



west virginia department of environmental protection

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

Earl Ray Tomblin, Governor
Randy C. Huffinan, Cabinet Secretary
www.dep.wv.gov

MEMORANDUM

To: Beverly D. McKeone, PE
From: Steven R. Pursley, PE *SAP*
Date: July 27, 2016
Subject: R14-0030C

On August 14, 2015 the West Virginia Department of Environmental Protection, Division of Air Quality, issued permit R14-0030A to Moundsville Power, LLC for a Class II Administrative Update, natural gas fired, combined cycle power plant. On November 19, 2015, The "Ohio Valley Jobs Alliance" appealed certain conditions in the permit to the West Virginia Air Quality Board. On July 18, 2016, a final order was issued by the Air Quality Board which required WVDAQ to make one change to permit R14-0030B. That change was to reduce the increase in PM_{2.5} emissions from 11.76 tons per year to "a value less than the 10 tons per year threshold....".

The original permit (R14-0030) limited emissions from the combined turbines/HRSG units to 67.4 tons per year. R14-0030A originally increased emissions to 79.15 tons per year (an 11.75 tpy increase.) Additionally, R14-0030 increased emissions from the fire pump engine from 0.03 to 0.04 tpy (a 0.01 tpy increase.) Together, these increases resulted in the 11.76 tpy increase referenced by the AQB. In order to reduce the emissions to "a value less than 10 tons per year", R14-0030C will decrease the emission limits from the combined turbine/HRSG units from 79.15 tons per year to 77.38 tons per year. This represents a 9.98 tpy increase from the turbine/HRSG units, which when combined with the 0.01 tpy increase from the fire pump engine, results in an overall PM_{2.5} emissions increase of 9.99 tons per year.

The method of determining compliance with the limit shall remain the same. Testing is required to verify compliance with the hourly limit. The hourly limit shall then be multiplied by the number of steady state operating hours. Finally, appropriate startup and shutdown emissions (as outlined in the permit) will be added. Note that the new annual limit is still EXTREMELY conservative as it represents the two turbine/HRSG units operating 24 hours per day each for more than 362 days per year.