

Emissions Summary

This modification results in the following potential emission changes for the facility:

Plantwide Emissions Summary [Tons per Year]				
Regulated Pollutants	Potential Emissions¹	Change under MM01²	Proposed Potential Emissions	
Carbon Monoxide (CO)	37.1	+ 0.16	37.26	
Nitrogen Oxides (NO _x)	58.6	+ 1.57	60.17	
Particulate Matter (PM _{2.5})	1.9	Not provided	1.9	
Particulate Matter (PM ₁₀)	7.3	+ 0.26	7.56	
Total Particulate Matter (TSP)	7.3	+ 0.26	7.56	
Sulfur Dioxide (SO ₂)	10.09	+ 0.03	10.12	
Volatile Organic Compounds (VOC)	53.04	+ 0.68	53.72	
Hazardous Air Pollutants	Potential Emissions¹	Change under MM01²	Proposed Potential Emissions	
Ethylene Glycol	21.8	+ 1.39	23.19	
Acetaldehyde	7.2	+ 0.13	7.33	
1,4-Dioxane	0.7	- 0.01	0.69	
HCl	2.72	Not provided	2.72	
Arsenic Compounds	0.00017		0.00017	
Beryllium Compounds	0.00001		0.00001	
Cadmium Compounds	0.0009		0.0009	
Chromium Compounds	0.0012		0.0012	
Cobalt Compounds	0.00007		0.00007	
Lead Compounds	0.0004		0.0004	
Manganese Compounds	0.0003		0.0003	
Mercury Compounds	0.0002		0.0002	
Nickel Compounds	0.0018		0.0018	
Selenium Compounds	0.00002		0.00002	
Aggregate HAPs	32.42		+ 1.51	33.93

¹ Potential emissions data are from the 2016 Title V Renewal Fact Sheet.

² The changes in potential emissions are from the minor modification application Attachment S.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 23.19 tpy of Ethylene Glycol and 33.93 tpy of aggregate HAPs. Due to this facility's potential to emit over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, APG Polytech, LLC's Apple Grove facility 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.

The modification to 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.
	45CSR7	Particulate matter and opacity limits for manufacturing sources.
	45CSR10	Sulfur dioxide limits.
	45CSR13	Construction/modification permits
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	40 C.F.R. 63, Subpart JJJ	Polymers and Resins IV MACT.

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit <i>(if any)</i>
R13-1650S	January 31, 2017	

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

Determinations and Justifications

1. **45CSR13, Permit No. R13-1650S and Title V Permit Minor Modification.** The purpose of the underlying permit Class II Administrative Update is to remove CSS-7 from the permit, increase the rates on CSS-12 and CSS-13 as a result of market requirements, and include various other minor changes and corrections identified in the preparation of the Title V permit renewal application. The underlying permit revision had been associated with the permit action designated as MM04 of R30-05300054-2011. However, due to the logistics of the underlying permit revision being finalized and the requirement to issue a renewed operating permit no later than October 26, 2016, this minor modification has been designated as permit action MM01 of renewal permit R30-05300054-2016. This modification will account for the revisions permitted in underlying R13-1650S. The following table describes the changes in the operating permit based upon R13-1650S.

R13-1650S	Title V	Discussion
Table 4.1.1.	Table 4.1.1.	The following changes have been made in Table 4.1.1.: <ul style="list-style-type: none"> • The production rates for CSS-7 have been removed and the unit has been designated as no longer in service. • The hourly and annual production rates for CSS-12 and CSS-13 have been increased.
4.1.6.	4.1.6.	The 400-ppm carbon monoxide emission limitation for the Hot Oil Heater C3T-F-1700 has been deleted and condition 4.1.6. reserved. Requirement 4.1.6. now specifies the periodic tune-ups under 40 C.F.R. 63 Subpart DDDDD. Therefore, the underlying requirement has been added to the citation of authority in condition 5.1.1.
4.1.7.	4.1.7.	The requirement to develop a written SSM plan for C3T-F-1700 has been deleted and the requirement number 4.1.7. is reserved in the underlying NSR permit. The content of Title V permit condition 4.1.7. has been deleted and the condition number reserved accordingly.
4.1.8.	4.1.8.	The requirement for a site-specific testing plan has been deleted and the requirement number 4.1.8. is reserved in the underlying NSR permit. The content of Title V permit condition 4.1.8. has been deleted and the condition number reserved accordingly.
4.1.9.	4.1.9.	The affected boilers and heaters have been revised in the first paragraph and in condition 4.1.9.c.
4.1.10.	4.1.10.	The list of emission units subject to the 20% opacity limitation for process source operations in 45CSR§7-3.1. has been revised as follows: <ul style="list-style-type: none"> ▪ 3P-2100 has been added. ▪ 4P-1020 has been deleted. ▪ 4P-2100 has been added. ▪ C4Q-F-5330 has been added. ▪ 7P-2601 has been deleted. ▪ 7P-2609 has been deleted. ▪ 7P-0520 has been deleted. ▪ 8E-1340 has been added. ▪ 8E-08 has been deleted. ▪ 8E-09 has been deleted. ▪ 8E-12 has been deleted. ▪ 9P-7040 has been added. ▪ 9P-5091 has been deleted. ▪ 9ECS5 has been deleted. ▪ 9P-1010 has been added. ▪ 9P-2030 has been added.

R13-1650S	Title V	Discussion
		<ul style="list-style-type: none"> ▪ 10P-1340 has been changed to 10P-6340. ▪ 10P-2390 has been changed to 10P-6390. ▪ 10P-3350 has been changed to 10P-7350. ▪ 10P-2420 has been changed to 10P-6420. ▪ 10P-1590 has been changed to 10P-5590. ▪ 11P-6340 has been changed to 11P-1340. ▪ 11P-6390 has been changed to 11P-2390. ▪ 11P-7350 has been changed to 11P-3350. ▪ 11P-6420 has been changed to 11P-2420. ▪ 11P-5590 has been changed to 11P-1590. ▪ 12P-2060 has been deleted. ▪ 12P-2080 has been deleted. ▪ 12P-6420 has been changed to 13P-6420. ▪ 13P-2080 has been deleted.
4.1.11.	4.1.11.	In the introductory text, the last table designation has been revised to reflect the number of tables in the underlying permit.
4.1.11. Appendix A	Table 4.1.11.a.	<p>CP3 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ The control device ID (CDID) and emission unit ID (EUID) have been revised for EPID 3P-3130. ▪ The emission point ID (EPID) 3P-2100 and its row contents have been added. ▪ The EUIDs have been updated under EPID 3P-7020. <ul style="list-style-type: none"> ▪ EPIDs 3P-2570 and 3P-2580 and their row contents have been deleted. ▪ The CDID has been changed from Baghouse to Bin Vent for EPID 3P-0200. ▪ The EUIDs have been updated under EPID 3P-1600 to reflect the content of the underlying permit appendix. The 1,4-Dioxane limits have been revised¹. ▪ The CDID has been written as Bin Vent for EPID 3P-5010.
4.1.11. Appendix B	Table 4.1.11.b.	<p>CP4 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ The CDID has been written as Bin Vent for EPID 4P-1020. ▪ The row contents of EPID 4P-1101 have been deleted under 4.1.11.b. and relocated to Table 4.1.11.f. ▪ The CDID and description have been revised for EPID 4P-3130. ▪ The EUID has been revised for EPID 4P-1070. ▪ The EUID has been revised for EPID 4P-1071. ▪ The EUID has been revised for EPID 4P-1072. ▪ The EUID has been revised for EPID 4P-1800. ▪ The row contents of EPID 4P-0430 have been added with ethylene glycol and total VOC limits. ▪ The row contents of EPID 4P-0430 with PM limits have been deleted. ▪ The control device description has been revised for EPID 4P-4220. ▪ The control device description has been revised for EPID 4P-4180. ▪ The control device description has been revised for EPID 4P-4160.

¹ During the draft period for the renewal operating permit a comment was submitted by Mr. Richard Lewis with Steptoe & Johnson PLLC that the “1,4 dioxane emissions for CP-3 Hot Oil Heater should be 0.001 lb/hr and 0.001 TPY. This was a typographical error in the 2011 Title V permit that was not corrected. The correct values were in the application and noted in the R13-1650R administrative update application.”

R13-1650S	Title V	Discussion
		<ul style="list-style-type: none"> ▪ The row contents of EPID P-7640 have been relocated following EPID 4P-1600. The EUID has been revised. ▪ The separate row for EPID 4P-1600 associated only with EUID C4T-F-2670 with the Total VOC, Total HAPs, and Benzene emission limits have been deleted. The two asterisk footnotes have been deleted as well. ▪ The EUIDs have been updated under EPID 4P-1600 to reflect the content of the underlying permit appendix. ▪ The CDID for EPID 4P-2002 has been revised. ▪ The CDID and description for EPID 4P-0001 have been revised. ▪ The row contents of EPID 3P-7020 have been deleted. ▪ A row for EUID C4Q-F-5330 and its PM limits has been added.
<p>4.1.11. Appendix C</p>	<p>Table 4.1.11.c.</p>	<p>CSS-7 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ The title of the table has been revised to indicate CSS-7 is no longer in service. ▪ The row contents of EPID 7P-2601 have been deleted. ▪ The row contents of EPID 7P-2609 have been deleted. ▪ The row contents of EPID 7P-0520 have been deleted. ▪ The row contents of EPID 7P-0607 have been deleted and relocated to the Warehouse. ▪ The row contents of EPID 7EC-15 have been deleted and relocated to the Warehouse. ▪ The row contents of EPID 7P-1510 have been deleted and relocated to the Warehouse. ▪ The row contents of EPID 7P-4227A have been deleted and relocated to CSS-8. ▪ The row contents of EPID 7P-4227B have been deleted and relocated to CSS-8. ▪ The row contents of EPID 7P-0430 (corrected from 7P-4030) have been deleted and relocated to CSS-8. ▪ The row contents of 7P-2660 have been deleted. ▪ The row contents of 7P-9002 have been deleted. ▪ The row contents of EPID 2P-9001 have been deleted.
<p>4.1.11. Appendix D</p>	<p>Table 4.1.11.d.</p>	<p>CSS-8 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ The row contents of EPID 8E-1340 have been added. ▪ The CDID, EUID, and emission limits have been revised for EPID 8E-03. ▪ The emission limits have been revised for EPID 8E-04. ▪ The EUID S8A-M-1610 has been deleted from the row for EPID 8E-06. ▪ The row contents of EPID 8E-08 have been deleted. ▪ The row contents of EPID 8E-09 have been deleted and relocated to the Warehouse with CDID L26-M-6010 associated with Warehouse Silo L26-F-6010. ▪ For EPID 8EP-204A the CDID description has been changed from Baghouse to Bin Vent. ▪ For EPID 8EP-204B the CDID description has been changed from Baghouse to Bin Vent. ▪ For EPID 8P-4127A the CDID description has been changed from Baghouse to Bin Vent.

R13-1650S	Title V	Discussion
		<ul style="list-style-type: none"> ▪ For EPID 8P-4127B the CDID description has been changed from Baghouse to Bin Vent. ▪ The row contents of EPID 7P-4227A have been relocated to CSS-8 from CSS-7. ▪ The row contents of EPID 7P-4227B have been relocated to CSS-8 from CSS-7. ▪ For EPID 8ECS4 the CDID description has been changed from Baghouse to Bin Vent. ▪ The row contents of EPID 8E-12 have been deleted. ▪ For EPID 8P-1030 the CDID has been added and the EUID has been revised. ▪ For EPID 8P-1050 the CDID has been added and the EUID has been revised. ▪ For EPID 8EP-208 the CDID has been added and the EUID has been revised. ▪ The row contents of EPID 7P-0430 (corrected from 7P-4030) were in CSS-7 and it is still listed in the emission units table of the underlying permit and have been added after EPID 8EP-208. ▪ For EPID 7P-2660 the EUID has been revised. ▪ For EPID 7P-9002 the EUID has been revised. ▪ The row contents of EPID 2P-9001 have been revised. The CDID now includes the name.
<p>4.1.11. Appendix E</p>	<p>Table 4.1.11.e.</p>	<p>CSS-9 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ The row contents of EPID 9P-7040 have been added. ▪ The CDID and EUID for EPID 9P-1701A have been revised. ▪ The CDID and EUID for EPID 9P-1701B have been revised. ▪ The row contents for EPID 9P-5091 have been deleted. ▪ The CDID and EUID for EPID 9P-2701A have been revised. ▪ The CDID and EUID for EPID 9P-2701B have been revised. ▪ The CDID and EUID for EPID 9P-6110 have been revised. ▪ The CDID and EUID for EPID 9E-11 have been revised. ▪ The row contents for EPID 9ECS5 have been deleted. ▪ The row contents for EPID 9P-1030 have been deleted. ▪ The row contents for EPID 8ECS4 have been deleted. ▪ EPID 9P-1010 and its row contents have been added. ▪ EPID 9P-2030 and its row contents have been added. ▪ EPID 9P-1030 and its revised row contents have been added.
<p>4.1.11. Appendix F</p>	<p>Table 4.1.11.f.</p>	<p>CSS-10 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ EPID 10P-1340 has been revised to be 10P-6340, and its CDID and EUID have been revised. ▪ EPID 10P-2390 has been revised to be 10P-6390, and its CDID and EUID have been revised. ▪ EPID 10P-3350 has been revised to be 10P-7350, and its CDID and EUID have been revised. Additionally, the hourly and annual emission limits for CO and NO_x, and the hourly limit for total VOC, have been revised. ▪ EPID 10P-2420 has been revised to be 10P-6420, and its CDID and EUID have been revised. Additionally, the hourly and annual emission limits for NO_x, and the annual limits for other pollutants except SO₂, have been revised.

R13-1650S	Title V	Discussion
		<ul style="list-style-type: none"> ▪ EPID 10P-1590 has been revised to be 10P-5590, and its CDID and EUID have been revised. ▪ The row contents for EPID 10P-1050 have been deleted and relocated to the Warehouse in Table 4.1.11.l. ▪ The row contents for EPID 10P-1100 have been deleted and relocated to the Warehouse in Table 4.1.11.l. ▪ For EPID 10P-1130 the CDID description has been revised. ▪ The CDID and EUID for EPID 10P-1140 have been revised. ▪ The row contents for 3P-1600 have been added. ▪ The row contents of EPID 4P-1101 have been added to 4.1.11.f. as mentioned above under discussion of Table 4.1.11.b. Its CDID and EUID have been revised.
<p>4.1.11. Appendix G</p>	<p>Table 4.1.11.g.</p>	<p>CSS-11 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ EPID 11P-6340 has been revised to be 11P-1340, and its CDID and EUID have been revised. ▪ EPID 11P-6390 has been revised to be 11P-2390, and its CDID and EUID have been revised. ▪ EPID 11P-7350 has been revised to be 11P-3350, and its CDID and EUID have been revised. Additionally, the hourly and annual emission limits for Particulate Matter have been revised. ▪ EPID 11P-6420 has been revised to be 11P-2420, and its CDID and EUID have been revised. Additionally, the hourly and annual CO emission limits have been revised. Finally, the annual emission limits for NO_x, Total VOC, Ethylene Glycol, and Acetaldehyde have been revised. ▪ EPID 11P-5590 has been revised to be 11P-1590, and its CDID and EUID have been revised. ▪ The row contents of EPID 11P-1090 have been deleted and relocated to the Warehouse in Table 4.1.11.l. ▪ The row contents of EPID 11P-1080 have been deleted and relocated to the Warehouse in Table 4.1.11.l. ▪ The CDID and EUIDs for EPID 11P-1160 have been revised. ▪ The CDID and EUID for EPID 11P-2170 have been revised. ▪ The row contents for 3P-1600 have been added. The underlying permit indicates that C38-F-1420 is an EUID whose emission limits are included in Table 4.1.11.a. However, this EUID is not listed elsewhere in the permit. The underlying permit “red-lined” edited emission units table indicates that the EUID is C3B-F-1420. The permit is revised to specify C3B-F-1420 as the EUID.
<p>4.1.11. Appendix H</p>	<p>Table 4.1.11.h.</p>	<p>CSS-12 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ EPID 4P-0340 and its row contents have been added. ▪ An EUID has been added for EPID 12P-3350. All emission limitations, except the hourly PM limit, have been revised. ▪ An EUID has been added for EPID 12P-2420. The annual emission limitations have been revised for all pollutants except NO_x. The hourly emission limitations have been revised for SO₂, Total VOC, Ethylene Glycol, and Acetaldehyde. ▪ All emission limitations, except the hourly Acetaldehyde limit, have been revised for EPID 12P-0520. ▪ The CDID and EUID for EPID 12P-1140 have been revised. ▪ EPID 12P-2060 and its row contents have been deleted.

R13-1650S	Title V	Discussion
		<ul style="list-style-type: none"> ▪ EPID 12P-2080 and its row contents have been deleted. ▪ The row contents for 4P-1600 have been added.
4.1.11. Appendix I	Table 4.1.11.i.	<p>CSS-13 Maximum Permitted Emissions have been revised as follows:</p> <ul style="list-style-type: none"> ▪ An EUID has been added for EPID 13P-7350. The hourly and annual emission limitations for Total VOC, Ethylene Glycol, and Acetaldehyde have been revised. ▪ EPID 12P-6420 has been revised to be 13P-6420, and all emission limitations have been revised except for both SO₂ limitations and the hourly PM limitation. ▪ EPID 13P-2080 and its row contents have been deleted. ▪ The CDID and EUID for EPID 13P-1170 have been revised. ▪ The row contents for 4P-1600 have been added.
4.1.11. Appendix J	Table 4.1.11.j.	<p>Boilers and Heaters Maximum Permitted Emissions have been extensively revised to reflect the underlying permit appendix.</p>
4.1.11. Appendix K	Table 4.1.11.k.	<p>There are no changes in the table for the Emergency Electrical Generator Permitted Emissions.</p>
4.1.11. Appendix L	Table 4.1.11.l.	<p>The Warehouse emission limitations have been added to the permit as follows:</p> <ul style="list-style-type: none"> ▪ The row contents of EPID WF-6010 have been added. The EPID 8E-09 has been revised to be WF-6010, and the row contents have been relocated from CSS-8 to the Warehouse with CDID L26-M-6010 attached to Warehouse Silo L26-F-6010. ▪ The row contents of EPID D56 have been added. ▪ The row contents of EPID 4P-1010 have been added. ▪ The row contents of EPID 4P-1060 have been added. ▪ The row contents of EPID 7P-0607 have been relocated to the Warehouse from CSS-7. ▪ The row contents of EPID 10P-1050 have been relocated to the Warehouse from CSS-10. ▪ The row contents of EPID 10P-1100 have been relocated to the Warehouse from CSS-10. ▪ The row contents of EPID 11P-1090 have been relocated to the Warehouse from CSS-11. The CD description has been revised. ▪ The row contents of EPID 11P-1080 have been relocated to the Warehouse from CSS-11. The CDID and EUID have been revised. ▪ The row contents of EPID 7EC-15 have been relocated to the Warehouse from CSS-7. ▪ The row contents of EPID 7P-1510 have been relocated to the Warehouse from CSS-7.
None	4.1.11.	<p>The streamlining note at the end of condition 4.1.11. has been revised as follows:</p> <ul style="list-style-type: none"> ▪ For the manufacturing source EPIDs subject to the 45CSR§7-4.1. PM limit, the following EPIDs have been added: 3P-2100, 4P-1101, 8E-1340, 9P-7040, 9P-1010, 9P-2030, 13P-6420, WF-6010, D56, 4P-1010, and 4P-1060. Also, EUID C4Q-F-5330 has been added. ▪ The following EPIDs have been deleted: 7P-2601, 7P-2609, 7P-0520, 8E-08, 8E-09, 8E-12, 9P-5091, 9ECS5, 12P-2060, 12P-2080, 12P-6420, and 13P-2080. ▪ 7P-4030 has been changed to 7P-0430. ▪ 10P-1340 has been changed to 10P-6340. ▪ 10P-2390 has been changed to 10P-6390.

R13-1650S	Title V	Discussion
		<ul style="list-style-type: none"> ▪ 10P-3350 has been changed to 10P-7350. ▪ 10P-2420 has been changed to 10P-6420. ▪ 10P-1590 has been changed to 10P-5590. ▪ 11P-6340 has been changed to 11P-1340. ▪ 11P-6390 has been changed to 11P-2390. ▪ 11P-7350 has been changed to 11P-3350. ▪ 11P-6420 has been changed to 11P-2420. ▪ 11P-5590 has been changed to 11P-1590.
4.1.13.	4.1.15.	<p>The list of EPIDs subject to the standard for storage structures with full enclosures and equipped with a PM control device has been revised as follows:</p> <ul style="list-style-type: none"> ▪ 3P-3130 has been added. ▪ 3P-2100 has been added since it is a storage bin silo with a bin vent. ▪ 4P-3130 has been added. ▪ 8E-1340 has been added since it is a storage bin silo with a bin vent. ▪ 8E-08 has been deleted. ▪ 9P-7040 has been added since it emits from two storage silos with a dust collector. ▪ 9P-1701A and 9P-1701B have been added. ▪ 9ECS5 has been deleted. ▪ 9P-1010 has been added. ▪ 10P-1340 has been changed to 10P-6340. ▪ 10P-6390 has been added. ▪ 11P-6340 has been changed to 11P-1340. ▪ 11P-2390 has been added.
4.1.15.	4.1.19.a.	<p>The list of EPIDs has been revised as follows:</p> <ul style="list-style-type: none"> ▪ C3L-F-2570 and C3L-F-2580 have been deleted. ▪ C31-E-1020 has been changed to C31-E-1020/1020A/1021. ▪ C32-E-1050 has been changed to C32-E-1050/1051. ▪ C3L-F-0430 has been deleted. ▪ C41-E-3020 has been changed to C41-E-3020/3021. ▪ C42-E-2050 has been changed to C42-E-2050/2060. ▪ C4L-F-0430 has been changed to C44-F-0430.
4.1.15.	4.1.19.b.	<p>The list of EPIDs has been revised as follows:</p> <ul style="list-style-type: none"> ▪ C33-F-5010 has been changed to C33-F-6010. ▪ C34-F-3280 has been changed to C34-F-5020. ▪ C4L-A-1070 has been changed to C4L-F-1070. ▪ C4L-A-1071 has been changed to C4L-F-1071. ▪ C4L-A-1072 has been changed to C4L-F-1072. ▪ C43-E-3250 has been changed to C43-F-3250. ▪ C44-E-3280 has been changed to C44-F-9280.
None	4.1.23.	<p>The Title V condition content has been deleted since the NSR permit now specifies a PM limit for WF-6010 in Table 4.1.11.I. of this permit. The condition number has been reserved.</p>
4.2.2.	4.2.2.	<p>The list of affected boilers and heaters subject to the recordkeeping of hourly and annual fuel consumption rates has been revised.</p>
4.3.2.	4.3.2.	<p>The requirement for initial performance testing for carbon monoxide emissions from the Hot Oil Heater C3T-F-1700 has been deleted and requirement number 4.3.2. is reserved in the underlying NSR permit. The content of Title V permit condition 4.3.2. has been deleted and the condition number reserved accordingly.</p>

R13-1650S	Title V	Discussion
4.3.3.	4.3.3.	The requirement for annual performance testing for carbon monoxide emissions from the Hot Oil Heater C3T-F-1700 has been deleted and requirement number 4.3.3. is reserved in the underlying NSR permit. The content of Title V permit condition 4.3.3. has been deleted and the condition number reserved accordingly.
4.3.4.	4.3.4.	The Part 63, Subpart A performance testing requirements for carbon monoxide has been deleted and requirement number 4.3.4. is reserved in the underlying NSR permit. The content of Title V permit condition 4.3.4. has been deleted and the condition number reserved accordingly.
4.4.5.	4.4.4.	The list of affected boilers and heaters subject to the recordkeeping of fuel consumption rates has been revised.

- Reporting Requirements Revisions.** The electronic reporting requirements have been added in conditions 3.5.3., 3.5.5., and 3.5.6. The U.S. EPA office designation has been revised in condition 3.5.3.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following: None.

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: Not Applicable for minor modifications
Ending Date: N/A

Point of Contact

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

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304-414-1279 • Fax: 304/926-0478
denton.b.mcderment@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)

On April 22, 2020 Stephanie Mink received an e-mail from Ms. Cynthia Stahl stating that USEPA has no comment on the proposed permit modification.