



west virginia department of environmental protection

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M E M O R A N D U M

To: Beverly D. McKeone, PE
From: Steven R. Pursley, PE *S&P*
Date: March 10, 2016
Subject: PD16-008

On January 27, 2016 Pleasants Energy, LLC submitted a request for a permit determination for their Waverly facility. The request involves the installation of an inlet fogging system on their existing turbines.

The inlet fogging system will reduce the temperature of the inlet air to the combustion turbine. As a result of the cooling, the combustion turbines will be able to increase their output. The system can not operate at ambient temperatures below 70°F and is only effective above 73°F. Worst case emissions from the facility typically occur at low ambient temperatures (when the combustion turbines have their maximum output and maximum air flow). At the ambient temperatures above 73 degrees, emissions are well below their maximum permitted emission rate. Additionally, it should be noted that the facility employs CEMS to monitor NO_x and CO emissions from the turbine. Therefore, any increase above permitted emission limits would be immediately documented.

Since no new regulations will be triggered with this proposal and since permitted emissions will not increase due to this change, no permit modification is necessary.