

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

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Frank Chervan, Inc.  
2005 Greenbrier Avenue  
Roanoke, Virginia  
Permit No. BRRO-20523

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, Frank Chervan, Inc. has applied for a Title V Operating Permit for its Roanoke facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_ Date: \_\_\_\_\_  
Paul R. Jenkins  
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Air Permit Manager: \_\_\_\_\_ Date: \_\_\_\_\_  
David J. Brown

Regional Director: \_\_\_\_\_ Date: \_\_\_\_\_  
Robert J. Weld

## **FACILITY INFORMATION**

### Permittee

Frank Chervan, Inc.  
2005 Greenbrier Avenue  
Roanoke, VA 24013-2628

### Facility

Frank Chervan, Inc.  
2005 Greenbrier Avenue  
Roanoke, VA 24013-2628

County-Plant Identification Number: 51-770-00088

## **SOURCE DESCRIPTION**

Facility Description: NAICS Code: 337211 – Wood Office Furniture Manufacturing.

The facility is a conventional wood office furniture manufacturing plant. The plant receives and dries rough sawn lumber, performs various woodworking and furniture assembly operations, and finishes the assembled furniture (primarily spray stains and spray lacquer). Finishes are primarily spray booth applied HAP compliant VOC based wood furniture coatings. All wood dust emissions are controlled by either closed loop cyclones or baghouses. Most heat is supplied by a boiler firing the plant's dry process wood byproduct (wood fuel) that is fed pneumatically from the plant's wood fuel storage silo. Oversized wood is hogged before entering the fuel storage silo.

In addition to particulate matter emissions from coating operations, the facility emits volatile organic compound (VOC) and Hazardous Air Pollutant (HAP) emissions. This facility is a PSD definition major source due to VOC PTE emissions exceeding 250 tons/yr. It is located in an area currently regarded as in attainment for all pollutants.

The Stationary Reciprocating Internal Combustion Engines MACT (40 CFR 63 Subpart ZZZZ) applies to the emergency diesel fire pump as an existing source at a major source of HAP (the source was a major source of HAP on the May 13, 2013 compliance date for MACT ZZZZ). The Industrial, Commercial, and Institutional Boilers Area Source MACT standard (40 CFR 63 Subpart JJJJJ) applies to boiler B1 as an existing source (the source received a permit on August 15, 2014 limiting HAP to become an area source).

The Plywood and Composite Wood Products Manufacture MACT standard (40 CFR 63 Subpart DDDD) applies to the lumber drying kilns at the facility. However, per 40 CFR 63.2252, the permittee is not required to comply with the monitoring or recordkeeping requirements of

Subpart DDDD or any other requirement in Subpart A except for the initial notification required in §63.9(b). The initial notification was submitted on January 27, 2005. The lumber kilns are listed in the Emission Units table since they do not qualify as Insignificant Emission Units; however, the kilns are not covered by a minor NSR permit and are not considered as a source of visible emissions.

The Wood Furniture Manufacturing Operations MACT standard (40 CFR 63 Subpart JJ) applies to the finishing operations portion of the facility as an existing source (commenced construction before the December 7, 1995 MACT applicability date).

The facility has one minor New Source Review permit issued on May 6, 1983. The application for renewal of this federal operating permit was received on September 14, 2012 and was deemed timely and administratively complete. The source has one State Operating Permit issued on August 15, 2014; this permit limits the potential HAP emissions to below the major source threshold.

## COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. 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 emission units at the facility are reflected in the Title V permit on Page 5 (significant units).

## EMISSIONS INVENTORY

A copy of the 2013 annual emission update is attached. Emissions are summarized in the following table.

	2013 Criteria Pollutant Emission in Tons/Year					
	CO	VOC	SO <sub>2</sub>	PM-10	NO <sub>2</sub>	PM <sub>2.5</sub>
Total	3.7	31.0	0.2	3.5	3.0	2.9

	2013 Hazardous Air Pollutant Emission in Tons/Year		
	Ethyl benzene	Toluene	Xylenes
Total	0.3	6.2	2.6

## EMISSION UNIT APPLICABLE REQUIREMENTS

The following section discusses requirements for the emissions units at the facility that are subject to Title V permitting. These requirements come from applicable federal requirements. The conditions are not repeated verbatim from the permit. The regulatory authority for each condition is listed in parentheses () below each condition in the permit.

### Process Equipment Requirements – Fuel Burning Equipment (B1)

Boiler B1 (1983) was constructed prior to the June 9, 1989 applicability date in NSPS Dc. Boiler B1 is included in the May 6, 1983 minor NSR permit. Boiler B1 has a multicyclone; however, the pre-control emissions are less than the major source threshold so CAM does not apply. Boiler B1 is subject to MACT JJJJJ (See the MACT JJJJJ section.).

#### Limitations

- Condition 1** Particulate emissions from wood fuel/coal fired boiler (B1) are required to be controlled by multicyclone.
- Condition 2** Coal consumption in boiler B1 is limited to 900 tons/yr.
- Condition 3** Wood residue consumption in boiler B1 is limited to 6,200 tons/yr.
- Condition 4** The sulfur and ash content of the coal burned in boiler B1 is limited to 1.1 percent and 7 percent by weight average, respectively.
- Condition 5** The approved fuels for boiler B1 are wood residue and coal.
- Condition 6** The emissions from the operation of boiler B1 are limited to 8.0 lbs/hr or 0.24 lbs/MMBtu for PM and 56 lbs/hr for sulfur dioxide.
- Condition 7** Fugitive emissions are not allowed from the storage, handling or transfer of fuel or ash.

**Condition 8** Visible emissions from boiler B1 are limited to 20 percent opacity except during one six-minute period in any one hour which it is limited to 30 percent.

### **Monitoring**

**Condition 9** The source is required to conduct daily visible emission evaluations on boiler B1. If visible emissions are observed the source must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9.

**Condition 10** The source is required to conduct an annual inspection of all internal and external components of the boiler B1 multicyclone.

**Condition 11** The source is required to train boiler B1 pollution control equipment operators and maintain records of all required training. The source is also required to have written operating procedures and a maintenance schedule.

### **Recordkeeping**

**Condition 12** The source is required to maintain records of all emission data and operating parameters necessary to demonstrate compliance with the permit.

### **MACT Subpart JJJJJ – Industrial, Commercial, and Institutional Boilers Area Sources - Fuel Burning Equipment (B1)**

Boiler B1 is subject to MACT Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. Boiler B1 is an existing biomass boiler since it was constructed before June 4, 2010 and burns more than 15% biomass on an annual heat input basis. The source received a State Operating Permit that limits the source's HAP emissions to below the major source thresholds prior to the compliance date (1/31/2016) of the major source boiler MACT (Subpart DDDDD).

### **Work Practice Standards, Emission Reduction Measures and Management Practices**

**Condition 13** The permittee is required to be operated in compliance with the requirements of 40 CFR Part 63 Subpart JJJJJ, by the applicable compliance dates as specified in 40 CFR 63.11196.

**Condition 14** The permittee is required to meet the work practice standards, emission reduction measures and management practice standards as specified in 40 CFR 63.11201.

### **General Compliance Requirements**

**Condition 15** The permittee is required to comply with the General Compliance Requirements specified in 40 CFR 63.11205.

### **Initial Compliance Requirements**

**Condition 16** The permittee is required to comply with the Initial Compliance Requirements specified in 40 CFR 63.11214.

### **Continuous Compliance Requirements**

**Condition 17** The permittee is required to demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards as specified in 40 CFR 63.11223.

### **Notifications, Reports and Records**

**Condition 18** The permittee is required to submit notifications, maintain the records and submit reports as specified in 40 CFR 63.11225.

### **Other Requirements and Information**

**Condition 19** The permittee is required to comply with the applicable General Provisions as specified in 40 CFR 63.11235.

The monitoring, recordkeeping and reporting that is included in these sections meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – Fuel Burning Equipment (EG-1)**

The 235 hp diesel fired emergency pump (EG-1) is subject to the New and Modified Stationary Sources regulations in 9 VAC 5-50-10 et seq. This diesel fired engine is not included in an underlying minor NSR permit. This diesel fired engine is subject to MACT ZZZZ as an existing source at a major source of HAP (See the MACT ZZZZ section.).

### **Limitations**

**Condition 20** Visible emissions from the emergency diesel fire pump (EG-1) are limited to 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.

**Condition 21** The approved fuel for the engine (EG-1) is diesel fuel.

**Monitoring**

**Condition 22** The source is required to conduct weekly visible emission evaluations on the EG-1 stack. If visible emissions are observed the source must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9.

**MACT Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines (EG-1)**

The 235 hp emergency diesel fire pump (EG-1) is subject to MACT ZZZZ as an existing source since the source commenced construction before June 12, 2006. Frank Chervan was a major source on the MACT ZZZZ compliance date (May 13, 2013) therefore; the source is subject to the requirements for an engine located at a major source.

**Emission and Operating Limitations**

**Condition 23** The permittee is required to comply with the emission limitations and other requirements in Table 2c to Subpart ZZZZ of Part 63.

**Initial Compliance Requirements**

**Condition 24** The permittee is required to operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop its own maintenance plan. If the permittee opts to utilize an oil analysis program the permittee is required to meet the requirements specified in 40 CFR 63.6625(i).

**Condition 25** The permittee is required to have a non-resettable hour meter on the stationary RICE.

**Condition 26** The permittee is required to minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

### **General Compliance Requirements**

**Condition 27** The permittee is required to be in compliance with the emission limitations, operating limitations and other requirements in Subpart ZZZZ that apply to the source at all times and to operate and maintain the affected source in a manner consistent with safety and good air pollution control practices for minimizing emissions as specified in 40 CFR 63.6605.

### **Continuous Compliance Requirements**

**Condition 28** The permittee is required to demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2c to Subpart ZZZZ of Part 63 using the methods in Table 6 to Subpart ZZZZ of Part 63. The permittee is also required to report each instance in which they did not meet each emission limitation or operating limitation.

**Condition 29** The permittee is required to report each instance in which they did not meet the requirements in Table 8 to Subpart ZZZZ of Part 63.

**Condition 30** The permittee is required to meet the requirements in 40 CFR 63.6640(f)(1) through (4) in order for the engine to be classified as an emergency engine. If the permittee does not operate the engine according to those requirements, the engine will not be considered an emergency engine under Subpart ZZZZ and shall meet all requirements for non-emergency engines.

### **Notifications, Reports and Records**

**Condition 31** The permittee is required to keep records of notifications, reports, each occurrence and duration of each malfunction of operation or air pollution control equipment, maintenance, actions taken during malfunctions and to show continuous compliance.

**Condition 32** If the emergency stationary RICE does not meet the standards in Subpart ZZZZ applicable to non-emergency engines, the permittee is required to keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter.

**Condition 33** The permittee is required to comply with the applicable requirements of 40 CFR Part 63 Subpart A as shown in Table 8 to Subpart ZZZZ to Part 63.

The monitoring, recordkeeping and reporting that is included in these two sections pertaining to

the emergency diesel fire pump meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – Woodworking Operation (ES-WD)**

The woodworking equipment includes various sanders, saws, mills, molders, planers and hogs. This equipment is controlled by four fabric filters and closed loop cyclones on all wood transfer points. The pre-control particulate emissions for each of the fabric filters are less than the major source threshold; therefore, CAM does not apply. The woodworking equipment is included in the May 6, 1983 minor NSR permit. The equipment is also subject to 9 VAC 5 Chapter 40 Existing Stationary Source regulations in Article 17 – Emission Standards for Woodworking Operations (9 VAC 5-40-2250 et seq.).

### **Limitations**

**Condition 34** Particulate emissions from the woodworking process (ES-WD) are required to be controlled by closed loop cyclones and fabric filtration at all emission points.

**Condition 35** Particulate emissions from each particulate emission point of the woodworking process (ES-WD) is limited to 0.05 grains per standard cubic foot of exhaust gas.

**Condition 36** Visible emissions from each emission point associated with the woodworking process (ES-WD) is limited to 5 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.

### **Monitoring**

**Condition 37** The source is required to conduct daily visible emission evaluations on each fabric filter stack. If visible emissions are observed the source must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9.

**Condition 38** The source is required to develop a maintenance schedule and maintain records of all maintenance, have written operating procedures and to conduct training on those procedures.

### **Recordkeeping**

**Condition 39** The permittee is required to maintain records of all emission data and operating parameters necessary to show compliance. These records are include, but are not limited to: operation and control device monitoring records, scheduled and

unscheduled maintenance, operator training, and results of all stack tests, visible emission evaluations and performance tests.

The monitoring, recordkeeping and reporting that is included in this section meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

### **Process Equipment Requirements – Finishing and Adhesive Operations (ES-F & ES-SA)**

The finishing operations consist of spray booths with spray guns and are included in the May 6, 1983 minor NSR permit. The adhesive operations consist of one spray booth. The finishing and adhesive operations are included in the August 15, 2014 State Operating Permit and are subject to MACT JJ (See the MACT JJ section). The finishing and adhesive operations are also subject to the New and Modified Stationary Sources regulations (9 VAC 5-50-10 et seq.).

### **Limitations**

- Condition 40** Particulate emissions from the spray booths are required to be controlled by fiberglass filters, or equivalent.
- Condition 41** Emissions from the finishing process are limited to 500 lbs/hr and 350 tons/year of volatile organic compounds.
- Condition 42** HAP emissions from the wood office furniture manufacturing facility are limited to 9.5 tons per year of any individual HAP and 21.8 tons per year of any combination, calculated monthly as the sum of each consecutive 12 month period.
- Condition 43** Visible emissions from each finishing spray booth is limited to 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
- Condition 44** The source is required to implement work practice standards for the handling of volatile organic compounds in all of the finishing areas of the facility.

### **Monitoring**

- Condition 45** The source is required to conduct weekly visible emission evaluations on each finishing spray booth stack. If visible emissions are observed the source must either correct the issue so that no visible emissions are observed or conduct a VEE in accordance with EPA Method 9.

### **Recordkeeping**

**Condition 46** The permittee is required to maintain records of all emission data and operating parameters necessary to show compliance. These records are include, but are not limited to: annual throughput of VOC in tons, monthly and annual individual and total HAP emissions, scheduled and unscheduled maintenance, operator training, and results of all stack tests, visible emission evaluations and performance tests.

### **MACT Subpart JJ – Wood Furniture Manufacturing Operations**

The finishing and adhesive operations are subject to the requirements of 40 CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations as an existing source (commenced construction before the December 7, 1995 MACT applicability date). The permit includes all applicable requirements of Subpart JJ. Subpart JJ was revised on November 21, 2011. Revisions for wood furniture manufacturing operations include a 1 percent formaldehyde coating and contact adhesive limit and an alternative 400 pound per 12-month formaldehyde use limit as well as a prohibition on the use of conventional spray guns. The effective date for these requirements is 3 years from the effective date of the standards (November 21, 2014).

**Condition 47** The facility is required to be operated in compliance with the requirements of 40 CFR Part 63 Subpart JJ, including future revisions.

### **Emission Standard**

**Condition 48** Emission limitations for Volatile Hazardous Air Pollutants (VHAP) include a weighted average VHAP content limit, the requirement to use compliant finishing materials, cleaning operations strippable spray booth coating limits, compliant contact adhesives and formaldehyde limits.

### **Continuous Compliance**

**Condition 49** The source is required to show continuous compliance with the VHAP emissions limits.

### **Testing**

**Condition 50** Requires that any compliance testing be conducted using the test methods and procedures in Subpart JJ.

### **Submittals**

**Condition 51** Requires that all submittals regarding Subpart JJ be sent to both the EPA and DEQ.

### **Operations and Maintenance**

**Condition 52** The source is required to meet operational and maintenance requirements including operating and maintaining the facility in a manner consistent with good air pollution control practices for minimizing emissions and correcting malfunctions as soon as practicable.

### **Work Practice Standards**

**Condition 53** The source is required to develop and implement the work practice standards outlined in the permit including the following: Work Practice Implementation Plan, Operator Training Course, Inspection and Maintenance Plan, Cleaning and Washoff Solvent Accounting System, Chemical Composition of Cleaning and Washoff Solvents limits, Spray Booth Cleaning, Storage Requirements, Application Equipment Requirements, Line Cleaning, Gun Cleaning, Washoff Operations and Formulation Assessment Plan for Finishing Operations.

### **Recordkeeping**

**Condition 54** The source is required to maintain records for emission limit purposes, calculations, the work practice implementation plan, compliance certifications, records associated with the compliance status reports and semiannual reports.

### **Notification of Compliance**

**Condition 55** The source is required to submit notifications of compliance that are signed by a responsible official and the notification is required to include the methods that were used to determine compliance, the results of all performance tests, the methods used for determining continuing compliance, the type and quantity of hazardous air pollutants emitted, an analysis demonstrating whether the facility is a major source or an area source and a statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in the permit.

### **Reporting**

**Condition 56** The source is required to submit reports demonstrating continuous compliance and any exceedance of a baseline level.

The monitoring, recordkeeping and reporting that is included in these two sections for the finishing operations meet permit content obligations at 9 VAC 5-80-110 E & K and are considered sufficient to assure compliance with the limits included in this permit.

## **STREAMLINED REQUIREMENTS**

Condition 17 of the May 6, 1983 minor NSR Permit has been included in the Title V Permit (T5 11 and 38), however, the requirement to maintain records “for a period of up to two (2) years” has been streamlined by the more stringent requirement in 9 VAC 5-80-110 F that requires records to be maintained for at least 5 years.

The requirement to use a multicyclone in the May 6, 1983 minor NSR Permit has been streamlined with Condition 2 of the August 15, 2014 State Operating Permit. Both conditions require the use of a multicyclone. The Title V Condition (T5-1) includes the language from Condition 2 of the August 15, 2014 State Operating Permit that states “The multicyclone shall be provided with adequate access for inspection and shall be in operation when the boiler is operating.”

Condition 5 of the May 6, 1983 minor NSR Permit has been streamlined with Condition 3 of the August 15, 2014 State Operating Permit. Both conditions limit coal consumption in the B1 boiler to 900 tons per year. The Title V Condition (T5-2) includes the language from Condition 3 of the August 15, 2014 State Operating Permit that states that the limit be “calculated as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.”

Condition 7 of the May 6, 1983 minor NSR Permit has been streamlined with Condition 4 of the August 15, 2014 State Operating Permit. Both conditions limit wood consumption in the B1 boiler to 6,200 tons per year. The Title V Condition (T5-3) includes the language from Condition 4 of the August 15, 2014 State Operating Permit that states that the limit be “calculated as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.”

Conditions 8 (T5-83), 9 (T5-70), 12 (T5-94) and 13 (T5-88) of the August 15, 2014 State Operating Permit have been streamlined. The requirements contained in these four conditions are included in the General Conditions section of the Title V permit.

The corresponding Title V permit condition is included in parentheses above and the Title V permit conditions include the corresponding minor NSR permit condition in the citation.

The following conditions in the May 6, 1983 minor NSR Permit have not been included in the Title V Permit for the stated reasons:

- Conditions 8, 9, 10 and 14 because they are no longer applicable (these four conditions have been completed).
- Conditions 18, 19 and 20 because they are no longer applicable (these requirements were applicable prior to construction or initial operation).

## **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**

#### **Permit Expiration**

These conditions refer 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”.

#### **Failure/Malfunction Reporting**

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.

#### **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 70 and General Conditions 90-93. For further explanation see the comments in previous paragraph (Failure/Malfunction Reporting).

### **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.

### **STATE ONLY APPLICABLE REQUIREMENTS**

None

### **FUTURE APPLICABLE REQUIREMENTS**

None

### **INAPPLICABLE REQUIREMENTS**

Compliance Assurance Monitoring is not applicable to the equipment at the facility. The following pollution specific emission units (PSEU) have uncontrolled emissions less than 100 tpy or are not controlled: ES-WD (fabric filters with less than 100 tons pre-control emissions) and ES-B (Boiler B1– less than 100 tons pre-control emissions)

### **COMPLIANCE PLAN**

None

### **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.

Boiler B5 is an insignificant emission unit due to emission levels. The uncontrolled emissions of NO<sub>x</sub>, SO<sub>2</sub>, PM, VOC and CO are each less than 5 tons/year.

### **CONFIDENTIAL INFORMATION**

No confidential information request has been made. All portions of the Title V permit and application are available for public review.

## **PUBLIC PARTICIPATION**

The draft permit will be published in the *Roanoke Times* on September 19, 2014. The public comment period ran from September 19, 2014 to October 20, 2014. No comments were received. The EPA review period ended on November 3, 2014. No comments were received.

Attachment: 2013 Annual Emissions Update