

Fact Sheet



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

Permit Number: **R30-03700007-2017**
Application Received: **June 22, 2016**
Plant Identification Number: **037-00007**
Permittee: **Ox Paperboard, LLC**
Facility Name: **Halltown Mill**
Mailing Address: **P.O. Box 70, Halltown, WV 25423**

Revised: N/A

Physical Location: Halltown, Jefferson County, West Virginia
UTM Coordinates: 776.32 km Easting • 4356.17 km Northing • Zone 17
Directions: From Charles Town proceed East on U.S. Route 340 to Halltown Road. Turn left off of U.S. Route 340 onto Halltown Road, the facility is located on the left approximately two (2) miles from the intersection of U.S. Route 340, Jefferson County.

Facility Description

Ox Paperboard LLC is a producer of 100% recycled paperboard from recovered papers. The facility operates under Standard Industrial Classification (SIC) Code 2631. The facility consists of one coal fired boiler, the paper mill, a carpenter shop, a waste water treatment plant, an emergency generator, truck traffic, and welding equipment.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	37.66	28.15
Nitrogen Oxides (NO _x)	83.12	61.94

Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Particulate Matter (PM _{2.5})	11.68	6.96
Particulate Matter (PM ₁₀)	15.49	15.21
Total Particulate Matter (TSP)	22.89*	31.10*
Sulfur Dioxide (SO ₂)	484.54	405.37
Volatile Organic Compounds (VOC)	0.93	0.28

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Hydrochloric Acid	2.20*	12.24*
Other Miscellaneous HAPs	1.19*	4.06*

Some of the above HAPs may be counted as PM or VOCs.

*The PTE for TSP and HAPs was reduced, and is now lower than 2015 actual emissions, due to the Title V significant modification issued on February 16, 2016.

Title V Program Applicability Basis

This facility has the potential to emit 484.54 tons per year of SO₂. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Ox Paperboard, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM Emission Limits
	45CSR6	Open burning prohibited
	45CSR7	PM from Manufacturing Sources
	45CSR10	SO ₂ Emission Limits
	45CSR11	Standby plans for emergency episodes
	45CSR13	Construction Permits
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 CFR Part 61	Asbestos inspection and removal
	40 CFR Part 82, Subpart F	Ozone depleting substances
	40 CFR 63 Subpart JJJJJ	Industrial, Commercial, and Institutional Boilers Area Sources
	40 CFR 63 Subpart ZZZZ	Reciprocating Internal Combustion Engines MACT
State Only:	45CSR4	No objectionable odors.

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

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

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-0622A	January 4, 2016	

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

Determinations and Justifications

This is a third renewal of the Title V permit which was issued on January 10, 2012. Changes to the most recent version of the Title V Permit consist of the following:

Conditions 3.5.3., 3.5.5., and 3.5.6. were revised to include the email address to use to submit documentation to the DAQ, such as compliance certifications, semi-annual monitoring reports, etc.

Condition 4.1.2. was amended to note demonstration of compliance is by Condition 4.4.6.e.

Old Condition 4.1.17. was deleted since the initial compliance test has been completed.

Conditions 4.3.1. and 4.3.2. were updated to reflect the most recent test dates and results.

Condition 4.3.3. was updated since the required initial performance testing was completed on June 28, 2016.

Condition 4.3.4. was updated to include the initial performance testing date.

Condition 4.4.1. was amended to note the Rule 2 and 10 monitoring plan requirements are incorporated in the permit.

Old Condition 4.5.3. was deleted because the requirement to submit a Notification of Compliance Status has been completed.

40 CFR 63 Subpart ZZZZ (RICE MACT) - EMG-1 is an existing 75 HP diesel-fired (CI) stationary emergency generator engine, installed at a major source in 1985. The facility is an area source for HAPs now, but the facility was major for HAPs on the date of compliance: May 3, 2013. The requirements from the MACT are listed in Section 6.0 of the permit.

40 CFR 63 Subpart JJJJJJ – The facility is subject to the area source GACT for Industrial, Commercial, and Institutional Boilers. The existing coal-fired boiler must comply with emissions standards for mercury and carbon monoxide, work practice standards, and a one-time energy assessment. The dry sorbent injection system

with a fabric filter will operate in conjunction with a bag leak detection system and must comply with Table 3 of the GACT. The facility will not be installing an oxygen trim on the boiler. In accordance with 40 CFR §63.11224(a), the facility must install and operate a continuous monitoring system for the oxygen level in the exhaust. The installation and use of an oxygen analyzer requires the facility to conduct CO emission testing and to establish an oxygen level as an operating parameter to demonstrate compliance with the CO concentration limit. The facility must conduct performance testing for mercury to demonstrate compliance with the mercury emission limit and to establish the minimum activated carbon injection rate. The facility must also establish a minimum dry sorbent injection rate. The initial tests were completed on June 28, 2016 and the following parameters were established: Minimum oxygen level - 9.45 percent, minimum activated carbon injection rate -10.0 pph per load, minimum dry sorbent injection rate - 35.64 pph.

Non-Applicability Determinations

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

- a. 40 CFR 60, Subpart Db - Standards of performance for Industrial-Commercial-Institutional Steam Generating Units. The coal-fired boiler 001 (BLR-2) commenced construction prior to and has not undergone a modification or reconstruction after June 19, 1984.
- b. 40 CFR 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. Halltown does not utilize storage vessels for petroleum liquids as defined in the rule.
- c. 40 CFR 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. Halltown does not utilize storage vessels in the capacity for which this subpart is applicable.
- d. 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Halltown has not commenced construction, modification, or reconstruction of storage tank 002-03 since July 23, 1984 and therefore is not subject to this subpart.
- e. 40 CFR 60, Subpart BB - Standards of Performance for Kraft Pulp Mills. Halltown does not operate a kraft pulp mill.
- f. 40 CFR 63, Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry: Halltown utilizes mechanical pulping of recycled material. The Halltown process does not include digesters, bleaching operations, or chemical pulping processes in its papermaking process.
- g. 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating: The Halltown process does not include web coating lines and does not include the application of web coating materials in its papermaking process.
- h. 40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters: The facility had been a major source of HAPs making it subject to the Industrial Boiler MACT for Major Sources. The compliance date for the MACT was January 31, 2016. By restricting the fuel consumption of the boiler and installing controls before the compliance date, the facility is no longer subject to this MACT and became subject to the Industrial Boiler GACT for Area Sources, 40 CFR 63 Subpart JJJJJ.

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

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Wednesday, March 22, 2017

Ending Date: Friday, April 21, 2017

Point of Contact

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

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478
Bobbie.Scroggie@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

Not applicable.