.  
45CSR14; R14-0005, B.1 and B.2; 45CSR2-8.1.a – Compliance with the visible emission limit shall be demonstrated by periodic testing in accordance with 40 CFR 60, Appendix A, Method 9 or a certified continuous opacity monitoring system.  
45CSR14; R14-0005, B.9 – Compliance with particulate matter emission limits shall be demonstrated in accordance with all applicable requirements of 45CSR2 and 40 CFR 60.  
45CSR14; R14-0005, B.10 – Compliance with SO<sub>2</sub> emission limits and SO<sub>2</sub> reduction requirements shall be demonstrated in accordance with all applicable requirements of 40 CFR 60. Compliance shall be determined using an SO<sub>2</sub> Continuous Emission Monitoring System.  
45CSR14; R14-0005, B.15 – Compliance with VOC emission limits shall be demonstrated by 40 CFR 60, Appendix A, Method 25A.  
45CSR14; R14-0005, B.17 – Compliance with lead emission limits shall be demonstrated by 40 CFR 60, Appendix A, Method 12.  
45CSR14; R14-0005, B.18 – Compliance with mercury emission limits shall be demonstrated by 40 CFR 60, Appendix A, Method 101A.  
45CSR14; R14-0005, B.19 – Compliance with fluorides emission limits shall be demonstrated by 40 CFR 60, Appendix A, Method 13.  
45CSR14; R14-0005, B.20 – Compliance with beryllium emission limits shall be demonstrated by 40 CFR 60, Appendix A, Method 104.  
45CSR14; R14-0005, B.1 and B.2; 45CSR2-8.1; 45CSR2A-2.6 and 5.2 – Compliance with particulate matter emission limits shall be demonstrated in accordance with the appropriate method in the Appendix of 45CSR2.

American Bituminous Power Partners LLC – Grant Town Power Plant

45CSR14; R14-0005, B.16; 45CSR30-5.c.1. – Compliance with the CO emission limits shall be determined by conducting a performance test in accordance with 40 CFR 60, Appendix A, Method 10. The test shall be conducted at least once every five (5) years.

45CSR14; R14-0005, B.1 and B.2; 45CSR2-8.3.a – Keep records of monitoring data per the Revised Air Emissions Monitoring Plan.

45CSR14; R14-0005, B.1 and B.2; 45CSR2-8.3.c; 45CSR2A-7.a.4 – Keep records of operating schedule and the quantity and quality of fuel consumed.

45CSR30-5.1.c – Keep records from NO<sub>x</sub> CEMS. Keep records per the Baghouse Inspection and Maintenance Plan. Keep records of all required pollution control equipment inspection and/or preventative maintenance procedures. Keep records of malfunctions of air pollution control equipment.

45CSR14; R14-0005, B.1 and B.2; 45CSR2-8.3.b – Submit periodic exception reports as determined by the Director.

45CSR14; R14-0005, B.1 and B.2; 45CSR2-8.3.b; 45CSR2A-7.b; 45CSR16; 40 CFR 60.7 – Submit quarterly reports in accordance with 40 CFR 60.7.

45CSR14; R14-0005, B.1 and B.2; 45CSR2-9.3.a – Report boiler or air pollution control equipment malfunctions on a quarterly basis.

45CSR14; R14-0005, B.1 and B.2; 45CSR2-9.3.b – Report any boiler or air pollution control equipment malfunction that results in excess particulate matter emissions or excess opacity with one business day and file a certified written report within thirty (30) days detailing the cause of the malfunction and corrective actions taken.

45CSR14; R14-0005, B.22. – Submit an emissions report annually as required under 45CSR14-19.8(c).

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

**ATTACHMENT E - Emission Unit Form**

***Emission Unit Description***

<b>Emission unit ID number:</b> See table below	<b>Emission unit name:</b> Fuel Group	<b>List any control devices associated with this emission unit:</b> See table below
--	--	--

**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
See table below

<b>Manufacturer:</b> See table below	<b>Model number:</b> See table below	<b>Serial number:</b> See table below
<b>Construction date:</b> See table below	<b>Installation date:</b> See table below	<b>Modification date(s):</b>

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
See table below

<b>Maximum Hourly Throughput:</b> See table below	<b>Maximum Annual Throughput:</b> See table below	<b>Maximum Operating Schedule:</b> 8,760 hr/yr
--	--	---

***Fuel Usage Data (fill out all applicable fields)***

<b>Does this emission unit combust fuel?</b> ___Yes ___X___ No	<b>If yes, is it?</b> ___ Indirect Fired ___ Direct Fired
<b>Maximum design heat input and/or maximum horsepower rating:</b> N/A	<b>Type and Btu/hr rating of burners:</b> N/A

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**  
N/A

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

***Emissions Data***

American Bituminous Power Partners LLC – Grant Town Power Plant

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		9.04
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Hg		
Formaldehyde		
POM		
Benzene		
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p><b>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</b></p> <p>Potential Emissions were obtained from the original Title V application and the PSD permit application.</p>		

***Applicable Requirements***

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

R14-0005E, A.2 – Fuel handling/storage equipment, control devices, and particulate matter emission limits

R14-0005E, A.7 – Storage pile operating conditions

R14-0005E, A.10 – Ro-Pro operating conditions

45CSR 2-5.1 – Fugitive dust control

R14-0005E, B.1, B.5 and B.12; 45CSR 16; 40 CFR 60.11(c); 40 CFR 60.254(a) – Subpart Y visible emissions

45CSR14, R14-0005, B.1 and B.5; 45CSR 16; 40CFR 60.11(d) – Acceptable operating and maintenance

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

45CSR30-5.1.c – Monthly visible emission checks and annual Method 9 visible emission evaluations.

45CSR14, R14-005, B.1 and B.5; 45CSR16; 40 CFR 60.8; 40 CFR 60.11(b) and (e)(1); 40 CFR 60.225(a) and 257 – Compliance with opacity limits shall be determined per 40 CFR 60, Appendix A, Method 9.

45CSR30-5.1.c – Keep records of visible emissions observations and records of each coal/gob stockpile.

45CSR14, R14-0005, B.21 – Keep certified records of daily and monthly amount of fuel through the Ro-Pro Roll Crusher.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

American Bituminous Power Partners LLC – Grant Town Power Plant

<b>Emission Unit</b>	<b>Description of Emissions Unit</b>	<b>Date Installed</b>	<b>Design Capacity and Maximum Rate</b>	<b>Maximum Annual Throughput</b>	<b>Control</b>
3S A	Raw Gob Hopper w/ Vibratory Feeder	1992	36 Ton	756,000 TPY	Common Wind Enclosure Wet/Chemical Suppression 3C
3S B	Raw Gob Hopper w/ Vibratory Feeder	1992	36 Ton	756,000 TPY	Common Wind Enclosure Wet/Chemical Suppression 3C
3S C	Gob Fines Hopper w/ Vibratory Feeder (Currently Not in Use)	1992	5 cu. Yds	756,000 TPY	Common Wind Enclosure Wet/Chemical Suppression 3C
3S D	Raw Gob Conveyor FH-BC-1 (36") and Transfer Points (from Raw Gob Hoppers to Fuel Prep Building)	1992	280 TPH	756,000 TPY	Hemispherical Rain/Wind Enclosure
19S A	Silt Feed Hopper	1992	12 Tons	90,000 TPY	Common Wind Enclosure
19S B	Silt Feed Conveyor FH-BC-8 (24") and Transfer Points (from Silt Feed Hopper to Conveyor FH-BC-9)	1992	150 TPH	90,000 TPY	Partial Enclosure
19S C	Silt Feed Conveyor FH-BC-9 (24"), Shredder, and Transfer Points (from Conveyor FH-BC-9 to Conveyor FH-BC-10)	1992	150 TPH	90,000 TPY	Partial Enclosure
19S D	Silt Screen	1992	150 TPH	90,000 TPY	None
18S A	Ro-Pro Hopper	1995	20 Ton		None
18S B	Ro-Pro Feed Conveyor FH-BC-11 (36") and Transfer Points (from Ro-Pro Hopper to Ro-Pro Scalping Screen)	1995	200 TPH		Partial Enclosure
18S C	Ro-Pro Scalping Screen	1995	200 TPH		Full Enclosure
18S D	Gundlach Ro-Pro Unit (Rotating Probability Screen)	1995	140 TPH		Full Enclosure
18S E	Ro-Pro Roll Crusher	2001	75 TPH		Full Enclosure
18S F	Ro-Pro Reversing Conveyor FH-BC-12 (30") and Transfer Points (from Gundlach Ro-Pro Unit to Ro-Pro Hammermill, Radial Stacking Conveyor, and Ro-Pro Coarse Transfer Conveyor)	1995	85 TPH		Full Enclosure
18S G	Ro-Pro Reversible Hammermill	1992/1996	85 TPH		Full Enclosure

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18S H	Radial Stacking Conveyor FH-BC-14 (32") and Transfer Points (from Ro-Pro Reversing Conveyor to Stockpile)	1995	200 TPH		Partial Enclosure
18S I	Ro-Pro Coarse Transfer Conveyor FH-BC-13 (30") and Transfer Points (from Ro-Pro Reversing Conveyor to Raw Gob Hoppers)	1995	200 TPH		Partial Enclosure
18S J	Ro-Pro Processed Fuel Transfer Conveyor FH-BC-15 (36") and transfer points (from Gundlach Ro-Pro unit and Ro-Pro and Ro-Pro Hammermill to FH-BC-10 and Boiler Day Bins)	1995	200 TPH		Partial Enclosure
19S E	Conveyor FH-BC-10 (24") and Transfer Points (from Silt Feed Hopper and Ro-Pro Building FH-BC-15 to Conveyor FH-BC-2)	1992	200 TPH		Partial Enclosure
4S A	Double Deck Screen	1992	230 TPH	750,000 TPY	Full Enclosure
4S B	Coarse Gob Impactor	1992	90 TPH	750,000 TPY	Full Enclosure
4S C	Hammermill Feed Hopper w/ Vibratory Feeder	1992	80 Tons	750,000 TPY	Full Enclosure, Baghouse 4C
4S D	Reversible Hammermill "A"	1992	85 TPH	750,000 TPY	Full Enclosure
4S E	Final Product Belt Conveyor FH-BC-2 (24") and transfer points (from Fuel Prep Building to Transfer House)	1992	160 TPH	750,000 TPY	Full Enclosure, Baghouse 4C
4S G	Fuel Prep Stack Out Conveyor FH-BC-16 (24") and Transfer Points (from Transfer House Discharging to Ground)	1992	200 TPH	750,000 TPY	Baghouse 4C
4S F	Fuel Storage Belt Conveyor FH-BC-3 (24") and Transfer Points (from Transfer house to Boiler Day Bins)	1992	280 TPH	750,000 TPY	Full Enclosure Baghouse 4C, 7C
5S A	Weigh Belt Scale FH-BC-4 (24") and transfer Points (from Covered Tube Conveyors to Cross Conveyor FH-BC-5)	1992	280 TPH	900,040 TPY	Full Enclosure Baghouse 5C

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5S B	Cross Conveyor FH-BC-5 (24") and Transfer Points (from Weigh Belt Scale to Day Bin #1 and FH-BC-6)	1992	280 TPH	900,040 TPY	Full Enclosure Baghouse 5C
5S C	Cross Conveyor FH-BC-6 (24") and Transfer Points (from FH-BC-5 to Day Bin #2 and FH-BC-7)	1992	280 TPH	900,040 TPY	Full Enclosure Baghouse 5C
5S D	Cross Conveyor FH-BC-7 (24") and Transfer Points (from FH-BC-6 to Day Bin #3)	1992	280 TPH	900,040 TPY	Full Enclosure Baghouse 5C
5S E	Boiler Day Bin #1	1992	950 Tons	900,040 TPY	Full Enclosure Baghouse 5C
5S F	Boiler Day Bin #2	1992	950 Tons	900,040 TPY	Full Enclosure Baghouse 5C
5S G	Boiler Day Bin #3	1992	300 Tons	900,040 TPY	Full Enclosure Baghouse 5C
16S A	Gob Storage Pile	1992/1995	170,000 Tons	750,000 TPY	Chemical Suppression 16C
16S B	Process Fuel N Pile	1992/1995	4,000 Tons	750,000 TPY	Chemical Suppression 16C
16S C	Process Fuel S Pile	1992/1995	11,000 Tons	750,000 TPY	Chemical Suppression 16C
16S D	High BTU Pile	1992/1995	10,000 Tons	750,000 TPY	Chemical Suppression 16C
16S E	Silt Pile	1992/1995	70,000 Tons	750,000 TPY	Chemical Suppression 16C
16S F	Fines Day Pile	1992/1995	3,000 Tons	750,000 TPY	Chemical Suppression 16C

**ATTACHMENT E - Emission Unit Form**

<b>Emission Unit Description</b>			
<b>Emission unit ID number:</b> See table below	<b>Emission unit name:</b> Limestone Group	<b>List any control devices associated with this emission unit:</b> See table below	
<b>Provide a description of the emission unit (type, method of operation, design parameters, etc.):</b> See table below			
<b>Manufacturer:</b> See table below	<b>Model number:</b> See table below	<b>Serial number:</b> See table below	
<b>Construction date:</b> See table below	<b>Installation date:</b> See table below	<b>Modification date(s):</b>	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> See table below			
<b>Maximum Hourly Throughput:</b> See table below	<b>Maximum Annual Throughput:</b> See table below	<b>Maximum Operating Schedule:</b> 8,760 hr/yr	
<b>Fuel Usage Data (fill out all applicable fields)</b>			
<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<b>If yes, is it?</b>  <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b>		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>  Natural Gas			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas			

American Bituminous Power Partners LLC – Grant Town Power Plant

<b><i>Emissions Data</i></b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		0.842
Nitrogen Oxides (NO <sub>x</sub> )		4.01
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		12.801
Total Particulate Matter (TSP)		12.801
Sulfur Dioxide (SO <sub>2</sub> )		0.024
Volatile Organic Compounds (VOC)		0.153
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Hg		0.000455
Formaldehyde		2.51
POM		0.000026
Benzene		0.00614
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p><b>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</b></p> <p>Potential Emissions were obtained from the original Title V application and the PSD permit application.</p>		

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45CSR14, R14-0005, A.3, B.1, and B.7; 45CSR16, 40 CFR 60.672(a) – Controlled particulate matter emissions limits.

45CSR14, R14-0005, A.8 – Operational limits.

45CSR14, R14-0005, B.1, and B.7; 45CSR16, 40 CFR 60.671 and 60.672(a) – Limits on fugitive particulate matter emissions.

45CSR14, R14-0005, B.1; 45CSR16; 40CFR 60.11(d) – Minimize particulate matter emissions.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45CSR30-5.1.c – Conduct annual visible emissions evaluations of each emission point using 40 CFR 60, Appendix A, Method 9. Conduct monthly visible emission observations of each emission point by a trained Method 22 observer. If emissions exceed 50 percent of the allowable limit Method 9 shall be employed at least once every consecutive 14-day period until visible emissions are less than or equal to 50 percent of the allowable.

45CSR14, R14-0005, B.1; 45CSR16, 40 CFR 60.675 – Conduct performance tests as required in 40 CFR 60.8.

45CSR30-5.1.c – Keep records of visible emissions observations. Maintain limestone stockpile records including capacity and annual throughput.

45CSR14, R14-0005, B.1; 45CSR16, 40 CFR 60.676(f) – Submit written reports of the test results.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

American Bituminous Power Partners LLC – Grant Town Power Plant

Emission Unit	Description of Emissions Unit	Date Installed	Design Capacity and Maximum Rate	Maximum Annual Throughput	Control
7S A	Limestone Reclaim Conveyor LH-BC-1 (24") (from Unloading Hopper to Transfer Building)	1992	300 TPH	435,300 TPY	Enclosure Baghouse 4C
7S B	Limestone Storage Belt Conveyor LH-BC-2 (24") (from Transfer Building to Surge Hopper – Limestone Prep Building)	1992	300 TPH	435,300 TPY	Enclosure Baghouses 4C, 7C
7S C	Surge Hopper (Uncrushed Limestone prior to Injection into Mills) – Two Feed Cones each w/ Vibratory Feeder	1992	1200 Tons	435,300 TPY	Baghouse 7C
6S A	Limestone Mill (DFM Mill)	1992	70 TPH	435,300 TPY	Baghouse 6C
6S B	Limestone Mill (Backup Hammermill)	1992	70 TPH	435,300 TPY	Baghouse 6C
7S D	003-06 Limestone Mill Heater (Indirect Contact Heat used to Dry Limestone)	1992	N/A	N/A	N/A
8S A	Pneumatic Conveyor (from Limestone Mills to Limestone Storage Silo)	1992	70 TPH	435,300 TPY	Baghouse 8C
8S B	Silo (Stores Crushed Limestone prior to Injection into Boilers)	1992	3600 Tons	435,300 TPY	Baghouse 8C, Bin Vent Filter
8S C	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1A) w/ Volumetric Feeder	1992	50 TPH	435,300 TPY	Full Enclosure
8S D	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1A) w/ Volumetric Feeder	1992	50 TPH	435,300 TPY	Full Enclosure
8S E	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1B) w/ Volumetric Feeder	1992	50 TPH	435,300 TPY	Full Enclosure
8S F	Pneumatic Conveyor (from Limestone Storage Silo to Boiler #1B) w/ Volumetric Feeder	1992	50 TPH	435,300 TPY	Full Enclosure
10S A	Limestone Pile #1	1992/1995	5000 Tons	N/A	Wet/Chemical Suppression 10C
10S B	Limestone Pile #2	1992/1995	10000 Tons	N/A	Wet/Chemical Suppression 10C
17S	Limestone Unloading Hopper (stores uncrushed limestone prior to being fed to Surge Hopper)	1992	25 Tons	435,300 TPY	Partial Enclosure, Wet/Chemical Suppression 17C

**ATTACHMENT E - Emission Unit Form**

***Emission Unit Description***

<b>Emission unit ID number:</b> See table below	<b>Emission unit name:</b> Ash Group	<b>List any control devices associated with this emission unit:</b> See table below
--	---	--

**Provide a description of the emission unit (type, method of operation, design parameters, etc.):**  
See table below

<b>Manufacturer:</b> Unknown	<b>Model number:</b> Unknown	<b>Serial number:</b> Unknown
<b>Construction date:</b> 1992	<b>Installation date:</b> See table below	<b>Modification date(s):</b>

**Design Capacity (examples: furnaces - tons/hr, tanks - gallons):**  
See table below

<b>Maximum Hourly Throughput:</b> See table below	<b>Maximum Annual Throughput:</b> See table below	<b>Maximum Operating Schedule:</b> 8,760 hr/yr
--	--	---

***Fuel Usage Data (fill out all applicable fields)***

<b>Does this emission unit combust fuel?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If yes, is it?</b> <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
--	--

<b>Maximum design heat input and/or maximum horsepower rating:</b> N/A	<b>Type and Btu/hr rating of burners:</b> N/A
---	--

**List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.**  
N/A

**Describe each fuel expected to be used during the term of the permit.**

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A			

American Bituminous Power Partners LLC – Grant Town Power Plant

<b>Emissions Data</b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO <sub>x</sub> )		
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		7.62
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p><b>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</b></p> <p>Potential Emissions were obtained from the original Title V application and the PSD permit application.</p>		

***Applicable Requirements***

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

- 45CSR14, R14-0005, A.4 – Emission Limits
- 45CSR2-5.1 – Fugitive Dust Control
- 45CSR30-12.7 – Minimize Emissions
- 45CSR30-5.1.c – Monitoring and Recordkeeping Requirements

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (*Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.*)

45CSR30-5.1.c – The permittee shall inspect all dust control systems weekly during periods of normal facility operation. Operate and maintain equipment and air pollution control equipment. Permittee shall maintain records of all scheduled and non-scheduled maintenance and shall state any maintenance or corrective actions taken.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

American Bituminous Power Partners LLC – Grant Town Power Plant

<b>Emission Unit</b>	<b>Description of Emission Unit</b>	<b>Date Installed</b>	<b>Design Capacity and Maximum Rate</b>	<b>Maximum Annual Throughput</b>	<b>Control</b>
9S A	Ash Silo (stores ash from boiler baghouses)	1992	3,100 Tons	761,244 TPY	Enclosure Baghouse 9C Bin Vent Filter
9S B	Ash Telescoping Dry Unloader Chute (Emergency Unloading)	1992	86.9 TPH	761,244 TPY	Vent Fan Baghouse 9C Bin Vent Filter
9S C	Wet Ash Rotary Unloader System (Dustless unloader includes a wetting step prior to discharge to trucks)	1992	86.9 TPH	761,244 TPY	N/A
9S D	Vacuum Pneumatic Conveyor (Fly ash handling system from Boiler #1A to Silo)	1992	40 TPH	761,244 TPY	Enclosure Baghouse 9C Bin Vent Filter
9S E	Vacuum Pneumatic Conveyor (Fly ash handling system from Boiler #1B to Silo)	1992	40 TPH	761,244 TPY	Enclosure Baghouse 9C Bin Vent Filter
14S A	Pressurized Pneumatic Conveyor (Bottom ash handling system from Boiler #1A to Silo)	1992	40 TPH	1,522,488 TPY	Enclosure, Cyclone Separator 14- C/A Baghouse 14C
14S B	Backup Pressurized Pneumatic Conveyor (Bottom ash handling system from Boiler #1A to Silo)	1992	40 TPH	1,522,488 TPY	Enclosure Cyclone Separator 14- C/A Baghouse 14C
15S A	Pressurized Pneumatic Conveyor (Bottom ash handling system from Boiler #1B to Silo)	1992	40 TPH	1,522,488 TPY	Enclosure Cyclone Separator 15- C/A Baghouse 15C
15S B	Backup Pressurized Pneumatic Conveyor (Bottom ash handling system from Boiler #1B to Silo)	1992	40 TPH	1,522,488 TPY	Enclosure Cyclone Separator 15- C/A Baghouse 15C

**ATTACHMENT E - Emission Unit Form**

<b>Emission Unit Description</b>			
<b>Emission unit ID number:</b> See table below	<b>Emission unit name:</b> Support Group	<b>List any control devices associated with this emission unit:</b> See table below	
<b>Provide a description of the emission unit (type, method of operation, design parameters, etc.):</b> See table below			
<b>Manufacturer:</b> See table below	<b>Model number:</b> See table below	<b>Serial number:</b> See table below	
<b>Construction date:</b> See table below	<b>Installation date:</b> 11/01/1992	<b>Modification date(s):</b>	
<b>Design Capacity (examples: furnaces - tons/hr, tanks - gallons):</b> See table below			
<b>Maximum Hourly Throughput:</b> See table below	<b>Maximum Annual Throughput:</b> See table below	<b>Maximum Operating Schedule:</b> 8,760 hr/yr	
<b>Fuel Usage Data (fill out all applicable fields)</b>			
<b>Does this emission unit combust fuel?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<b>If yes, is it?</b> <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired	
<b>Maximum design heat input and/or maximum horsepower rating:</b> Emergency Diesel Feed Pump – 235 HP Diesel Fire Pump – 350 HP		<b>Type and Btu/hr rating of burners:</b>	
<b>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.</b>  Diesel Fuel			
<b>Describe each fuel expected to be used during the term of the permit.</b>			
<b>Fuel Type</b>	<b>Max. Sulfur Content</b>	<b>Max. Ash Content</b>	<b>BTU Value</b>
Diesel			0.137 MMBtu/gal

American Bituminous Power Partners LLC – Grant Town Power Plant

<b><i>Emissions Data</i></b>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		0.04
Nitrogen Oxides (NO <sub>x</sub> )		0.13
Lead (Pb)		
Particulate Matter (PM <sub>2.5</sub> )		
Particulate Matter (PM <sub>10</sub> )		23.79
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO <sub>2</sub> )		4.62
Volatile Organic Compounds (VOC)		0.01
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde		0.000000353
Benzene		0.00000079
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

**List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).**

Potential emissions from fuel burning equipment were calculated using AP-42 emission factors for fuel burning equipment.

Potential emissions from tanks were calculated using TANKS2 software assuming 100 turnovers per year.

Potential emissions from cooling tower were calculated assuming 25,228,800 gallons of water and 1100 TDS.

**Applicable Requirements**

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45CSR34; 40 CFR 63.6602, 63.6625(h), Table 2c(1) and footnote 1 – Work practice requirements for emergency and fire pump engines.  
45CSR34; 40 CFR 63.6605 – Operate and maintain each engine in a manner consistent with safety and good air pollution control practices for minimizing emissions.  
45CSR34; 40 CFR 63.6625(c)(2), 63.6640(a), Table 2c(1), Table 6(9) – Operate and maintain the stationary RICE according to the manufacturer’s emission-related written instructions or develop a maintenance plan.  
45CSR34; 40 CFR 63.6625(i) – Optional oil analysis program.  
45CSR34; 40 CFR 63.6640(f)(1), (2)(i), (3) – Engine operations to maintain emergency engine status.  
45CSR34; 40 CFR 63.6665, 63.6645(a)(5), Table 8 – Comply with the general provisions for 40 CFR 63, Subpart ZZZZ.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45CSR34; 40 CFR 63.6625(f) – Install a non-resettable hour meter if one is not already installed.  
45CSR34; 40 CFR 63.6655(a), (e)(2), (f)(1) – Keep records of notifications, malfunctions, tests, maintenance, and hours of operation.  
45CSR34; 40 CFR 63.6640(b) – Report deviations from emission and operating limits.  
45CSR34; 40 CFR 63.6640(e), 63.6665, and Table 8 – Report instances not meeting requirements of Subpart ZZZZ, Table 8 as applicable.

Are you in compliance with all applicable requirements for this emission unit?  Yes  No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

American Bituminous Power Partners LLC – Grant Town Power Plant

<b>Emission Unit</b>	<b>Description of Emissions Unit</b>	<b>Date Installed</b>	<b>Design Capacity and Maximum Rate</b>	<b>Maximum Annual Throughput</b>	<b>Control</b>
20S	Aqua Ammonia 8% Usage (007-07) to Boiler Feed Water	1992	N/A	N/A	N/A
21S	Cooling Tower Operations (007-01)a	1992	N/A	25,228,800 gal	N/A
Tank #1	Kerosene Storage Tank – Fuel Prep	1992	1,000 gal	100,000 gal	N/A
Tank #2	Kerosene Storage Tank – Fuel Prep	1992	1,000 gal	100,000 gal	N/A
Tank #3	Kerosene Storage Tank – Fuel Prep	1992	500 gal	500,000 gal	N/A
Tank #4	Kerosene Storage Tank – Fuel Prep	1992	2,000 gal	2,000,000 gal	N/A
Tank #5	Kerosene Storage Tank – Cooling Tower	1992	500 gal	500,000 gal	N/A
Tank #6A	Gasoline Storage Tank – Cooling Tower	1992	500 gal	500,000 gal	N/A
Tank #6B	Diesel Storage Tank – Cooling Tower	1992	500 gal	500,000 gal	N/A
Tank #7	Diesel Storage Tank – Diesel Fire Pump	1992	250 gal	250,000 gal	N/A
Tank #11	Diesel Storage Tank – Site Civil Contractor	2001	4,000 gal	4,000,000 gal	N/A
Tank #12	Diesel Storage Tank – Site Civil Contractor	2001	1,000 gal	1,000 gal	N/A
DFP	Emergency Diesel Feed Pump	1992	235 HP		N/A
DFP2	Diesel Fire Pump	1992	350 HP		N/A

# ATTACHMENT G

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## **Air Pollution Control Device Form(s)**

## ATTACHMENT G - Air Pollution Control Device Form

**Control device ID number:**  
Baghouses 1C and 2C

**List all emission units associated with this control device.**  
Boilers 1A and 1B

**Manufacturer:**  
Alstrom Pyropower

**Model number:**  
N/A

**Installation date:**  
11/01/1992

**Type of Air Pollution Control Device:**

- |   |  |   |
|---|--|---|
| <input checked="" type="checkbox"/> Baghouse/Fabric Filter    | <input type="checkbox"/> Venturi Scrubber      | <input type="checkbox"/> Multiclone                           |
| <input type="checkbox"/> Carbon Bed Adsorber                  | <input type="checkbox"/> Packed Tower Scrubber | <input type="checkbox"/> Single Cyclone                       |
| <input type="checkbox"/> Carbon Drum(s)                       | <input type="checkbox"/> Other Wet Scrubber    | <input type="checkbox"/> Cyclone Bank                         |
| <input type="checkbox"/> Catalytic Incinerator                | <input type="checkbox"/> Condenser             | <input type="checkbox"/> Settling Chamber                     |
| <input type="checkbox"/> Thermal Incinerator                  | <input type="checkbox"/> Flare                 | <input type="checkbox"/> Other (describe) _____               |
| <input type="checkbox"/> Wet Plate Electrostatic Precipitator |  | <input type="checkbox"/> Dry Plate Electrostatic Precipitator |

**List the pollutants for which this device is intended to control and the capture and control efficiencies.**

Pollutant	Capture Efficiency	Control Efficiency
particulate matter	100%	99.9%

**Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).**

Particulate laden flue gas is pulled into the baghouse through the inlet plenum by the ID fan. The inlet air-to-cloth ratio allows for operation of the baghouse with one compartment out of service for cleaning or maintenance. Each compartment is equipped with 306 bags, 6 inches in diameter by 14 feet long. The bags are supported on 11-gauge wire cages with annular rings spaced on 8 inch centers. The range for the pressure drop across the baghouse is 10 to 12 inches water column.

**Is this device subject to the CAM requirements of 40 C.F.R. 64?**  Yes  No

If Yes, Complete ATTACHMENT H

If No, **Provide justification.** The CFB boilers are controlled for PM and SO<sub>2</sub> and have pre-control emissions greater than the major source threshold. However, under 40 CFR 64.2(b)(1)(vi) CAM does not apply to emission limitations or standards for which a Part 70 permit specifies a continuous compliance demonstration method. In the case of the CFB boilers, the Title V permit currently requires continuous monitoring of opacity from the associated baghouses using a continuous opacity monitoring system (COMS), as well as continuous monitoring of the total pressure drop across each baghouse. Similarly, the Title V permit also requires continuous monitoring of SO<sub>2</sub> using a CEMS. The CFB boilers are subject to federally-enforceable conditions to demonstrate compliance with the emission limits for PM and SO<sub>2</sub>, and therefore CAM does not apply.

**Describe the parameters monitored and/or methods used to indicate performance of this control device.**

Pressure drop across the baghouse is monitored. The range for the pressure drop across the baghouse is 10 to 12 inches water column. The exhaust stack is also equipped with a continuous opacity monitoring system (COMS).