

**COMMONWEALTH OF VIRGINIA  
Department of Environmental Quality  
Blue Ridge Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Amendment to Statement of Basis for the April 8, 2013 Title V Permit

Babcock & Wilcox Nuclear Operations Group Inc. - Mt Athos Site  
Campbell County, Virginia  
Permit No. BRRO-30260

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Babcock & Wilcox Nuclear Operations Group Inc. - Mt Athos Site has applied for a Title V Operating Permit for its Campbell County, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Air Permit Contact: \_\_\_\_\_

Keith Sandifer  
(434) 582-6232

Date: October 7, 2013

Air Permit Manager: \_\_\_\_\_ Date: \_\_\_\_\_.

Regional Director: \_\_\_\_\_

Date: \_\_\_\_\_.

**FACILITY INFORMATION**

Permitee

Babcock & Wilcox Nuclear Operations Group Inc. - Mt Athos Site  
P. O. Box 785  
Lynchburg, VA 24505-0785

Facility

Babcock & Wilcox Nuclear Operations Group Inc. - Mt Athos Site  
P. O. Box 785  
Lynchburg, VA 24505-0785

County-Plant Identification Number: 51- 031-0006

**SOURCE DESCRIPTION CHANGES**

The source submitted an application on July 24, 2014 to add two new emergency generators (manufactured in 2010) to their existing Title V permit dated April 20, 2013. Generator EU-MM2-02 (235 hp installed in 1980) will be replaced by a new 900 hp emergency generator. This new generator will have the same EU-MM2-02 unit number. The other new generator (900 hp) will have the unit number of EU-B-07.

Both of the new generators will be subject to 40 CFR 63 Subpart ZZZZ - NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES and NSPS 40 CFR 60 Subpart IIII - STANDARDS OF PERFORMANCE FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES. Since they are both new, at an area source for HAPs and greater than 500 hp, they are included in Group 4 of the Emergency Generators in the April 8, 2013 permit and have to meet the Group 4 requirement stated in the April 8 2013 permit.

The two additional generators are shown in the generator table below and in the Condition II Emission Units table and Condition XIII. Emergency Generators table in the permit. There are no other changes to the permit conditions.

Unit ID	Date of Manufacture	Date of Installation	Rated Capacity (kW)	Rated Capacity (hp)	Applicable Federal Requirements
Group 1					
EU-01-01	1982	1982	370	503	40-CFR 63 Subpart ZZZZ
EU-01A-13	2004	2004	450	685	40-CFR 63 Subpart ZZZZ
EU-10A-01	2003	2003	400	535	40-CFR 63 Subpart ZZZZ

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<b>Group 2</b>					
EU-BC-03	2010	2012	800	1214	40 CFR 60 Subpart III 40-CFR 63 Subpart ZZZZ
EU-FF-01	2010	2010	800	1214	40 CFR 60 Subpart III 40-CFR 63 Subpart ZZZZ
<b>Group 3</b>					
EU-B1-01	2002	2002	200	325	40-CFR 63 Subpart ZZZZ
EU-BC-06	1988	1988	150	230	40-CFR 63 Subpart ZZZZ
EU-AMB-01	1981	1981	100	166	40-CFR 63 Subpart ZZZZ
EU-LL-05	4/22/2006	2006	200	325	40-CFR 63 Subpart ZZZZ
EU-BD-04	2001	2001	188	219	40-CFR 63 Subpart ZZZZ
EU-WT-01	2/1977	<1998	Fire Pump	310	40-CFR 63 Subpart ZZZZ
EU-WT-01	7/1975	<1998	Fire Pump	310	40-CFR 63 Subpart ZZZZ
<b>Group 4</b>					
EU-DN-01	2011	2012	450	689	40 CFR 60 Subpart III 40-CFR 63 Subpart ZZZZ
EU-MM2-02	2010	2013	600	900	40 CFR 60 Subpart III 40-CFR 63 Subpart ZZZZ
EU-B-07	2010	2014	600	900	40 CFR 60 Subpart III 40-CFR 63 Subpart ZZZZ