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**west virginia department of environmental protection**

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Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: 304/926-0475 • Fax: 304/926-0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

**MEMORANDUM**

To: Beverly D. McKeone, PE

From: Steven R. Pursley, PE *SRP*

Date: March 28, 2016

Subject: R14-0030B

On December 21, 2015, Moundsville Power, LLC submitted a request for a class II administrative update to permit R14-0030A. The original submittal contained request for two changes:

1. **Startup and Shutdown** - Moundsville requested a revision to the startup and shutdown provisions in Section 4.1.3 of the air permit to improve operational flexibility. The current permit lists permitted emissions from each type of startup (hot, warm and cold) and shutdown and then limits the number of each of those events that may occur in a year. The permit then sums those emission limits to obtain a total annual emission limit. Moundsville's requested change would remove the specific limit on the number of each type of event while retaining the resulting annual emission limit. For example, under the current permit, if Moundsville had one cold start and 97 warm starts during a given 12 months they would be in violation of the permit (because the permit limits cold starts to 8/year and warm starts to 96/year) even though the resulting total emissions (of NO<sub>x</sub> for example) would be 296 pounds less than what would result if they operated in compliance with the permit and had 8 cold starts and 96 warm starts. Therefore, the permit was revised to eliminate the column limiting the number of each specific event per year. Additionally, the corresponding annual emission limits for each specific type of event were removed. However, the total annual emission limit was retained.
2. **Ethane Mix** - Moundsville initially requested that DAQ revise the existing permit to increase the permitted amount of ethane use from 25% of fuel by volume to 50%. However, during a phone conversation on March 16, 2016 Moundsville withdrew this request.