

**COMMONWEALTH OF VIRGINIA  
Department of Environmental Quality  
Piedmont Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Industrial Power Generating Company, LLC – Chester Plant  
Chesterfield County, Virginia  
Permit No. PRO-52037

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, Industrial Power Generating Company, LLC (INGENCO) Chester Plant has applied for a Title V Operating Permit for its Chesterfield County facility. The Department of Environmental Quality, Air Quality Division (DEQ) has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_ Date: \_\_\_\_\_

Ashby Scott  
(804) 698-4467

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

James E. Kyle, P.E.

Deputy Regional Director: \_\_\_\_\_ Date: \_\_\_\_\_

Kyle Ivar Winter, P.E.

## **FACILITY INFORMATION**

### Permittee

Industrial Power Generating Company, LLC  
2250 Dabney Road  
Richmond, VA 23230

### Facility

Industrial Power Generating Company, LLC  
Chester Plant  
11800 Lewis Road  
Chesterfield County, VA

### Responsible Official

Mr. Charles J. Packard

### Contact Person

Mr. Robert L. Greene, PhD  
Environmental Compliance Manager  
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County-Plant Identification Number: 51-041-00487

## **SOURCE DESCRIPTION**

NAICS ID# 221119 –Other Electrical Power Generation  
SIC Code: 4931 – Electrical Power Generation

The INGENCO Chester Plant is a 16.8 MW power generation facility using 48 Detroit Diesel Series 60 diesel-electric generators arranged into 8 groups of 6 engines each. The INGENCO Chester Plant is located adjacent to the Shoosmith Brothers Landfill (Registration No. 50752), which supplies landfill gas to the INGENCO Chester Plant as one of the fuels for the 48 Detroit Diesel Series 60 diesel-electric generators. All landfill gas consumed by the engines must be processed through the landfill gas treatment system on the INGENCO Chester Plant site before usage. The landfill gas treatment system is composed of de-watering, filtration, and compression processes.

The INGENCO Chester Plant is a Title V major source of Nitrogen Oxides (NO<sub>x</sub>) and Carbon Monoxide (CO) and is currently permitted to 240 Tons per Year (TPY) or less for each pollutant.

The source is located in an attainment area for all pollutants, and is a PSD minor source. A Title V Operating Permit was initially issued on September 24, 2004 and the facility is currently permitted under a minor New Source Review (NSR) Permit amendment issued on April 28, 2011 which supersedes the previous minor NSR permit amendment issued April 11, 2011. The facility submitted a timely Title V permit application for renewal on August 22, 2008. The application was deemed administratively complete on April 25, 2011.

### **COMPLIANCE STATUS**

A full compliance evaluation of this facility, including a site visit, has been conducted on December 11, 2009. 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 Chester Plant 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:

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Description</b>	<b>Size/Rated Capacity*</b>	<b>Pollution Control Device (PCD) Description</b>	<b>PCD ID</b>	<b>Pollutant Controlled</b>	<b>Applicable Permit Date</b>
A1-H6	S-1 through S-8	Forty-eight (48) Detroit Diesel Model 6063-TK35 dual-fuel diesel engines constructed in 2004, each driving a 350 kW generator; arranged in eight groups of six engines each. Each group has a separate exhaust stack, e.g. S1 serving group A1-A6, S2 serving group B1-B6, etc.	550 HP and 3.57 MMBtu/hr heat input each, total for 48 engines, 171.36 MMBtu/hr heat input.	N/A Passive controls: air-to-fuel ratio control, turbo-charging, custom built after coolers and charge-air cooling systems, engine control modules.	-	NO <sub>x</sub> , CO, SO <sub>x</sub> , VOC, PM, PM-10.	April 28, 2011
-	-	Landfill gas treatment and transport system components.	3,000 – 4,500 cfm	N/A	-	-	April 28, 2011

\*The Size/Rated capacity and PCD efficiency are provided for informational purposes only, and are not applicable requirements.

**EMISSIONS INVENTORY**

A copy of the 2009 annual emission update is attached. Emissions are summarized in the following table:

<i>2009 PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]</i>	
<b>CRITERIA POLLUTANTS</b>	<b>2009 ACTUAL EMISSIONS</b>
Particulate Matter (PM <sub>10</sub> )	20.071
Particulate Matter (PM <sub>2.5</sub> )	20.071
Nitrogen Oxides (NO <sub>x</sub> )	50.651
Sulfur Dioxide (SO <sub>2</sub> )	19.047
Carbon Monoxide (CO)	51.850
VOC	26.931

**EMISSION UNIT APPLICABLE REQUIREMENTS - [A1-H6]**

The permit conditions are taken from the following: a minor NSR permit amendment dated April 28, 2011, superseding the April 11, 2011 modified minor NSR permit; 40 CFR Part 63 MACT Subpart ZZZZ, Standards of Performance for Reciprocating Internal Combustion Engines; 40 CFR 60 NSPS Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills and 9 VAC 5-80-50 et seq., Part II-Article 1 Federal Operating Permits for Stationary Sources. The facility is subject to 9 VAC 5 Chapter 50-Part II-Article 1 New and Modified Stationary Sources Standards of Performance for Visible Emissions and Fugitive Dust/Emissions (Rule 5-1). Virginia has not currently accepted delegation to enforce the RICE MACT.

**Limitations**

1. Emissions of NO<sub>x</sub> from the engines are limited in Conditions III.A.1, III.A.2, and III.A.3 by using passive controls inherent to the design of the engines and standard operating practices, rather than add-on pollution control devices; from Conditions 2, 3, and 4 of the minor NSR permit dated April 28, 2011.
2. Carbon Monoxide emissions from the engines are limited in Condition III.A.4 by using standard operating practices regulated by devices inherent to the design of the engines; from Condition 5 of the minor NSR permit dated April 28, 2011.

3. Uncontrolled releases of treated landfill gas from either, the 48 dual-fuel diesel engines, the landfill gas treatment system, or the treated landfill gas transport system are prohibited in Condition III.A.5; from Condition 6 of the minor NSR permit dated April 28, 2011.
4. Particulate Matter and Volatile Organic Compounds emissions from the 48 dual-fuel diesel engines are limited in Condition III.A.6 by using good operation and maintenance practices; from Condition 7 of the minor NSR permit dated April 28, 2011.
5. Condition III.A.7 requires proper operation of the 48 dual-fuel diesel engines, treated landfill gas transport system, and the landfill gas treatment system (as specified in Permit Condition III.A.13) whenever the facility is operating the engines in a dual fuel mode; from Condition 8 of the minor NSR permit dated April 28, 2011.
6. The heat value of the treated LFG fuel is required to be calculated on a weekly basis by Condition III.A.8. Condition III.A.8 requires logs of the calculated LFG fuel heat values to be kept the device to measure methane concentration in the treated LFG fuel to be kept at a minimum; properly maintained, calibrated and operated in accordance with the manufacturer's requirements; from Condition 15 of the minor NSR permit dated April 28, 2011.
7. Proper operation of the landfill gas treatment system is required whenever LFG fuel is being transferred to any of the engines by Permit Condition III.A.9; from Condition 16 of the minor NSR permit dated April 28, 2011.
8. Condition III.A.10 lists the approved fuels for the engines; from Condition 17 of the minor NSR permit dated April 28, 2011.
9. The formula and associated variables for calculating the NO<sub>x</sub> and CO emissions based on the type of, ratio of liquid fuel to LFG fuel, and quantity of fuels used, to prevent either criteria pollutant from exceeding the permit limits of 240 tpy or PSD thresholds is defined in Condition III.A.11; from Condition 18 of the minor NSR permit dated April 28, 2011.
10. The fuel specifications to be used in the engines are defined in Condition III.A.12; from Condition 19 of the minor NSR permit dated April 28, 2011.
11. The source of LFG fuel for the facility and the minimum treatment specifications for the LFG fuel are defined in Condition III.A.13; from Condition 20 of the minor NSR permit dated April 28, 2011.

12. Emissions of criteria pollutants from each engine on a pound of pollutant per million BTU basis are limited by Condition III.A.14. Compliance with the established limits will be determined by stack testing of the engines; from Condition 22 of the minor NSR permit dated April 28, 2011.
13. Hourly and annual emissions from the Chester Plant, whether operated in single or dual fuel mode, are limited by Condition IV.A; from Condition 23 of the minor NSR permit dated April 28, 2011. Compliance with these limits may be determined as stated in Condition numbers III.A.1 through III.A.7, III.A10, III.A.11, III.A12 and III.A.13.
14. Operating and maintenance procedures for each engine as stated in 40 CFR 63 Subpart ZZZZ Table 2d(11) are required by Condition III.A.15.
15. Visible emissions from the engines' stacks are limited to 10% opacity when operated in single fuel mode and 20% opacity when operated in dual fuel mode by Condition III.A.16; from Condition 24 of the minor NSR permit dated April 28, 2011.

### **Compliance Assurance Monitoring (CAM)**

Generally, the requirements of 40 CFR 64, CAM, apply to each emissions unit meeting all three of the following criteria on a pollutant-by-pollutant basis:

- The unit emits or has the potential to emit (in the absence of add-on control devices) quantities of one or more regulated air pollutants that exceed major source thresholds,
- The unit is subject to one or more emission limitations for the regulated air pollutants for which it is major before control, and
- The unit uses a control device to achieve compliance with one or more of these emission limitations.

The INGENCO Chester Plant does not meet the third of these requirements as the 48 dual-fuel diesel engines do not have add-on control devices and rely instead on passive controls inherent to the design of the generators.

## **Periodic Monitoring and Recordkeeping**

The EPA periodic monitoring guidance, dated September 18, 1998, states periodic monitoring is required for each emission point at a source, subject to Title V of the Act, which is subject to an applicable requirement. The INGENCO Chester Plant emission units are applicable to MACT Subpart ZZZZ, for the 48 dual-fuel diesel generators, NSPS Subpart WWW, for the landfill gas treatment and transport system, and the associated monitoring and recordkeeping requirements from these standards.

Periodic monitoring for the INGENCO Chester Plant emission units has been determined to consist of obtaining fuel supplier certifications, records to demonstrate compliance with good operating practices, and adhering to a maintenance schedule, all of which are described in State Regulations. Performance testing required under MACT Subpart ZZZZ is also part of the periodic monitoring for the INGENCO Chester Plant. Details of the specific permit conditions are listed in the Testing section.

1. Condition III.B.1 requires the continuous measurement and recording of the quantity of each type of allowable fuel consumed by each engine and the proper installation, maintenance, calibration and operation of each monitoring device; from Condition 9 of the minor NSR permit dated April 28, 2011.
2. Condition III.B.2 requires the continuous measurement of the inlet charge-air temperature for each engine and the proper installation, maintenance, calibration and operation of each monitoring device; from Condition 10 of the minor NSR permit dated April 28, 2011.
3. Condition III.B.3 requires continuous measurement of the pressure within the LFG transport system and the proper installation, maintenance, calibration and operation of each monitoring device; from Condition 11 of the minor NSR permit dated April 28, 2011.
4. Continuous monitoring and recording of the LFG fraction and inlet charge-air temperature each engine as well as hourly written logs of each value in the event of a computer malfunction/ failure are required by Condition III.B.4; from Condition 12 of the minor NSR permit dated April 28, 2011.
5. Hourly observation of devices used to measure the inlet charge-air temperature for each engine while in operation and a daily log of these observations are required by Condition III.B.5; from Condition 13 of the minor NSR permit dated April 28, 2011.

6. Daily observation of the devices used to measure the pressure of the treated landfill gas transport system whenever LFG fuel is used in the dual-fuel diesel engines and a daily log of these observations are required by Condition III.B.6; from Condition 14 of the minor NSR permit dated April 28, 2011.
7. Daily determination and recording of the water remaining after draining each treated LFG polishing tank is required by Condition III.B.7, at least once each day LFG fuel is combusted in the dual-fuel diesel engines; from Condition 31 of the minor NSR permit dated April 28, 2011.
8. Condition III.B.8 describes how the opacity limits for the engines will be monitored by having a monthly opacity observation schedule providing a reasonable assurance of compliance with the applicable opacity limits; from Condition 34 of the minor NSR permit dated April 28, 2011.
9. Condition III.C.1 requires fuel certifications from suppliers of distillate and number 4 fuel oils; from Condition 21 of the minor NSR permit dated April 28, 2011.
10. Condition III.C.2 includes the requirements for maintaining records of all emissions monitoring and operating parameters and testing required by the permit; from Condition 26 of the minor NSR permit dated April 28, 2011.
11. Condition III.C.3 incorporates by reference the recordkeeping requirements in MACT *ZZZZ*.

## **Testing**

1. Condition III.D.1 requires performance tests to demonstrate compliance with NO<sub>x</sub> and CO emission limits after commencement of using distillate oil in the engines; from Condition 26 of the minor NSR permit dated April 28, 2011.
2. Condition III.D.2 requires performance tests to demonstrate compliance with NO<sub>x</sub>, CO, SO<sub>x</sub>, VOC and PM-10 emissions limits after commencement of the engines operating in dual fuel mode; from Condition 27 of the minor NSR permit dated April 28, 2011.
3. Condition III.D.3 requires performance tests to demonstrate compliance with nitrogen oxides and carbon monoxide emissions limits after commencement of using number 4 fuel oil and/or bio-diesel in the engines while operating in single fuel mode using 100% number 4 fuel oil and/or bio-diesel and after commencement of the engines operating in dual fuel mode using various quantities of landfill gas and number 4 fuel oil and/or bio-diesel; from Condition 28 of the minor NSR permit dated April 28, 2011.

4. Condition III.D.4 requires the determination of the moisture content of the LFG to be performed concurrent with the performance tests being conducted in Conditions III.D.1 through III.D.3; from Condition 29 of the minor NSR.
5. Condition III.D.5 requires VEEs to be performed concurrent with the performance tests being conducted in Conditions III.D.1 through III.D.3; from Condition 30 of the minor NSR permit dated April 28, 2011.
6. Condition III.D.6 requires each set of six engines to be performance tested in continual rotation so that every set is tested every Title V Permit term; from Condition 32 of the minor NSR Permit dated April 28, 2011.
7. Condition III.D.7 requires the operator to provide testing and monitoring ports and use appropriate test method(s) in accordance with procedures approved by the Department; from Condition 33 of the minor NSR Permit dated April 28, 2011.

### **Reporting**

1. Condition III.E.1 requires written notification of the anticipated and actual dates of any modification or change to any of the engine control modules and subsequent start up dates for the modified engines; from Condition 35 of the minor NSR permit dated April 28, 2011.
2. Notification for any removal of the engine's passive control equipment is required by Condition III.E.2; from Condition 36 of the minor NSR permit dated April 28, 2011.
3. Condition III.E.3 incorporates by reference submission of the notifications in 40 CFR §§63.7 (b) and (c), 63.8 (e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h).
4. Condition III.E.4 incorporates by reference the annual reporting requirements in 40 CFR 63 Subpart ZZZZ Table 7(2).

### **Streamlined Requirements**

Conditions 37-45 of the minor NSR permit, dated April 28, 2011, have been streamlined out as they duplicate the general conditions of the Title V permit for the facility.

### **FACILITY WIDE CONDITIONS**

The facility has minor NSR facility wide emission limits to keep it from being PSD applicable for NO<sub>x</sub> and CO. The requirements listed in the Title V permit for the individual units are valid for facility wide emissions and do not need to be repeated in this section. Only the emissions limits need to be listed.

## **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 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**

#### **B. Permit Expiration**

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”.

This general condition cite(s) the Article(s) that follow(s):  
Article 1 (9 VAC 5-80-50 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 5-80-80. Application

9 VAC 5-80-140. Permit Shield

9 VAC 5-80-150. Action on Permit Applications

#### **F. Failure/Malfunction Reporting**

Section 9 VAC 5-20-180 requires notification of malfunction and excess emissions 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.

## **J. Permit Modification**

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits for New and Modified Stationary Sources

9 VAC 5-80-1790. 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

## **U. Malfunction as an Affirmative Defense**

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

## **Y. Asbestos Requirements**

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 a citation 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 5-80-110. Permit Content

### **STATE ONLY APPLICABLE REQUIREMENTS**

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-50-310, Odorous Emissions

### **INAPPLICABLE REQUIREMENTS**

The Existing Source Rule 4-8, NSPS Subpart IIII, Compliance Assurance Monitoring, Title V Greenhouse Gas Tailoring Rule, Phase 1 and NSPS Subpart Kb do not apply to the facility. In addition, certain portions of NSPS Subpart WWW, MACT Subpart AAAA, and MACT Subpart A do not apply. An explanation for the determination is provided in the following:

Existing Source Rule 4-8 does not apply (9 VAC 5-40-880)

*“E. The provisions of this article do not apply to stationary internal combustion engines.”*

NSPS Subpart IIII does not apply until the diesel engines are modified in accordance with 40 CFR 60, NSPS Subpart IIII. The engine configuration and controls were last set by the minor NSR permit dated April 28, 2011.

*“Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

*What This Subpart Covers § 60.4200 Am I subject to this subpart?*

*(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section.*

*For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.*

*(1) Manufacturers of stationary CI ICE with a displacement of less than 30 liters per cylinder where the model year is:*

*(i) 2007 or later, for engines that are not fire pump engines,*

*(ii) The model year listed in table 3 to this subpart or later model year, for fire pump engines.*

*(2) Owners and operators of stationary CI ICE that commence construction after July 11, 2005 where the stationary CI ICE are:*

*(i) Manufactured after April 1, 2006 and are not fire pump engines, or*

*(ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006. “*

*“ (3) Owners and operators of stationary CI ICE that modify or reconstruct their stationary CI ICE after July 11, 2005.”*

Compliance Assurance Monitoring, 40 CFR Part 64, does not apply to the facility as the CI RICE do not have add-on pollution control devices.

Title V Greenhouse Gas Tailoring Rule, Phase 1, 40 CFR Parts 51,52,70 and 71, does not apply to the facility as it is an existing source not currently subject to PSD for any pollutant. There are no applicable GHG permitting requirements.

NSPS Subpart Kb does not apply based on the size of the tanks, largest being 32,000 gallons, and from recordkeeping requirements as revised on October 13, 2003.

NSPS Subpart WWW requirements pertaining to the collection and destruction of the landfill gas are inapplicable to the INGenco Chester Plant as long as the INGenco Chester Plant's treatment of the landfill gas meets the requirements listed in 40 CFR, Part 60.752(b)(2)(iii)(C).

NSPS Subpart AAAA requirements pertaining to the collection and destruction of the landfill gas are inapplicable to the INGenco Chester Plant as long as the INGenco Chester Plant's treatment of the landfill gas meets the requirements listed in 40 CFR, Part 60.752(b)(2)(iii)(C).

Certain MACT Subpart A requirements do not apply to the Chester Plant. The inapplicable sections are 40 CFR Part 63.6(d), 63.6(e), 63.6(h), 63.7(e)(1), 63.8(a)(4), 63.8(c)(5), 63.9(d), 63.10(b)(2)(i)-(v), 63.10(d)(3), 63.1(e)(2)(ii), 63.10(e)(4), and 63.11.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A.4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

**COMPLIANCE PLAN**

There is no compliance plan for the permit.

**INSIGNIFICANT EMISSION UNITS**

The insignificant emission units 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 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (5-80-720 B)	Rated Capacity (5-80-720 C)
T1	Fuel oil storage tank	5-80-720 B.	VOC	32,000 Gallon
T2	Fuel oil storage tank	5-80-720 B.	VOC	32,000 Gallon
T3	Fuel oil storage tank	5-80-720 B.	VOC	32,000 Gallon
T4	Fuel oil storage tank	5-80-720 B.	VOC	32,000 Gallon
T5	Lubricating oil storage tank	5-80-720 B.	VOC	1,000 Gallon
T6	Lubricating oil storage tank	5-80-720 B.	VOC	1,000 Gallon

B-1	Burnham boiler	5-80-720 B.	NO <sub>x</sub> , CO, SO <sub>x</sub> , VOC, PM, PM-10.	0.195 MMBtu/hr
RV-1	Rosemont methane measurement instrument LFG vent	5-80-720 B.	NMOC, VOC	0.5 liters/min

<sup>1</sup>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

#### **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 will be placed on public notice in the Style Weekly from August 3, 2011 to September 2, 2011.