Modi, Beena J <beena.j.modi@wv.gov>

Re: FW: [EXT] Message from "RNP0026734616E0"

1 message

Modi, Beena J <beena.j.modi@wv.gov> Tue, Feb 27, 2024 at 4:43 PM
To: "TILLSON, JOHN" <john.tillson@chemours.com>

Thank you!

On Tue, Feb 27, 2024 at 4:41 PM TILLSON, JOHN <john.tillson@chemours.com> wrote:

> I have no changes to suggest.
>
> ---
>
> **From:** Modi, Beena J <beena.j.modi@wv.gov>
> **Sent:** Monday, February 26, 2024 4:15 PM
> **To:** TILLSON, JOHN <john.tillson@chemours.com>
> **Subject:** Re: FW: [EXT] Message from "RNP0026734616E0"
>
> External email. Confirm links and attachments before opening.
>
> John,
>
> Please review the updated factsheet and the permit and let me know if I am missing anything.
>
> Thanks,
>
> Beena Modi
>
> On Mon, Feb 26, 2024 at 3:03 PM TILLSON, JOHN <john.tillson@chemours.com> wrote:
>
> > You are welcome.
> >
> > ---
> >
> > **From:** Modi, Beena J <beena.j.modi@wv.gov>
> > **Sent:** Monday, February 26, 2024 3:03 PM
> > **To:** TILLSON, JOHN <john.tillson@chemours.com>
> > **Subject:** Re: FW: [EXT] Message from "RNP0026734616E0"
> >
> > External email. Confirm links and attachments before opening.

Thank you, John!

On Mon, Feb 26, 2024 at 12:19 PM TILLSON, JOHN <john.tillson@chemours.com> wrote:

> They aren't vented into the room. The three saws in that area are connected to VCS001E which is an emission point outdoors.
>
> .

From: Modi, Beena J <beena.j.modi@wv.gov>
Sent: Monday, February 26, 2024 12:09 PM
To: TILLSON, JOHN <john.tillson@chemours.com>
Subject: Re: FW: [EXT] Message from "RNP0026734616E0"

External email. Confirm links and attachments before opening.

I deleted the bold line from the Emission Unit Table since you wanted "(inside vent)" deleted. Is that ok?

VCS01E	VCS01C Wood Dust Collection System – Drum Mounted Filter Unit **venting into work area**	VCS04	Band Saw (B-101)	15"
VCS01E	VCS02C Wood Dust Collection System – Drum Mounted Filter Unit **venting into work area**	VCS05	Table Saw (B-101)	7.5 HP

On Wed, Feb 21, 2024 at 10:55 AM TILLSON, JOHN <john.tillson@chemours.com> wrote:

> The changes I noted on page three are the only ones I saw.
> Thank you,
> John
>
> -----Original Message-----
> From: gps-device@chemours.com <gps-device@chemours.com>
> Sent: Wednesday, February 21, 2024 10:40 AM
> To: TILLSON, JOHN <john.tillson@chemours.com>
> Subject: [EXT] Message from "RNP0026734616E0"
>
> External email. Confirm links and attachments before opening.

This E-mail was sent from "RNP0026734616E0" (Aficio MP C4502).

Scan Date: 02.21.2024 10:39:47 (-0500)
Queries to: gps-device@chemours.com

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Modi, Beena J <beena.j.modi@wv.gov>

Fwd: FW: [EXT] Message from "RNP0026734616E0"

1 message

Modi, Beena J <beena.j.modi@wv.gov> Thu, Feb 22, 2024 at 10:35 AM
To: Carrie McCumbers <carrie.mccumbers@wv.gov>

On Wed, Feb 21, 2024 at 10:55 AM TILLSON, JOHN <john.tillson@chemours.com> wrote:

> The changes I noted on page three are the only ones I saw.
> Thank you,
> John
>
> -----Original Message-----
> From: gps-device@chemours.com <gps-device@chemours.com>
> Sent: Wednesday, February 21, 2024 10:40 AM
> To: TILLSON, JOHN <john.tillson@chemours.com>
> Subject: [EXT] Message from "RNP0026734616E0"
>
> External email. Confirm links and attachments before opening.
>
> This E-mail was sent from "RNP0026734616E0" (Aficio MP C4502).
>
> Scan Date: 02.21.2024 10:39:47 (-0500)
> Queries to: gps-device@chemours.com
>
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202402211039.pdf
236K

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Emission Point ID	Control Device	Emission Unit ID	Emission Unit Description	Design Capacity	Year Installed
V238G01E	None	V238G01	Mineral Spirits Parts Cleaner (B-238)	44 Gallons	1991
VBOS08E	None	VBOS08	Mineral Spirits Parts Cleaner (B-301B)	44 Gallons	1991
VP005E	VP005C External Bag Filter	VP005	Bead Blast Unit w/integral collection and recovery system and an external filter (B-96)	275 lb/hr	2004
VTIS01E	VTIS01C Dust Collection System – Cabinet Filter System	VTIS01	Band Saw Insulation Shop (B-166)	15"	1991
VCS01E ~~(inside vent)~~	VCS01C Wood Dust Collection System – Drum Mounted Filter Unit venting into work area	VCS04	Band Saw (B-101)	15"	1968
VCS01E ~~(inside vent)~~	VCS02C Wood Dust Collection System – Drum Mounted Filter Unit venting into work area	VCS05	Table Saw (B-101)	7.5 HP	2000
VCS01E	VCS03C Wood Dust Collection System – Cyclone Separator with particulate collection drum	VCS03	Radial Arm Saw (B-101)	2 HP	1968
VCFT01E	None	VCFT01	Portable Diesel Fuel Tank	200 Gallons	2014
~~V238G03E~~	~~None~~	~~V238G03~~	~~"Hotsy" Propane Hot Water Cleaner~~	~~360 GPH 0.4 MMBtu/hr~~	~~1991~~
VTEMPWORK	None	VTEMPWORK	Temporary Field-erected Facilities for Construction and Maintenance Activities	N/A	N/A

DELETE

DELETE

Modi, Beena J <beena.j.modi@wv.gov>

FW: [EXT] Title V Operating Permit R30-10700182-2024 (12 of 14), The Chemours Company FC, LLC • Washington Works

1 message

Mentink, John J <JOHN.J.MENTINK@chemours.com> Wed, Feb 14, 2024 at 2:15 PM
To: "TILLSON, JOHN" <john.tillson@chemours.com>, "Beena J Modi (Beena.J.Modi@wv.gov)" <Beena.J.Modi@wv.gov>

Resend of data supplied below in table at bottom. It is the FC&S emissions for 2023.

From: Mentink, John J
Sent: February 12, 2024 12:49
To: Modi, Beena J <beena.j.modi@wv.gov>
Cc: Sims, Erik <erik.sims@chemours.com>; TILLSON, JOHN <john.tillson@chemours.com>; Pritchard, Logan M <Logan-Marie.Frank@chemours.com>
Subject: RE: [EXT] Title V Operating Permit R30-10700182-2024 (12 of 14), The Chemours Company FC, LLC • Washington Works

Ms. Modi –

Below in your tables for the FC&S Title V renewal application I have provided the 2023 emissions numbers that are to be entered as part fo the AEI by month end.

The Potential to emit (PTE) was based upon full occupancy and full use of the FC&S facilities, which are largely construction and facility maintenance focused. We have not been strongly utilizing the facilities due to economic conditions that have impacted our operations as well as the restriction of the involved personnel to supporting only Chemours operations.

I hope this answers your questions.

See below

From: Sims, Erik <erik.sims@chemours.com>
Sent: February 12, 2024 11:55
To: Mentink, John J <JOHN.J.MENTINK@chemours.com>
Subject: Fw: [EXT] Title V Operating Permit R30-10700182-2024 (12 of 14), The Chemours Company FC, LLC • Washington Works

John,

Can you pull these numbers please for WVDEP.

Thanks,
Erik

From: Modi, Beena J <beena.j.modi@wv.gov>
Sent: Monday, February 12, 2024 11:53 AM
To: Sims, Erik <erik.sims@chemours.com>
Subject: [EXT] Title V Operating Permit R30-10700182-2024 (12 of 14), The Chemours Company FC, LLC • Washington Works

Could you please add the latest(2022 or 2023)actual emissions in TPY?

Plantwide Emissions Summary for FC&S [Tons per Year]

Regulated Pollutants	Potential Emissions	2023 Actual Emissions
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO_X)	0	0
Particulate Matter ($PM_{2.5}$) [1]	0	0
Particulate Matter (PM_{10}) [1]	96.37	0.00801
Total Particulate Matter (TSP)[1]	96.37	0.00809
Sulfur Dioxide (SO_2)	0	0
Volatile Organic Compounds (VOC)	11.32	0.6006

[1] *$PM_{2.5}$ and PM_{10} are components of TSP*

Hazardous Air Pollutants	Potential Emissions	2022Actual Emissions
Cumene	0.02	0

Ethylene Glycol	0.06	0
Glycol Ethers	0.22	0
Toluene	0.21	0.01
Ethyl Benzene	0.10	0.0018
Xylenes (mixed)	0.40	0.0101
Methyl Isobutyl Ketone	0.00	0.0024
Methyl Ethyl Ketone	0.60	0.0032
Methylene Chloride	0.02	0
Methyl Methacrylate	0.00	0
Chromium	0.00	0
Chromium VI	0.00	0
Cobalt	0.00	0
Manganese	0.00	0
Nickel	0.00	0
Benzene	0.00	0
n-Hexane	0.01	0
Total HAPs	1.64	0.0275

Modi, Beena J <beena.j.modi@wv.gov>

R30-10700182-2023

1 message

Modi, Beena J <beena.j.modi@wv.gov> Thu, Jun 22, 2023 at 10:28 AM
To: james.w.hollingsworth@chemours.com, john.tillson@chemours.com

Your Title V renewal application for a permit to operate the above referenced facility was received by this Division on June 8, 2023. After review of said application, it has been determined that the application is administratively complete as submitted. Therefore, the above referenced facility qualifies for an Application Shield.

The applicant has the duty to supplement or correct the application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

The submittal of a complete application shall not affect the requirement that any source have all **preconstruction permits** required under the rules of the Division.

If during the processing of this application it is determined that additional information is necessary to evaluate or take final action on this application, a request for such information will be made in writing with a reasonable deadline for a response. Until which time as your renewal permit is issued or denied, please continue to operate this facility in accordance with 45CSR30, section 6.3.c. which states: *If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.* This protection shall cease to apply if, subsequent to the completeness determination made pursuant to paragraph 6.1.d. of 45CSR30 and as required by paragraph 4.1.b., the applicant fails to submit by the deadline specified in writing any additional information identified as being needed to process the application.

Please remember, **failure of the applicant to timely submit information required or requested to process the application may cause the Application Shield to be revoked.** Should you have any questions regarding this determination, please call me at (304)926-0499 ext. 41283.

Sincerely,

Beena Modi

Title V Permit Engineer

Beena.j.modi@wv.gov

Received
June 8, 2023
WV DEP/Div of Air Quality

TABLE OF CONTENTS

Chemours Washington Works R30-10700182 Part 12 of 14 Renewal Application
Facilities, Construction & Support

Renewal Application Form

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

Received
June 8, 2023
WV DEP/Div of Air Quality

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):**
The Chemours Company FC, LLC

2. Facility Name or Location:
Chemours Washington Works Building 1
8480 DuPont Road
Washington, WV 26181-1217

3. DAQ Plant ID No.:
107-00182

4. Federal Employer ID No. (FEIN):
464845564

5. **Permit Application Type:**

☐ Initial Permit — When did operations commence?
☑ Permit Renewal — What is the expiration date of the existing permit?
☐ Update to Initial/Renewal Permit Application

6. Type of Business Entity:

☑ Corporation ☐ Governmental Agency ☐ LLC
☐ Partnership ☐ Limited Partnership

7. Is the Applicant the:

☐ Owner ☐ Operator ☑ 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:
Approximately 570

9. Governmental Code:

☑ Privately owned and operated; 0
☐ Federally owned and operated; 1
☐ State government owned and operated; 2
☐ County government owned and operated; 3
☐ Municipality government owned and operated; 4
☐ District government owned and operated; 5

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☑ 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: P.O Box 1217		
City: Washington	**State:** WV	**Zip:** 26181-1217
Telephone Number: (304)863-4240 (gatehouse_	**Fax Number:** (304) 863-4862	

12. Facility Location (Physical Address)		
Street: 8480 DuPont Road	**City:** Washington	**County:** Wood
UTM Easting: 442.368 km	**UTM Northing:** 4,346.679 km	**Zone:** ☑ 17 or ☐ 18
Directions: From I-77 take the Route 50 bypass around Parkersburg towards Ohio. At the last exit prior to the bridge exit from the route 50 Bypass on to DuPont Road. At the light turn left on DuPont Road. The facility welcome sign is approximately ½ from the light. The main entrance is at the first traffic light on DuPont Road.		
Portable Source? ☐ Yes ☑ No		
Is facility located within a nonattainment area? ☐ Yes ☑ No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? ☑ Yes ☐ No		**If yes, name the affected state(s).** Ohio
Is facility located within 100 km of a Class I Area[1]? ☐ Yes ☑ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☑ No		**If yes, name the area(s).**
[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: James W. Hollingsworth		**Title:** Site Manager
Street or P.O. Box: Building 1, 8480 Dupont Road		
City: Washington	**State:** WV	**Zip:** 26181-1217
Telephone Number: 304-863-4083	**Cell Number:**	
E-mail address: james.w.hollingsworth@chemours.com		
Environmental Contact: Erik Sims		**Title:** Environmental Manager
Street or P.O. Box: Building 1, 8480 Dupont Road		
City: Washington	**State:** WV	**Zip:** 26181-1217
Telephone Number:	**Cell Number:** (740) 434-8170	
E-mail address: erik.sims@chemours.com		
Application Preparer: John D. Tillson		**Title:** Env. Eng. Principle Consultant
Company: Chemours		
Street or P.O. Box: Building 1, 8480 Dupont Road		
City: Washington	**State:** WV	**Zip:** 26181-12147
Telephone Number:	**Cell Number:** (270)205-6532	
E-mail address: john.tillson@chemours		

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
Washington Works -Facilities Construction & Support	Maintenance Activities and facility support	325211	2821

Provide a general description of operations.

Facility Construction and Support (FC&S) performs operations such as welding, excavation, demolition, concrete installation, painting, metal fabrication, and insulating for other business units at the site.

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

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☐ Section 111 NSPS	☐ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☑ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☑ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ Cross-State Air Pollution Rule (45CSR43)	

19. Non Applicability Determinations
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. See Attachment 1 (to this form)
☑ 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.

☑ 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*).

See Attachment 2 (to this form)

☑ 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.)

See Attachment 3 (to this form)

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.

See Attachment 3 (to this form)

☑ 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.)

See Attachment 3 (to this form)

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

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

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
None	NA	NA

22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance MM/DD/YYYY	Permit Condition Number
None	NA	NA

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	
Nitrogen Oxides (NO_X)	
Lead (Pb)	
Particulate Matter ($PM_{2.5}$)[1]	
Particulate Matter (PM_{10})[1]	.83-See Attachement 4
Total Particulate Matter (TSP)	96.37-See Attachment 4
Sulfur Dioxide (SO_2)	
Volatile Organic Compounds (VOC)	11.32-See Attachment 4
Hazardous Air Pollutants[2]	Potential Emissions
See Attachment 4 to this form	
Regulated Pollutants other than Criteria and HAP	Potential Emissions

[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)		
☑	1.	Air compressors and pneumatically operated equipment, including hand tools.
☐	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☑	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.
☑	4.	Bathroom/toilet vent emissions.
☑	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☑	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.
☐	7.	Blacksmith forges.
☐	8.	Boiler water treatment operations, not including cooling towers.
☑	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☑	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☑	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☑	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☐	14.	Demineralized water tanks and demineralizer vents.
☑	15.	Drop hammers or hydraulic presses for forging or metalworking.
☐	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.
☐	17.	Emergency (backup) electrical generators at residential locations.
☐	18.	Emergency road flares.
☐	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)		
☐	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:
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☑	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	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.
☑	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☑	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☑	26.	Fire suppression systems.
☑	27.	Firefighting equipment and the equipment used to train firefighters.
☐	28.	Flares used solely to indicate danger to the public.
☑	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.
☑	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☑	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☑	33.	Hydraulic and hydrostatic testing equipment.
☑	34.	Indoor or outdoor kerosene heaters.
☑	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☐	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☑	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.

24. Insignificant Activities (Check all that apply)		
☑	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.)
☑	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.
☑	43.	Process water filtration systems and demineralizers.
☑	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.
☑	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☑	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☑	50.	Space heaters operating by direct heat transfer.
☑	51.	Steam cleaning operations.
☑	52.	Steam leaks.
☐	53.	Steam sterilizers.
☑	54.	Steam vents and safety relief valves.
☐	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.
☐	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.
☐	57.	Such other sources or activities as the Director may determine.
☑	58.	Tobacco smoking rooms and areas.
☑	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 as defined in 45CSR§30-2.38.

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: James W. Hollingsworth James W. Hollingsworth	Title: 6/8/2023 Site Manager

Responsible official's signature:

Signature: _____ Signature Date: _____
(Must be signed and dated in blue ink or have a valid electronic signature)

Note: Please check all applicable attachments included with this permit application:	
☑	ATTACHMENT A: Area Map
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Equipment Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☑	ATTACHMENT G: Air Pollution Control Device Form(s)
☑	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, requested by phone (304) 926-0475, and/or obtained through the mail.

Attachment 1-Non-Applicability Determinations

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.

a. 40 C.F.R. 60, Subpart K - "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." There were no petroleum liquid storage tanks constructed in Facilities, Construction, and Support during these dates.

b. 40 C.F.R. 60, Subpart Ka - "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." There are no petroleum liquid storage tanks constructed in FC&S Area during these dates with a capacity greater than 40,000 gallons.

c. 40 C.F.R. 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." There are no volatile organic liquid storage tanks constructed in FC&S Area after the effective date with a design capacity greater than 75 m3 (19,812.9 gallons).

d. 40 C.F.R. 60, Subpart VV - "Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry." FC&S Area does not produce as intermediates or final products any of the materials listed in 40 C.F.R. §60.489.

e. 40 C.F.R. 60, Subpart DDD - "Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry." FC&S Area does not manufacture polypropylene, polyethylene, polystyrene, or poly(ethylene terephthalate) for which this rule applies.

f. 40 C.F.R. 60, Subpart RRR - "Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes. FC&S Area does not produce any of the chemicals listed in 40 C.F.R. §60.707 as a product, co-product, by-product, or intermediate.

g. 40 C.F.R. 61, Subpart V - "National Emission Standards for Equipment Leaks (Fugitive Emissions Sources)." Applies to sources in VHAP service as defined in 40 C.F.R. §61.241. VHAP service involves chemicals that are not used in a manner that qualifies them under the rule in FC&S Area.

h. 40 C.F.R. 63, Subpart F-"National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry." 40 C.F.R. 63 Subparts F, G, and H does not apply to FC&S Area manufacturing process units that do not meet the criteria in 40 C.F.R. 63.100(b), (b)(2), and (b)(3).

i. 40 C.F.R. 63, Subpart G- "National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater." 40 C.F.R. 63 Subparts F, G, and H does not apply to FC&S Area manufacturing process units that do not meet the criteria in 40 C.F.R. 63.100(b), (b)(2), and (b)(3).

j.40 C.F.R. 63, Subpart H - "National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks." 40 C.F.R. 63 Subparts F, G, and H do not apply to FC&S Area manufacturing process units, as they do not meet the criteria in 40 C.F.R. §§63.100(b)(1), (b)(2), and (b)(3).

j. 40 C.F.R. 63, Subpart JJJ - "National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins. FC&S Area does not produce the materials listed in 40 C.F.R. §63.1310.

k. 40 C.F.R.63, Subpart EEEE—"National Emission Standards for Hazardous Air Pollutants" Organic Liquid Distribution (Non-Gasoline)." The FC&S Area does not operate and organic liquids distribution operations nor does it handle organic liquids defined in §63.2406.

k. 40 C.F.R.63, Subpart FFFF – "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing." FC&S Area does not manufacture any material or family of materials defined in §63.2435(b)(1)(i) through (v).

l. 40 C.F.R. 63, Subpart WWWW "National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Productions." FC&S Area does not engage in reinforced plastics composites production as defined in 40 C.F.R. §63.5785 and does not manufacture composite material as defined in 40 C.F.R. §63.5935.

l. 40 C.F.R. 63, Subpart PPPP – "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products." FC&S Area does not produce an intermediate or final product that meets the definition of "surface coated" plastic part.

m. 40 C.F.R. 63, Subpart IIII – "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks." FC&S Area does not engage in the surface coating of new automobile or light-duty truck bodies or body parts for new automobiles or light-duty trucks.

n. 40 C.F.R. 63, Subpart MMMM – "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products." There are no surface coating activities conducted in FC&S Area subject to the requirements of this rule.

o. 40 C.F.R. 63, Subpart HHHHH – "National Emission Standards for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing." FC&S Area does not produce, blend, or manufacture coatings as part of the manufacturing process.

p. 40 C.F.R. 82, Subpart C – "Protection of Stratospheric Ozone." Bans non-essential products containing Class I substances and bans non-essential products containing or manufactured with Class II substances. FC&S Area does not use, manufacture, nor distribute these materials.

q. 45CSR27 – "To Prevent and Control the Emission of Toxic Air Pollutants" FC&S Area does not have emission sources of toxic air pollutants as listed in 45CSR27.

r. 45CSR§21-19 – "Other Facilities that Emit Volatile Organic Compound (VOC)." The operations of FC&S Area are outside of the SIC grouping to which this section of 45CSR21 applies.

s. 45CSR§21-40 – "Other Facilities that Emit Volatile Organic Compound (VOC)." None of the emission sources in FC&S Area have maximum theoretical emissions of 6pounds per hour or more and are not subject to the requirements of this section.

Attachment 2-Facility-Wide Applicability Requirements--Underlying rule/regulation citation and /or construction permit with condition number.

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1. **[45CSR§6-3.1.]**

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. **[45CSR§6-3.2.]**

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health. **[40 C.F.R. 61 and 45CSR15]**

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. **[45CSR§4-3.1 State-Enforceable only.]**

3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11. **[45CSR§11-5.2]**

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality. **[W.Va. Code § 22-5-4(a)(14)]**

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, or disposal of appliances must be certified by an approved Technician certification program pursuant to 40 C.F.R. § 82.161. **[40 C.F.R. 82, Subpart F]**

3.1.8. **Risk Management Plan.** This stationary source, as defined in 40 C.F.R. § 68.3, is subject to Part 68. This stationary source shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. Part 68.10. This stationary source shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71. **[40 C.F.R. 68]**

3.1.9. **Fugitives.** The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary, particulate matter suppressants shall be applied in relation to stockpiling and general material handling to

minimize particulate matter generation and atmospheric entrainment. **[45CSR§7-5.2]**

3.1.10. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures. **[45CSR§7-4.12.]**

3.1.11. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has beensubmitted by the owner or operator and approved by the Director. **[45CSR§7-9.1.]**

Attachment 3-Facility-Wide Applicability Requirements—Monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance.

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 as applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 as applicable.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; as statement of compliance status, also signed by responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of condition shall include the following:
    1. The permit or rule evaluated, with the citation number and language.
    2. The result of the test for each permit or rule condition.

3. A statement of compliance or non-compliance with each permit or rule condition.
[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;
b. The date(s) analyses were performed;
c. The company or entity that performed the analyses;
d. The analytical techniques or methods used;
e. The results of the analyses; and
f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.]

3.4.2 Retention of records. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records. **[45CSR§30-5.1.c.2.B.]**

3.4.3 Odors. For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken. **[45CSR§30-5.1.c. State-Enforceable only.]**

3.4.4 Fugitives. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures as required by 3.1.10. applied at the facility. These records shall be maintained on site for a period of no less than five (5) years. **[45CSR§30-5.1.c.]**

3.5 Reporting Requirements

3.5.1 Responsible official. Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. **[45CSR§§30-4.4. *and* 5.1.c.3.D.]**

3.5.2 A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31. **[45CSR§30-5.1.c.3.E.]**

3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

If to the US EPA:
Associate Director

Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency - Region III
1650 Arch Street
Philadelphia, PA 19103-2029

DAW Compliance and Enforcement[1]:
DEPAirQualityReports@wv.gov
[1]For all self-monitoring repots (MACT, GACT, NSPS, etc., stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

3.5.4. Certified emissions statement. The permittee shall submit a certified emissions statement and pay fees on
an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]

3.5.5. Compliance certification. The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address:
DAQ
DEPAirQualityReports@wv.gov
US EPA:
R3_APD_Permits@epa.gov

[45CSR§30-5.3.e.]

3.5.6. Semi-annual monitoring reports. The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and March 15 for the reporting period July 1 toDecember 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:
DAQ
DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

3.5.7. Emergencies. For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. Deviations.

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of

such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.
[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

Attachment 4

Facility Wide Emissions Summary (Tons per Year) Potential to emit for non-fixed sources is highly variable and dependent on project work. State form was not compatible with font size or ability to add additional rows		
	Potential Emissions	
	PPH	TPY
Total Particulate Matter (TSP)	Dependent of task-refer to work plan. May Include blasting and painting of structures	Dependent of task-refer to work plan. May Include blasting and painting of structures
Volatile Organic Compounds (VOCs)	Dependent of task-refer to work plan.	Dependent of task-refer to work plan. For painting, estimate 33.4.
Hazardous Air Pollutants	PPH	TPY
Cumene	0.0125	0.018
Ethylene Glycol	0.043	0.062
Glycol Ethers	0.153	0.22
Toluene	0.15	0.212
Ethyl Benzene	0.07	0.1
Xylenes	0.305	0.4
Methyl Isobutyl Ketone	0.0031	0.004
Methyl Ethyl Ketone	0.45	0.589
Methylene Chloride	0.014	0.018
Methyl Methacrylate	0.0031	0.004
Chromium	0.0005	0.0006
Chromium VI	0.0001	0.00005
Cobalt	0.0008	0.0009
Manganese	0.0003	0.0003
Nickel	0.00017	0.0002
Benzene	0.0004	0.0043
n-Hexane	0.001	0.007

Attachment A – Area Map – Route to Facility

Wood County Airport to Site

Exit Airport Rd to Rt 31-S (right)
Rt 31-S to Rt 2-S (right)
Rt 2 S to I-77 S
Rt 50 W (Corridor D)
Rt 892 to Site (left at traffic light)
WashWorks Site on your right ~1 mile

Charleson WV to Site

I-77 north from Charleston
Rt 50 W (Corridor D) take to Ohio
Rt 892 to Site (left at traffic light)
WashWorks Site on your right ~1 mile

Airport to Comfort Inn

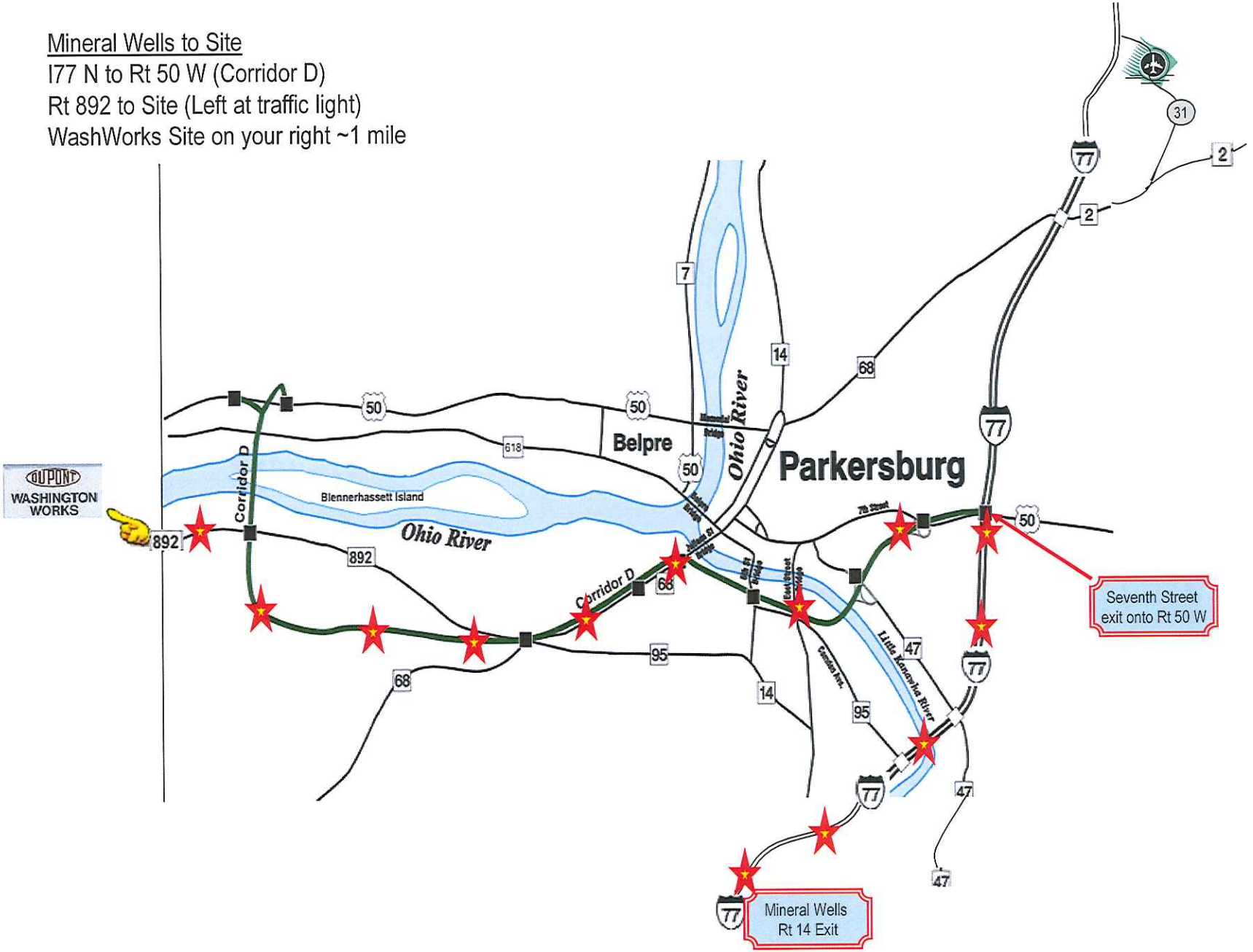
Exit Airport Rd to Rt 31-S (right)
Rt 31-S to Rt 2-S (right)
Rt 2 S to Rt 68 S (Emerson Avenue)
Follow Rt 68 S to Rt 14 N
Comfort Inn is on left (near Red Lobster)

Mineral Wells to Site

I77 N to Rt 50 W (Corridor D)

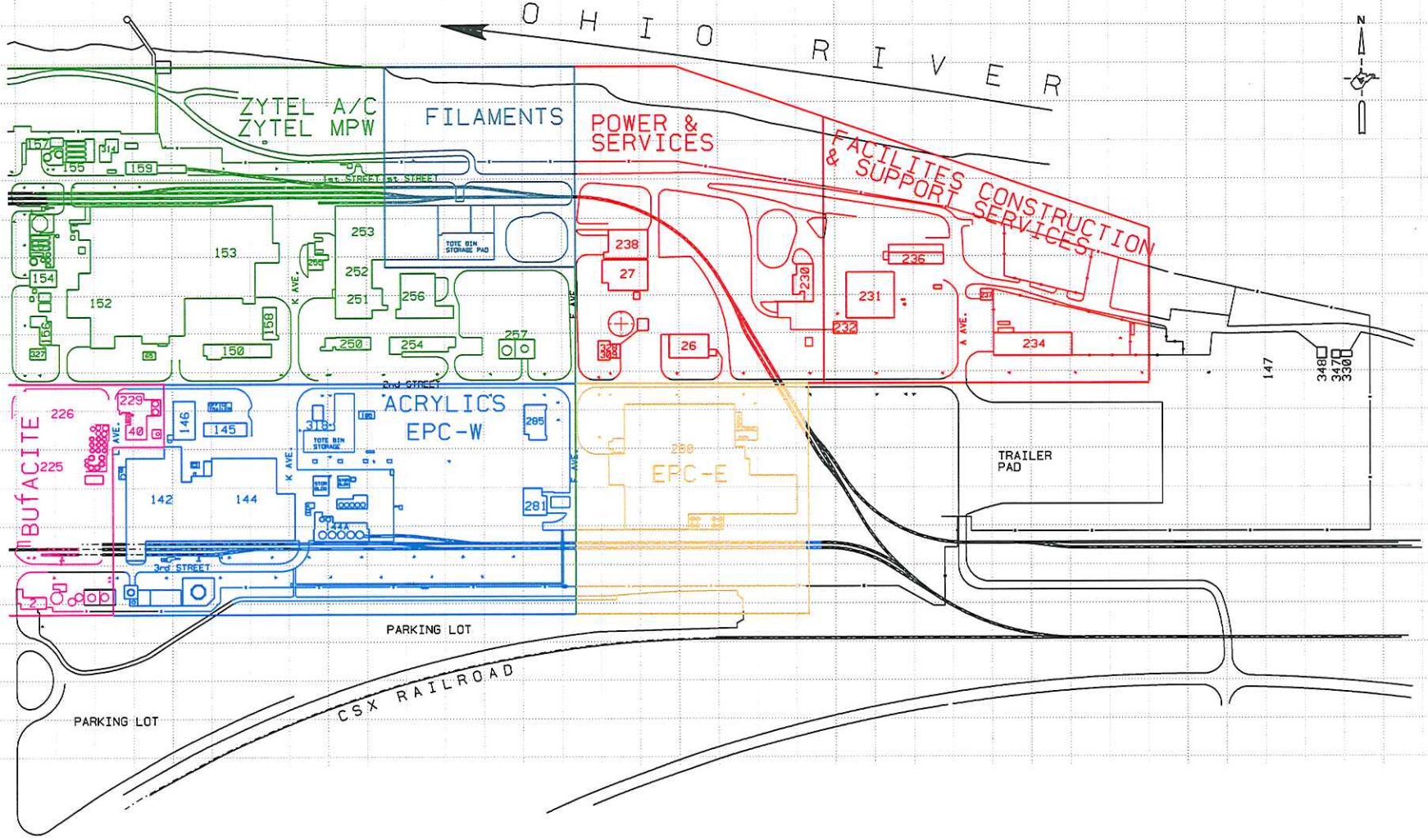
Rt 892 to Site (Left at traffic light)

WashWorks Site on your right ~1 mile



Attachment B – Facility Plot Plan

Plot plan for FC& S facilities shows entire plant as the facilities are spread over many areas.

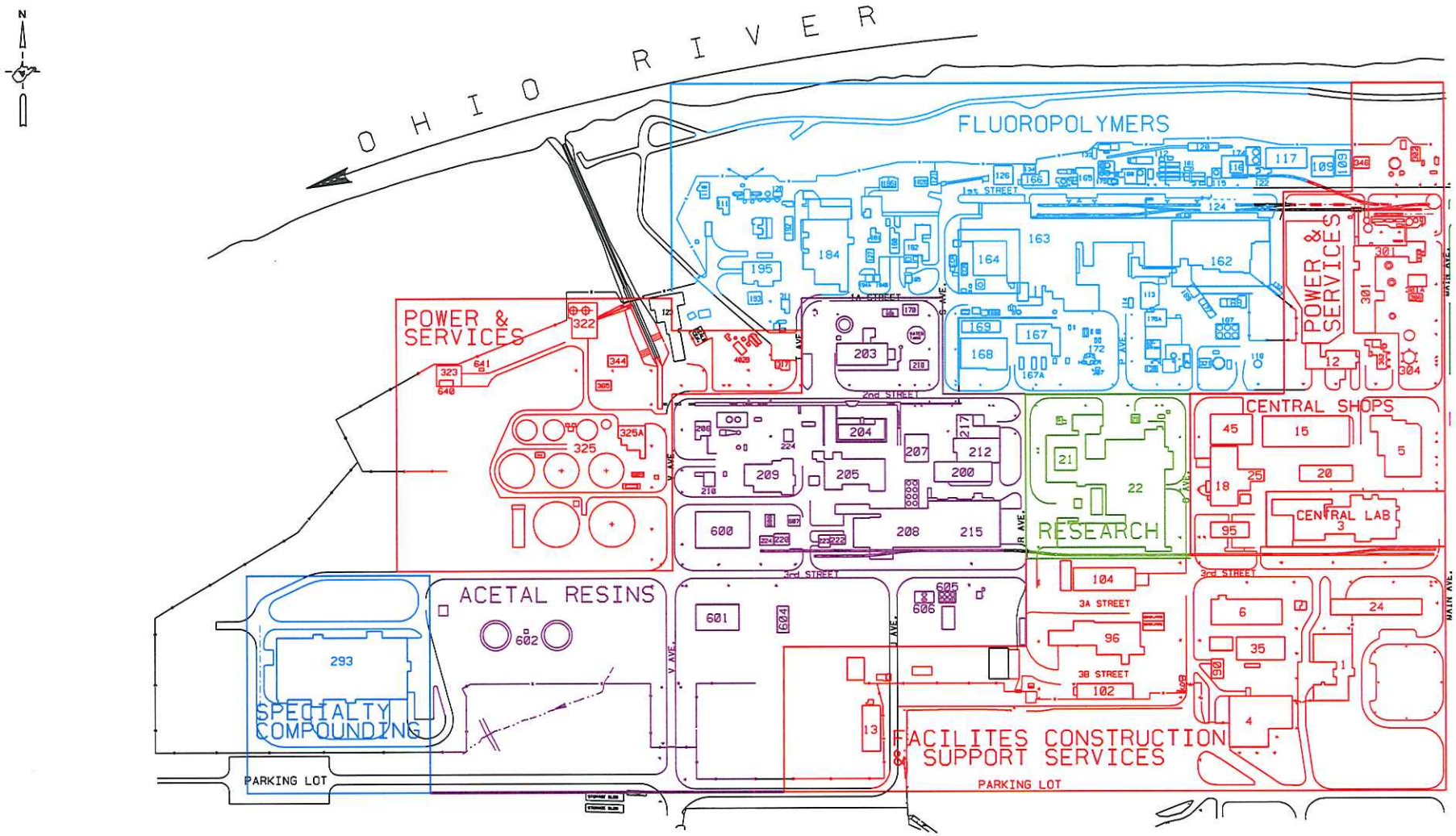


WASHINGTON WORKS
TITLE 5
APPLICATION UPDATE

C-2B

WASHINGTON WORKS
WW M-809 AR

INTERGRAPH COMPUTER DRAWING



WASHINGTON WORKS
TITLE 5
APPLICATION UPDATE

C-1B

SCALE	1" = 300'
DRAWN BY	JOE GASTON 11-28-01
UPDATED BY	DAVE DRENNEN 12-5-01
CHECKED BY	
APPROVED BY	

WASHINGTON WORKS
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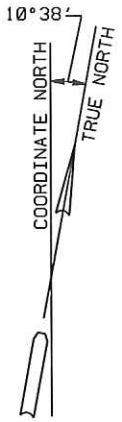
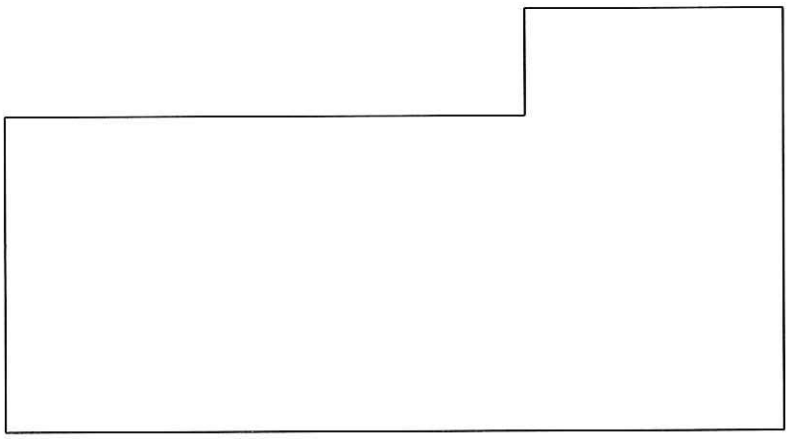
INTERGRAPH COMPUTER DRAWING



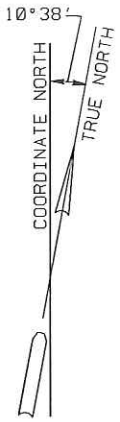


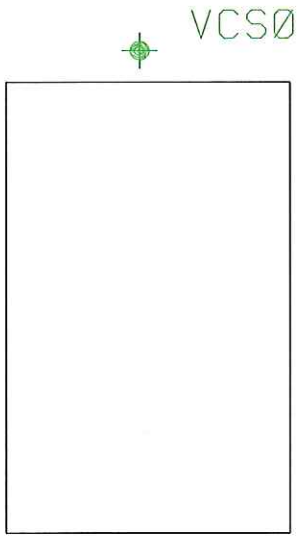
VTIS01E

PERMIT APPLICATION
TITLE 5
45CSR30

DAVE DRENNEN 1-29-09
SCALE: 1"=150'

WWM666
-166





PERMIT APPLICATION
TITLE 5
45CSR30

DAVE DRENNEN 1-29-09 SCALE: 1"=300'	WWM666 -101

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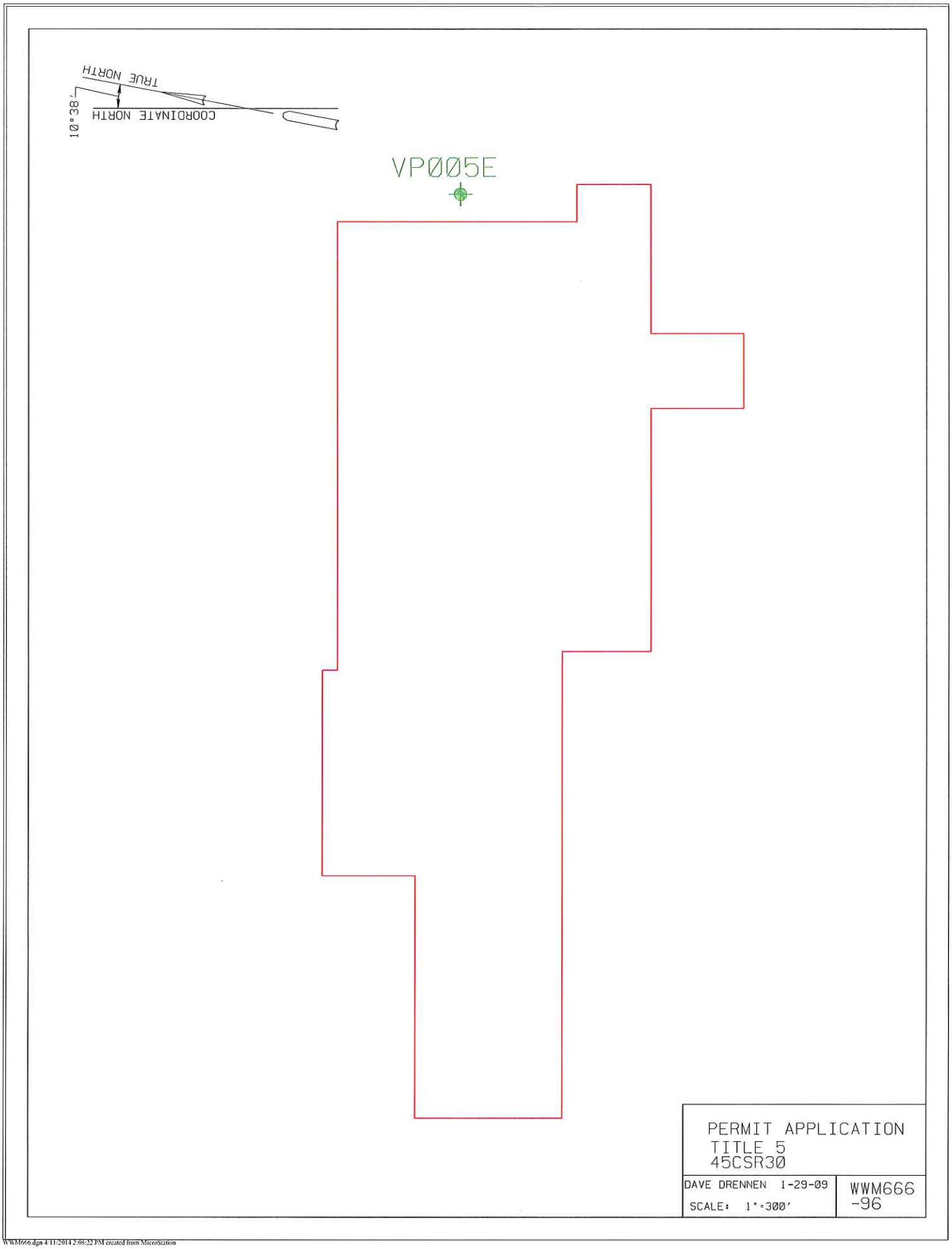

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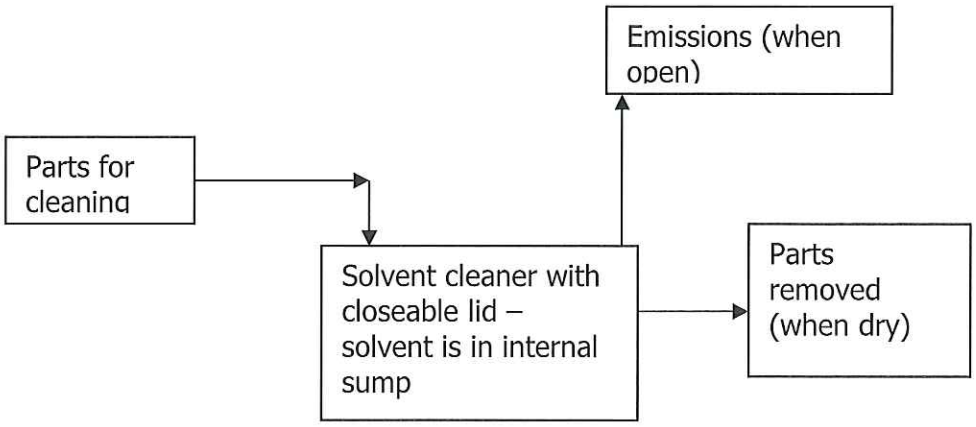
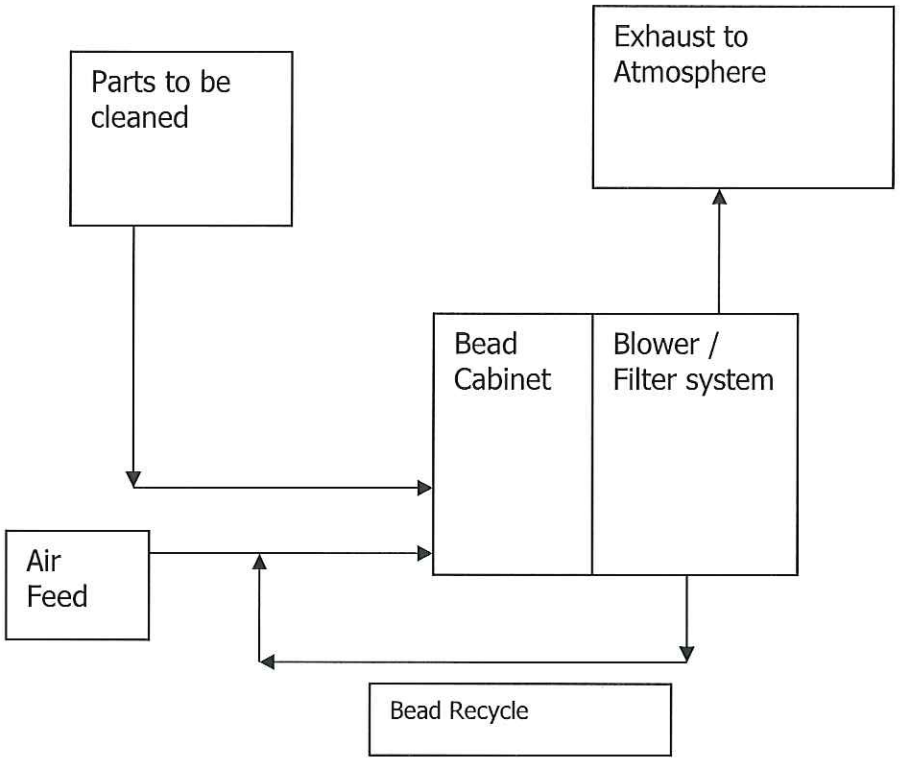
Attachment C – Process Flow Diagrams

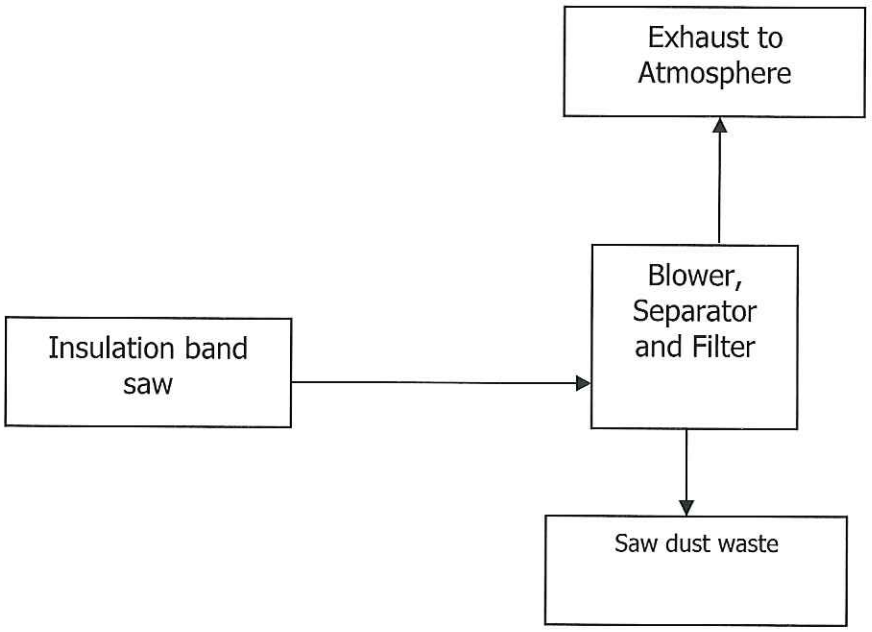
Process Flow Diagram – General Unit – Solvent Cleaner (Safety-Kleen)



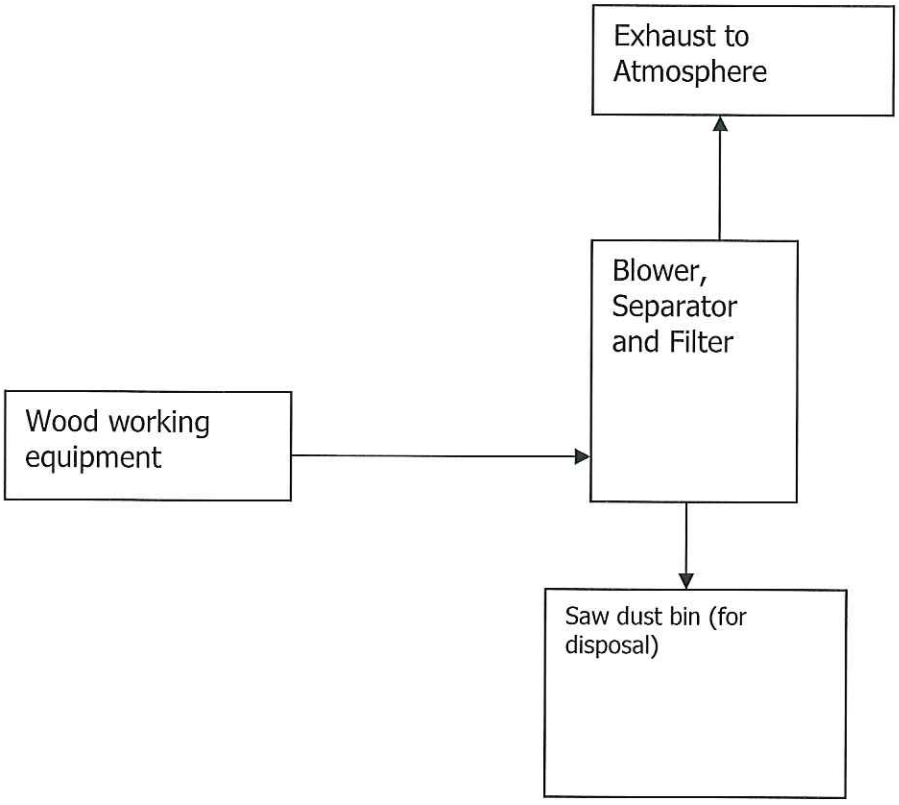
Process Flow Diagram – Bead Blast Unit
(General)



Process Flow Diagram – Insulation saw (General)



Process Flow Diagram – Wood working equipment (General)



Attachment D – Tile V Equipment List

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 Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
V238G01	V238G01E	Mineral Spirits Parts Cleaner (B-238)	1991	44 gal	No
VBOS08	VBOS08E	Mineral Spirits Parts Cleaner (B-301B)	1991	44 gal	No
VP005	VP005E	Bead Blast Unit (B-96)	2004	275 lb/hr	External Bag Filter
VTIS01	VTIS01E	Band Saw Insulation Shop (B-166)	1991	15"	Yes
VCS03	VCS01E	Radial Arm Saw (B-101)	1968	2hp	Yes
VCS04	VCS01E	Band Saw (B-101)	1968	15"	Yes
VCS05	VCS01E	Table Saw (B-101)	2000	7.5hp	Yes
VCFT01	VCFT01E	Portable Diesel Fuel Tank	2014	200 gal	No
VTEMPWORK	VTEMPWORK	Temporary Work Areas at Task Sites	NA	NA	NA

[1]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 – Emission Unit Forms

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
V238G01	Building 238 Parts Cleaner	None

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Parts Cleaner bath (rented from and serviced by contractor) building 238

Manufacturer:	**Model number:**	**Serial number:**

Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	MM/DD/YYYY 1991	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

44 gallons

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
1 batch	8760 batches	8760 hours per year

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

Does this emission unit combust fuel? ☐ Yes ☑ No	**If yes, is it?** ☐ Indirect Fired ☐ 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)	1.12	5.65
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).

Emission factors were determined by assuming a vent moving in a 4" duct – 149ft3 / min over the opened solvent enclosure. It was determined that 6.69 lbs / hour are lost through evaporation. Examination of a typical parts cleaning cycle found that the enclosure was open for a total of 10 minute per cycle maximum. Thus a total of 1.12 pph was determined as the maximum emissions.

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.

Mineral spirits parts cleaners are subject to the cold cleaning provisions of 45CSR§21-30.

45 CSR 21-30.3.a.4. Provide a permanent, legible, conspicuous label, summarizing the operating requirements;

45 CSR 21-30.3.a.5. Store waste solvent in covered containers;

45 CSR 21-30.3.a.6. Close the cover whenever parts are not being handled in the cleaner;

45 CSR 21-30.3.a.7. Drain the cleaned parts until dripping ceases;

45 CSR 21-30.3.a.8. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge (psig); and

45 CSR 21-30.3.a.9. Degrease only materials that are neither porous nor absorbent.

45 CSR 21-30.6.b. Comply with the requirements of section 5.2. regarding reports of excess 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.)

All applicable testing, recordkeeping, and reporting are the same as required by 45CSR§21, Section 30 with the exception that records shall be maintained for a period of 5 years instead of two.

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

Emission unit ID number:	Emission unit name:	List any control devices associated with this emission unit:
VBOS08	Building 301 B Parts Cleaner	None

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Parts Cleaner bath (rented from and serviced by contractor) building 301

Manufacturer:	Model number:	Serial number:

Construction date:	Installation date:	Modification date(s):
MM/DD/YYYY	MM/DD/YYYY 1991	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

44 gallons

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule:
1 batch	8760 batches	8760 hours per year

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

Does this emission unit combust fuel? ☐ Yes ☑ No	If yes, is it? ☐ Indirect Fired ☐ 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)	1.12	5.65
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).

Emission factors were determined by assuming a vent moving in a 4" duct – 149ft3 / min over the opened solvent enclosure. It was determined that 6.69 lbs / hour are lost through evaporation. Examination of a typical parts cleaning cycle found that the enclosure was open for a total of 10 minute per cycle maximum. Thus a total of 1.12 pph was determined as the maximum emissions.

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.

Mineral spirits parts cleaners are subject to the cold cleaning provisions of 45CSR§21-30.

45 CSR 21-30.3.a.4. Provide a permanent, legible, conspicuous label, summarizing the operating requirements;

45 CSR 21-30.3.a.5. Store waste solvent in covered containers;

45 CSR 21-30.3.a.6. Close the cover whenever parts are not being handled in the cleaner;

45 CSR 21-30.3.a.7. Drain the cleaned parts until dripping ceases;

45 CSR 21-30.3.a.8. If used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed 10 pounds per square inch gauge (psig); and

45 CSR 21-30.3.a.9. Degrease only materials that are neither porous nor absorbent.

45 CSR 21-30.6.b. Comply with the requirements of section 5.2. regarding reports of excess 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.)

All applicable testing, recordkeeping, and reporting are the same as required by 45CSR§21, Section 30 with the exception that records shall be maintained for a period of 5 years instead of two.

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

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
VP005	Building 96 Bead Blast Unit	Integral

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Bead Blast unit located in building 96 with integral recovery / collection device

Manufacturer:	**Model number:**	**Serial number:**

Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	MM/DD/YYYY 1992	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

4 cubic feet

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
665 pounds	831 tons per year	2500 hours per year

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

Does this emission unit combust fuel? ☐ Yes ☑ No	**If yes, is it?** ☐ Indirect Fired ☐ 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})	.8	.83
Total Particulate Matter (TSP)	.8	.83
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).

The maximum hourly process weight rate was calculated to be 665 pph and was based on the volume of material capable of being placed into the unit (4ft3), its weight (assumed the metal was carbon steel with an 80% void space in the metal part), and a 275 pph grit rate through the blast nozzle

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.

4.1. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

☑ 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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks
-Ensure integrity of Flexible Fittings
-Operate Filter Shaker
-Ensure that filters are engaged
-Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

Post-Operation Checks
-Check area around collector

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

Emission unit ID number:	Emission unit name:	List any control devices associated with this emission unit:
VC1S01	Band Saw	Dust collector with filter fabric

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Band saw used to cut insulation

Manufacturer:	Model number:	Serial number:
Forrest	204	204-45

Construction date:	Installation date:	Modification date(s):
MM/DD/YYYY	MM/DD/YYYY 1984	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

3450 rpm

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule:
360 linear feet		8760

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

Does this emission unit combust fuel? ☐ Yes ☑ No	If yes, is it? ☐ Indirect Fired ☐ 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)	8.19	35.87
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).

Maximum throughput is 12 feet per minute. Maximum amount of dust that can be produced from a 1/8" kerf is .021 cubic feet per minute. .021 cubic feet per minute X 60 minutes per hour X .5 hours operate per hour X 13 pounds per cubic foot (bulk density of insulation being cut) = 8.19 pounds of particulates per hour.

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.

45 CSR CSR 7 4.1. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

☑ 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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks
-Ensure integrity of Flexible Fittings
-Operate Filter Shaker
-Ensure that filters are engaged
-Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

Post-Operation Checks
-Check area around collector

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

Emission unit ID number:	Emission unit name:	List any control devices associated with this emission unit:
VCS03	Radial Arm Saw	Dust collector with filter fabric

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Radial arm saw used to cut wood.

Manufacturer:	Model number:	Serial number:
DeWalt	542021-00	

Construction date:	Installation date:	Modification date(s):
MM/DD/YYYY	MM/DD/YYYY 05/012000	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

7.5 Hp electric drive 3425 RPM

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule:
360 linear feet		8760 hours per year

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

Does this emission unit combust fuel? ☐ Yes ☑ No	If yes, is it? ☐ Indirect Fired ☐ 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)	4.54	19.89
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).

A board 2 inches thick by 12 inches wide would be the maximum size you could cut. Cutting at 12 feet per minute with a 1/8" kerf produces .021cubic feet of dust. Sawing 30 minutes per hour produces 4.54 pounds of sawdust per hours with a density of 7.2 pounds per cubic foot.

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.

45 CSR CSR 7 4.1. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

☑ 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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks
-Ensure integrity of Flexible Fittings
-Operate Filter Shaker
-Ensure that filters are engaged
-Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

Post-Operation Checks
-Check area around collector

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

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
VCS04	Band Saw	Dust collector with filter fabric

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Band saw used to cut wood.

Manufacturer:	**Model number:**	**Serial number:**
Rockwell		4801A
Construction date: MM/DD/YYYY	**Installation date:** MM/DD/YYYY 01/01/1968	**Modification date(s):** MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

15" throat

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**

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

Does this emission unit combust fuel? ☐ Yes ☑ No	**If yes, is it?** ☐ Indirect Fired ☐ 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)	4.54	19.89
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).

A board 2 inches thick by 12 inches wide would be the maximum size you could cut. Cutting at 12 feet per minute with a 1/8" kerf produces .021cubic feet of dust. Sawing 30 minutes per hour produces 4.54 pounds of sawdust per hours with a density of 7.2 pounds per cubic foot.

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.

45 CSR CSR 7 4.1. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

☑ 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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks
-Ensure integrity of Flexible Fittings
-Operate Filter Shaker
-Ensure that filters are engaged
-Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

Post-Operation Checks
-Check area around collector

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

Emission unit ID number:	Emission unit name:	List any control devices associated with this emission unit:
VCS05	Table Saw	Dust collector with filter fabric

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Table saw used to cut wood.

Manufacturer:	Model number:	Serial number:
		4801A

Construction date:	Installation date:	Modification date(s):
MM/DD/YYYY	MM/DD/YYYY 2000	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

7.5 Hp

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule:
360 Linear feet		8760

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

Does this emission unit combust fuel? ☐ Yes ☑ No	If yes, is it? ☐ Indirect Fired ☐ 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)	4.54	19.89
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
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.).

A board 2 inches thick by 12 inches wide would be the maximum size you could cut. Cutting at 12 feet per minute with a 1/8" kerf produces .021cubic feet of dust. Sawing 30 minutes per hour produces 4.54 pounds of sawdust per hours with a density of 7.2 pounds per cubic foot.

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.

45 CSR CSR 7 4.1. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

☑ 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.)

The following work practice shall be employed to minimize the potential of fugitive particulate matter:

Pre-Operation Checks
-Ensure integrity of Flexible Fittings
-Operate Filter Shaker
-Ensure that filters are engaged
-Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

Post-Operation Checks
-Check area around collector

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

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
VCFT01	Portable Diesel Fuel Tank	None

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Tank that is stored in containment shed that can be taken around the plant if need be (by fork lift) to fill mobile equipment.

Manufacturer:	**Model number:**	**Serial number:**

Construction date:	**Installation date:**	**Modification date(s):**
MM/DD/YYYY	MM/DD/YYYY 2014	MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

200 gallons

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
		8760 hours per year

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

Does this emission unit combust fuel? ☐ Yes ☑ No	**If yes, is it?** ☐ Indirect Fired ☐ 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)	.006	.019
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total HAP	.005	.0006
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.).

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.

☑ 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.)

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

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
VTEMPWORK	Temporary Work Facilities	As described in work plan

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Dependent of task -refer to work plan

Manufacturer:	**Model number:**	**Serial number:**
Varies	Varies	Varies
Construction date: MM/DD/YYYY	**Installation date:** MM/DD/YYYY	**Modification date(s):** MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
		Defined by work plan

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

Does this emission unit combust fuel? ☐ Yes ☑ No	**If yes, is it?** ☐ Indirect Fired ☐ 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)	See Attached to this form	See Attached to this form
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)	See Attached to this form	See Attached to this form
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
See Attached to this form		
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.).

Compliance will be judged against a work plan developed prior to the start of the activities at the VTEMPWORK location. Activities and associated emission will be specified in the work plan and emission control measures will also be specified in the work plan. Compliance is judged against conformance to the work plan. The Basis work plan for the potential to emit was for maintenance of building steel which involved cutting, welding, and painting of building steel to repair or replace structure elements.

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.

4.1. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

☑ 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.)

Work practices and equipment used to control emissions will be defined in the work plan associated with the VTEMPWORK location and prepared prior to the start of the activities at the location. Estimated emissions for the planned work will be part of the work plan.

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.**

VTEMPWORK State form was not compatible with font size or ability to add additional rows		
	Potential Emissions	
	PPH	TPY
Total Particulate Matter (TSP)	Dependent of task-refer to work plan. May Include blasting and painting of structures	Dependent of task-refer to work plan. May Include blasting and painting of structures
Volatile Organic Compounds (VOCs)	Dependent of task-refer to work plan.	Dependent of task-refer to work plan. For painting, estimate 33.4
Hazardous Air Pollutants	PPH	TPY
Cumene	0.0125	0.018
Ethylene Glycol	0.043	0.062
Glycol Ethers	0.153	0.22
Toluene	0.15	0.212
Ethyl Benzene	0.07	0.1
Xylenes	0.305	0.4
Methyl Isobutyl Ketone	0.0031	0.004
Methyl Ethyl Ketone	0.45	0.589
Methylene Chloride	0.014	0.018
Methyl Methacrylate	0.0031	0.004
Chromium	0.0005	0.0006
Chromium VI	0.0001	0.00005
Cobalt	0.0008	0.0009
Manganese	0.0003	0.0003
Nickel	0.00017	0.0002
Benzene	0.0004	0.0043
n-Hexane	0.001	0.007

Attachment F – Schedule of Compliance Forms

FC&S does not have a non-compliance situation so there is no need for a compliance schedule.

Attachment G – Air Pollution Control Device Forms

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: VTIS01C	**List all emission units associated with this control device.** Band Saw	
Manufacturer: Torit	**Model number:** 19-FR	**Installation date:** 1990

Type of Air Pollution Control Device:

_X__ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	__X_ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	[ ] Other (describe)
___ Wet Plate Electrostatic Precipitator		___ 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	95%	

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

This is a dust collection system for the insulation cutting table in B-166.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes [X] No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

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

This equipment is monitored by weekly inspections of equipment in its entirety. All fittings and associated ductwork are inspected. Engagement of fabric filters and any emptying of collection trays or drums are also included.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: VCS01C	**List all emission units associated with this control device.** Band Saw, Table Saw, and Radial Arm Saw	
Manufacturer:	**Model number:**	**Installation date:**

Type of Air Pollution Control Device:

_X__ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Absorber	___ Packed Tower Scrubber	__X_ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	[ ] Other (describe)
___ Wet Plate Electrostatic Precipitator		___ 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	95%	

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

This is a dust collection system for the carpenter shop tools in B-101.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes [X] No

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

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

This equipment is monitored by weekly inspections of equipment in its entirety. All fittings and associated ductwork are inspected. Engagement of fabric filters and any emptying of collection trays or drums are also included.

Attachment H – CAM Rule Forms

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

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:

☐ 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
EXAMPLE 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 **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 monitoring data and information for EACH indicator selected for EACH 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:	**4b) Pollutant:**	**4c) [a] Indicator No. 1:**	**4d) [a] Indicator No. 2:**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:			
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:			
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:			
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):			
[d] Provide the MONITORING FREQUENCY:			
Provide the DATA COLLECTION PROCEDURES that will be used:			
Provide the DATA AVERAGING PERIOD 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:	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:

Attachment I- Supplemental Information

APPLICABLE REQUIREMENTS – FC&S Segment 12 of 14

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.
This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate matter and opacity limits for indirect heat exchangers.
	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR10	Sulfur dioxide limits.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR21, Section 23	Control of VOC emissions from gasoline dispensing facility.
	45CSR21, Section 30	Control of VOC emissions from cold and solvent metal cleaning.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances.
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

45CSR7 Requirements

45CSR§§7-3.1 and 3.2

Emission points VP005E, VTIS01E, VCS01E and VTEMPWORK are subject to the opacity limits of 45CSR§§7-3.1 and 3.2. In order to demonstrate compliance with the opacity limits for VTEMPWORK, visible emission observations are required to be conducted monthly using methods based on 40 C.F.R. 60, Appendix A, Method 22. Records of the visible emission observations must be maintained on site for a period of five years. Compliance with the opacity limits for the emission points VP005E, VTIS01E, and VCS01E will be demonstrated through monitoring and record keeping of the control devices as described below. VTEMPWORK visible emissions will be controlled and monitored according to the work practices plan generated at the establishment of the temporary source.

45CSR§7-4.1

The Bead Blast Unit (emission point VP005E) consists of an enclosed chamber with both an integral filter and external filter. The unit is designed for use on small parts and is used intermittently. The maximum allowable emission limits, calculated from 45CSR§7-4.1, for the blast unit is 0.8 pounds per hour.

The insulation band saw (emission point VTIS01E) use filters to control particulate emissions. The band saw unit is used to cut insulation. The maximum hourly process weight rates were based on the maximum amount of insulation that can be either cut. The 45CSR§7-4.1 maximum allowable hourly emission limit for VTIS01E (Insulation Band Saw VTIS01) is 0.368 pounds.

Since the Bead Blast Unit and Insulation Units are rather small, used in a batch mode, and there are filters in place for control of particulate emissions, Chemours proposed work practice standards to demonstrate compliance with both the opacity and the hourly particulate matter emission limitations of 45CSR§§7-3.1 and 4.1. These work practices consist of the following:

1) Pre-Operation Checks
    a. Ensure integrity of flexible fittings.
    b. Operate Filter Shaker.
    c. Ensure that filters are engaged.
    d. Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

2) Post-Operation Checks
    a. Check area around collector/recovery device for indications of leaks.
    b. If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

Records to demonstrate performance of the work practices must be maintained on site for a period of no less than five (5) years. These records shall be in the form of a log for each unit and shall document that the first operator to use the unit in the calendar day performed the necessary pre-operation/post-operation checks. These records shall also be used to document any problems that were discovered during inspection and the measures taken to correct the problem(s) and prevent the reoccurrence.

The Radial Arm Saw (emission point VCS01E) has a cyclone separator with a particulate collection drum to control particulate emissions. The 45CSR§7-4.1 allowable particulate emission limit of 0.435 pounds per hour was calculated based on the maximum amount of lumber that can be cut in an hour. In order to demonstrate compliance with both the opacity and emission limitations of 45CSR§§7-3.1 and 4.1, the permittee will be required to monitor and implement work practice standards similar to those for the filter units. These work practice standards shall consist of the following:

1) Pre-Operation Checks
    a. Ensure integrity of flexible fittings.
    b. Operate Cyclone Separator.
    c. Ensure that Cyclone Separator is engaged.
    d. Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

2) Post-Operation Checks
    a. Check area around collector/recovery device for indications of leaks.
    b. If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

Records to demonstrate performance of the work practices must be maintained on site for a period of no less than five (5) years. These records shall be in the form of a log for each unit and shall document that the first operator to use the unit in the calendar day performed the necessary pre-operation/post-operation checks. These records shall also be used to document any problems that were discovered during inspection and the measures taken to correct the problem(s) and prevent the reoccurrence.

45CSR§7-5.1

45CSR§7-5.1 requires the emission units to be equipped with a system which may include, but not be limited to, process equipment design, control equipment design, or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. In order to demonstrate compliance with this requirement, the permittee will be required to maintain records of the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. Chemours maintains that for equipment not listed in the Title V permit that is used solely under the insignificant listings found as items 41 and 44 in the application form there is a general duty to operate these systems in a manner to minimize fugitive particulate emissions to the environment and that individual listing of the affected equipment is unnecessary. At the same time the applicable requirement to all maintenance activities may be found in 45 CSR 7-10.3 as referenced below.

45CSR§7-10.3

VTEMPWORK is the emission unit and emission point ID for temporary field-erected facilities for construction and maintenance activities and has also been classified by Chemours as maintenance operations.

In accordance with 45CSR§7-10.3, maintenance operations are exempt from the provisions of 45CSR§7-4 provided that at all times the owner or operator conducts these maintenance operations in a manner consistent with good air pollution control practices for minimizing emissions. In order to demonstrate compliance, the permittee will be required to maintain records of the types of particulate capture and/or suppression systems used to minimize emissions, the times these systems were inoperable, and the corrective actions taken to repair these systems. In addition, the monthly visible emission observations required to be conducted to demonstrate compliance with 45CSR§7-3.1 will also be used to verify that these emission units are being operating in accordance with good air pollution control practices.

45CSR21 Requirements

45CSR§21-23

The Diesel Fuel Tank (VCFT01) is subject to the requirements of 45CSR§21-23 for gasoline dispensing facilities. Since it has a capacity less than 250 gallons and were constructed after December 31, 1978, the only applicable requirement is that the tanks be loaded by submerged fill. Compliance with this requirement can be verified upon inspection.

45CSR§21-30

The Mineral Spirits Parts Cleaners (V238G01 and VBOS08) are subject to the cold cleaning provisions of 45CSR§21-30. All applicable testing, record keeping, and reporting are the same as required by Section 30 with the exception that records shall be maintained for a period of five (5) years instead of two (2).

4.0. 45CSR7 Requirements

4.1. Limitations and Standards

4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity. These provisions shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period. *(VP005E, VTIS01E, VCS01E, and VTEMPWORK)* **[45CSR§§7-3.1. and 3.2]**

4.1.2. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A of 45CSR7.

Emission Points	45CSR7 Hourly Particulate Emission Limit pph
VP005E	0.8
VTIS01E	0.368
VCS01E	0.435

(VP005E, VTIS01E, VCS01E) **[45CSR§7-4.1.]**

4.1.3. Maintenance operations shall be exempt from the provisions of 45CSR§7-4 provided that at all times the owner or operator shall conduct maintenance operations in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source. *(VTEMPWORK)* **[45CSR§7-10.3]**

4.2. Monitoring Requirements

4.2.1. For the purpose of determining compliance with the opacity limits of 45CSR§§7-3.1 and 3.2, the permittee shall conduct opacity monitoring and record keeping for all emission points and equipment subject to an opacity limit under 45CSR7. Monitoring shall be conducted at least once per month. These checks shall be conducted by personnel trained in the practices and limitations of 40 C.F.R. 60, Appendix A, Method 22 during periods of normal operation of emission sources that vent from the referenced emission points for a sufficient time interval to determine if there is a visible emission. If visible emissions are identified during the visible emission check, or at any other time regardless of operations, the permittee shall conduct an opacity reading using the procedures and requirements of 45CSR7A within twenty-four (24) hours of the first signs of visible emissions. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within twenty-four (24) hours after the visible emission and the sources are operating at normal conditions. *(VTEMPWORK)* **[45CSR§30-5.1.c.]**

4.2.2. The following work practices shall be employed for VP005E, and VTIS01E to minimize the potential of fugitive particulate matter and demonstrate compliance with the opacity limits of 4.1.1 and the hourly emission limits of 4.1.2.

1. Pre-Operation Checks

   (a) Ensure integrity of flexible fittings.

   (b) Operate Filter Shaker.

   (c) Ensure that filters are engaged.

   (d) Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

2. Post-Operation Checks

   (a) Check area around collector/recovery device for indications of leaks.

   (b) If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

(VP005E, and VTIS01E) **[45CSR§30-5.1.c.]**

4.2.3. The following work practices shall be employed for VCS01E to minimize the potential of fugitive particulate matter and demonstrate compliance with the opacity limits of 4.1.1 and the hourly emission limit of 4.1.2.

1. Pre-Operation Checks

   (a) Ensure integrity of flexible fittings.

   (b) Operate Cylcone Separator.

   (c) Ensure that Cyclone Separator is engaged.

   (d) Empty collector tray/drum or ensure sufficient capacity remains in the collector tray/drum to allow proper operation of the unit.

2. Post-Operation Checks

   (a) Check area around collector/recovery device for indications of leaks.

   (b) If leaks are noted, the sources of those will be repaired prior to the next use of the unit and any free particulate will be swept up and contained for proper disposal.

(VCS01E) **[45CSR§30-5.1.c.]**

4.3. Testing Requirements

4.3.1. At such reasonable times as the Director may designate, the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases. Such tests shall

be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or his duly authorized representative, may at his option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices. **[45CSR§7-8.1]**

4.4. Recordkeeping Requirements

4.4.1. Records of the visible emission observations required by 4.2.1 shall be maintained documenting the date and time of each visible emission check, the name of the responsible observer, the results of the check, and, if necessary, all corrective actions taken. These records shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request. **[45CSR§30-5.1.c.]**

4.4.2. Records of the work practices performed for each emission unit and its associated control device, conducted in accordance with 4.2.2 and 4.2.3 shall be maintained on site for a period of no less than five (5) years. These records shall be in the form of a log for each unit and shall document that the first operator to use the unit in the calendar day performed the necessary inspections outlined in 4.2.2 and 4.2.3. These records shall also be used to document any problems which were discovered during inspection and the measures which were taken to correct the problem(s) and prevent the reoccurrence. **[45CSR§30-5.1.c.]**

4.4.3. The permittee shall monitor all fugitive particulate emission sources as required by 4.1.3. to ensure that a system to minimize fugitive emissions has been installed or implemented. Records shall be maintained on site for a period of no less than five (5) years stating the types of fugitive particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. **[45CSR§30-5.1.c.]**

4.4.4. The permittee shall monitor all maintenance operations as required by 4.1.4. to ensure that a system to minimize particulate emissions has been installed or implemented. Records shall be maintained on site for a period of no less than five (5) years stating the types of particulate capture and/or suppression systems used, the times these systems were inoperable, and the corrective actions taken to repair these systems. **[45CSR§30-5.1.c.]**

5.0. Diesel Fuel Tank (VCFT01) Requirements

5.1. Limitations and Standards

5.1.1. All gasoline storage vessels at gasoline dispensing facilities shall be loaded by submerged fill. **[45CSR§21-23.2.a.1]**

5.2. Monitoring Requirements

5.2.1. Compliance with the requirement to equip with the tank with a fill tube for submerged fill shall be verified upon inspection. **[45CSR§30-5.1.c.]**

6.0. Mineral Spirits Parts Cleaners (V238G01 and VBOS08) Requirements

(5) For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and

(6) The proposed corrective actions and schedule to correct the conditions causing the excess emissions.

[45CSR§21-5.2]