

July 7, 2016

CERTIFIED MAIL

Ms. Beverly D. McKeone
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, WV 25304-2345

**Re: Monongahela Power Company
Harrison Power Station
R13-2988A Class I Administrative Update**

Dear Ms. McKeone:

In response to the telephone conversation and subsequent follow-up email correspondence on June 3, 2016 between James Lefik and John Legg (copy enclosed), this correspondence serves as a request for a Class I Administrative Amendment to permit number R13-2988A that was issued on May 25, 2016 for the Refined Coal Facility to be installed at the Harrison Power Station.

Enclosed is a list of specific items that will need revision based upon review of the issued permit. In addition, copies of the pertinent permit pages with the items redlined for your review and consideration are also enclosed. As per John Legg, he also suggested that you assign this request to him for expediency since he is most familiar with the permit's terms and conditions.

If you have any questions or need additional information at this time, please contact me by telephone at (304) 584-2233, or by email at gdinzeo@firstenergycorp.com.

Sincerely,

Gary J. Dinzeo
Director, Harrison Power Station

Refined Coal Permit #R13-2988A

Revision List



1. **Page 13, Section 4.0, Source-Specific Requirements:** For clarification, we request that the red font notation on the enclosed Page 13 be added under Condition 4.1 to indicate that all conditions and references to 40 CFR Part 60, Subpart Y are not applicable to the refined coal process. These conditions and requirements are intended for the Rapid Discharge Rail Unloader (RDRU) process which has yet to be installed, as noted in the permit.
2. **Page 14, Condition 4.1.4:** The total annual throughput of coal for the RDRU facility is incorrectly listed as 500,000 tons per year, which was also incorrect in the original permit #R13-2988. This throughput should be revised to 5,000,000 tons per year for consistency to Title V Operating Permit R30-03300015-2015 Condition 8.1.4, and the original R13-2988 application (copy of cover letter attached for reference).
3. **Page 17, Condition 4.1.13:** change the word “either” to “any” since there are three main boilers at Harrison.
4. **Page 17, Condition 4.1.13.c:** Change the word ‘urea’ to “ammonia” (3 separate places). Harrison does not use urea in its catalysts.
5. **Page 19, Conditions 4.2.2 through 4.2.5:** The numbering of these conditions needs revised as noted in the enclosed redlined permit Page 19 since there is already a Condition 4.2.2 on the previous page, Page 18.
6. **Page 20, Condition 4.3.4:** Add the phrase “Rapid Discharge Rail Unloading” prior to the word “facility” as noted on the enclosed redlined permit Page 20 to clarify that the 5,000,000 tons per year limit applies only to the amount of coal to be unloaded by the RDRU.

Lefik, James A

From: Legg, John C <John.C.Legg@wv.gov>
Sent: Friday, June 03, 2016 11:49 AM
To: Lefik, James A
Subject: WVDEP DAQ Permit R13-2988A - Monongahela Power Company (033-00015); Harrison Station; Haywood, WV
Attachments: example.pdf

Mr. Lefik,

I spoke with my boss Beverly McKeone after our conversation this morning.

She want me to make sure that:

- You mention in your cover letter that your submission is for a Class I Administrative Update and
- A responsible official for your company must sign off on the submission.

I have attached a recent submission by another company that should serve as an example.

Sincerely,

John

From: Lefik, James A [mailto:jlefik@firstenergycorp.com]
Sent: Thursday, March 31, 2016 6:35 AM
To: Legg, John C <John.C.Legg@wv.gov>; Dinzeo, Gary J <gdinzeo@firstenergycorp.com>
Cc: Swanson, J. Charles <swansonc@firstenergycorp.com>
Subject: RE: WVDEP DAQ Permit Application R13-2988A - Monongahela Power Company (033-00015); Harrison Station; Haywood, WV

Mr. Legg,

The affidavit was submitted along with the \$300 check on February 10, 2016. I have scanned a copy of that correspondence here. Let me know if you need any additional information.

Thanks,

James A. Lefik
Engineer IV
FirstEnergy Corp., Environmental Dept.
800 Cabin Hill Drive
Greensburg, PA 15601
Phone: (724) 838-6136 (Internal 350-6136)
FAX: (234) 678-2384

From: Legg, John C [mailto:John.C.Legg@wv.gov]
Sent: Wednesday, March 30, 2016 3:59 PM

CERTIFIED MAIL

91 7199 9991 7090 5299 6672

April 6, 2012

Mr. John A. Benedict, Director
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

**RE: Allegheny Energy Supply Company, LLC
Harrison Power Station
Application for NSR Permit – Rapid Discharge Railcar Unloading System**

Dear Mr. Benedict:

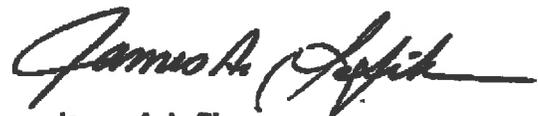
Enclosed please find an original and three (3) copies of the Application for NSR Permit Title V Revision Form for the planned installation of a Rapid Discharge Railcar Unloading (RDRU) system at the Harrison Power Station located in Haywood, West Virginia. Also enclosed are two (2) separate checks in the amount of \$1,000.00 each to cover the cost of the 45CSR13 application fee, and the NSPS fee.

As detailed in the application, the project will involve the removal of the existing rotary dumper and the installation of the RDRU and associated conveyors, stacking tube, and transfer points. The system will have the capability of handling 3,000 tons of coal per hour, and 5,000,000 tons of coal per year. The coal will be unloaded to either the existing crusher, or be directed to a new radial stacker into the existing coal pile. As detailed in the application, the potential particulate emissions increase due to the operation of the RDRU is relatively minor and well below the thresholds for PSD applicability. The original Affidavit of Publication from the Class I Legal Ad (Public Notice) will be submitted separately once it has been received.

I certify that, to the best of my knowledge and belief the statements and information contained in these reports are true, accurate, and complete.

If you have any questions or require additional information, please contact me at (724) 838-6136.

Sincerely,



James A. Lefik
Environmental Engineer

Bc: (w/o enclosures)
J. E. Graf – WV-HRPS
J. Filipek – G-CH
M. A. Sowa – G-CH
M. J. Jirousek – A-GO-13
E. V. Howell – WV-HRPS

(w/enclosure)
File – Harrison Permit Applications

ALL CONDITIONS UNDER THIS SECTION WITH CITATIONS FROM 40 CFR PART 60, SUBPART Y, "STANDARDS OF PERFORMANCE FOR COAL PREPARATION AND PROCESSING PLANTS" APPLY ONLY TO THE RAPID DISCHARGE RAIL UNLOADING SYSTEM, WHICH IS YET TO BE INSTALLED.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Emissions from activities permitted herein shall not exceed the following when handling Powder River Basin Coal:

	PM		PM ₁₀		PM _{2.5}	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Railcar Unloading	0.66	0.45	0.31	0.22	0.05	0.04
Coal Load-in	3.27	2.25	1.55	1.07	0.24	0.17
Coal Storage Pile	0.43	0.06	0.22	0.03	0.09	0.01
Coal Load-out	9.14	6.28	2.12	1.46	0.21	0.14
Conv. Transfer Points	1.31	1.35	0.62	0.64	0.10	0.10
Total	14.81	10.39	4.82	3.42	0.69	0.46

4.1.2. Emissions from activities permitted herein shall not exceed the following when handling Illinois Basin Coal:

	PM		PM ₁₀		PM _{2.5}	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Railcar Unloading	0.80	0.55	0.38	0.26	0.06	0.04
Coal Load-in	3.97	2.74	1.88	1.30	0.29	0.20
Coal Storage Pile	0.21	0.06	0.11	0.03	0.05	0.01
Coal Load-out	4.52	3.11	0.86	0.59	0.10	0.07
Conv. Transfer Points	1.59	1.64	0.76	0.78	0.12	0.12
Total	11.09	8.1	3.99	2.96	0.62	0.44

4.1.3. In no case shall annual emissions exceed the following:

	PM	PM ₁₀	PM _{2.5}
	TPY	TPY	TPY
Total	10.39	3.42	0.46

5,000,000

- 4.1.4. The facility's annual throughput of total coal shall not exceed 500,000 tons per year. Compliance with this limit shall be based on a 12 month rolling total.
- 4.1.5. No person shall cause, suffer, allow or permit any source of fugitive particulate matter to operate that is not equipped with a fugitive particulate matter control system. This system shall be operated and maintained in such a manner as to minimize the emission of fugitive particulate matter.
[45CSR§2-5.1.]
- 4.1.6. On and after the date on which the performance test is conducted or required to be completed under §60.8, whichever date comes first, an owner or operator of any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified after April 28, 2008, must meet the requirements in paragraphs (b)(1) through (3) of this section, as applicable to the affected facility.
[40CFR§60.254(b)]
- (1) Except as provided in paragraph (b)(3) of this section, the owner or operator must not cause to be discharged into the atmosphere from the affected facility any gases which exhibit 10 percent opacity or greater.
[40CFR§60.254(b)(1)]
 - (2) The owner or operator must not cause to be discharged into the atmosphere from any mechanical vent on an affected facility gases which contain particulate matter in excess of 0.023 g/dscm (0.010 gr/dscf).
[40CFR§60.254(b)(2)]
 - (3) Equipment used in the loading, unloading, and conveying operations of open storage piles are not subject to the opacity limitations of paragraph (b)(1) of this section.
[40CFR§60.254(b)(3)]
- 4.1.7. Fugitive Coal Dust Emissions Control Plan for Subpart Y - Fugitive Coal Dust Emissions Control Plan. The owner or operator of an open storage pile, which includes the equipment used in the loading, unloading, and conveying operations of the affected facility, constructed, reconstructed, or modified after May 27, 2009, must prepare and operate in accordance with a submitted fugitive coal dust emissions control plan that is appropriate for the site conditions as specified in paragraphs (c)(1) through (6) of this section.
[40CFR§60.254(c)]
- (1) The fugitive coal dust emissions control plan must identify and describe the control measures the owner or operator will use to minimize fugitive coal dust emissions from each open storage pile.
[40CFR§60.254(c)(1)]
 - (2) For open coal storage piles, the fugitive coal dust emissions control plan must require that one or more of the following control measures be used to minimize to the greatest extent practicable fugitive coal dust: Locating the source inside a partial enclosure, installing and operating a water spray or fogging system, applying appropriate chemical dust suppression agents on the source (when the provisions of paragraph (c)(6) of this section are met), use of a wind barrier, compaction, or use of a vegetative cover. The owner or operator must select, for inclusion in the

AMMONIA
that urea injection to the selective catalytic reduction system must be discontinued due to low flue gas temperature to avoid damaging the catalyst. Low flue gas temperature conditions shall mean when the temperature of the flue gas is less than 605°F during any operating hour and this time shall be excluded from the operating day for the purpose of averaging. An operating day shall mean a calendar day in which either boiler is operated for at least one hour.

- ANY*
- a. The NOx emission rate shall not exceed 0.25 lb/mmbtu on a 30 day rolling average; and
- b. Beginning the 30 day period that commences on May 1 and ends on May 30 and for each succeeding 30 day period through September 30, the NOx emission rate shall not exceed ⁽¹⁾0.20 lb/mmbtu.
- (1) But for the following one-time exception for Unit 2 boiler only, during the five (5), consecutive 30 day periods of May through September 2016, preceding and during a catalyst replacement: The NOx emission rate shall not exceed 0.28 lb/mmbtu on a 30 day rolling average.

AMMONIA c. The permittee shall monitor the catalyst flue gas temperature and record it as rolling block hourly averages. The recorded information shall include the date, hour, catalyst flue gas temperature, urea flow and an indicator that shows if the urea flow has been discontinued due to low flue gas temperature. *AMMONIA*

d. The permittee shall maintain on-site the records required in 4.1.13.c. for a period of five (5) years. Such records may be in electronic form but must be available for inspection by designated agents of the DAQ and exportable to standard database/spreadsheet formats.

4.1.14. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Testing Requirements

4.2.1. The permittee shall comply with all applicable standards of 40 CFR 60 Subpart Y including but not limited to the following:

Performance Tests and Other Compliance Requirements for Subpart Y - Performance Tests. An owner or operator of each affected facility that commenced construction, reconstruction, or modification after April 28, 2008, must conduct performance tests according to the requirements of §60.8 and the methods identified in §60.257 to demonstrate compliance with the applicable emission standards in Subpart Y as specified in paragraphs (b)(1) and (b)(2) of this section.
[40CFR§60.255(b)]

(2) For each affected facility subject to an opacity standard, an initial performance test must be performed. Thereafter, a new performance test must be conducted according to the requirements in

image every 15 seconds for 10-minute periods (during normal operation) every operating day. An approvable monitoring plan must include a demonstration that the occurrences of visible emissions are not in excess of 5 percent of the observation period. For reference purposes in preparing the monitoring plan, see OAQPS "Determination of Visible Emission Opacity from Stationary Sources Using Computer-Based Photographic Analysis Systems." This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality and Planning Standards; Sector Policies and Programs Division; Measurement Group (D243-02), Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network (TTN) under Emission Measurement Center Preliminary Methods. The monitoring plan approved by the Administrator delegated authority shall be implemented by the owner or operator.

[40CFR§60.255(f)(2)]

- 4.2.3. 4.2.2. The permittee shall perform daily monitoring and recordkeeping of the total daily sorbent usage rate, and records of startups, shut-downs, malfunctions, and maintenance of the Refined Coal System. Daily records maintained in accordance with this paragraph shall be available upon request at the facility.
- 4.2.4. 4.2.3. In order to determine compliance with condition 4.1.9, the permittee shall monitor and record the amount of S-Sorb delivered to the facility on a daily basis.
- 4.2.5. 4.2.4. In order to determine compliance with condition 4.1.12, the permittee shall monitor and record the amount of MerSorb delivered to the facility on a daily basis.
- 4.2.6. 4.2.5. In order to determine compliance with condition 4.1.13, the permittee shall install, certify, operate and maintain continuous emissions monitoring systems (CEMS). Said CEMS shall be designed, installed, operated and maintained in accordance with 40 CFR 75 as applicable.

4.3. Monitoring and Recordkeeping Requirements

- 4.3.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- The date, place as defined in this permit and time of sampling or measurements;
 - The date(s) analyses were performed;
 - The company or entity that performed the analyses;
 - The analytical techniques or methods used;
 - The results of the analyses; and
 - The operating conditions existing at the time of sampling or measurement.
- 4.3.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

4.3.3. Record of Malfunctions of Air Pollution Control Equipment. For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

4.3.4. In order to determine compliance with the throughput requirement of section 4.1.4 of this permit the permittee shall monitor and record the amount of total coal processed through the facility on a monthly basis.

*RAPID DISCHARGE RAIL
UNLOADING*

4.3.5 In order to determine compliance with the requirements of sections 4.2.1 and 4.2.2 of this permit, records of the Method 22 and/or Method 9 testing shall be retained on site by the permittee for at least five (5) years. Upon request the records shall be certified and made available to the Director or his/her duly authorized representative.

4.4. Reporting Requirements

4.4.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation using 40CFR Part 60, Appendix A, Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.