



Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Virginia Electric & Power Company	Facility:	Mt. Storm
Region:	7	Plant ID:	023-00003
Application #:	13-3299		
Engineer:	Pursley, Steve	Category:	Power Plt
Physical Address:	436 Dominion Boulevard Mt. Storm WV 26739-8632	SIC: [4911] ELECTRIC, GAS AND SANITARY SERVICES - ELECTRIC SERVICES NAICS: [221112] Fossil Fuel Electric Power Generation	
County:	Grant		
Other Parties:	ENV_CONT - Gates, Andy 804-273-2950 DIRECTOR - Balkus, Peter 804-273-3740		

Information Needed for Database and AIRS
 1. Need valid physical West Virginia address with zip

Regulated Pollutants

Summary from this Permit 13-3299		
Air Programs	Fee	Applicable Regulations
Fee Program	\$1,000.00	Application Type CONSTRUCTION

Notes from Database

Activity Dates

APPLICATION RECEIVED	02/24/2016
APPLICATION FEE PAID	02/25/2016
ASSIGNED DATE	02/25/2016

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 023-00003
 Company: Virginia Electric & Power Comp
 Printed: 02/25/2016
 Engineer: Pursley, Steve

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name VEPCO

Permitting Action Number 13-3299 Total Days 106 DAQ Days 77

Permitting Action:

- | | | |
|---|------------------------------------|---|
| <input type="radio"/> Permit Determination | <input type="radio"/> Temporary | <input checked="" type="radio"/> Modification |
| <input type="radio"/> General Permit | <input type="radio"/> Relocation | <input type="radio"/> PSD (Rule 14) |
| <input type="radio"/> Administrative Update | <input type="radio"/> Construction | <input type="radio"/> NNSR (Rule 19) |

Documents Attached:

- | | |
|--|--|
| <input checked="" type="radio"/> Engineering Evaluation/Memo | <input type="radio"/> Completed Database Sheet |
| <input checked="" type="radio"/> Draft Permit | <input type="radio"/> Withdrawal |
| <input checked="" type="radio"/> Notice | <input type="radio"/> Letter |
| <input type="radio"/> Denial | <input type="radio"/> Other (specify) _____ |
| <input type="radio"/> Final Permit/General Permit Registration | _____ |

Date	From	To	Action Requested
6-9-16	Steven Pursley	Bev	Please Review
6/17	Bev	Steve	Public Notice missing - Go to Notice
			Entire Document NON-CONFIDENTIAL

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).



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. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-3299
Plant ID No.: 023-00003
Applicant: Virginia Electric & Power Company
Facility Name: Mt. Storm
Location: Grant
NAICS Code: 221112
Application Type: Construction
Received Date: February 24, 2016
Engineer Assigned: Steven R. Pursley, PE
Fee Amount: \$1,000.00
Date Received: February 25, 2016
Complete Date: March 24, 2016
Due Date: June 22, 2016
Applicant Ad Date: February 23, 2016
Newspaper: *The Grant County Press*
UTM's: Easting: 649.85 Northing: 4,340.00 Zone: 17
Description: Installation of a fly ash separation process.

DESCRIPTION OF PROCESS

Virginia Electric and Power Company (Dominion) proposes to install and operate a process for separating the fly ash generated at the Mt. Storm Power Station. This process would be constructed, owned, and operated by a third-party, Separation Technologies LLC (ST) on the Mt. Storm property.

The project consists of a process to separate high-carbon fly ash from low-carbon fly ash. The mineral content ash (ProAsh®) will be used as a supplementary cementitious product for ready mix concrete. The high-carbon fly ash (EcoTherm®) may be returned to the boilers as fuel (which will off-set the use of some virgin coal fuel and subsequently create a higher mineral content ash that can be recovered through the separation process) or it may continue to be trucked to the landfill. Capturing and beneficially reusing both the mineral and high-carbon content ash has the benefit of minimizing the amount of fly ash

that will need to be landfilled. Currently, all of the ash generated by Mt. Storm is landfilled. This project will not affect the generation or disposal of bottom ash (the ash that forms in the bottom of the boilers and is not entrained in the boiler exhaust).

Initially, a single separator will be installed to process ash from Units 1 and 2, which will utilize approximately half of the plant total fly ash production. Subsequently a second separator will be installed, increasing the capacity to process all of the fly ash produced from Units 1, 2 and 3.

Project Description

The Mt. Storm Power Station is a coal-fired electric power generating facility that generates ash and other byproducts (such as gypsum) from its operation. Most of these byproducts are currently placed in an on-site landfill that was designed for this purpose. Two general categories of ash are produced by the boilers: fly ash (so called because it becomes airborne in the combustion process) and bottom ash (which forms in the bottoms of the boilers and does not become airborne). This application is only concerning the fly ash portion of these byproducts.

Fly ash has long been used as a substitute for Portland cement. Fly ash is a good substitute or admixture with cement as long as the carbon content of the ash is low. High carbon ash does not result in acceptable concrete for most purposes (the resulting concrete is generally darker and less structurally sound than normal Portland cement). Therefore, only low-carbon ash is desirable as a cement substitute. There are two widely available methods of generating low-carbon ash for the cement market; either processing the ash in a separate circulating fluidized bed boiler which leaves only low-carbon ash, or physically separating the high-carbon ash from the low-carbon ash. The project that is the subject of this application is a physical separation process.

Separation Technologies LLC's (ST) proprietary technology consists of a unique, triboelectrostatic belt separator. Fly ash that is collected in the main boilers electrostatic precipitators (ESPs) at Mt. Storm is placed into silos at the facility. From there, it will be fed into the separation process, which is a belt conveyor with a thin gap between two parallel planar electrodes. The ST separator utilizes electrical charge differences between materials to separate the fly ash into two products. The separator produces a 3% "loss on ignition" ("LOI") low-carbon mineral product (ProAsh®), which is sold as a supplementary cementitious material for use in concrete, and a high-carbon ash product (EcoTherm®). For the Mt. Storm facility, the high-carbon ash product (EcoTherm®) will be returned to the utility for re-burning, as discussed below.

A new building will be constructed to accommodate the new separator and its associated equipment. Fly ash will be fed from the existing fly ash silos using new airslide assemblies connecting the existing silos to the separators. ProAsh® will be conveyed from

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the separators by dilute phase transport to a new ProAsh® silo. The new ProAsh® silo will be equipped with a dry loadout spout assembly and truck scale for loading of bulk pneumatic tanker trucks.

The EcoTherm® from the separators will be conveyed by dilute phase transport to a new storage silo for temporary storage and subsequent re-burning by the utility. For re-burning, the EcoTherm® will be conveyed by pneumatic transport to a carbon return system located just above the existing coal belt. The carbon return system consists of a filter-receiver discharging through a rotary feeder and impact scale to a high speed mixer located over the existing coal conveyors. When a coal conveyor is running and carrying coal to replenish the bunkers, EcoTherm® may be conveyed from the high-carbon ash storage silo to the carbon return filter receiver. The EcoTherm® is then metered into the high speed mixer where it is mixed with just enough water to suppress dust (typically about 8 weight percent moisture) and discharged onto the operating coal conveyor. A gravity "V" diverter valve is provided on the mixer discharge to permit a selection between the two existing conveyors. For disposal, if necessary, the high carbon ash will be wet conditioned at the high carbon storage silo. A central vacuum cleaning system will also be installed to facilitate housekeeping in the operating areas.

SITE INSPECTION

No site inspection of the facility was deemed necessary. The facility was last inspected on July 24, 2014 by Karl Dettinger of DAQs Eastern Panhandle Regional Office and was found to be in compliance. To get to the facility, take I79 north to exit 99. Then take Corridor H (US Route 48 / US Route 219) east approximately 84 miles. Then turn right on WV Route 93 and go approximately 0.5 miles. The plant access road is on the right.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions from the proposed operations consist only of equipment emissions, transfer points and paved haul roads. All equipment emissions and transfer operations will be controlled by baghouses. Emissions from these sources were calculated by multiplying the baghouses guaranteed grain loading by the maximum flow rate. Haul road emissions were calculated using AP-42 Section 13.2.1 Equation 2. Annual emissions from the baghouses were based on 8,760 hours per year. Annual haulroad emissions were based on a maximum of 525,600 tons per year of ash (ProAsh) being shipped offsite via truck.

Controlled emissions from the operations covered by this permit will be limited to the following:

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Virginia Electric & Power Company
Mt. Storm

Emission Point ID	PM		PM ₁₀		PM _{2.5}	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
ST-E1	0.05	0.24	0.05	0.24	0.04	0.19
ST-E9	0.05	0.24	0.05	0.24	0.04	0.19
ST-E2	0.30	1.30	0.30	1.30	0.24	1.04
ST-E3	0.03	0.15	0.03	0.15	0.03	0.12
ST-E4	0.25	1.10	0.25	1.10	0.20	0.88
ST-E5	0.13	0.58	0.13	0.58	0.11	0.47
ST-E6	0.16	0.68	0.16	0.68	0.12	0.55
ST-E7	0.06	0.24	0.06	0.24	0.04	0.19
ST-E8	0.10	0.45	0.10	0.45	0.08	0.36
Haul Roads	4.72	2.31	0.95	0.47	0.24	0.12
Total	5.85	7.29	2.08	5.45	1.14	4.11

REGULATORY APPLICABILITY

The following state regulations apply to the facility (no federal rules, i.e. NSPS, MACT/NESHAPs are applicable):

45CSR13 **Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation).**

Because uncontrolled emissions from the facility exceed 6 pounds per hour and 10 tons per year of PM the facility is subject to 45CSR13.

45CSR17 **To Prevent and Control Particulate Matter Air Pollution From Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.**

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The main requirement of 45CSR17 is the prohibition of fugitive particulate matter which causes or contributes to statutory air pollution. VEPCO will comply with this requirement with the use of baghouses.

45CSR30: Requirements For Operating Permits.

The facility is an existing Title V major source with an issued Title V permit (R30-02300003-2011). VEPCO must update their Title V permit in accordance with 45CSR30.

Nonapplicability Determinations

45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration

Although the facility is an existing major stationary source, as can be seen from the following table the increase in emissions from this project are not "significant" (as defined in 45CSR14):

Pollutant	Increase (TPY)	Significance Level (TPY)	PSD (Y/N)
PM_{2.5}	4.11	10	N
PM₁₀	5.45	15	N
PM	7.29	25	N

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

No non-criteria regulated pollutants are addressed in this permit.

AIR QUALITY IMPACT ANALYSIS

Because this is a minor modification to an existing major stationary source, no modeling was required.

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MONITORING OF OPERATIONS

The permittee shall maintain the following records:

- * Records of monthly EPA Method 22 opacity testing and any corrective actions taken.
- * Monthly production of ProAsh shipped offsite.
- * Monthly inspection of all baghouse bags.

RECOMMENDATION TO DIRECTOR

Information supplied in the application indicates that compliance with all applicable regulations will be achieved. Therefore it is the recommendation of the writer that permit R13-3299 for the construction of a fly ash separation process at the Mount Storm Power Station, Grant County, be granted to Virginia Electric & Power Company.



Steven R. Pursley, PE
Engineer

5-31-16

May 31, 2016

R13-3299
Virginia Electric & Power Company
Mt. Storm

Permit to Construct



R13-3299

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Virginia Electric & Power Company
Mt. Storm Plant
023-00003

William F. Durham
Director

Issued: DRAFT

Facility Location: Mt. Storm, Grant County, West Virginia
Mailing Address: 5000 Dominion Blvd
Glen Allen, VA 23060
Facility Description: Coal fired electric power plant
NAICS Codes: 221112
UTM Coordinates: 649.85 km Easting • 4,340.00 km Northing • Zone 17
Permit Type: Construction
Description of Change:
Installation of a fly ash separation process.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
ST-S1	ST-E1	Feed Surge Bin A	2016	100 ton	BH
ST-S2	ST-E2	Dust Collector Vent - Air slides, conveyors, hoppers, Separators	2016	80 tph	BH
ST-S3	ST-E3	Clean up vacuum vent	2016	2 tph	BH
ST-S4	ST-E4	ProAsh Silo	2016	10,000 ton	BH
ST-S5	ST-E5	ProAsh Truck Loadout	2016	200 tph	BH
ST-S6	ST-E6	EcoTherm Silo w/ wet truck loadout	2016	500 ton/120 tph	BH
ST-S7	ST-E7	Carbon Feeder Receiver	2016	46 tph	BH
ST-S8	ST-E8	EcoTherm mixer vent	2016	50 tph	BH
ST-S9	ST-E9	Feed Surge Bin B	2016	100 ton	BH

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3299 and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee.

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. Emissions from the activities covered by this permit shall not exceed the following:

Emission Point ID	PM		PM ₁₀		PM _{2.5}	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
ST-E1	0.05	0.24	0.05	0.24	0.04	0.19
ST-E9	0.05	0.24	0.05	0.24	0.04	0.19
ST-E2	0.30	1.30	0.30	1.30	0.24	1.04
ST-E3	0.03	0.15	0.03	0.15	0.03	0.12
ST-E4	0.25	1.10	0.25	1.10	0.20	0.88
ST-E5	0.13	0.58	0.13	0.58	0.11	0.47
ST-E6	0.16	0.68	0.16	0.68	0.12	0.55
ST-E7	0.06	0.24	0.06	0.24	0.04	0.19
ST-E8	0.10	0.45	0.10	0.45	0.08	0.36
Total	1.13	4.98	1.13	4.98	0.9	3.99

4.1.2 Emissions from each baghouse shall not exceed 0.01 gr/dscf.

4.1.3 The facility shall be designed, constructed, operated and maintained such that 100% of PM emissions from process operations are captured and vented to a baghouse.

4.1.4 The process rates contained in Table 1.0 of this permit shall not be exceeded. Additionally, the permittee shall install, maintain and operate all control devices listed in Table 1.0 of this permit.

4.1.5 The permittee shall pave and maintain all haulroads including a reasonable shoulder area.

4.1.6 Fugitive particulate matter shall not be discharged beyond the boundary lines of the property on which the discharge originates or at any public or residential location, which causes or contributes to statutory air pollution.

[45CSR§17-3.1]

4.1.7. **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. In order to ensure that all baghouses are operating properly, the permittee shall conduct visible emission checks and / or opacity monitoring and recordkeeping for all baghouses.
- a. The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.
 - b. Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each baghouse vent for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Each observation must be recorded as either visible emissions observed or no visible emissions observed. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.
 - c. If visible emissions are present at a source(s) the permittee shall take corrective action as soon as practicable, but within seventy-two (72) hours of the emission check. Once corrective action has been taken another observation shall be made to confirm that no visible emissions are present.

4.3. Monitoring and Recordkeeping Requirements

- 4.3.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. 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 requirements of section 4.2.1 of this permit, records of the Method 22 testing and any necessary corrective actions taken 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.

4.3.5. In order to determine compliance with section 4.1.2 of this permit, the permittee shall perform monthly visible inspections of all baghouse bags. Records of said inspections shall be maintained on site in accordance with section 3.4.1 of this permit.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹

(please use blue ink)

Responsible Official or Authorized Representative _____

Date _____

Name and Title

(please print or type)

Name _____

Title _____

Telephone No. _____

Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On February 24, 2016, Virginia Electric & Power Company applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to construct an ash separation process at their Mt. Storm Power Plant located, in Grant County, WV at latitude 39.203 and longitude -79.265. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-3299.

The following increase in potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, 5.45 tons per year (TPY); Particulate Matter, 7.29 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on **DRAFT**. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Steven R. Pursley, PE
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1218
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx

Pursley, Steven R

From: Pursley, Steven R
Sent: Thursday, May 26, 2016 11:36 AM
To: 'peter.m.balkus@dom.com'
Cc: 'andy.gates@dom.com'
Subject: WV DAQ NSR Permit Application Complete for Virginia Electric & Power Co, Mount Storm Plant

**RE: Application Status: Complete
VEPCO, Mount Storm Plant
Permit Application R13-3299
Plant ID No. 023-00003**

Mr. Balkus

Your application for a Construction permit to install a fly ash recycling system at your Mount Storm plant was received by this Division on February 26, 2016 and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on March 24, 2016.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Steven R. Pursley, PE at (304) 926-0499 ext. 1218 or reply to this email.

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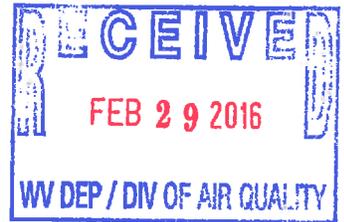
Dominion Resources Services, Inc.
5000 Dominion Boulevard, Glen Allen, VA 23060
dom.com



BY U.S. MAIL, RETURN RECEIPT REQUESTED

February 25, 2016

Mr. William F. Durham
Director, Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, WV 25304



RE: Virginia Electric and Power Co., Mt. Storm Power Station
Application Number R13-3299
DAQ Air Facility ID No. 023-00003

Dear Mr. Durham:

Virginia Electric and Power Company d/b/a Dominion Virginia Power ("Dominion") owns and operates the Mt. Storm Power Station, located in Grant County, West Virginia. Dominion submitted an application received by your office on February 24, 2016 for coverage under a Regulation 13 permit for an ash recycling system to be located at the facility.

We placed a legal advertisement notifying the public of this application, including the latitude and longitude coordinates of the facility, in the *Grant County Press* edition dated February 23, 2016. The original Affidavit of Publication from the *Grant County Press* is enclosed.

If you have any questions about this submittal please contact Andy Gates at (804) 273-2950.

Sincerely,

Scott Lawton
Director, Electric Environmental Business Support

Enclosure

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Certificate of Publication

State of West Virginia
County of Grant, to-wit:

The undersigned hereby certifies
that the annexed notice was duly
published in the

Grant County Press

a weekly newspaper published at
Petersburg, Grant County, West
Virginia, for 1 consecutive
weeks ending on the 23 day of
February, 2016

GRANT COUNTY PRESS
By William E. Touch
Editor

Publishing Notice \$ 39.68

Hand Bills _____

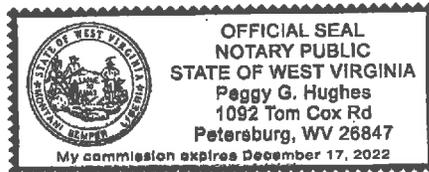
Miscellaneous _____

Total \$ 39.68

Sworn before me on this the 1
day of Feb, 2016.

Peggy M Hughes
Notary Public

Dec 17, 2022
My Commission Expires



AIR QUALITY PERMIT NOTICE

Notice of Application

Notice is given that Virginia Electric and Power Co. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Construction Permit for a fly ash recycling system located at the Mt. Storm Power Station located at 436 Dominion Boulevard near Mt. Storm, in Grant County, West Virginia. The latitude and longitude coordinates are: 39.203N and 79.265W.

The applicant estimates the increased potential to discharge the following Regulated Air Pollutants will be: 7.3 tons of total particulate matter, 5.5 tons of PM10, or 4.1 tons of PM2.5 per year from new equipment and fugitive sources.

Startup of operation is planned to begin on or about the 29th day of May, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours.

Dated this the 18th day of February, 2016.

By: Virginia Electric
and Power Co.
Peter M. Balkus
Station Director
Mt. Storm Power Station
436 Dominion Boulevard
Mt. Storm, West Virginia
26739

2/23

Pursley, Steven R

From: Ward, Beth A
Sent: Thursday, February 25, 2016 2:05 PM
To: Pursley, Steven R
Subject: VIRGINIA ELECTRIC AND POWER CO PERMIT APPLICATION FEE

Categories: Red Category

This is the receipt for payment received from:

VIRGINIA ELECTRIC AND POWER CO, MT STORM, CHECK NUMBER 547371, CHECK DATE 01/29/2016, \$1,000.00
R13-3299 ID# 023-00003

OASIS Deposit CR 1600093016

Thank You!

Beth Ward

WV DEPARTMENT OF ENVIRONMENTAL PROTECTION
BTO FISCAL
601 57TH STREET SE
CHARLESTON, WV 25304
(304) 926-0499 EXT 1846
beth.a.ward@wv.gov

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Pursley, Steven R

From: Adkins, Sandra K
Sent: Thursday, February 25, 2016 10:44 AM
To: peter.m.balkus@dom.com; andy.gates@dom.com
Cc: McKeone, Beverly D; Pursley, Steven R
Subject: WV DAQ Permit Application Status for Virginia Electric & Power Co.; Mt. Storm

Categories: Red Category

**RE: Application Status
Virginia Electric & Power Company
Mt. Storm
Plant ID No. 023-00003
Application No. R13-3299**

Mr. Balkus,

Your application for a construction permit for the Mt. Storm Power Station was received by this Division on February 24, 2016, and was assigned to Steve Pursley. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Steve stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Steve Pursley, at 304-926-0499, extension 1218.