COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

INGENCO Wholesale Power, LLC –Brunswick Plant
Lawrenceville, Virginia
Permit No. PRO-52154

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, INGENCO Wholesale Power, LLC (INGENCO) Brunswick Plant has applied for a Title V Operating Permit for its Lawrenceville, Virginia facility. The Department of Environmental Quality, Air Quality Division (the Department) has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____
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Air Permit Manager:_____ Date:_____
James E. Kyle, P.E.

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FACILITY INFORMATION

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Brunswick Plant
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Richmond, VA 23230

Facility
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County-Plant Identification Number: 51-025-0035

SOURCE DESCRIPTION

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

The INGENCO Brunswick 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 Brunswick Plant is located adjacent to the Brunswick Waste Management Facility, LLC (Registration No. 31007), which supplies landfill gas to the INGENCO Brunswick 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 Brunswick Plant site before usage. The landfill gas treatment system is composed of de-watering, filtration, and compression processes. The INGENCO Brunswick Plant is a Title V major source of Nitrogen Oxides (NO_x) 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. The source's permitted emissions for all pollutants are below Prevention of

Significant Deterioration (PSD) applicability levels. The facility is currently permitted under the following permits: A State Major New Source Review (NSR) permit issued on August 20, 2008. This permit action pertains to the initial issuance of the Title V Operating Permit. An application for an initial Title V permit was received on June 9, 2008 by the Department and was deemed administratively complete on July 3, 2008.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted on April 25, 2011. In addition, all reports and other data required by permit conditions or regulations, which are submitted to the Department, are evaluated for compliance. Based on these compliance evaluations, the Brunswick 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:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
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_x, CO, SO_x, VOC, PM, PM-10.	08/20/2008
–	–	Landfill gas treatment and transport system components.	3,000 – 4,500 cfm	N/A	–	–	–

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

EMISSIONS INVENTORY

A copy of the 2010 annual emission update is attached. Emissions are summarized in the following table:

2010 PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]	
CRITERIA POLLUTANTS	**2010 ACTUAL EMISSIONS**
Particulate Matter (PM_{10})	30.70
Particulate Matter ($PM_{2.5}$)	30.70
Nitrogen Oxides (NO_x)	64.80
Sulfur Dioxide (SO_2)	1.10
Carbon Monoxide (CO)	75.90
VOC	40.90

EMISSION UNIT APPLICABLE REQUIREMENTS - [A1-H6]

The permit conditions are taken from the following: a NSR permit dated August 20, 2008; 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_x 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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 also 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 NSR permit dated August 20, 2008.

7. Proper operation of the landfill gas treatment system, as specified in Condition III.A.13, is required whenever LFG fuel is being transferred to any of the engines by Permit Condition III.A.9; from Condition 16 of the NSR permit dated August 20, 2008.

8. Condition III.A.10 lists the approved fuels for the engines; from Condition 17 of the NSR permit dated August 20, 2008.

9. The formula and associated variables for calculating the NO_x 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 NSR permit dated August 20, 2008.

10. The fuel specifications to be used in the engines are defined in Condition III.A.12; from Condition 19 of the NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

13. Hourly and annual emissions from the Brunswick Plant, whether operated in single or dual fuel mode, are limited by Condition IV.A.1; from Condition 23 of the NSR permit dated August 20, 2008. 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. 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.15; from Condition 24 of the NSR permit dated August 20, 2008.

15. Operating and maintenance procedures for each engine as stated in 40 CFR 63 Subpart ZZZZ Table 2d (11) are required by Condition III.A.16.

16. Condition III.A.17 requires the facility to combust treated landfill gas in the 40 dual fuel diesel engines in an amount equivalent to 10% or more gross annual heat input on an annual basis.

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 Brunswick 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 Brunswick 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 Brunswick 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. 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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

6. Hourly 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 NSR permit dated August 20, 2008.

7. Daily determination and recording of the water remaining after draining each treated LFG polishing tank is required by Condition III.B.8, at least once each day LFG fuel is combusted in the dual-fuel diesel engines; from Condition 31 of the NSR permit dated August 20, 2008.

8. Condition III.B.9 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 NSR permit dated August 20, 2008.

9. Conditions III.C.1 requires fuel certifications from suppliers of distillate and number 4 fuel oils; from Condition 21 of the NSR permit dated August 20, 2008.

10. Conditions III.C.2 includes the requirements for maintaining records of all emissions monitoring and operating parameters and testing required by the permit; from Condition 25 of the NSR permit dated August 20, 2008.

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_x and CO emission limits after commencement of using distillate oil in the engines; from Condition 26 of the NSR permit dated August 20, 2008.

2. Condition III.D.2 requires performance tests to demonstrate compliance with NO_x, CO, SO_x, VOC and PM-10 emissions limits after commencement of the engines operating in dual fuel mode; from Condition 27 of the NSR permit dated August 20, 2008.

3. Condition III.D.3 requires performance tests to demonstrate compliance with nitrogen oxides and carbon monoxide emissions limits after commencement of using distillate oil and/or bio-diesel in the engines while operating in single fuel mode using 100% distillate oil and/or bio-diesel and after commencement of the engines operating in dual fuel mode using various quantities of landfill gas and distillate oil and/or bio-diesel; from Condition 28 of the NSR permit dated August 20, 2008.

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 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 NSR permit dated August 20, 2008.

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 NSR Permit dated August 20, 2008.

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 NSR Permit dated August 20, 2008.

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 NSR permit dated August 20, 2008.

2. Notification for any removal of the engines passive control equipment is required by Condition III.E.2; from Condition 36 of the NSR permit dated August 20, 2008.

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 requires the facility to submit an annual report containing the fuel flow rates of each fuel and the heating values used in the calculations to demonstrate the percentage of heat input provided by landfill gas is equivalent to 10 percent or more of the gross heat input.

Streamlined Requirements

Conditions 42-48 of the NSR permit, dated August 20, 2008, have been streamlined out as they duplicate the general conditions of the Title V permit for the facility.

FACILITY WIDE CONDITIONS

The facility has NSR facility wide emission limits to keep it from being PSD applicable for NOx and CO. Hourly and annual emissions from the Brunswick Plant, whether operated in single or dual fuel mode, are limited by Condition IV.A.1; from Condition 23 of the NSR permit dated August 20, 2008. 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.

<u>Federal Operating Permits for Stationary Sources</u>
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 the following citations from the Code of Federal Regulations:
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 following regulatory sections:
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 <u>does not</u> 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 NSR permit dated August 20, 2008.

"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 does 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, the largest being 30,000 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 Brunswick Plant as long as the INGENCO Brunswick 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 Brunswick Plant as long as the INGENCO Brunswick 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 Brunswick 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	30,000 Gallon
T2	Fuel oil storage tank	5-80-720 B.	VOC	30,000 Gallon
T3	Fuel oil storage tank	5-80-720 B.	VOC	30,000 Gallon
T4	Fuel oil storage tank	5-80-720 B.	VOC	30,000 Gallon
T5	Lubricating oil storage tank	5-80-720 B.	VOC	1,000 Gallon
T6	Used Lubricating oil storage tank	5-80-720 B.	VOC	1,000 Gallon
B1	Boiler for space heating (Exempt 10/10/2007)	5-80-720 B.	NOx, SO2, CO, VOC, PM/PM-10	(0.156 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

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 place on public notice in the Style Weekly from December 14, 2011 to January 13, 2012 .