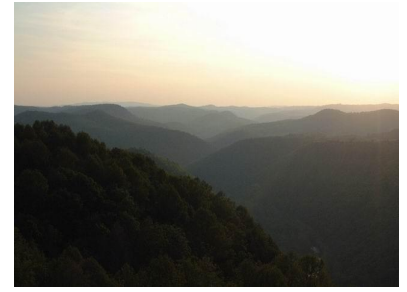


Public Meeting

concerning

W–L Construction & Paving, Inc. (Millville HMA Plant)



West Virginia Division of Air Quality

Virtual Public Meeting

Thornton E. Martin Jr. (Lee)

September 21, 2023



Presentation Outline

- **Introduction**
- **Permitting Process**
- **Project Overview**
- **DAQ Documents**
- **What Happens Next?**
- **Accessing Information**
- **Contact Information**



Permitting Programs

- Pre-construction Permits
 - Minor Source Program (45CSR13)
 - General Permits (EPA approved)
 - G20-C (Issued July 18, 2018)
 - Major Source in Attainment Areas (45CSR14)
“Prevention of Significant Deterioration” (PSD)
 - Major Source in Non-Attainment Areas (45CSR19)
- Post-Construction Operating Permit Program
 - Title V Process
 - Major Source (Permit) vs. Minor Source (No Permit)
 - 45CSR30



Minor Source Permitting Program

- Applicable to new “minor sources” of air pollution
 - Administered under West Virginia Legislative Rule 45CSR13
- 45CSR13 Permitting Process: What it does do:
 - Determine/enforce compliance with state/federal air quality rules and regulations
 - Determine/enforce compliance with facility’s air emissions
 - Provide framework of public notification/participation
- 45CSR13 Permitting Process: What it does not do:
 - Take into consideration any other important but non-air quality benefits/impacts such as jobs, property values, traffic, zoning, national energy issues, economics of project, infrastructure, archeology, or public support (or lack thereof) etc.
 - Require or prohibit the location of facilities in any particular area.
 - Address non-air quality environmental impacts (eg water).



Permitting Process

- Company applies for a general permit through ESS and publishes a legal ad, beginning a 30-day public comment period.
- Application is reviewed for completeness and company is notified of any deficiencies.
- Application undergoes a technical review to determine which air quality rules apply, and if the proposal meets those rules



Permitting Process (cont'd)

- If the proposed project meets all applicable air quality rules, DAQ notifies the Company that the application has been deemed Complete.
- After the close of the comment period, all comments received are reviewed and addressed by the DAQ and a final decision is made.
- All documents can be found under “Popular Searches” at:
<https://dep.wv.gov/daq/permitting/Pages/NSR-Permit-Applications.aspx>



Project Overview

Millville HMA Plant

Proposed Equipment (G20-C041)

2005 Astec Model RDB-8437 Drum Mixer
Cold Feed Bins (Aggregate & Sand)
Vibrating Screen
14 Conveyors
3 Drag Links
1 Auger Conveyor
1 Recycled Asphalt Pavement (RAP) Crusher
1 RAP Screen
9 Open Stockpiles
3 Asphalt Silos
Cement Tank Heater 2.115 MMBtu/hr
4 Storage Tanks

Equipment to be Removed (R13-1121A)

1968 Hetherington & Berner Rotary Dryer
Vibrating Screen
Weigh Hopper
Cold Feed Belt Conveyor
Pre-Collector
Bucket Elevator
Screw Conveyor
Auger
3 Slat Conveyors
5 Open Stockpiles
Cold Feed Bins
3 Silos
Natural Gas Heater 2.0 MMBtu/hr
2 Storage Tanks



Equipment Specifics

Millville HMA Plant

Equipment to be installed:

2005 Astec Model RDB-8437 7' x 37' Double
Barrel Drum Mixer
Hauck Starjet SJ-580
Combination oil/gas burner
120 MMBtu/hr
(870 gal/hr No.2FO, 863 gal/hr UO)
2,800 Hours/Year

350 TPH / 250,000 TPY
Maximum Production

2 MMBtu/hr Asphalt Heater (No. 2FO)

Location: Latitude/Longitude
39.29680 N / 77.79510 W

Equipment to be removed:

1968 Hetherington & Berner Rotary Dryer
Hauck SJ04520E
No. 2 Fuel Oil only
1,800 Hours/Year

180 TPH / 150,000 TPY
Maximum Production

2.115 MMBtu/hr Asphalt Heater (NG)

Location: Latitude/Longitude
39.28420 N / 77.79450 W



Proposed Emissions

Millville HMA Plant

Estimated Emissions: G20-C041

Pollutant ¹	Facility Total ²	
	(lb/hr)	(tpy)
PM-TSP	62.02	51.52
PM ₁₀	19.54	16.06
PM _{2.5}	3.14	3.71
CO	47.70	17.23
SO ₂	21.43	10.49
NOx	19.62	7.94
VOC	29.65	10.62
Benzene	0.14	0.05
Ethylbenzene	0.10	0.04
Toluene	1.03	0.37
Xylene	0.12	0.05
Formaldehyde	1.21	0.43
Total HAPs	3.79	1.36

Maximum Allowed
for Minor Source
(tpy)

Criteria Pollutant
< 100 tpy
or < 250 tpy

Individual HAP
< 10 tpy

Combined HAP
< 25 tpy

¹ The individually speciated HAPS listed are based on DAQ's G20 permit application. HAP emission factors taken from AP-42 Table 11.1-10 with the highest emission factor from No. 2 fuel, and waste oil-fired dryers used.

² Fugitive emissions are to be included for determining whether facility is a major source [§45-30-2.26.b.28.]



Minor Source Emissions

Millville HMA Plant

Jefferson County, West Virginia is classified as 'Attainment' for all criteria pollutants;

Minor Source level emissions for Criteria Pollutants and HAP's do not trigger the requirement for Modeling to determine concentration level increases. Only a Major Source or modification resulting in Major Source level emissions trigger the modeling requirements.

It is typical for an Applicant to over-estimate their emissions to reduce the chance of a violation later on. This is the case with the Stockpile emissions for this facility. The footprint defined will allow for storage of an amount far greater than anticipated production which inflates the estimated emissions.

Also, the equation for stockpile emissions is referenced incorrectly in the Application. The equation used is correct for estimating stockpile emissions. The reference source is actually the Air Pollution Engineering Manual.



Proposed Location

Millville HMA Plant



WVDAQ Documents

- Engineering Evaluation/Fact Sheet
 - Rationale document for Preliminary Determination.
- Draft General Permit
 - Includes operating restrictions, emission limitations and monitoring, testing, recordkeeping and reporting requirements.
 - Enforces the potential-to-emit (PTE) upon which we based our Preliminary Determination to approve.



Engineering Evaluation/Fact Sheet

- Administrative information.
- Description of proposed facility/emission units.
- Discussion of emission calculations.
- Quantifies proposed emissions per pollutant.
- Applicability and compliance with federal regulations and state air quality rules.



General Permit Requirements (G20-C)

- Source-Specific Requirements
 - Hot Mix Asphalt Plants
 - Limitations and Standards
 - Monitoring Requirements
 - Recordkeeping Requirements
 - Reporting Requirements
 - Testing Requirements
 - Small Heaters and Boilers not subject to 40CFR60 Subpart Dc
 - Limitations and Standards
 - Monitoring Requirements
 - Testing Requirements
 - Recordkeeping Requirements



General Permit Requirements (cont'd)

- Source-Specific Requirements [Hot Mix Asphalt Plants]
 - Limitations and Standards
 - Maximum Production Rate
 - Annual Production Limit
 - Limitation for Particulate Matter (PM)
 - Limitation for PM from RAP Systems
 - Multiple Stacks
 - PM Capture Systems and Prevention of Emissions
 - Minimization of Fugitive Emissions, Methods and Required Systems
 - Burner, Dryer and Drum Mixer Limitation, Operation and Design
 - Fuel Type
 - Recycled or Used Oil
 - Allowable Materials
 - Recycled Asphalt Paving
 - Storage Tanks
 - Maintenance of Air Pollution Control Equipment



General Permit Requirements (cont'd)

- Source-Specific Requirements [Small Heaters and Boilers not subject to 40CFR60 Subpart Dc]
 - Limitations and Standards
 - Maximum Design Heat Input must be < 10 MMBtu/hr
 - Allowable fuels for the small heaters and boilers are natural gas, diesel fuel, and other distillate fuel oils. Recycled or used oils are not allowable fuels for small heaters and boilers.
 - No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six-minute block average.
 - Monitoring Requirements
 - At such reasonable times as the Secretary may designate, the registrant shall conduct Method 9 emission observations for the purpose of demonstrating compliance with permit condition 8.1.3. Method 9 shall be conducted in accordance with 40 CFR 60 Appendix A.
 - Testing Requirements
 - Upon request by the Secretary, compliance with the visible emission requirements of permit condition 8.1.3. shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 or by using measurements from continuous opacity monitoring systems approved by the Secretary.
 - Recordkeeping Requirements
 - The registrant shall maintain records of all monitoring data required by permit condition 8.2.1. documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned.



What Happens Next?

- Comment period has been extended and scheduled to conclude at 5:00 pm on Friday, September 22, 2023.
- Prior to a final determination, the DAQ will evaluate and respond to timely comments that are relevant to air quality issues.
- DAQ will make a Final Determination pursuant to the requirements §45-13-5.7.
- The Final Determination will be available in same locations as Engineering Evaluation/Fact Sheet and Draft General Permit.
- Important to note: NO FINAL DECISION HAS BEEN MADE
 - A DRAFT general permit has been developed and posted for public review. The company is NOT permitted to construct and operate until a final decision has been made, and a final permit issued.



ESS Public Query

<https://dep.wv.gov/Data/Pages/default.aspx>

The screenshot shows a web browser window with the URL https://apps.dep.wv.gov/webapp/_dep/securearea/public_query/ePermittingApplicationSearchPage.cfm. The page features the DEP logo and the text "west virginia department of environmental protection". The main heading is "e-Permitting Applications Search".

The search interface includes the following fields and controls:

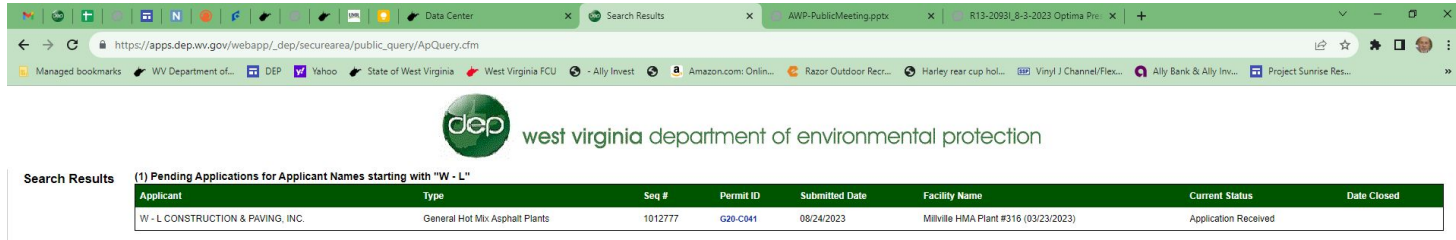
- Select Office:** A dropdown menu with "Air Quality" selected.
- Select App Status:** A dropdown menu with "Open Applications" selected, accompanied by "Go" and "Reset" buttons.
- Identify Applicant:** A section with the instruction "(Enter 3 or more characters of Name or * for all)". It contains a text input field with "W - L", a "starting with" dropdown menu, and "Go" and "Reset" buttons.
- Permit Number:** A text input field with "Go" and "Reset" buttons.
- County Name:** A dropdown menu with "Jefferson" selected, accompanied by "Go" and "Reset" buttons.

At the bottom of the page, there is a footer with the text: "Lucee | Privacy, Security and Accessibility | WV.gov | USA.gov | © 2017 State of West Virginia".



E-Permitting Applications Search

https://apps.dep.wv.gov/webapp/_dep/securearea/public_query/ApQuery.cfm



The screenshot shows a web browser window with the URL https://apps.dep.wv.gov/webapp/_dep/securearea/public_query/ApQuery.cfm. The browser's address bar and tabs are visible at the top. Below the browser, the DEP logo and the text "west virginia department of environmental protection" are displayed. The main content area shows search results for "Pending Applications for Applicant Names starting with 'W - L'". A table with 8 columns (Applicant, Type, Seq #, Permit ID, Submitted Date, Facility Name, Current Status, Date Closed) contains one row of data.

Applicant	Type	Seq #	Permit ID	Submitted Date	Facility Name	Current Status	Date Closed
W - L CONSTRUCTION & PAVING, INC.	General Hot Mix Asphalt Plants	1012777	G29-C041	08/24/2023	Milville HMA Plant #316 (03/23/2023)	Application Received	

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Application G20-C041

https://apps.dep.wv.gov/webapp/_dep/securearea/Application/AppIndex.cfm

The screenshot shows a web browser window displaying the DEP electronic submission system. The browser's address bar shows the URL: https://apps.dep.wv.gov/webapp/_dep/securearea/Application/AppIndex.cfm. The page header features the DEP logo and the text "electronic submission system" and "section list".

On the left side, there is a sidebar with navigation options: Attachments, Comments, Activities, Print, Progress, and Milestones. Below these is an "App Search" field. A note states: "The items listed to the right make up the application. By clicking on each item, you can fill out the required form and submit your application for approval."

The main content area is divided into two columns. The left column lists application sections with checkboxes and expandable icons:

- INTRO:**
- G20:**
 - APP1:
 - APP2:
 - APP3:
 - APP4:
 - APP5:
 - APP6:
 - LOC:
- ALTLOC:**
- SSD:**
- SCW:**
- CBC:**
- PFD:**
- PD:**
- AM:**
- PP:**
- SAF:**
- HMA:**
 - HMA:
- CYL:**
- BH:**
- BG:**
- SH:**
 - SH:
 - SH:
 - SH:
 - SH:
 - SH:
- HEAT:**
 - HEAT:
- STDT:**
- STDT:**
- HR:**
- HR:**

The right column displays the expanded content for the selected section, "Introduction to General Permit G20 Application - START HERE". It includes a link to "Introduction to General Permit G20 Application" and a list of sub-sections under "General Permit Registration Application":

- Application Type
- General Information
- Responsible Official
- Authorized Representative
- Environmental Contact
- Operating Site Information
- Facility Location
- Alternate Facility Location
 - Single Source Determination
 - Siting Criteria Waiver
 - Current Business Certificate
 - Process Flow Diagram
 - Process Description
 - Area Map
 - Plot Plan
 - Section Applicability Form
- Hot Mix Asphalt Plant
 - Hot Mix Asphalt Plant -- DBDM1
- Cyclone
- Baghouse
 - Baghouse -- APCD1 and APCD2
- Storage and Handling
 - Storage and Handling -- OS1-OS8
 - Storage and Handling -- OS9
 - Storage and Handling -- B1-B6
 - Storage and Handling -- B7 and B8
 - Storage and Handling -- B1-B13
- Heaters and Boilers
 - Heaters and Boilers -- AH1
- Storage Vessel Data Sheet
 - Storage Tank Data Table
- Haulroad
- Haulroad

At the top right of the main content area, the following information is displayed:

Applicant: W - I CONSTRUCTION & PAVING, INC.
Type: General Hot Mix Asphalt Plants
Permit No.: G20-C041



DEP Email Notification Service

Sign up for DEP's e-mail notification service at

<https://dep.wv.gov/insidedep/Pages/DEPMailingLists.aspx> or write to:

DEP Public Information Office
Public Notice List
601 57th Street, S.E.
Charleston, WV 25304

You have the option to receive notices of activities by county or statewide.



Contact Information

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Additional Comments can be e-mailed to thornton.e.martin@wv.gov with “Millville HMA Plant Comments” in the subject line.

