



NRO-051-15

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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COMMONWEALTH OF VIRGINIA
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STATEMENT OF LEGAL AND FACTUAL BASIS

Virginia Electric and Power Company
Dominion Remington Combustion Turbine Station
Fauquier County, Virginia
Permit No. NRO40961

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, Virginia Electric and Power Company has applied for a Title V Operating Permit for its Fauquier County facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

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FACILITY INFORMATION

Permittee

Virginia Electric and Power Company
5000 Dominion Boulevard
Glen Allen, VA 23060

Facility

Dominion Remington Combustion Turbine Station
12025 Lucky Hill Road, Remington, Virginia

County-Plant Identification Number: 51- 061-00061

SOURCE DESCRIPTION

NAICS Code: 221112 – Fossil Fuel Electric Power Generation

The Dominion Remington Combustion Turbine Station consists of four (4) GE Model PG7241 (FA) simple cycle combustion turbines (CT), two (2) pipeline heaters, and two Number 1 and 2 distillate fuel oil above ground storage tanks (AST). Each CT is nominally rated at 1766 MMBtu/hr firing natural gas and 1917 MMBtu/hr firing distillate fuel oil at 100% load, an ambient air temperature of 59 °F, and 60% relative humidity. Each pipeline heater has a maximum rated heating input capacity of 5.21 MMBtu per hour. Each fuel AST has a storage capacity of 2,700,000 gallons. The maximum heat input rates of the CTs will vary depending upon ambient conditions and the combustion turbine characteristics at those ambient conditions. Natural gas is the primary fuel with Number 1 and 2 distillate fuel oil as the backup fuel for the CTs and natural gas is the fuel for the pipeline heaters.

The facility was issued a minor New Source Review (mNSR) permit to construct and operate on June 25, 1999 for five units, identified as Unit 1, Unit 2, Unit 3, Unit 4, and Unit 5. Unit 5 was never constructed and will require an additional permit to construct and operate since the applicable permit construction period expired without construction commencing on the fifth unit. The June 25, 1999 mNSR permit was superseded on April 1, 2008 with a mNSR amendment which allowed for the installation of an air fogging system on each of the four combustion turbines. On May 14, 2013 an administrative amendment to the April 1, 2008 NSR was issued which added a subsection to one of the conditions describing the procedures for retuning the combustion turbines. The mNSR permit, as amended May 14, 2013 was most recently amended on July 24, 2014 by adding the facility procedures for fuel type transfers into the appendix to the permit and described the conditions in which excess emissions were allowed during this activity.

Unit 1, Unit 2, Unit 3, and Unit 4 are all subject to the requirements of 40 CFR 60, Subpart GG. This source is located in an attainment area for all pollutants, and is a synthetic minor source under the Prevention of Significant Deterioration (PSD) regulations (9 VAC 5-80 Article 8). For the purposes of an Article 3 Federal Operating Permit program (9 VAC 5-80-360 through 705), the source is classified as a major source for NO_x and CO emissions.

The initial Acid Rain Permit was issued on January 1, 2000. In 2005, a rule known as the Clean Air Interstate Rule (CAIR) was applicable to the facility's four (4) electric generating units and

remained in place through the 2014 compliance periods. Effective January 1, 2015, a “new” federal rule – the Cross-State Air Pollution Rule (CSAPR) took effect and replaced CAIR. The requirements of the Acid Rain Program and CSAPR are incorporated into this federal operating permit.

Additionally, in a letter to the DEQ dated March 2, 2000, the facility applied for a custom fuel monitoring schedule for Unit 1, Unit 2, Unit 3, and Unit 4 by requesting that the Department of Environmental Quality (DEQ) send their request to EPA. DEQ forwarded the facility request to EPA in a letter dated March 22, 2000. EPA approved the custom fuel monitoring schedule for Unit 1, Unit 2, Unit 3, and Unit 4 in a letter dated July 6, 2000. All letters are attached as a part of the Title V permit in Appendix A.

On December 3, 2008, the facility requested to reconfigure the operating software to allow for the operation of Unit 1, Unit 2, Unit 3, and Unit 4 in peak firing mode. An exemption letter was issued on March 3, 2009 allowing this operation.

The following federal regulations are applicable to the emission sources at the facility:

- The four combustion turbines (CT) are subject to 40 CFR 60, Subpart GG.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was most recently conducted on September 16, 2014. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity ¹ (P)-Primary Fuel (S)-Secondary Fuel	Pollution Control Device (PCD) Description	PCD ID ²	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
Unit 1, Unit 2, Unit 3, and Unit 4	CTS1, CTS2, CTS3 & CTS4	Each CT is a GE Model PG7241 (FA) simple cycle combustion turbine. Constructed in 2000	³ 1,766 MMBtu/hr on natural gas each (P) (nominal heat input)	When firing natural gas – dry low NOX burners, each unit; and ,	DLN1-DLN4	Nitrogen Oxides (as NO ₂)	7/24/14 Minor NSR permit
			³ 1,917 MMBtu/hr on Number 1 and 2 distillate fuel oil each (S) (nominal heat input)	When firing Number 1 and 2 distillate fuel oil – water injection, each unit.	WI1-WI4	Nitrogen Oxides (as NO ₂)	
PH1 – PH2	PHS1-PHS2	Natural gas pipeline heaters. Constructed in 2000.	5.21 MMBtu/hr, each	None	N/A	N/A	7/24/14 Minor NSR permit
Miscellaneous Equipment							
Unit 1, Unit 2, Unit 3, and Unit 4	N/A	Inlet air fogging systems on each turbine	36 gallons/min each	None	N/A	N/A	7/24/14 Minor NSR permit
TNK1 – TNK2	N/A	Number 1 and 2 distillate fuel oil tanks. Constructed in 2000.	2,700,000 gallons, each. (nominal storage capacity)	None	N/A	N/A	7/24/14 Minor NSR permit

1. Specifications included in this section are for informational purposes only and do not form enforceable terms or conditions of the permit
2. DLN = dry low NO_x technology
 WI = water injection
3. When operated at 100% base load at an ambient temperature of 59°F, 60% relative humidity and a pressure of 14.7 psia. These maximum heat input rates will vary depending upon ambient conditions and the combustion turbine characteristics.

EMISSIONS INVENTORY

The facility emission data below is actual emission data based on the 2013 annual emission update; the most current data validated by DEQ, and is summarized below in the Criteria and Hazardous Air Pollutant tables.

2013 Actual Emissions

2013 Criteria Pollutant Emission (Tons/Year)					
Emission Unit	VOC	CO	SO ₂	PM-10	NO _x
1	1.856	1.686	0.500	5.871	27.7
2	1.622	1.148	0.700	5.187	25.1
3	1.514	1.102	0.300	4.854	23.2
4	1.638	1.174	0.500	5.187	25.6
TNK1	0.071	–	–	–	–
TNK2	0.071	–	–	–	–
PH1	0.085	1.302	0.009	0.118	1.55
PH2	0.047	0.714	0.005	0.065	0.85
Total	6.904	7.126	2.014	21.282	104.00

2013 Facility Hazardous Air Pollutant Emissions

Pollutant	2013 Hazardous Air Pollutant Emission (Tons/Yr)
Benzene	0.039
Formaldehyde	2.255
Lead	0.000

EMISSION UNIT APPLICABLE REQUIREMENTS - Combustion Turbines (Unit 1, Unit 2, Unit 3, and Unit 4) and Pipeline Heaters (PH1 and PH2)

The applicant has submitted the following information to be included as parts of their Title V permit application:

- An Acid Rain Permit Application
- A NO_x Budget Permit Application, and
- A CAIR Permit Application (see discussion below for current applicability of CAIR Program)

Therefore, this Federal Operating Permit (Title V) will be issued under State Air Pollution Control Board's (SAPCB) Article 3 (Acid Rain) instead of Article 1; and Article 3 regulatory citations are stated in the permit conditions. The Title V includes conditions addressing Acid Rain (Title IV) and the Cross-State Air Pollution Rule (CSAPR).

On July 6, 2011, the US Environmental Protection Agency (EPA) finalized the Cross-State Air Pollution Rule (CSAPR) which requires states (including the Commonwealth of Virginia) to significantly improve air quality by reducing power plant emissions that contribute to ozone and/or fine particle pollution in other states. In a separate, but related, regulatory action, EPA finalized a supplemental rulemaking on December 15, 2011 to require five states - Iowa, Michigan, Missouri, Oklahoma, and Wisconsin - to make summertime NO_x reductions under the CSAPR ozone season control program. CSAPR requires a total of 28 states to reduce annual SO₂ emissions, annual NO_x emissions and/or ozone season NO_x emissions to assist in attaining the 1997 ozone and fine particle and 2006 fine particle National Ambient Air Quality Standards (NAAQS). On February 7, 2012 and June 5, 2012, EPA issued two sets of minor adjustments to the Cross-State Air Pollution Rule (CSAPR).

The timing of CSAPR's implementation has been affected by a number of court actions. On December 30, 2011, CSAPR was stayed prior to implementation. On April 29, 2014, the U.S. Supreme Court issued an opinion reversing an August 21, 2012 D.C. Circuit decision that had vacated CSAPR. Following the remand of the case to the D.C. Circuit, EPA requested that the court lift the CSAPR stay and toll the CSAPR compliance deadlines by three years. On October 23, 2014, the D.C. Circuit granted EPA's request. Accordingly, CSAPR Phase 1 implementation is now scheduled for 2015, with Phase 2 beginning in 2017.

This rule replaces EPA's 2005 Clean Air Interstate Rule (CAIR). A December 2008 court decision kept the requirements of CAIR in place temporarily but directed EPA to issue a new rule to implement Clean Air Act requirements concerning the transport of air pollution across state boundaries. The Cross-State Air Pollution Rule is designed to implement these Clean Air Act requirements and respond to the court's concerns. The CSAPR took effect January 1, 2015; CAIR was implemented through the 2014 compliance periods, and then was replaced by the CSAPR. Consequently, although CAIR remains in Virginia's State Implementation Plan (9 VAC 5 Chapter 140) until removed, it is not referenced in the facility's Title V Permit since it is currently considered more or less null and moot.

The Title V emission requirements are based on the following: the mNSR permit issued on July 24, 2014, 40 CFR Part 60 Subpart GG, Standards of Performance for Stationary Gas Turbines, Commonwealth of Virginia's Rule 4-8 – Fuel Burning Equipment, 40 CFR Part 97 (Subparts AAAAA - DDDDD), the Cross-State Air Pollution Rule (CSAPR) and 9 VAC 5-80-50 *et seq.*, Part II-Article 3 Federal Operating Permit for Stationary Sources.

The following is a chronology of the permitting actions for Dominion Remington Combustion Turbine Station:

- June 25, 1999 – the initial NSR permit was issued to construct and operate five (5) dual fuel combustion turbines, of which only four (4) were constricted.
- June 9, 2000 – the Phase II Acid Rain permit was issued.
- April 1, 2008 – an NSR permit was issued which superseded the June 25, 1999 NSR permit and allowed for the installation of four (4) air inlet foggers, one on each of the four (4) unit.
- May 14, 2013 – an NSR permit was issued which superseded the April 1, 2008 NSR permit. This NSR permit was an administrative amendment to incorporate the alternate operating scenario for retuning which had been inadvertently been left out of the previous permit.
- July 24, 2014 – an NSR permit was issued which superseded the May 14, 2013 NSR permit. This NSR permit was for several administrative amendments to the May 14, 2013 NSR permit and also include a request to add a condition concerning the fuel type transfer and excess emission during these events. This permit was issued prior to the issuance of the Title V permit so those conditions could be incorporated in this Title V permit.

The Title V permit, unless stated otherwise in this SOB, includes the conditions from the NSR permit issued July 24, 2014.

This facility was constructed and permitted prior to the issuance of 40 CFR 60, Subpart KKKK (Standards of Performance for Stationary Combustion Turbines) on February 25, 2005 and therefore the facility is subject to 40 CFR 60, Subpart GG, (Standards of Performance for Stationary Gas Turbines) as construction commenced after October 3, 1977.

The facility is not subject to 40 CFR 63, Subpart YYYY as described at 40 CFR 63.6090(b)(4) since it is not a major source of hazardous air pollutants (HAP).

The CTs are equipped with NO_x controls (e.g., low-NO_x burners and water injection) and has the potential of uncontrolled emissions which exceed the CAM applicability threshold. However, the CTs are exempt from the CAM Rule per 40 CFR 64.2(b)(1)(vi). This section states that

“Emission limitations or standards for which a part 70 or 71 permit specifies a continuous compliance determination method, as defined in §64.1” are exempt from the requirements of 40 CFR 64. Since each CT has a NO_x CEMS installed, the CAM rule does not apply to NO_x emissions from the CT units.

The following Title V conditions reference the current NSR permit conditions from the NSR dated July 24, 2014:

Fuel Burning Equipment Emission Units Applicable Requirements – (Unit ID No. – Unit 1, Unit 2, Unit 3, Unit 4, PH1, and PH2)

Limitations

- Title V Condition 1 incorporates Condition 2 of the July 24, 2014 NSR permit which provide information on the emission controls required by the NSR permit for the combustion turbines (CT).
- Title V Conditions 2 and 3 discusses the approved fuels for the CTs and imposes limitations on the sulfur content of the natural gas and Number 1 and 2 distillate fuel oil. The conditions also describe the methods of fuel sulfur determination from the July 24, 2014 NSR permit Conditions 10, 11, and 12.
- Title V Conditions 4, 5, 6, and 7 includes Conditions 19, 20, 21, and 23 of July 24, 2014 NSR permit which sets the short term emission limits on each CT and the total annual emission limits from the combined operation of the CTs while firing natural gas and Numbers 1 and 2 distillate fuel oil. These conditions also define a start-up and shut-down and the requirements for the incorporation of the fuel bound nitrogen (FBN) credit, should the facility decide to use the adjustment. The methods for calculating the emissions are also defined in these conditions.
- Title V Condition 8 limits the visible emissions from the CTs as from the July 24, 2014 NSR permit Condition 24.
- Title V Condition 9 describes the conditions necessary for excess emissions during a malfunction to be considered as a possible acceptable reason as detailed in Condition 18 of the July 24, 2014 NSR permit.
- Title V Condition 10 describes the procedures for transferring fuel types while the CTs are in operation and the necessary procedures for the recordkeeping of the excess emissions during this operation. The steps of this process are detailed in the July 24, 2014 NSR permit Condition 17 and included in Appendix C of this Title V permit.
- Title V Condition 11 describes the procedures for re-tuning the CTs. The re-tuning must follow the procedures in Appendix D of this Title V permit. The condition also allows for

excess emissions during this operation under specific operating conditions. The steps of this process are detailed in July 24, 2014 NSR permit Condition 16.

- Title V Conditions 12 and 13 specifies the process for demonstrating continuing compliance of the Numbers 1 and 2 distillate fuel oil and the natural gas as stipulated in the July 24, 2014 NSR permit Conditions 13 and 14.
- Title V Condition 14 incorporates Condition 3 of the July 24, 2014 NSR permit which provide information on the emission controls required by the NSR permit for the pipeline heaters (PH1 and PH2).
- Title V Conditions 15 and 16 identifies the allowed fuel for PH1 and PH2 and the specifications for that fuel from Conditions 10 and 12 of the July 24, 2014 NSR permit.

Monitoring

- Title V Condition 17 provides procedures for demonstrating compliance with the opacity limitations in the permit for the CTs. Since the facility does not have continuous opacity monitors (COMS) this step by step procedure provides a reasonable method for assuring compliance. There was not a method of demonstrating compliance with the visibility emission limits in Condition 24 in the July 24, 2014 permit, therefore the procedures are incorporated in this condition of the Title V permit as EPA had requested in other Title V permits.
- Title V Conditions 18, 19, 20, 21, and 22 describe the continuous emission monitoring NO_x CEM requirements and actions required in the case of NO_x CEM malfunction and failures and the data substitution methods required during these times. The data capture requirements are also incorporated in these conditions. The right to use the NO_x CEM data in determining compliance with the emission limits and standards are explicitly set out in these conditions. Should the NO_x CEMS require replacement the requirements for this are laid out in these conditions. These requirements are obtained from Conditions 4, 5, 6, and 7 of the July 24, 2014 NSR permit.

Recordkeeping

- Title V Condition 23 requires the facility to obtain fuel certifications from the fuel supplier with each shipment. This condition lists the items to be included in the certification and references the definition of a fuel shipment as included in Appendix B of the Title V permit. This condition is incorporated from Condition 10 of the July, 2014 NSR permit.
- Title V Condition 24 specifies the minimum records necessary to demonstrate compliance with the Title V permit as incorporated from Condition 25 from the July 24, 2014 NSR permit.

- Title V Condition 25 includes the requirement to maintain training records and the items to be maintained including written operating procedures based on the manufactures recommendations. This requirement is from the July 24, 2014 NSR permit Condition 31.

Testing

- Title V condition 26 states stack testing to demonstrate compliance with the short term emission limits in Conditions 19 and 20 of the July 24, 2014 NSR permit are not included in the NSR or the Title V permit because of the margin of compliance, as demonstrated by the initial performance testing, is considered sufficient (see the Appendix to this document). This conclusion is further supported by the continuous monitoring requirements of Subpart GG, the provisions for the Acid Rain Program, and the general duty requirement for all sources that stack testing can be required by the VADEQ and EPA at any time upon reasonable notice. Testing for NO_x is not required because data from the NO_x CEM is used to demonstrate compliance with the NO_x emissions.
- Title V Condition 27 requires the facility to modify the facility to accommodate testing as required to demonstrate compliance. This requirement is explained in Condition 26 of the July 24, 2014 NSR permit.
- Title V Condition 28 states that if additional testing is conducted in addition to that required in the Title V permit, that in order for the results to be acceptable to DEQ, they must be approved by DEQ.

Reporting

- Title V Condition 29 requires quarterly excess emission reports related to the CEM data and specific information to be included in that report. This is required in Condition 8 of the July 24, 2014.
- Title V Condition 30 necessitates that all pertinent facts concerning the re-tuning event be reported and the minimum data reported. This information is described in Condition 16 of the July 24, 2014 NSR permit.

Facility Wide Conditions

Limitations

- Title V Condition 31 specifies the facility wide emission limits as designated in Condition 22 of the July 24, 2014 NSR permit.
- Title V Condition 32 outlines the minimum requirements in which the facility should follow to minimize emissions. The condition also defines the retention period for training records at the facility. These requirements come from Condition 31 of the July 24, 2014 NSR permit.

Reporting

- Title V Condition 33 gives the reporting addresses of DEQ and EPA as defined in Condition 4 of the July 24, 2014 NSR permit.
- Title V Condition 34 requires that the facility report any malfunction of the facility or control device to the DEQ which may cause excess emissions for more than an hour. The condition stipulates the requirements on these notifications and time requirements on those notifications. These requirements come from Condition 27 of the July 24, 2014 NSR permit.
- Title V Condition 35 requires the facility to notify the DEQ of proposed shutdown, bypass, or both of pollution control equipment for scheduled maintenance for which excess emissions may last for more than 1-hour, at least 24-hours prior to the shutdown. Minimum requirements of the notification are given in this condition from Condition 28 of the July 24, 2014 NSR permit.
- Title V Condition 36 requires that any excess emissions related to fuel type transfers to be included in the quarterly Excess Emission Report with these events flagged in the CEM data as required in Condition 17 of the July 24, 2014 NSR permit.

Streamlined Requirements

No requirements of the July 24, 2014 permit were streamlined from the Title V permit.

INSIGNIFICANT EMISSION UNITS

- Title V Condition 37 provides a table of emission units which are insignificant emission units under 9 VAC 5-80-720. The insignificant emission units identified in Condition No. 37 of the Title V permit are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-490.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹	Pollutant(s) Emitted (if applicable to 9 VAC 5-80-720B)	Rated Capacity (if applicable to 9 VAC 5-80-720)
TNK1	Number 1 and 2 distillate fuel oil storage tank	9 VAC 5-80-720B	VOC	2,700,000 gallons
TNK2	Number 1 and 2 distillate fuel oil storage tank	9 VAC 5-80-720B	VOC	2,700,000 gallons

Emission Unit No.	Emission Unit Description	Citation ¹	Pollutant(s) Emitted (if applicable to 9 VAC 5-80-720B)	Rated Capacity (if applicable to 9 VAC 5-80-720)
PH-1	Pipeline heater	9 VAC 5-80-720B	PM, PM-10, SO ₂ , NO _x , and VOC	5.21 MMBtu/hr
PH-2	Pipeline heater	9 VAC 5-80-720B	PM, PM-10, SO ₂ , NO _x , and VOC	5.21 MMBtu/hr

¹ The citation criteria for insignificant activities are as follows:
 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
 9 VAC 5-80-720 B - Insignificant due to emission levels
 9 VAC 5-80-720 C - Insignificant due to size or production rate

PERMIT SHIELD & INAPPLICABLE REQUIREMENTS

- Title V Condition 38 lists the regulations which are not applicable to this facility and a reason for the inapplicability as if the date of this Title V permit. The inapplicable requirements are listed below:
- 40 CFR 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage
 This standard does not apply to the fuel oil storage tanks because it is not applicable to units storing petroleum liquids with a vapor pressure less than 1.5 pounds per square inch (such as kerosene and fuel oil).
- 40 CFR 60, Subpart KKKK – The combustion turbines were constructed prior to February 18, 2005, the applicability date of Subpart KKKK.
- 40 CFR 63, Subpart YYYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines applies to stationary combustion turbines located at major sources of HAP emissions. Dominion Remington Combustion Turbine Station is not a major source of HAP.
- 40 CFR 64 – The facility is exempt from CAM since the facility uses CEMS to monitor its NO_x emissions per 40 CFR .64.2(b)(1)(vi).

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-490 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

- Permit Expiration – Title V permit Conditions 39 – 46

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the Code of Virginia, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

These general conditions cite the Articles that follow:

Article 3 (9 VAC 5-80-360 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-430 – Application

9 VAC 5-80-500 – Permit Shield

9 VAC 5-80-510 – Action on Permit Applications

- Recordkeeping and Reporting – Title V Conditions 47 – 49

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

- Annual Compliance Certification – Title V Condition 50 discusses the specifics of the annual compliance certification, when the certification must be submitted, and who and how the certification must be submitted.
- Permit Deviation Report – Title V Condition 51 requires that the facility notify the Regional Air Compliance Manager of the DEQs NRO of any deviation of the permit requirements. This notification must be made within four daytime business hours with other notifications given in the condition.
- Failure/Malfunction Reporting – Title V Conditions 52 - 55

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-650 of the Article 3 Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to

section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-650 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-650. The report must be made within four daytime business hours of discovery of the malfunction.

Note: The choices below are based on continuous monitors meeting New Source Review requirements or existing source requirements listed in 9 VAC 5-40-41.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors meeting the requirements of 9 VAC 5-50-410 or 9 VAC 5-40-41.

Note: The choices below are based on continuous monitors meeting New Source Review requirements or existing source requirements listed in 9 VAC 5-40-41.

This general condition cites the sections that follow:

- 9 VAC 5-40-41 – Emissions Monitoring Procedures for Existing Sources
- 9 VAC 5-40-50 – Notification, Records and Reporting
- 9 VAC 5-50-50 – Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:

40 CFR 60.13 (h) – Monitoring Requirements.

- Permit Modification – Title V Condition 59

This general condition cites the sections that follow:

- 9 VAC 5-80-360 – Applicability, Federal Operating Permit For Stationary Sources
- 9 VAC 5-80-550 – Changes to Permits.
- 9 VAC 5-80-660 – Enforcement.
- 9 VAC 5-80-1100 – Applicability, Permits For New and Modified Stationary Sources
- 9 VAC 5-80-1605 – Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
- 9 VAC 5-80-2000 – Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

This general boilerplate condition contains several referenced state regulations; and the 9 VAC 5-80-50 is replaced with 9 VAC 5-80-360 Applicability, Federal Operating Permit for Acid Rain Sources.

- Malfunction as an Affirmative Defense – Title V Condition 70

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-650 and 9 VAC 5-20-180. For

further explanation see the comments on General Condition Failure/Malfunction Reporting.

- Asbestos Requirements – Title V Condition 74

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains citations from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70 – Designated Emissions Standards

9 VAC 5-80-490 – Permit Content

Title IV requirements

- Permit Allowances and Conditions – Title V Condition 79

Title IV Acid rain requirements are included in the Title V permit in the section titled "Title IV (Phase II Acid rain) Permit Allowances and requirements and include conditions 80 and the Title IV Phase II Acid Rain Permit Application is included in the Title V permit as Appendix F.

Cross-State Air Pollution Rule

- Requirements – Title V Condition 80

CSAPR requirements are included in the Title V Permit by reference (40 CFR Part 97, Subparts AAAAAA-DDDDDD); as such requirements are not currently part of the Commonwealth of Virginia's State Implementation Plan.

GREENHOUSE GASES (GHG)

Remington's potential greenhouse gas (GHG) emissions exceed the thresholds at which GHG are considered a "major NSR pollutant" (100,000 tpy CO₂e and 100 tpy GHG on a mass basis) according to Step 2 of EPA's GHG Tailoring Rule (incorporated into Virginia's State Implementation Plan May 13, 2011). Remington is subject to Title V permitting requirements regardless of GHG emissions due to its potential emissions of criteria pollutants, so there are no

additional requirements associated with GHG applicable to the Dominion Remington Combustion Turbine Station.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in the Fauquier Times from November 5, 2014 to December 8, 2014. EPA had the opportunity to review and comment from November 5, 2014 to December 22, 2014. No comments were received from the public and no comments were received from EPA.

Subsequent to the conclusion of the public comment period and EPA's review of the proposed Title V Permit, effective January 1, 2015, a "new" federal rule – the Cross-State Air Pollution Rule (CSAPR) took effect and replaced the Clean Air Interstate Rule (CAIR). The requirements of the replaced CAIR program were included in the proposed Title V permit that was presented during the public comment period and EPA's review.

The proposed permit has since been revised (Condition 79) to incorporate the CSAPR requirements. DEQ vetted the proposed CSAPR language and rationale/proposal to EPA for not having to take the revised proposed permit back to public comment or EPA review. Both EPA Region III and DEQs Air Director supported the proposals, in light that both the CSAPR and CAIR require 40 CFR Part 75 monitoring, both are emission trading rules and both rules are administered through EPA's Clean Air Markets Division. See attached emails for the correspondence between DEQ and EPA regarding these decisions.

APPENDIX

**Remington Combustion Turbine Station
Initial Compliance Testing Compared to Permitted Limits**

Number 1 and 2 Distillate Oil

Unit	Permitted Oil Limit	Load	CO (ppmvd)	% of Permitted Limit
Unit 1	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (50 MW)	1.06	3.53
		Intermediate (90 MW)	1.23	4.10
		Intermediate (130 MW)	1.42	4.73
		Peak (168 MW)	1.37	4.57
Unit 2	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (40 MW)	5.73	19.10
		Intermediate (85 MW)	1.20	4.00
		Intermediate (130 MW)	1.39	4.63
		Peak (174 MW)	1.32	4.40
Unit 3	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (40 MW)	11.24	37.47
		Intermediate (85 MW)	0.77	2.57
		Intermediate (131 MW)	10.90	36.33
		Peak (176 MW)	0.92	3.07
Unit 4	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (40 MW)	0.59	1.97
		Intermediate (87 MW)	0.76	2.53
		Intermediate (132 MW)	0.80	2.67
		Peak (180 MW)	0.85	2.83

**Remington Combustion Turbine Station
Initial Compliance Testing Compared to Permitted Limits**

Natural Gas

Unit	Permitted Natural Gas Limit	Load	CO	% of Permitted Limit
Unit 1	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (80 MW)	1.08	12.00
		Intermediate (100 MW)	0.98	10.89
		Intermediate (120 MW)	0.91	10.11
		Peak (153 MW)	1.11	12.33
Unit 2	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (85 MW)	2.28	25.33
		Intermediate (112 MW)	0.89	9.89
		Intermediate (140 MW)	0.99	11.00
		Peak (165 MW)	1.00	11.11
Unit 3	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (90 MW)	0.59	6.56
		Intermediate (112 MW)	0.76	8.44
		Intermediate (134 MW)	0.80	8.89
		Peak (154 MW)	0.85	9.44
Unit 4	CO = 30 ppmvd @ 15% O2 (3 hour average)	Minimum (95 MW)	0.70	7.78
		Intermediate (117 MW)	0.86	9.56
		Intermediate (140 MW)	0.88	9.78
		Peak (162 MW)	0.85	9.44

Remington Fuel Usage 2009 - 2013

Unit ID

Year	Unit 1		Unit 2		Unit 3		Unit 4		Percent of actual fuel usage as a percent of Max (Annual Capacity Factor)	
	Natural Gas (100 scf)	Distillate Oil (gal)	Natural Gas (100 scf)	Distillate Oil (gal)	Natural Gas (100 scf)	Distillate Oil (gal)	Natural Gas (100 scf)	Distillate Oil (gal)	Natural Gas	Distillate Oil
2009	6,538,179.0	1,017,214.3	5,156,177.0	681,283.1	3,665,169.1	644,580.7	6,786,241.3	860,889.0	14.74	2.64
2010	10,897,109.8	1,307,817.2	10,808,016.2	879,287.5	8,124,361.5	925,151.3	10,367,170.2	712,084.4	26.76	3.15
2011	6,684,136.0	672,368.0	5,643,188.7	486,612.4	6,230,310.7	406,567.0	7,686,775.1	187,841.6	17.47	1.45
2012	8,214,999.2	19,097.2	8,502,801.3	22,309.4	7,201,599.4	29,283.9	6,058,108.6	77,421.2	19.96	0.12
2013	16,314,138.1	71,453.0	14,243,145.7	138,103.1	13,537,552.3	17,235.3	14,394,117.6	62,875.7	38.94	0.24
TOTAL	48,648,562.1	3,087,949.7	44,353,328.9	2,207,595.5	38,758,993.0	2,022,818.2	45,292,412.8	1,901,111.9		

Total (MMBtu/hr)	5,010,801.90	427,681.03	4,568,392.88	305,751.98	3,992,176.28	280,160.32	4,665,118.52	263,304.00	23.58	1.52
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Heating value of Natural Gas	1,030.00 Btu/cu ft
Heating value of Distillate Oil	138,500.00 Btu/gal

		Maximum Annual Heat Input @ 8760 hr/yr		
Heat Rating on Natural Gas =	1766	MMBtu/hr	15,470,160	MMBtu/yr
Heat Rating on Distillate Oil =	1917	MMBtu/hr	16,792,920	MMBtu/yr

Cross-State Air Pollution Rule (CSAPR) Email Background

LaFratta, James (DEQ)

From: Faggert, Stanley (DEQ)
Sent: Friday, March 20, 2015 10:31 AM
To: Pandey, Janardan (DEQ); Brown, Jed (DEQ); Feagins, Rob (DEQ); Breathwaite, Troy (DEQ); Kyle, James (DEQ); LaFratta, James (DEQ)
Cc: Thompson, Tamera (DEQ)
Subject: FW: CSAPR issue for Title V permits

Group,

I am going to treat this as their final answer.

If OAQPS does eventually produce something, we can evaluate whether to start using their product at that time.

Thanks, SMF

Stanley M. Faggert
Environmental Specialist II
Virginia Department of Environmental Quality
804-698-4424
stanley.faggert@deq.virginia.gov

From: campbell, dave [mailto:campbell.dave@epa.gov]
Sent: Thursday, March 19, 2015 1:25 PM
To: Faggert, Stanley (DEQ)
Cc: VanOsten, Cathleen; Mastro, Donna
Subject: Re: CSAPR issue for Title V permits

Stanley

We are satisfied with your approach. We understand your interest in issuing sooner than later.

Sorry for the delay in response, I am still getting my "air" legs back under me.
Dave

Sent from my iPhone

On Mar 19, 2015, at 12:47 PM, Faggert, Stanley (DEQ) <Stanley.Faggert@deq.virginia.gov> wrote:

Dave,

Since Donna is probably getting tired of hearing from me, I thought I would ask you: have you guys had a chance to discuss this any further?

Thanks, SMF

Stanley M. Faggert
Environmental Specialist II
Virginia Department of Environmental Quality
804-698-4424
stanley.faggert@deq.virginia.gov

From: Mastro, Donna [<mailto:Mastro.Donna@epa.gov>]
Sent: Friday, March 13, 2015 9:52 AM
To: Faggert, Stanley (DEQ)
Cc: Thompson, Tamera (DEQ); VanOsten, Cathleen; campbell, dave
Subject: Re: CSAPR issue for Title V permits

Thanks for the email. I specifically told OAQPS the state might not be able to wait for template that could be issued at some unspecific future time- .. OAQPS title v manager said she understands the states have reasons to go forward and not wait. I'm fine with what you've outlined here- but I'll confirm with Dave Campbell on Monday. My understanding of Title V petitions is they are limited to comments raised with specificity to the state. Since you didn't receive comments on CAIR, and the new permit includes CSAPR, which validly applies and is the applicable requirement as CAIR has sunset, I think risk of enviros filing petition is low. I'll confer with Dave to make sure he concurs .

Sent from my iPhone

On Mar 13, 2015, at 9:43 AM, Faggert, Stanley (DEQ) <Stanley.Faggert@deq.virginia.gov> wrote:

Donna,

My understanding from our regional staff is that there are more than one TV application that we have had on hold for this CAIR/CSAPR issue, and we have had the brakes on some of these since last year. If it were just one application or if OAQPS had a more defined timeframe in mind, then I think we would be comfortable waiting to see what they produced. After all, it's not like we've never had delays in issuing Title IV/V permits before.

However, issuing these kinds of permits does entail a certain kind of "momentum" and sometimes delays for one particular reason then lead to delays for other reasons (it seems like the worlds of air pollution permitting regulation and stationary source business activity are rarely static).

So, unless Region III has an objection, our intention is to resume processing these TV applications using the general CSAPR condition described below. These all (*) need to be public noticed, so they are probably still 2-3 months away from potential issuance.

(*) We do have only the one application that has already been public noticed with CAIR. While we agree that they are certainly different regulations, they both require Part 75 monitoring, they are both emission trading rules and they are both administered through CAMD. Our internal thinking/analogy was along the lines of: "if, in response to comment or otherwise, we increased the frequency of a monitoring requirement (2/day to 3/day) or tightened an emission standard (4 lbs/hr to 3 lbs/hr) after the public comment period and we wouldn't normally re-notice a draft permit, why should we necessarily re-notice a draft permit when we replace one emission trading regulation (CAIR) with what is generally considered to be a more stringent one (CSAPR)?"

Thanks, SMF

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804-698-4424
stanley.faggert@deq.virginia.gov

From: Mastro, Donna [<mailto:Mastro.Donna@epa.gov>]
Sent: Wednesday, March 11, 2015 10:04 AM
To: Thompson, Tamera (DEQ); Faggert, Stanley (DEQ); VanOsten, Cathleen; campbell, dave
Subject: FW: CSAPR issue for Title V permits

Hi Tamera and Stan- we received a response from OAQPS today. I think some of what OAQPS suggests is clearly an ideal version of what to include for permits. What OAQPS suggests is that a template is being developed by EPA for states for "what to include" regarding CSAPR applicable requirements. It sounds like OAQPS may want to itemize some more requirements and not just list the reg citation. If you are able to defer action on this particular Title V permit you have, perhaps this template will be helpful. I'm not sure about timing but OAQPS said maybe the template will be ready in a "few months". Can DEQ wait for the template? Otherwise, I would suggest perhaps you follow the protocol you were doing on CAIR (as you suggest below with providing citations to the CSAPR requirements but not detailing) if you are under a deadline on permits.

On your other issue regarding notice, OAQPS is suggesting providing a new comment period for the public on the CSAPR applicable requirements since your prior notice only had CAIR requirements because CSAPR is different in certain respects. If you have questions, feel free to call Dave, Cathleen or myself to follow up. I just provided a summary here of OAQPS comments but I can provide more of the detail if you'd like!

Donna L. Mastro - EPA Region III – ORC - Air Branch Chief - [\(215\) 814-2777](tel:2158142777)

From: Faggert, Stanley (DEQ) [<mailto:Stanley.Faggert@deq.virginia.gov>]

With a revised "standard" CSAPR permit condition:

1. The permittee shall comply with all applicable cross-state air pollution rule (CSAPR) requirements (40 CFR Part 97, Subparts AAAAA-DDDDD) by the compliance date specified in 40 CFR 97, Subparts AAAAA-DDDDD, as amended. ~~The CAIR application in Attachment B to this document contains specific conditions and expires upon expiration of this Title V permit.~~
(40 CFR Part 97, Subparts AAAAA-DDDDD and 9 VAC 5-80-110)

Also, for TV applications where we have already completed the public comment process with CAIR (but not CSAPR) included in the draft/proposed permits but not yet issued the permits, does EPA believe that such permits must be public noticed again if the only change is to replace the standard CAIR condition with the standard CSAPR condition as I have described? Particularly where there were no public comments or no emission trading related public comments during the comment period?

Thanks, SMF

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804-698-4424
stanley.faggert@deq.virginia.gov

LaFratta, James (DEQ)

From: Faggert, Stanley (DEQ)
Sent: Friday, March 20, 2015 10:26 AM
To: LaFratta, James (DEQ)
Cc: Thompson, Tamera (DEQ)
Subject: RE: CSAPR issue for Title V permits

Jim,

See the highlighted correction below; I think you were interpreting my message as I intended, but the correction may be useful for future generations of permit writers.

Stanley M. Faggert
Environmental Specialist II
Virginia Department of Environmental Quality
804-698-4424
stanley.faggert@deq.virginia.gov

From: LaFratta, James (DEQ)
Sent: Friday, March 20, 2015 10:23 AM
To: Faggert, Stanley (DEQ)
Cc: Thompson, Tamera (DEQ)
Subject: RE: CSAPR issue for Title V permits

o.k. Thank you Stan for all your follow-up on this issue/matter. I'll discuss it with Tom F. and go from there...

James B. LaFratta
Regional Air Permit Manager
Northern Regional Office
Virginia Department of Environmental Quality
13901 Crown Court
Woodbridge, Virginia 22193

(703) 583-3928 (phone)
(703) 583-3821 (fax)

james.lafratta@deq.virginia.gov (email)

From: Faggert, Stanley (DEQ)
Sent: Friday, March 20, 2015 10:21 AM
To: LaFratta, James (DEQ)
Cc: Thompson, Tamera (DEQ)
Subject: FW: CSAPR issue for Title V permits

Jim,

I did get a chance to talk to Mike Dowd this morning, and it is OAPP's position that you may proceed with the Remington Title V permit without re-noticing it for the CSAPR vs. CAIR issue. Of course, if you choose to re-notice it for other reasons, you always have the authority to do so.

Thanks, SMF

Stanley M. Faggert
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804-698-4424
stanley.faggert@deq.virginia.gov

From: Faggert, Stanley (DEQ)
Sent: Thursday, March 19, 2015 4:44 PM
To: LaFratta, James (DEQ)
Subject: FW: CSAPR issue for Title V permits

Jim,

I am for sure going to interpret this to mean that EPA Region III is on board with our standard CSAPR condition approach.

I am 90% sure I am going to also interpret this to mean they are on board with not re-noticing the one NRO permit that was originally noticed with CAIR. Tamera and I definitely support that approach.

Let me run it by Mike Dowd tomorrow, and then I will send you our final CO recommendation.

Thanks, SMF

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