



June 20, 2016

Director
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

**Ox Paperboard, LLC
Halltown Paperboard Mill
WVDAQ ID# 037-00007**

REFERENCE: Permit R30-03700007-2012 (Issued January 10, 2012; Modified February 16, 2016)

SUBJECT: Application for Title V Permit Renewal

Dear Director:

Ox Paperboard, LLC (OXP) hereby submits the enclosed application for renewal of permit R30-03700007-2012. We would appreciate the opportunity to review a pre-draft version of the Title V renewal permit.

Please note that we have enclosed two copies of the application on CDs, and have enclosed hard copies of the form requiring signature (original signature in blue ink). No confidential business information is included with this submittal.

Should you have additional questions regarding this submittal please contact me at 304/725-2076, ext 142 or mweller@oxindustries.com, or contact our consultant Rick Wilson, TRC Environmental Corporation, at 304/476-7037 or rwilson@trcsolutions.com.

Very truly yours,

Ox Paperboard, LLC

A handwritten signature in blue ink, appearing to read 'Martin Weller', is written over a horizontal line.

Martin Weller
General Manager

Enclosures

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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

1. Name of Applicant (As registered with the WV Secretary of State's Office): Ox Paperboard, LLC		2. Facility Name or Location: Halltown Paperboard Mill	
3. DAQ Plant ID No.: 0 3 7 — 0 0 0 0 7		4. Federal Employer ID No. (FEIN): 2 6 1 3 8 7 0 1 0	
5. Permit Application Type: <input type="checkbox"/> Initial Permit When did operations commence? 1870 <input checked="" type="checkbox"/> Permit Renewal What is the expiration date of the existing permit? 01/10/2017 <input type="checkbox"/> Update to Initial/Renewal Permit Application			
6. Type of Business Entity: <input type="checkbox"/> Corporation <input type="checkbox"/> Governmental Agency <input checked="" type="checkbox"/> LLC <input type="checkbox"/> Partnership <input type="checkbox"/> Limited Partnership		7. Is the Applicant the: <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Both If the Applicant is not both the owner and operator, please provide the name and address of the other party. _____ _____ _____	
8. Number of onsite employees: ~ 100 employees			
9. Governmental Code: <input checked="" type="checkbox"/> Privately owned and operated; 0 <input type="checkbox"/> County government owned and operated; 3 <input type="checkbox"/> Federally owned and operated; 1 <input type="checkbox"/> Municipality government owned and operated; 4 <input type="checkbox"/> State government owned and operated; 2 <input type="checkbox"/> District government owned and operated; 5			
10. Business Confidentiality Claims Does this application include confidential information (per 45CSR31)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY" guidance.			

11. Mailing Address		
Street or P.O. Box: PO Box 70		
City: Halltown	State: WV	Zip: 25423
Telephone Number: (304) 725-2076	Fax Number: (304) 728-7544	

12. Facility Location		
Street: 164 Eyster Road	City: Halltown	County: Jefferson
UTM Easting: 776.32 km	UTM Northing: 4,356.17 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: From Charles Town proceed East on U.S. Route 340 to Halltown Road. Turn left off of U.S. Route 340 onto Halltown Road, the facility is located on the left approximately two (2) miles from the intersection of U.S. Route 340, Jefferson County.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, for what air pollutants?
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If yes, name the affected state(s). Maryland, Pennsylvania, Virginia
Is facility located within 100 km of a Class I Area¹? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, do emissions impact a Class I Area¹? <input type="checkbox"/> Yes <input type="checkbox"/> No		If yes, name the area(s). Shenandoah National Park
¹ 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.		

13. Contact Information		
Responsible Official: Martin H. Weller		Title: General Manager
Street or P.O. Box: PO Box 70		
City: Halltown	State: WV	Zip: 25423
Telephone Number: (304) 725-2076	Fax Number: (304) 728-7544	
E-mail address: mweller@oxpaperboard.com		
Environmental Contact: Martin H. Weller		Title: General Manager
Street or P.O. Box: PO Box 70		
City: Halltown	State: WV	Zip: 25423
Telephone Number: (304) 725-2076	Fax Number: (304) 728-7544	
E-mail address: mweller@oxpaperboard.com		
Application Preparer: Rick Wilson		Title: Principal Consultant
Company: TRC Environmental		
Street or P.O. Box: One Kenton Drive, Suite 200		
City: Charleston	State: WV	Zip: 25311
Telephone Number: (304) 476-7037	Fax Number: (304) 346-2591	
E-mail address: rwilson@trcsolutions.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
Paperboard Mill	100% recycled paperboard	322130	2631
Provide a general description of operations. The Ox Paperboard, LLC Halltown Mill is a producer of 100% recycled paperboard from recovered papers. The facility operates under Standard Industrial Classification (SIC) Code 2631. The facility consists of a coal-fired boiler, the paper mill, a carpenter shop, a waste water treatment plant, an emergency generator, truck traffic, and welding equipment.			
15. Provide an Area Map showing plant location as ATTACHMENT A . Enclosed.			
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." Enclosed.			
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. Enclosed.			

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR34)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS	<input checked="" 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 checked="" 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 checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input checked="" type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	

19. Non Applicability Determinations
<p>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.</p> <p>a. 40 CFR 60, Subpart Db – <i>Standards of performance for Industrial-Commercial-Institutional Steam Generating Units</i>. The coal-fired boiler 001 (BLR-2) commenced construction prior to and has not undergone a modification or reconstruction after June 19, 1984.</p> <p>b. 40 CFR 60, Subpart K – <i>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</i>. Halltown does not utilize storage vessels for petroleum liquids as defined in the rule.</p> <p>c. 40 CFR 60, Subpart Ka – <i>Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984</i>. Halltown does not utilize storage vessels in the capacity for which this subpart is applicable.</p>
<input checked="" type="checkbox"/> Permit Shield

19. Non Applicability Determinations (*Continued*) - Attach additional pages as necessary.

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.

d. 40 CFR 60, Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.* Halltown has not commenced construction, modification, or reconstruction of storage tank 002-03 since July 23, 1984 and therefore is not subject to this subpart.

e. 40 CFR 60, Subpart BB – Standards of Performance for Kraft Pulp Mills. Halltown does not operate a kraft pulp mill.

f. 40 CFR 63, Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry: Halltown utilizes mechanical pulping of recycled material. The Halltown process does not include digesters, bleaching operations, or chemical pulping processes in its papermaking process.

g. 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating: The Halltown process does not include web coating lines and does not include the application of web coating materials in its papermaking process.

h. 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: The facility had been a major source of HAPs making it subject to the Industrial Boiler MACT for Major Sources. The compliance date for the MACT is January 31, 2016. By restricting the fuel consumption of the boiler and installing controls before the compliance date, the facility will no longer be subject to this MACT, but will become subject to the Industrial Boiler GACT for Area Sources, 40 CFR 63 Subpart JJJJJ.

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

☒ 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. & 3.2. Open burning & open burning exemptions.
40CFR61 Subpart M - 61.145, 61.148, and 61.150 Asbestos.
45CSR4-3.1. [State-Enforceable only.] Odors.
45CSR13-10.5. [State-Enforceable only.] Permanent shutdown.
45CSR11-5.2. Standby plan for reducing emissions.
WV Code § 22-5-4(a)(14) Emission inventory.
40 CFR Part 82, Subpart F Ozone-depleting substances.
40 CFR Part 68 Risk Management Plan.
45CSR7-5.1. & 5.2. Fugitive particulate matter.
45CSR13, R13-0622, 3.1.7. Hazardous air pollutants facility-wide limits.
WV Code §§ 22-5-4(a)(14-15), 45CSR2, 45CSR10, 45CSR7, and 45CSR13 Stack testing.
45CSR§30-5.1.c.2.A. and 45CSR13, R13-0622, 4.4.1. Monitoring information.
45CSR§30-5.1.c.2.B. Retention of records.
45CSR§§30-4.4. and 5.1.c.3.D. Responsible official.
45CSR31, 45CSR§30-5.1.c.3.E. Confidential business information.
45CSR§30-8. Certified emissions statement.
45CSR§30-5.3.e. Compliance certification.
45CSR§30-5.1.c.3.A. Semi-annual monitoring reports.
45CSR§30-5.7 Emergencies.
45CSR§30-5.1.c.3.B.-C. Deviations.
45CSR30-4.3.h.1.B. New applicable requirement.

☒ 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.)

45CSR6-3.1. & 3.2. Open burning & open burning exemptions – Compliance is demonstrated by Condition Numbers 3.1.1 & 3.1.2.

40CFR61 Subpart M - 61.145, 61.148, and 61.150 Asbestos – Compliance is demonstrated by Condition Number 3.1.3.

45CSR4-3.1.; 45CSR§30-5.1.c. Odors – Compliance is demonstrated by Condition Numbers 3.1.4 & 3.4.3.

45CSR13-10.5. Permanent shutdown – Compliance would be demonstrated by submittal of written notification to WVDAQ of any permanent shutdown of the permitted facility.

45CSR11-5.2. Standby plan for reducing emissions – Compliance is demonstrated by Condition Number 3.1.5.

WV Code § 22-5-4(a)(14) Emission inventory – Compliance is demonstrated by Condition Number 3.1.6.

40 CFR Part 82, Subpart F Ozone-depleting substances – Compliance is demonstrated by Condition Number 3.1.7.

40 CFR Part 68 Risk Management Plan – Compliance is demonstrated by Condition Number 3.1.8.
Note: The permitted facility is not currently subject to 40 CFR Part 68; see application section# 19. Non Applicability Determinations.

45CSR7-5.1. & 5.2.; 45CSR§30-5.1.c. Fugitive particulate matter – Compliance is demonstrated by Condition Numbers 3.1.9 & 3.1.10; 3.4.4.

45CSR13, R13-0622, 3.1.7. The potential to emit of hazardous air pollutants (HAPs) from the facility shall not exceed 25 tons per year with no single HAP greater than 10 tons. Compliance with this limit is satisfied by complying with Condition Numbers 4.1.2., 4.1.3., 4.1.6., 4.1.8., and 4.1.12. through 4.1.21.

WV Code §§ 22-5-4(a)(14-15), 45CSR2, 45CSR10, 45CSR7, and 45CSR13 Stack testing – Compliance is demonstrated by Condition Number 3.3.1.

45CSR§30-5.1.c.2.A. and 45CSR13, R13-0622, 4.4.1. Monitoring information – Compliance is demonstrated by Condition Number 3.4.1.

45CSR§30-5.1.c.2.B. Retention of records – Compliance is demonstrated by Condition Number 3.4.2.

45CSR§30-4.4. and 5.1.c.3.D. Responsible official – Compliance is demonstrated by Condition Number 3.5.1.

45CSR31, 45CSR§30-5.1.c.3.E. Confidential business information– Compliance is demonstrated by Condition Number 3.5.2.

45CSR§30-8. Certified emissions statement – Compliance is demonstrated by Condition Number 3.5.4.

45CSR§30-5.3.e. Compliance certification – Compliance is demonstrated by Condition Number 3.5.5.

45CSR§30-5.1.c.3.A. Semi-annual monitoring reports – Compliance is demonstrated by Condition Number 3.5.6.

45CSR§30-5.7 Emergencies – Compliance is demonstrated by Condition Number 3.5.7.

45CSR§30-5.1.c.3.B.-C. Deviations – Compliance is demonstrated by Condition Number 3.5.8.

45CSR30-4.3.h.1.B. New applicable requirement – Compliance is demonstrated by Condition Number 3.5.9.

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.

New Applicable Requirements:

40 CFR Part 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (Area Source Boiler MACT).

☒ 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.)

New Applicable Requirements:

40 CFR Part 63, Subpart JJJJJJ, Area Source Boiler MACT – Compliance is demonstrated for the existing coal-fired boiler affected source by complying with Condition Numbers 4.1.12. through 4.1.22.; 4.2.11. through 4.2.15.; 4.3.2. through 4.3.5.; 4.4.5. through 4.4.6.; 4.5.3. through 4.5.4.

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

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

[illegible]

[illegible]

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	37.66
Nitrogen Oxides (NOX)	83.12
Lead (Pb)	0.004
Particulate Matter (PM _{2.5}) ¹	11.68
Particulate Matter (PM ₁₀) ¹	15.49
Total Particulate Matter (TSP)	22.89
Sulfur Dioxide (SO ₂)	484.54
Volatile Organic Compounds (VOC)	0.93
Hazardous Air Pollutants ²	Potential Emissions
Benzene	0.01
Cyanide	0.02
Formaldehyde	0.002
Hydrochloric acid	2.20
Hydrofluoric acid	1.13
Antimony	<0.001
Arsenic	0.003
Beryllium	<0.001
Cadmium	<0.001
Chromium	0.002
Cobalt	<0.001
Lead	0.004
Manganese	0.004
Mercury	<0.001
Nickel	0.003
Selenium	0.010
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Ammonia	4.24
Carbon Dioxide	40,814
Methane	4.81
Nitrous Oxide	0.70
¹ PM _{2.5} and PM ₁₀ are components of TSP.	
² 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

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input 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 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 ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input 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 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 type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , 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: _____ _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)	
<input 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 checked="" 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 checked="" 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 type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" 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.

24. Insignificant Activities (Check all that apply)	
<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 checked="" 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 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 type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input 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 type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

25. Equipment Table

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

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**. Enclosed.

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

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**. Enclosed.

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**. Enclosed.

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: Martin H. Weller

Title: General Manager

Responsible official's signature:

Signature: 

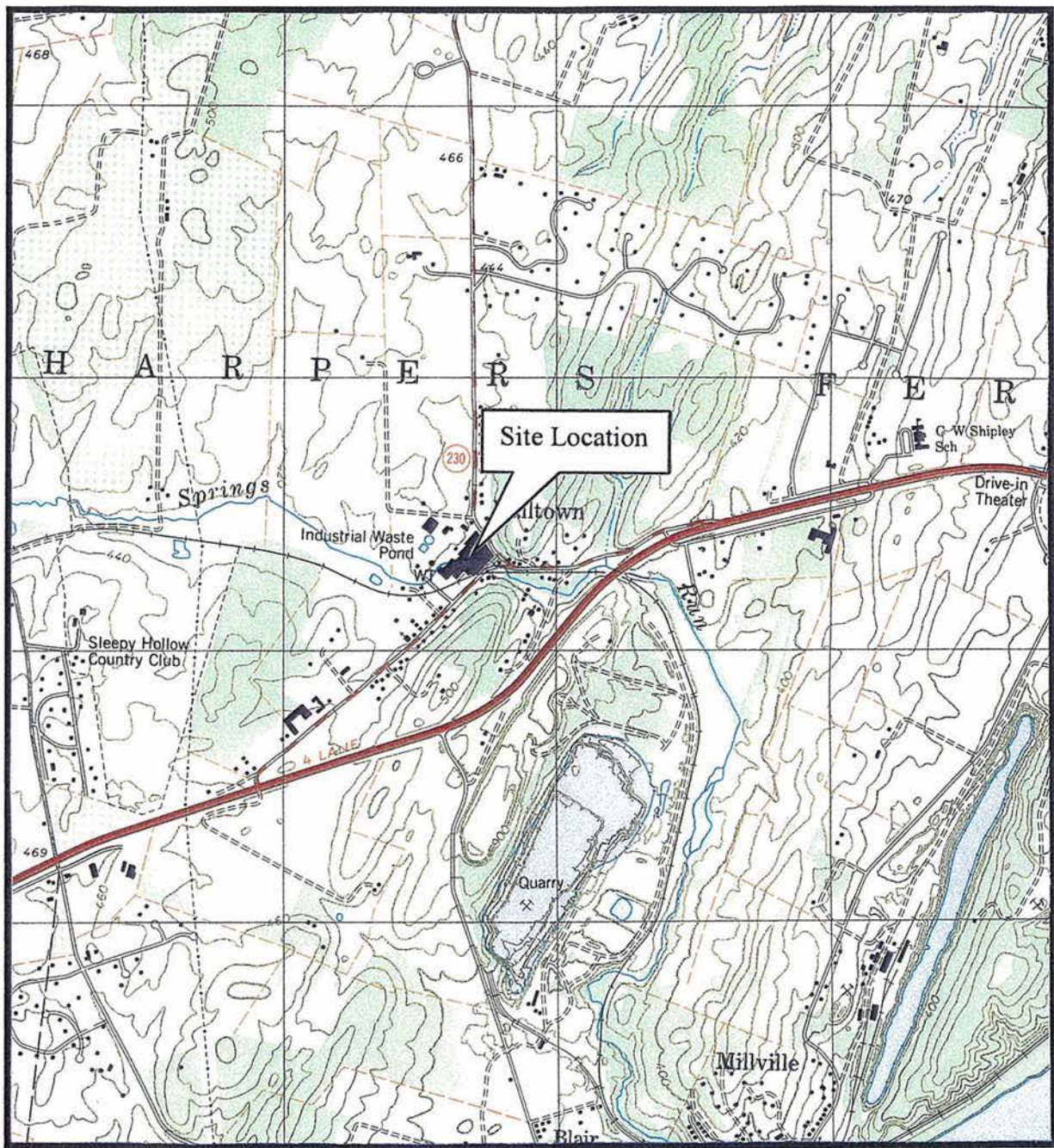
Signature Date: 6/20/16

(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 checked="" 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/dag, requested by phone (304) 926-0475, and/or obtained through the mail.



Attachment B A
Ox Paperboard LLC
Location Map
1" = 24,000'

USGS 7.5 Minute Series Topographic Map
Charles Town, W. Va. Quadrangle

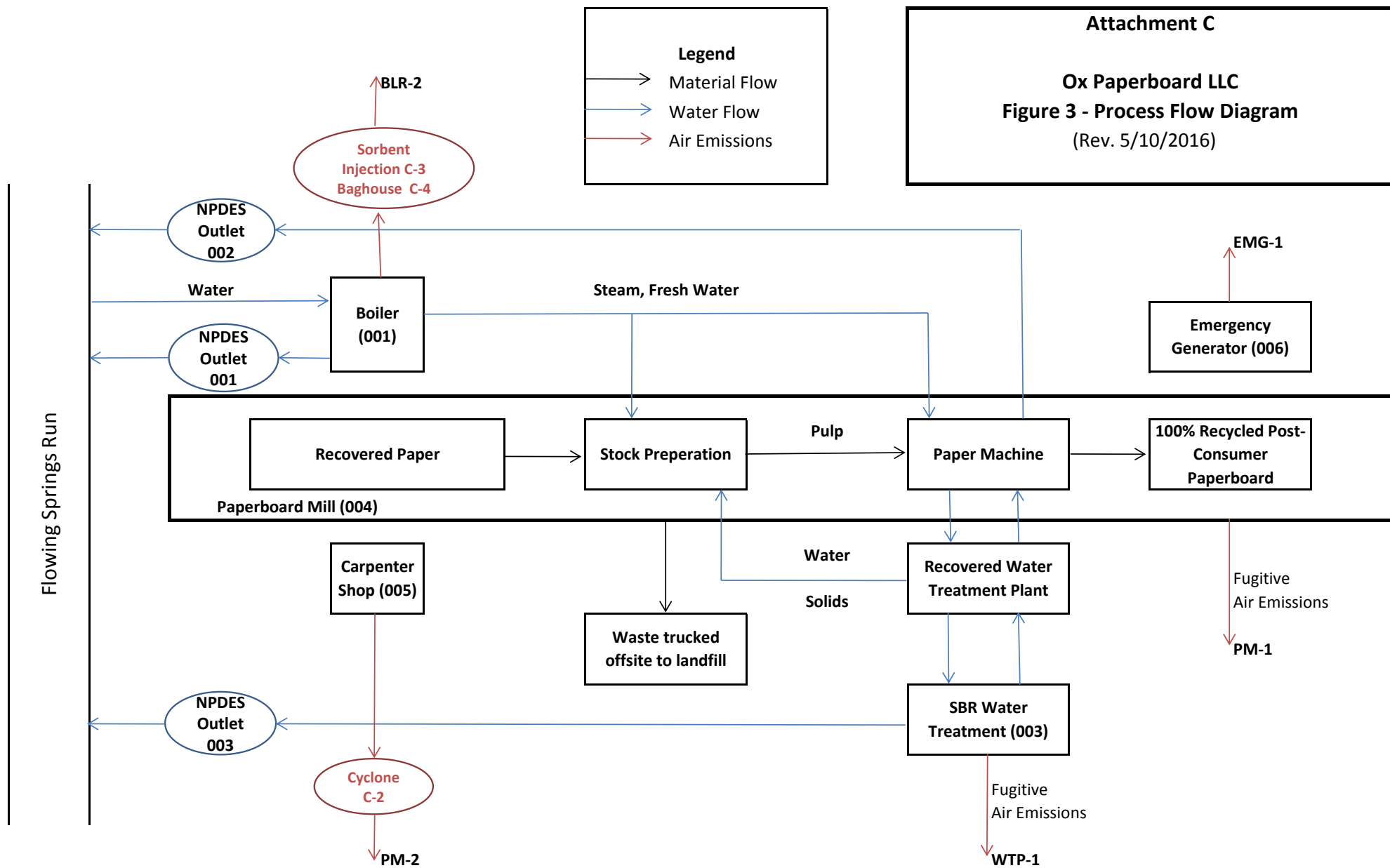


FACILITY MAP
SCALE: 1 INCH = 60 FT

IF THIS DRAWING IS A REDUCTION,
GRAPHIC SCALE MUST BE USED.

REVISION CONTROL									
REV.	DATE	BY	APP.	DESCRIPTION	REV.	DATE	BY	APP.	DESCRIPTION

Wiley & Wilson ARCHITECTS ENGINEERS PLANNERS A PROFESSIONAL CORPORATION 2310 LANGHORNE ROAD LYNCHBURG, VIRGINIA 24505-0877		Attachment B		DESIGNED _____ DRAWN _____ CHECKED _____ REVIEWED _____ APPROVED _____ FILE NO. _____ REFERENCE _____ COMM. NO. 36066.00 DATE MAY 1996 TITLE FACILITY MAP WITH EMISSION POINTS DWN. NO. _____ SHEET NO. _____ REV. 0	
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ATTACHMENT D - Emission Units Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID ¹	Emission Point ID ¹	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device ¹
001	BLR-2	E. Keeler Co. Model: MKB coal-fired boiler. Serial No. 17148	1984 New control devices installed 2016	112 MMBtu/hr	C-3 Dry Sorbent Injection System C-4 Fabric Filter Baghouse
003	WTP-1	Wastewater Treatment Plant - consists of a Dissolved Air Filtration (DAF) clarifier, a settling clarifier, two clarified water storage tanks, a Sequencing Batch Reactor (SBR) treatment tank, a chlorine contact basin, and an effluent holding tank	1970	1.8 MGD	None
004	PM-1	Paperboard Mill	1870	73,000 tons/year	None
005	PM-2	Carpenter Shop	1870	N/A	C-2 Cyclone
006	EMG-1	Emergency Generator	Circa 1985	75 HP	None

¹For 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 - Emission Unit Form			
Emission Unit Description Boiler (Emission Point BLR-2)			
Emission unit ID number: 001	Emission unit name: Boiler No. 2	List any control devices associated with this emission unit: C-3 Dry Sorbent Injection System C-4 Fabric Filter Baghouse	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): 112 MMBtu/hr coal-fired boiler			
Manufacturer: E. Keeler Co.	Model number: MKB	Serial number: 17148	
Construction date: 1984	Installation date: 1984	Modification date(s): NA	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 112 MMBtu/hr			
Maximum Hourly Throughput: 4.3 tons/hour	Maximum Annual Throughput: 15,000 tons/year	Maximum Operating Schedule: 8,760 hours/year	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating: 112 MMBtu/hr		Type and Btu/hr rating of burners: 112 MMBtu/hr	
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. Primary: Coal, 4.3 tons/hour, 15,000 tons/year Secondary: None			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Coal	1.7%	12%	13,000 Btu/lb

Emissions Data		
Criteria Pollutants	Potential Emissions (after control devices)	
	PPH	TPY
Carbon Monoxide (CO)	21.50	37.50
Nitrogen Oxides (NO _x)	47.30	82.50
Lead (Pb)	0.002	<0.01
Particulate Matter (PM _{2.5})	4.74	8.27
Particulate Matter (PM ₁₀)	5.00	8.72
Total Particulate Matter (TSP)	6.82	11.89
Sulfur Dioxide (SO ₂)	277.78	484.50
Volatile Organic Compounds (VOC)	0.22	0.38
Hazardous Air Pollutants	Potential Emissions (after control devices)	
	PPH	TPY
Benzene	0.006	0.010
Cyanide	0.011	0.019
Formaldehyde	0.001	<0.01
Hydrochloric acid	1.26	2.20
Hydrofluoric acid	0.65	1.13
Antimony	<0.001	<0.001
Arsenic	0.002	<0.01
Beryllium	<0.001	<0.001
Cadmium	<0.001	<0.001
Chromium	0.001	<0.01
Cobalt	<0.001	<0.001
Lead	0.002	<0.01
Manganese	0.002	<0.01
Mercury	<0.001	<0.001
Nickel	0.001	<0.01
Selenium	0.006	0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
Ammonia	0.97	4.24

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.).

a. Coal combustion emission factors are based upon AP-42 Coal Combustion Chapter 1.1:
Table 1.1-3 [Spreader stoker, bituminous (Uncontrolled)] (Rev. 9/98) for NO_x, CO and SO₂;
Table 1.1-4 [Spreader stoker (Uncontrolled)] (Rev. 9/98) for Filterable PM and Filterable PM-10;
Table 1.1-5 [Spreader stoker (Uncontrolled)] (Rev. 9/98) for CPM-TOT; Table 1.1-9 for PM-2.5 particle size distribution [Spreader stoker, baghouse controlled];
Table 1.1-9 for PM-2.5 particle size distribution [Spreader stoker, baghouse controlled], where ratio of PM-2.5 to PM-10 is 26/60;
Table 1.1-19 for VOC (TNMOC) [Spreader stoker];
and Table 1.1-14 for Organic HAPs; Table 1.1-15 for HCl and HF [Spreader stoker]; Table 1.1-18 for HAP metals.

b. Coal combustion emissions are based upon permitted coal use in permit R13-0622A.

c. Coal quality factors are based upon the 2014 sampled average values of 26.42 MMBtu/ton, and the existing limit for sulfur content of <=1.7%.

d. Estimated control system efficiency is based upon manufacturer's guaranteed emissions for PM, HCl and Hg. For these emission calculations, no control efficiency was utilized for Condensable PM (CPM), SO₂, HF or any HAP metal except Hg.

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.

1. Emission Limits – R30-03700007-2012: 4.1.6, 4.1.8, 4.1.12, 4.1.13, 4.1.14; R13-0622, 4.1.1.b., 4.1.1.d. - 4.1.1.h.; 45CSR§2-4.1.c.; 45CSR§10-3.3.f.; 45CSR34, and 40 CFR §63.11201(a) and row 6 of Table 1 in Subpart JJJJJ of Part 63 – Emission Limits.
2. Opacity Limits – R30-03700007-2012: 4.1.3, 4.1.4, 4.1.5; R13-0622, 4.1.1.c.; 45CSR§2-3.1 & 3.3; 45CSR§2-9.1.
3. Operational Limits – R30-03700007-2012: 4.1.1, 4.1.2, 4.1.7; R13-0622, 4.1.1.a.; 45CSR§2-5., 45CSR§2-9.2.

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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.)

1. Emission Limits – R30-03700007-2012: 4.1.9, 4.1.10, 4.1.11, 4.1.15, 4.1.17 - 4.1.22, 4.2.3 - 4.2.15, 4.3.1 - 4.3.5, 4.4.1, 4.4.3 - 4.4.5, 4.5.2; R13-0622A, 4.1.1.i. - 4.1.1.o., 4.1.2, 4.2.1, 4.2.2 - 4.2.6, 4.3.1 - 4.3.3, 4.4.2 - 4.4.4; 45CSR§13-5.11.; 45CSR34, and 40 CFR §§ 63.11201(b)-(c), 63.11205(c), (c)(1) through (c)(3), 63.11210(a) and (i), 63.11211(b)(3), 63.11212, 63.11214, 63.11220(a) and (c), 63.11222(a)(1), 63.11223(b) and (g), 63.11224(a), (a)(7), (c), (d) and (f), 63.11225(e)(1), Table 2, row 16, Table 3, rows 1 and 4, Table 4 and Table 5; 45CSR§2-8.1., 8.2.a., 8.3.a. & c. and 9.3; 45CSR§2A-5.2.; 45CSR§10-3.8., 8.1., 8.2.a, 8.2.c., 8.3.a. & c. and 11.1; 45CSR§10A-5.1.; 45CSR§30-5.1.c.; 45CSR2 & 10 Monitoring Plan §§ A.3.a. & c., A.4.a., b. & c. and B.1.a.; 40 CFR §§64.3(a), 64.3(b), 64.6(c)(2), 64.7(b)-(e) and 64.9(b).
2. Opacity Limits – R30-03700007-2012: 4.2.1, 4.2.2, 4.2.3, 4.2.5 - 4.2.9, 4.4.1, 4.5.2, 4.5.5; R13-0622A, 4.5.3; 45CSR§30-5.1.c.; 45CSR§§2-3.2., 8.1.a., 8.2., 8.3.a. & c. and 9.3; 45 CSR §2A-7.2c.; 45CSR2 & 10 Monitoring Plan §§A.1.a., b., d., A.2.a. & b., A.3.a. & c. and A.4.b. & c.; 40 CFR §§64.3(a), 64.3(b), 64.6(c)(2), 64.7(b)-(e) and 64.9(b).
3. Operational Limits – R30-03700007-2012: 4.4.1, 4.4.2, 4.4.6, 4.5.1, 4.5.3 - 4.5.4; R13-0622A, 4.4.5, 4.5.1 - 4.5.2; 45CSR§30-5.1.c., 45CSR§§2-8.3.a., b. & c. and 9.3, 45CSR§§10-8.3.a., b. & c., 45CSR2 & 10 Monitoring Plan §§A.3.a. & c. and A.4.b.; 45CSR§30-5.1.c.; 45CSR34, 40 CFR §63.11225 (a)(4), (b) and (c); 40 CFR §64.9.

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 Wastewater Treatment Plant (Emission Point WTP-1)			
Emission unit ID number: 003	Emission unit name: Wastewater Treatment Plant	List any control devices associated with this emission unit: None	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): The on-site Wastewater Treatment Plant consists of a Dissolved Air Filtration (DAF) clarifier, a settling clarifier, two clarified water storage tanks, a Sequencing Batch Reactor (SBR) treatment tank, a chlorine contact basin, and an effluent holding tank.			
Manufacturer: NA	Model number: NA	Serial number: NA	
Construction date: 1970	Installation date: 1970	Modification date(s): NA	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1.8 MGD			
Maximum Hourly Throughput: 0.3 MG/hour	Maximum Annual Throughput: 700 MG/year	Maximum Operating Schedule: 8,760 hours/year	
Fuel Usage Data (fill out all applicable fields) NA			
Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	---	---
Nitrogen Oxides (NO _x)	---	---
Lead (Pb)	---	---
Particulate Matter (PM _{2.5})	---	---
Particulate Matter (PM ₁₀)	---	---
Total Particulate Matter (TSP)	---	---
Sulfur Dioxide (SO ₂)	---	---
Volatile Organic Compounds (VOC)	Trivial	Trivial
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
NA	---	---
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
NA	---	---
<p>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.).</p> <p>Since the papermill utilizes a water-based process, there are only trivial volatile organic compound emissions from the Wastewater Treatment Plant.</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.

1. Emission Limits – There are no applicable requirements that impose emission limits for this emission unit.
2. Opacity Limits – There are no applicable requirements that impose opacity limits for this emission unit.
3. Operational Limits – R30-03700007-2012: 3.1.4; 45CSR§4-3.1 [State-Enforceable only].

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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.)

1. Emission Limits – There are no applicable requirements that impose emission limits for this emission unit.
2. Opacity Limits – There are no applicable requirements that impose opacity limits for this emission unit.
3. Operational Limits – R30-03700007-2012: 3.4.3; 45CSR§30-5.1.c. [State-Enforceable only].

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

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

ATTACHMENT E - Emission Unit Form			
Emission Unit Description Paperboard Mill (Emission Point PM-1)			
Emission unit ID number: 004	Emission unit name: Paperboard Mill	List any control devices associated with this emission unit: None	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): The Paperboard Mill consists of a beater room (mechanical pulpers that break recovered fiber into pulp), wet-end (applies liquid slurry onto felt), dry-end (paper "web" is dried on steam-heated dryer cans), and finishing/converting (additional trimming and laminating).			
Manufacturer: NA	Model number: NA	Serial number: NA	
Construction date: 1870	Installation date: 1870	Modification date(s): NA	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 200 tons/day			
Maximum Hourly Throughput: 10 tons/hour	Maximum Annual Throughput: 73,000 tons/year	Maximum Operating Schedule: 8,760 hours/year	
Fuel Usage Data (fill out all applicable fields) NA			
Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	---	---
Nitrogen Oxides (NO _x)	---	---
Lead (Pb)	---	---
Particulate Matter (PM _{2.5})	0.77	3.37
Particulate Matter (PM ₁₀)	1.54	6.73
Total Particulate Matter (TSP)	2.50	10.95
Sulfur Dioxide (SO ₂)	---	---
Volatile Organic Compounds (VOC)	---	---
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
NA	---	---
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
NA	---	---
<p>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.).</p> <p>a. Hourly PM emission factor based upon a conservative plant engineering estimate.</p> <p>b. Assumes PM-10 is 61.4% of total PM emitted (per AP-42 10.6.4 Hardboard and Fiberboard Manufacturing Table 10.6.4-4.), and assumes PM-2.5 is 50% of PM-10 (per Engineering Estimate).</p> <p>c. Note that published emission factors are not available for papermill operations of this nature.</p> <p>d. The papermill operations occur within a totally enclosed building.</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.

1. Emission Limits – R30-03700007-2012: 5.1.3; 45CSR§7.4.1.
2. Opacity Limits – R30-03700007-2012: 5.1.1, 5.1.2; 45CSR§7-3.1 & 3.2.
3. Operational Limits – There are no applicable requirements that impose operational limits for this emission unit.

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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.)

1. Emission Limits – R30-03700007-2012: 5.2.2; 45CSR§30-5.1.c.
2. Opacity Limits – R30-03700007-2012: 5.2.1, 5.2.2, 5.4.1; 45CSR§7A-2.1., 45CSR§30-5.1.c.
3. Operational Limits – There are no applicable requirements that impose operational limits for this emission unit.

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

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

ATTACHMENT E - Emission Unit Form			
Emission Unit Description Carpenter Shop (Emission Point PM-2)			
Emission unit ID number: 005	Emission unit name: Carpenter Shop	List any control devices associated with this emission unit: Cyclone C-2	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): The Carpenter Shop consists of various woodworking equipment used to construct wooden pallets, skids and packing tops. Wood dust emissions are controlled by a dust collection system vented through a cyclone.			
Manufacturer: NA	Model number: NA	Serial number: NA	
Construction date: 1870	Installation date: 1870	Modification date(s): NA	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): NA			
Maximum Hourly Throughput: NA	Maximum Annual Throughput: NA	Maximum Operating Schedule: 600 hours/year	
Fuel Usage Data (fill out all applicable fields) NA			
Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating:		Type and Btu/hr rating of burners:	
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.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	---	---
Nitrogen Oxides (NO _x)	---	---
Lead (Pb)	---	---
Particulate Matter (PM _{2.5})	---	---
Particulate Matter (PM ₁₀)	---	---
Total Particulate Matter (TSP)	0.02	0.09
Sulfur Dioxide (SO ₂)	---	---
Volatile Organic Compounds (VOC)	---	---
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
NA	---	---
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
NA	---	---
<p>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.).</p> <p>a. Based upon plant engineering estimate, per DAQ Title V Fact Sheet, page 3 of 5.</p> <p>b. Assumes all PM emitted is larger diameter than PM-2.5 or PM-10.</p> <p>c. The carpenter shop operations occur within a totally enclosed building.</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.

1. Emission Limits – There are no applicable requirements that impose emission limits for this emission unit.
2. Opacity Limits – R30-03700007-2012: 5.1.1, 5.1.2; 45CSR§7-3.1 & 3.2.
3. Operational Limits – There are no applicable requirements that impose operational limits for this emission unit.

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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.)

1. Emission Limits – There are no applicable requirements that impose emission limits for this emission unit.
2. Opacity Limits – R30-03700007-2012: 5.2.1, 5.2.2, 5.4.1; 45CSR§7A-2.1., 45CSR§30-5.1.c.
3. Operational Limits – There are no applicable requirements that impose operational limits for this emission unit.

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

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

ATTACHMENT E - Emission Unit Form			
Emission Unit Description Emergency Generator (Emission Point EMG-1)			
Emission unit ID number: 006	Emission unit name: Emergency Generator	List any control devices associated with this emission unit: None	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): 75 HP diesel-fired stationary Emergency Generator engine			
Manufacturer: Allis Chalmers	Model number: Unknown	Serial number: Unknown	
Construction date: 1985	Installation date: 1985	Modification date(s): NA	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 75 HP			
Maximum Hourly Throughput: 5 gallons/hour diesel fuel	Maximum Annual Throughput: 2,500 gallons/year diesel fuel	Maximum Operating Schedule: 500 hours/year	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating: 75 HP		Type and Btu/hr rating of burners: NA	
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. Primary: No. 2 Diesel, 5 gal/hour, 2,500 gal/year Secondary: None			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
No. 2 Diesel	NA	NA	18,000 Btu/lb

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.50	0.13
Nitrogen Oxides (NO _x)	2.33	0.59
Lead (Pb)	Trivial	Trivial
Particulate Matter (PM _{2.5})	0.17	0.05
Particulate Matter (PM ₁₀)	0.17	0.05
Total Particulate Matter (TSP)	0.17	0.05
Sulfur Dioxide (SO ₂)	0.15	0.04
Volatile Organic Compounds (VOC)	0.19	0.05
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
NA	Trivial	Trivial
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
NA		
<p>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.).</p> <p>a. Diesel combustion emission factors are based upon AP-42 Gasoline And Diesel Industrial Engines Table 3.3-1 [Uncontrolled Diesel Industrial Engines] (Rev. 10/96) for all pollutants.</p> <p>b. Diesel combustion emissions are based upon 500 operating hours.</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.

1. Emission Limits – R30-03700007-2012: 6.1.1; 45CSR34, 40 CFR §63.6595(a)(1).
2. Opacity Limits – There are no current applicable requirements that impose opacity limits for this emission unit.
3. Operational Limits – There are no current applicable requirements that impose operational limits for this emission unit.

MACT Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines (RICE) Requirements: Per 40 C.F.R. §63.6385 and 63.6590(a)(1)(iii), the existing stationary compression ignition emergency RICE with a site rating of less than or equal to 500 brake HP located at an area source of HAP emissions will be subject to minor preventative maintenance requirements, and monitoring, recordkeeping and reporting requirements. [40 C.F.R. §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.)

1. Emission Limits – R30-03700007-2012: 6.1.1; 45CSR34, 40 CFR §63.6595(a)(1).
2. Opacity Limits – There are no current applicable requirements that impose opacity limits for this emission unit.
3. Operational Limits – There are no current applicable requirements that impose operational limits for this emission unit.

MACT Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines (RICE) Requirements: The owner or operator will comply with the applicable requirements of 40 C.F.R. §63 Subpart ZZZZ for its existing stationary compression ignition emergency RICE. In accordance with 40 C.F.R. §63.6595(a)(1), the deadline for existing stationary compression ignition RICE located at an area source of HAP emissions to comply with the applicable emission limitations and operating limitations is May 3, 2013. [40 C.F.R. §63 Subpart ZZZZ]

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 G - Air Pollution Control Device Form		
Control device ID number: C-2	List all emission units associated with this control device. 005 Carpenter Shop	
Manufacturer: Dustkop, Inc.	Model number: Unknown	Installation date: Unknown
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input checked="" type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
PM	Estimated 90%	Estimated 90%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Maximum gas flow rate = 2,500 cfm.		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification. This control device has potential pre-control device annual emissions of applicable regulated air pollutants that are less than major source levels, and thus is exempt per 40 C.F.R. §64.2(a)(3).		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Periodic visual inspection.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: C-3	List all emission units associated with this control device. 001 Boiler	
Manufacturer: Amec Foster Wheeler	Model number: Universal Bulk Bag Discharging System	Installation date: January 2016
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input checked="" type="checkbox"/> Other (describe) <u>Dry Sorbent Injection System</u></div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
HCl	Approx. 100%	75.6%
Mercury	Approx. 100%	To be determined by Subpart JJJJJJ stack test
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Gas flow rate = 44,373 cfm; average inlet gas temperature = 325 degF. Adsorbent Type: Hydrated lime & activated carbon. Pressure drop across unit: 6 inches of water.		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification. Per 40 C.F.R. §64.2(b)(i), this control device is subject to an exempt emission limitation or standard, 40 C.F.R. §63 Subpart JJJJJJ, proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. Additionally, this control device has potential pre-control device annual emissions of applicable regulated air pollutants that are less than major source levels, and thus is exempt per 40 C.F.R. §64.2(a)(3).		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Continuous monitoring of sorbent injection rates; periodic monitoring for visible emissions.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: C-4	List all emission units associated with this control device. 001 Boiler	
Manufacturer: Amec Foster Wheeler	Model number: 144 Jet III (Size 1717 TA-SB)	Installation date: January 2016
Type of Air Pollution Control Device:		
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input checked="" type="checkbox"/> Baghouse/Fabric Filter</div> <div style="width: 33%;"><input type="checkbox"/> Venturi Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Multiclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Bed Adsorber</div> <div style="width: 33%;"><input type="checkbox"/> Packed Tower Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Single Cyclone</div> <div style="width: 33%;"><input type="checkbox"/> Carbon Drum(s)</div> <div style="width: 33%;"><input type="checkbox"/> Other Wet Scrubber</div> <div style="width: 33%;"><input type="checkbox"/> Cyclone Bank</div> <div style="width: 33%;"><input type="checkbox"/> Catalytic Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Condenser</div> <div style="width: 33%;"><input type="checkbox"/> Settling Chamber</div> <div style="width: 33%;"><input type="checkbox"/> Thermal Incinerator</div> <div style="width: 33%;"><input type="checkbox"/> Flare</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe) _____</div> <div style="width: 33%;"><input type="checkbox"/> Wet Plate Electrostatic Precipitator</div> <div style="width: 33%;"><input type="checkbox"/> Dry Plate Electrostatic Precipitator</div> </div>		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
Filterable PM	Approx. 100%	99.2%
Filterable PM-10	Approx. 100%	99.2%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Fiber glass/membrane fabric filter baghouse; closed pressure; pulse jet filter cleaning; 3.92:1 air to cloth ratio; typical gas flow rate = 44,373 acfm; typical inlet gas temperature = 325 degF; 11,306 sqft cloth.		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification. No changes to existing, approved CAM Plan.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Continuous monitoring of baghouse bag leak detection system; periodic monitoring for visible emissions.		

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at <http://www.epa.gov/ttn/emc/cam.html>

CAM APPLICABILITY DETERMINATION

- 1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*):

☐ YES ☒ NO

Note: No changes to existing, approved CAM Plan.

- a. The PSEU is located at a major source that is required to obtain a Title V permit;
- b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is **NOT** exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
 - Stratospheric Ozone Protection Requirements.
 - Acid Rain Program Requirements.
 - Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
 - An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).
- c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;
- d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND
- e. The PSEU is **NOT** an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

- 2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit: **Not Applicable.**

☐ **RENEWAL APPLICATION.** **ALL** PSEUs for which a CAM plan has **NOT** yet been approved need to be addressed in this CAM plan submittal.

☐ **INITIAL APPLICATION** (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ **SIGNIFICANT MODIFICATION TO LARGE PSEUs.** **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, **Only** address the appropriate monitoring requirements affected by the significant modification.

3) ^a BACKGROUND DATA AND INFORMATION

Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU in order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	^b EMISSION LIMITATION or STANDARD	^c MONITORING REQUIREMENT
Not Applicable					
<u>EXAMPLE</u> Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

^a If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

^b Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

^c Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA			
Complete this section for <u>EACH</u> PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for <u>EACH</u> indicator selected for <u>EACH</u> PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. If more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: Not Applicable	4b) Pollutant:	4c) ^a Indicator No. 1:	4d) ^a Indicator No. 2:
5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators:			
^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			
5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy:			
^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring:			
Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):			
^d Provide the <u>MONITORING FREQUENCY</u> :			
Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used:			
Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred:			

^a Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

^b Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

^c The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

^d Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:
Not Applicable

6b) Regulated Air Pollutant:

7) **INDICATORS AND THE MONITORING APPROACH:** Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

8) **INDICATOR RANGES:** Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how EACH indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION: