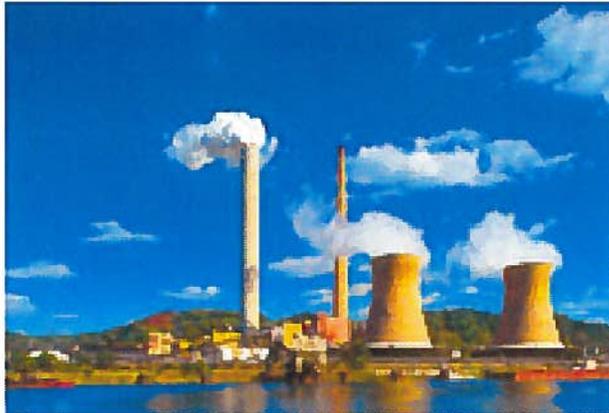


Ohio Power Company
Mitchell Plant

Title V Permit Renewal Application
R30-05100005-2009



Prepared For:

Ohio Power Company
Mitchell Plant
Moundsville, West Virginia

Prepared By:

American Electric Power
Environmental Services
1 Riverside Plaza
Columbus, Ohio 43215
September, 2013

**Ohio Power Company
Mitchell Plant**

Regulation 30 Permit Renewal Application

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WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

Form with 10 sections: 1. Name of Applicant, 2. Facility Name, 3. DAQ Plant ID, 4. Federal Employer ID, 5. Permit Application Type, 6. Type of Business Entity, 7. Is the Applicant the, 8. Number of onsite employees, 9. Governmental Code, 10. Business Confidentiality Claims.

11. Mailing Address		
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: West Virginia	Zip: 26041-
Telephone Number: (304) 843-6000	Fax Number: (304) 843-6080	

12. Facility Location		
Street: State Route 2	City: Cresap/Moundsville	County: Marshall County
UTM Easting: 516.00 km	UTM Northing: 4409.00 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: From Charleston, take I-77 north to exit 179. Travel north on State Route 2 approximately 70 miles to Cresap. Facility is located on State Route 2, approximately 9 miles south of Moundsville, WV.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, for what air pollutants? PM2.5	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). Ohio Pennsylvania	
Is facility located within 100 km of a Class I Area ¹ ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
If no, do emissions impact a Class I Area ¹ ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Source meets BART for SO2 and NOx by implementing CAIR and BART Modeling indicated source was insignificant from a PM standpoint.		
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: D. L. Moyer		Title: Plant Manager
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041-
Telephone Number: (304) 843-6001	Fax Number: (304) 843-6080	
E-mail address: dlmoyer@aep.com		
Environmental Contact: J. W. Palmer		Title: Env. & Lab Supervisor
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041-
Telephone Number: (304) 843-6051	Fax Number: (304) 843-6080	
E-mail address: jwpalmer@aep.com		
Application Preparer: G. J. Wooten		Title: Senior Engineer
Company: AEP Service Corporation		
Street or P.O. Box: 1 Riverside Plaza, 22 nd Floor		
City: Columbus	State: OH	Zip: 43215-
Telephone Number: (614) 716-1262	Fax Number: (614) 716-1252	
E-mail address: gjwooten@aep.com		

14. Facility Description			
List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.			
Process	Products	NAICS	SIC
Coal Fired Electric Generating Unit	Electricity	221112	4911
<p>Provide a general description of operations.</p> <p>The Mithell Plant is a fossil fuel fired electric generation facility and operates under Standard Industrial Code (SIC) 4911. The facility consists of two coal-fired steam generators that provide a steam supply to turbine driven electrical generators and an oil-fired auxiliary boiler that provides auxiliary steam services to the facility. The facility also includes various supporting operations including by not limited to coal handling, ash handling, gypsum handling, limestone handling, wastewater treatment system filter cake handling, and various tanks with insignificant emissions. The facility has the potential to operate seven days per week, twenty-four hours per day, and 52 weeks per year.</p>			
<p>15. Provide an Area Map showing plant location as ATTACHMENT A.</p>			
<p>16. Provide a Plot Plan(s), e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as ATTACHMENT B. For instructions, refer to "Plot Plan - Guidelines."</p>			
<p>17. Provide a detailed Process Flow Diagram(s) showing each process or emissions unit as ATTACHMENT C. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.</p>			

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input checked="" type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS	<input checked="" type="checkbox"/> Section 112(d) MACT standards
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input checked="" type="checkbox"/> 45CSR4 State enforceable only rule	<input checked="" type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input checked="" type="checkbox"/> Compliance Assurance Monitoring (40CFR64)
<input checked="" type="checkbox"/> CAIR NO _x Annual Trading Program (45CSR39)	<input checked="" type="checkbox"/> CAIR NO _x Ozone Season Trading Program (45CSR40)
<input checked="" type="checkbox"/> CAIR SO ₂ Trading Program (45CSR41)	

19. Non Applicability Determinations
<p>List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.</p> <ul style="list-style-type: none"> ▪ 45 CSR 5: Pursuant to 45CSR5, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR5. 45CSR2 is applicable to the facility. ▪ 45 CSR 17: Pursuant to 45CSR17, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR17. 45CSR2 is applicable to the facility. ▪ 40 CFR 60 Subpart D: The fossil fuel fired steam generators potentially affected by this rule have not commenced construction or modification after August 17, 1971. ▪ 40 CFR 60 Subpart Da: The electric utility steam generating units potentially affected by this rule have not commenced construction or modification after September 18, 1978. ▪ 40 CFR 60 Subpart K: The facility doesn't include storage vessels that are used to store petroleum liquids (as defined in 40 CFR 60.111(b)) and have storage capacity greater than 40,000 gallons for which construction, reconstruction, or modification commenced after June 11, 1973 and prior to May 19, 1978. ▪ 40 CFR 60 Subpart Ka: The facility does not include storage vessels that are used to store petroleum liquids (as defined in 40 CFR 60.111(b)) and that have a storage capacity greater than 40,000 gallons for which construction, reconstruction, or modification was commenced after May 18, 1978 and prior to July 23, 1984. ▪ 40 CFR 60 Subpart Kb: Storage vessels potentially affected by this rule are exempted because they contain liquids with a maximum true vapor pressure of less than 3.5 kPa, have a storage capacity of less than 40 cubic meters, or have not commenced construction, reconstruction or modification after July 23, 1984.
<input type="checkbox"/> Permit Shield

19. Non Applicability Determinations (Continued) - Attach additional pages as necessary.

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

- **40 CFR 60 Subpart Y:** The coal handling equipment potentially affected by this rule has not been constructed or modified after October 24, 1974.
- **40 CFR 63 Subpart Q:** This facility does not include industrial process cooling towers that have operated with chromium-based water treatment chemicals on or after September 8, 1994.

Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

- 45CSR6, R30-05100005-2009 Section 3.1.1 and 3.1.2 (Open Burning)
- 40CFR61, R30-05100005-2009 Section 3.1.3 (Asbestos)
- 45CSR4, R30-05100005-2009 Section 3.1.4 (Odor)
- 45CSR11-5.2, R30-05100005-2009 Section 3.1.6 (Standby Plan)
- WV Code 22-5-4(a)(14), R30-05100005-2009 Section 3.1.7 (Emission Inventory)
- 40CFR82, R30-05100005-2009 Section 3.1.8 (Ozone-depleting Substances)
- 45CSR2, R30-05100005-2009 Section 3.1.12 (Fugitive Particulate Matter Control)
- 45CSR39, R30-05100005-2009 Section 3.1.14 (Annual NOx CAIR Program)
- 45CSR40, R30-05100005-2009 Section 3.1.15 (Ozone Season NOx CAIR Program)
- 45CSR41, R30-05100005-2009 Section 3.1.16 (Annual SO2 CAIR Program)

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

- 45CSR2, 45CSR10, and WV Code 22-5-4(a), R30-05100005-2009 Section 3.2.1 (Stack Testing)
- 45CSR30-5.1.c.2.A, R30-05100005-2009 Section 3.3.1 (Monitoring Information)
- 45CSR30-5.1.c.2.B, R30-05100005-2009 Section 3.3.2 (Retention of Records)
- 45CSR30-5.1.c, R30-05100005-2009 Section 3.3.3 (Odors)
- 45CSR30-5.1.c, R30-05100005-2009 Section 3.3.4 (Fugitive Particulate Matter Control)
- 45CSR30-5.1.c.3, R30-05100005-2009 Sections 3.4.1-3.4.3 (Reporting Requirements)
- 45CSR30-8, R30-05100005-2009 Section 3.4.4 (Certified Emissions Statement)
- 45CSR30-5.3.e, R30-05100005-2009 Section 3.4.5 (Compliance Certification)
- 45CSR30-5.1.c.3.A, R30-05100005-2009 Section 3.4.6 (Semi-Annual Monitoring Reports)
- R30-05100005-2009 Section 3.4.7 (Emergency Reporting)
- 45CSR30-5.1.c.3, R30-05100005-2009 Section 3.4.8 (Deviation Reports)
- 45CSR30-4.3.f.1.B, R30-05100005-2009 Section 3.4.9 (New Applicable Requirements)

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Are you in compliance with all facility-wide applicable requirements? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit <i>(if any)</i>
	05/12/2004	PD04-042: No permit needed for SCR
	08/05/2004	PD04-064: No permit needed for FGD system
	08/24/2005	PD04-073: No permit needed for urea handling
R13-2908D	11/13/2012	Reg 13 permit for FGD support equipment, Dry Fly Ash and Ash Landfill project and Aux. Boiler rebuild project
U.S. District Court Consent Decree regarding Civil Actions C2-99-1182, C2-05-360 and C2-04-1098	12/13/2007	Consent Decree for NSR lawsuits
R33-3948-2017-4A	05/14/2013	
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Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	4739.68
Nitrogen Oxides (NO _x)	36305.91
Lead (Pb)	3.643
Particulate Matter (PM _{2.5}) ¹	1096.11
Particulate Matter (PM ₁₀) ¹	3168.79
Total Particulate Matter (TSP)	5423.54
Sulfur Dioxide (SO ₂)	89742.64
Volatile Organic Compounds (VOC)	558.35
Hazardous Air Pollutants²	Potential Emissions
Hydrogen Chloride	12337
Hydrogen Fluoride	1071
Selenium	48.45
Manganese	3.77
Nickel	1.69
Arsenic	5.62
Mercury Compounds	2.13
Beryllium	13.37
Chromium	2.00
Cobalt	0.74
Lead	3.65
Regulated Pollutants other than Criteria and HAP	Potential Emissions

¹PM_{2.5} and PM₁₀ are components of TSP.
²For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input checked="" type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input checked="" type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input checked="" type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input checked="" type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO _x , SO ₂ , VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)	
<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input checked="" type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input checked="" type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input checked="" type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input checked="" type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input checked="" type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input checked="" type="checkbox"/>	40. Ozone generators.
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

24. Insignificant Activities (Check all that apply)	
	owners/operators must still get a permit if otherwise requested.)
<input checked="" type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input checked="" type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input checked="" type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input checked="" type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input checked="" type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

<p>25. Equipment Table</p>
<p>Fill out the Title V Equipment Table and provide it as ATTACHMENT D.</p>
<p>26. Emission Units</p>
<p>For each emission unit listed in the Title V Equipment Table, fill out and provide an Emission Unit Form as ATTACHMENT E.</p>
<p>For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F.</p>
<p>27. Control Devices</p>
<p>For each control device listed in the Title V Equipment Table, fill out and provide an Air Pollution Control Device Form as ATTACHMENT G.</p>
<p>For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the Compliance Assurance Monitoring (CAM) Form(s) for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as ATTACHMENT H.</p>

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

Note: This Certification must be signed by a responsible official. The original, signed in blue ink, must be submitted with the application. Applications without an original signed certification will be considered as incomplete.

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: D. L. Moyer

Title: Plant Manager

Responsible official's signature:

Signature: *Daniel L Moyer*

Signature Date: 10/9/13

(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

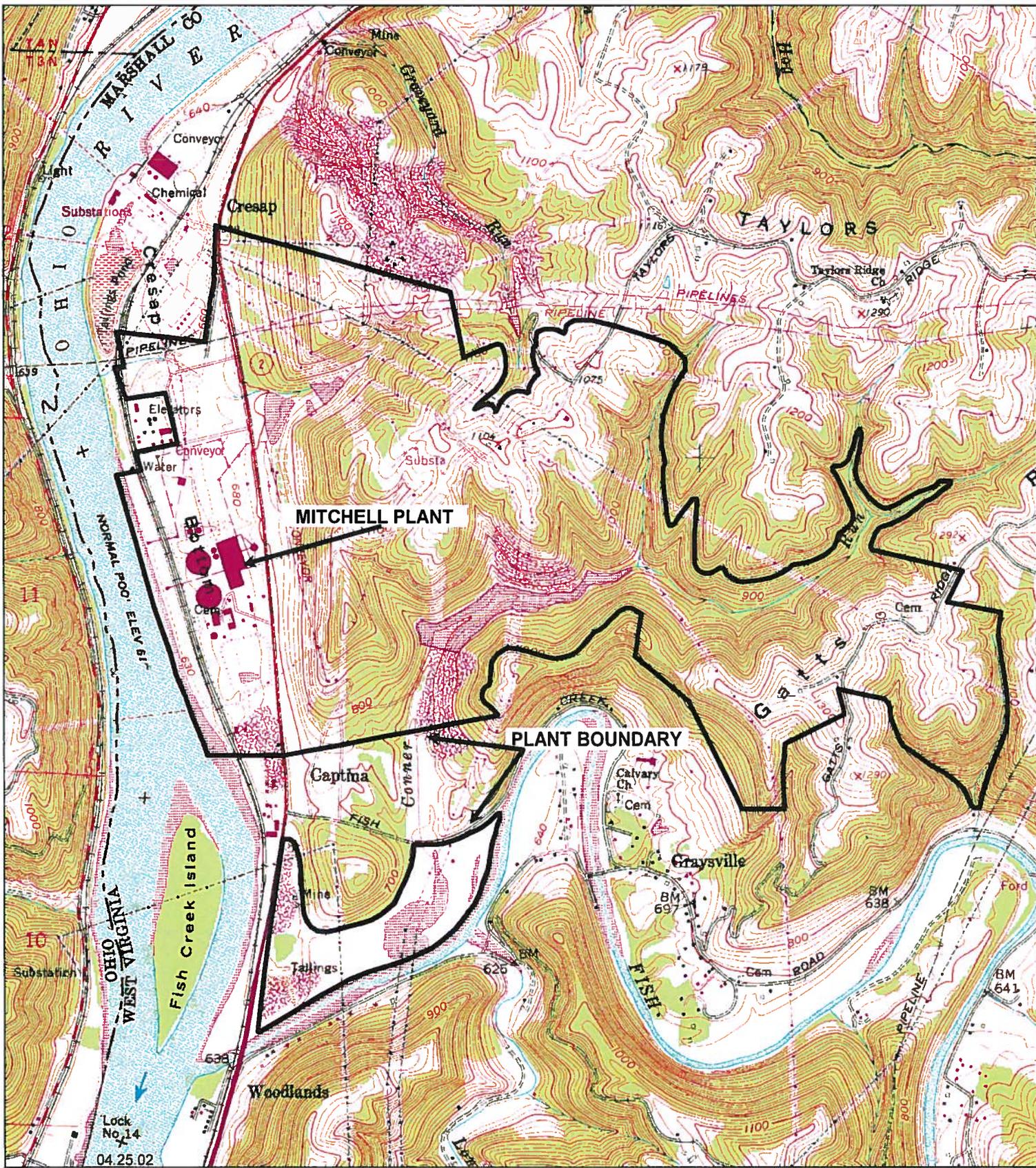
All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

Attachment A

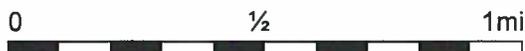
Area Map

Driving directions to Mitchell Plant: From Charleston, take Interstate 77 North to Exit 179. Travel north on State Route 2 approximately 70 miles to Cresap. Facility is located on Route 2 approximately nine miles south of Moundsville, WV.





Powhatan Point, W.VA. - OH
 Quadrangle
 USGS Topographic Map



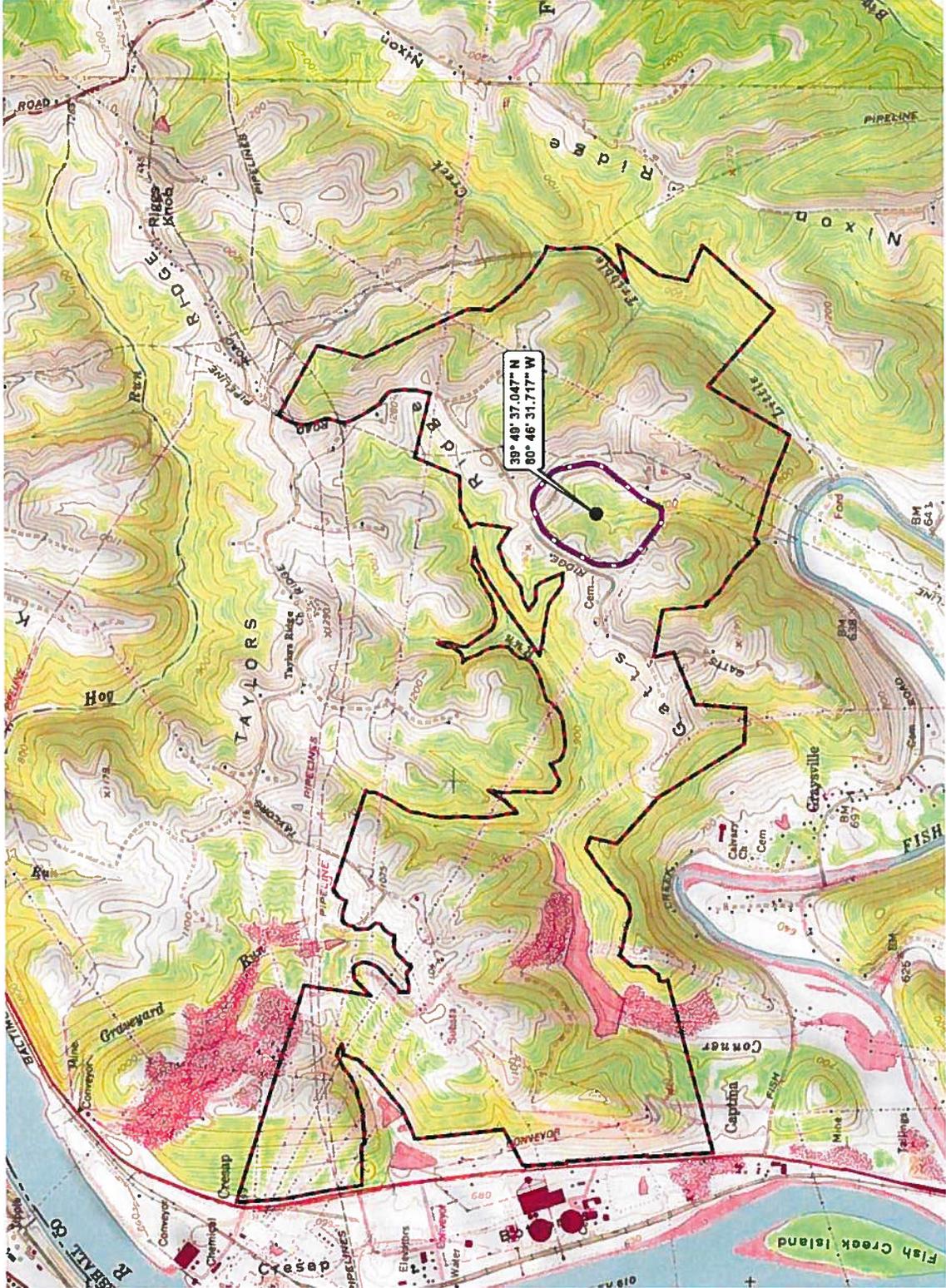
Plant Latitude 39° 49' 45"
 Plant Longitude 80° 48' 59"

Ohio Power Company
Mitchell Plant

Facility Boundary

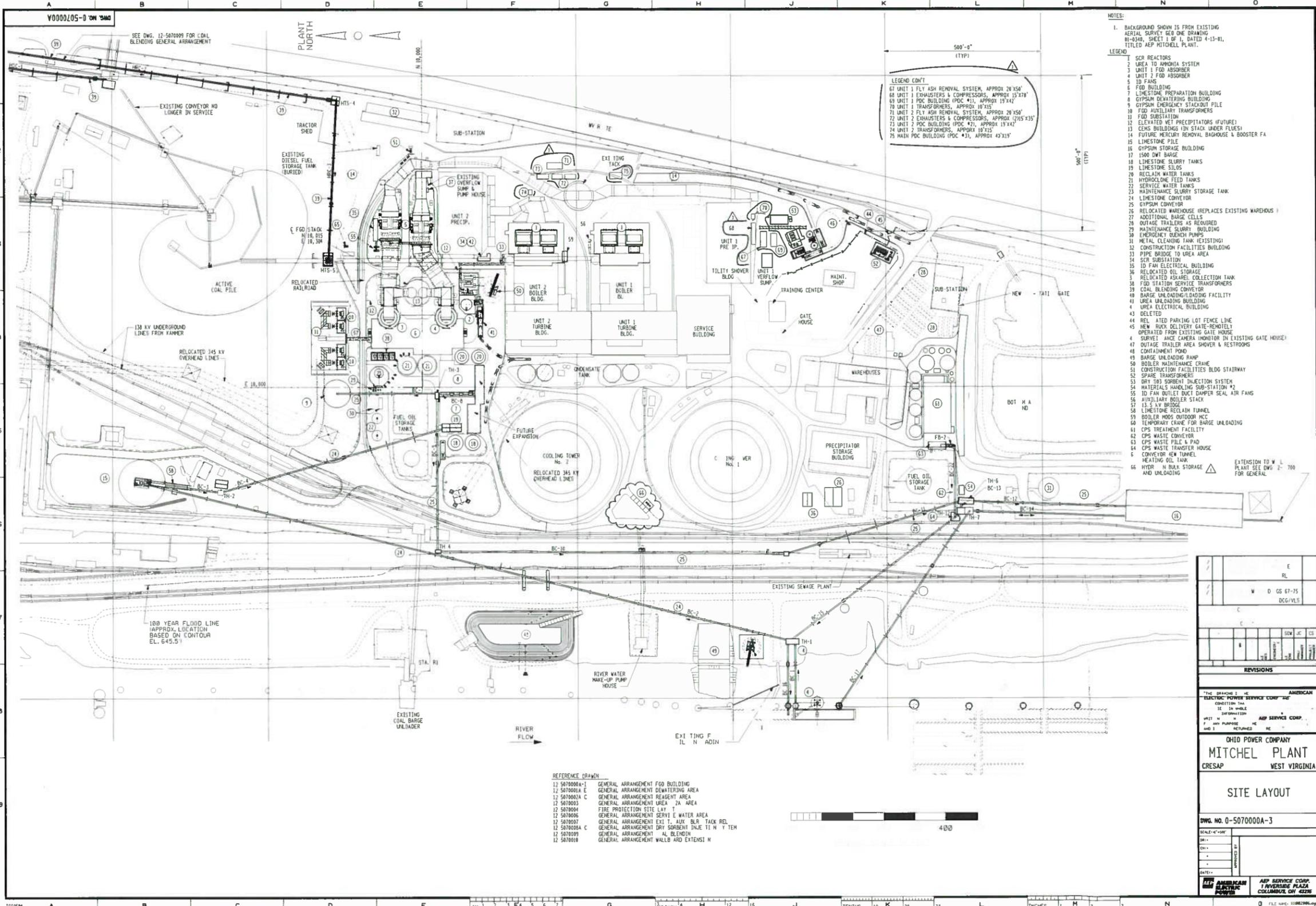


Mitchell Plant Dry Fly Ash Landfill Boundary



Attachment B

Plot Plan



Y0000205-0 DM

SEE DWG. 12-5070009 FOR COAL BLENDING GENERAL ARRANGEMENT

PLANT NORTH

LEGEND CONT

- 67 UNIT 1 FLY ASH REMOVAL SYSTEM, APPROX 20'X50'
- 68 UNIT 1 EXHAUSTERS & COMPRESSORS, APPROX 15'X70'
- 69 UNIT 1 POC BUILDING (POC #1), APPROX 19'X42'
- 70 UNIT 1 TRANSFORMERS, APPROX 10'X15'
- 71 UNIT 2 FLY ASH REMOVAL SYSTEM, APPROX 20'X50'
- 72 UNIT 2 EXHAUSTERS & COMPRESSORS, APPROX (215'X135')
- 73 UNIT 2 POC BUILDING (POC #2), APPROX 19'X42'
- 74 UNIT 2 TRANSFORMERS, APPROX 10'X15'
- 75 MAIN POC BUILDING (POC #3), APPROX 40'X19'

NOTES:

1. BACKGROUND SHOWN IS FROM EXISTING AERIAL SURVEY, SEE ONE DRAWING 81-84M, SHEET 1 OF 1, DATED 4-13-81, TITLED AEP MITCHELL PLANT.

- LEGEND
- 1 SCR REACTORS
 - 2 UREA TO AMMONIA SYSTEM
 - 3 UNIT 1 FGD ABSORBER
 - 4 UNIT 2 FGD ABSORBER
 - 5 ID FANS
 - 6 FGD BUILDING
 - 7 LIMESTONE PREPARATION BUILDING
 - 8 GYPSUM DEWATERING BUILDING
 - 9 GYPSUM EMERGENCY STACKOUT PILE
 - 10 FGD AUXILIARY TRANSFORMERS
 - 11 FGD SUBSTATION
 - 12 ELEVATED WET PRECIPITATORS (FUTURE)
 - 13 CENS BUILDINGS (ON STACK UNDER FLOES)
 - 14 FUTURE MERCURY REMOVAL BAGHOUSE & BOOSTER FA
 - 15 LIMESTONE PILE
 - 16 GYPSUM STORAGE BUILDING
 - 17 1500 DWT BARGE
 - 18 LIMESTONE SLURRY TANKS
 - 19 LIMESTONE SOLDS
 - 20 RECLAIM WATER TANKS
 - 21 HYDROCLONE FEED TANKS
 - 22 SERVICE WATER TANKS
 - 23 MAINTENANCE SLURRY STORAGE TANK
 - 24 LIMESTONE CONVEYOR
 - 25 GYPSUM CONVEYOR
 - 26 RELOCATED WAREHOUSE (REPLACES EXISTING WAREHOUSE)
 - 27 ADDITIONAL BARGE CELLS
 - 28 OUTAGE TRAILERS AS REQUIRED
 - 29 MAINTENANCE SLURRY BUILDING
 - 30 EMERGENCY QUENCH PUMPS
 - 31 METAL CLEANING TANK (EXISTING)
 - 32 CONSTRUCTION FACILITIES BUILDING
 - 33 PIPE BRIDGE TO UREA AREA
 - 34 SCR SUBSTATION
 - 35 10 FAN ELECTRICAL BUILDING
 - 36 RELOCATED OIL STORAGE
 - 37 FGD STATION SERVICE TRANSFORMERS
 - 38 COAL BLENDING CONVEYOR
 - 39 BARGE UNLOADING/LOADING FACILITY
 - 40 UREA UNLOADING BUILDING
 - 41 UREA ELECTRICAL BUILDING
 - 42 DELETED
 - 43 DELETED
 - 44 RELATED PARKING LOT FENCE LINE
 - 45 NEW RUCK DELIVERY GATE-REMOTELY OPERATED FROM EXISTING GATE HOUSE
 - 46 SURVEY ANGLE CAMERA MONITOR IN EXISTING GATE HOUSE
 - 47 OUTAGE TRAILER AREA SHOWER & RESTROOMS
 - 48 CONTAINMENT POND
 - 49 BARGE UNLOADING RAMP
 - 50 BOILER MAINTENANCE CRANE
 - 51 CONSTRUCTION FACILITIES BLDG STAIRWAY
 - 52 SPARE TRANSFORMERS
 - 53 DRY SOB SORBENT INJECTION SYSTEM
 - 54 MATERIALS HANDLING SUB-STATION #2
 - 55 10 FAN OUTLET DUCK DAMPER SEAL AIR FANS
 - 56 AUXILIARY BOILER STACK
 - 57 11.5 KV BRIDGE
 - 58 LIMESTONE RECLAIM TUNNEL
 - 59 BOILER HOODS OUTDOOR HCC
 - 60 TEMPORARY CRANE FOR BARGE UNLOADING
 - 61 CPS TREATMENT FACILITY
 - 62 CPS WASTE CONVEYOR
 - 63 CPS WASTE PILE & PAD
 - 64 CPS WASTE TRANSFER HOUSE
 - 65 CONVEYOR REM TUNNEL
 - 66 HEATING OIL TANK
 - 67 HYDR N BULK STORAGE AND UNLOADING

- REFERENCE DRAWING
- 12 5070000-A-1 GENERAL ARRANGEMENT FGD BUILDING
 - 12 5070000-A-E GENERAL ARRANGEMENT DEWATERING AREA
 - 12 5070000-A-C GENERAL ARRANGEMENT REAGENT AREA
 - 12 5070003 GENERAL ARRANGEMENT UREA 2A AREA
 - 12 5070004 FIRE PROTECTION SITE LAY T
 - 12 5070006 GENERAL ARRANGEMENT SERVIC WATER AREA
 - 12 5070007 GENERAL ARRANGEMENT EXI T, AUX BLR TACK REL
 - 12 5070008-C GENERAL ARRANGEMENT DRY SORBENT INJE TION Y TCH
 - 12 5070009 GENERAL ARRANGEMENT AL BLENDING
 - 12 5070010 GENERAL ARRANGEMENT WALLB AND EXTENS N

E	RL
W D GS 67-75	DCG/VLS
C	
B	
A	

REVISIONS

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OHIO POWER COMPANY
MITCHELL PLANT
CRESAP WEST VIRGINIA

SITE LAYOUT

DWG. NO. 0-5070000A-3

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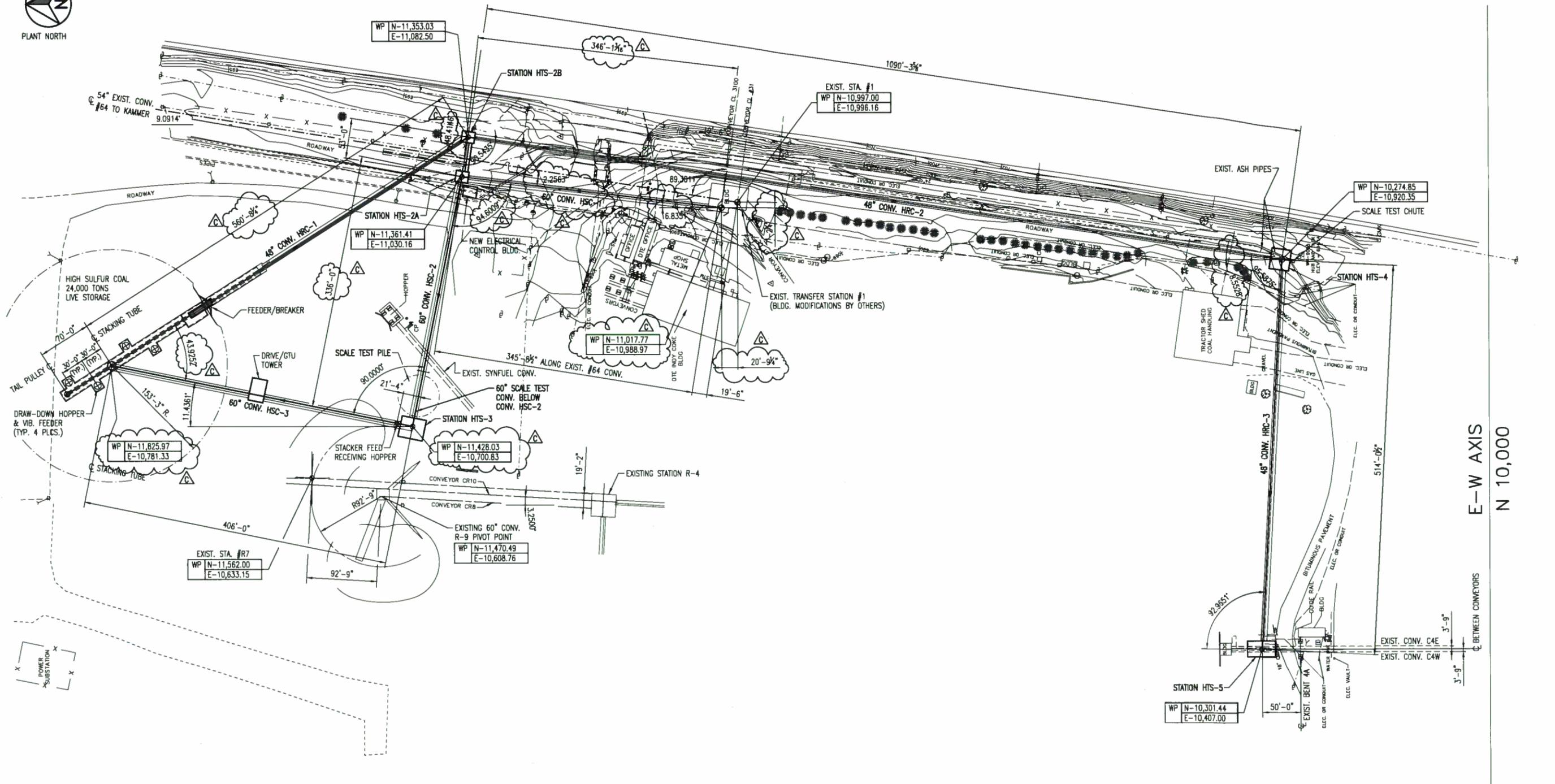
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FILE: 0-5070000A-3.dwg

11/11/09 11:11:11 AM



PLANT NORTH



E-W AXIS
N 10,000

N-S AXIS
E 10,000

FOR REVIEW

AMERICAN ELECTRIC POWER
MITCHELL PLANT UNIT 1 & 2
CRESAP, WV.
COAL BLENDING SYSTEM
PARSONS E & C SPECIFICATION AEPM-0-SP-092603
AEP P.O. 849133X181

L-003	DESIGN CRITERIA & GENERAL NOTES
L-002	FLOW DIAGRAM
L-000	TITLE SHEET & DRAWING LIST
DWG. NO.	REFERENCE DRAWING

DATE	No.	REVISION	BY	JOB NO.	05-7680
9/2/05	C	REVISED PER SITE VISIT 8/18/05 FOR FINAL CLIENT REVIEW	JLB	CHK. BY:	CJS
8/4/05	B	REVISED LAYOUT PER SITE VISIT	JLB	APP. BY:	
7/18/01	A	ISSUED FOR CLIENT REVIEW	JLB		

RECORD DATE

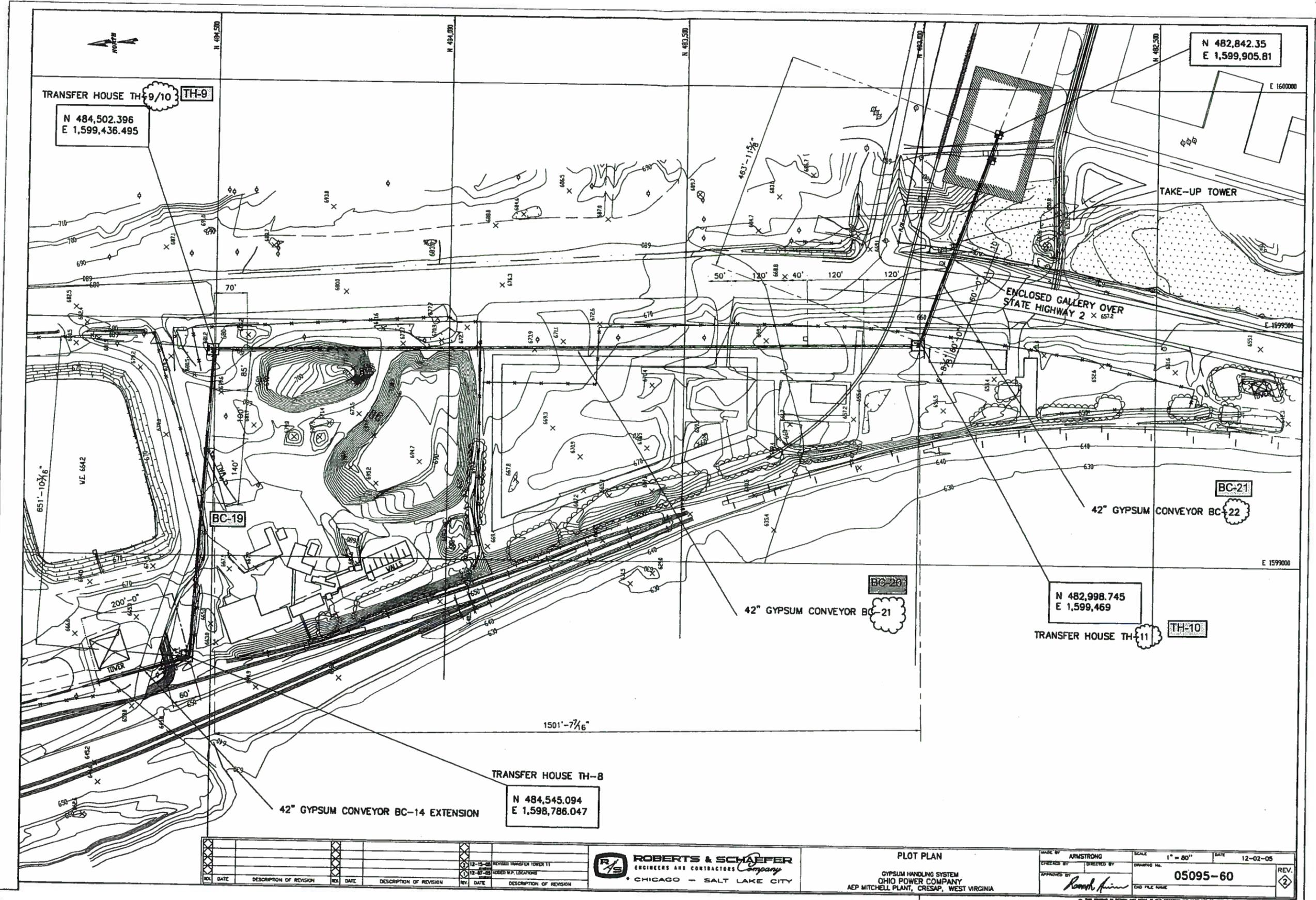
TO APPROVAL	7/18/01
TO SHOP	
TO FIELD	

DWN. BY: GLS 7/25/05
CHK. BY: CJS 7/26/05
APP. BY:

SCALE 1"=60'-0"
DWG. NO. L-001
REV. NO. C

FILE NAME: C:\B21\1-001.dwg
PLOT DATE & TIME:
PLOT SCALE:

SCALE OF BORDER
PLOT DATE & TIME
CAD No. DWG



REV.	DATE	DESCRIPTION OF REVISION	REV.	DATE	DESCRIPTION OF REVISION
1	12-15-05	REVISED TRANSFER TOWER TT			
2	12-07-05	ADDED W.P. LOCATIONS			

ROBERTS & SCHAEFER
 ENGINEERS AND CONTRACTORS
 CHICAGO - SALT LAKE CITY

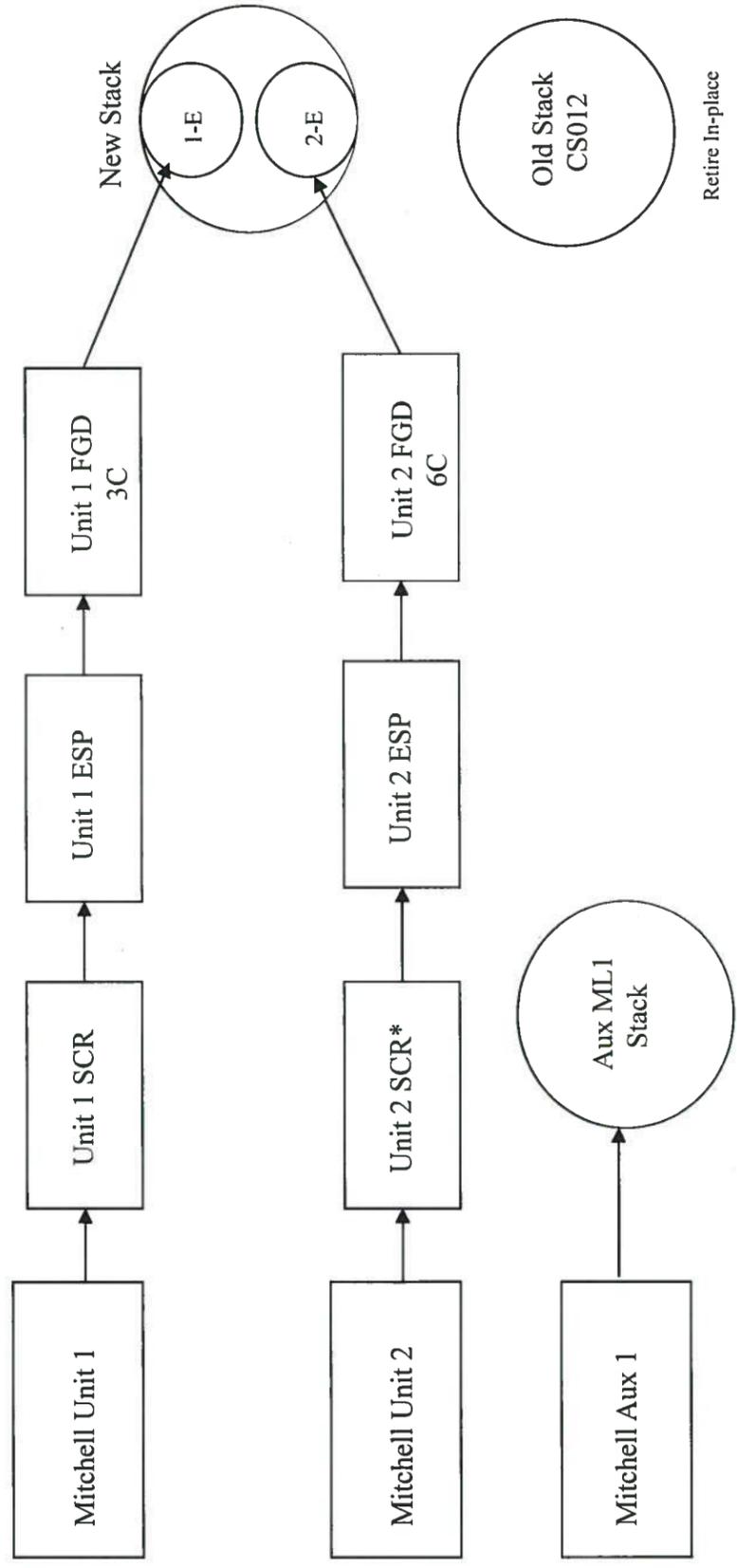
PLOT PLAN
 GYPSUM HANDLING SYSTEM
 OHIO POWER COMPANY
 AEP MITCHELL PLANT, CRESAP, WEST VIRGINIA

MADE BY: ARMSTRONG
 CHECKED BY: DIRECTED BY:
 APPROVED BY: *Ronald J. ...*
 SCALE: 1" = 80'
 DATE: 12-02-05
 DRAWING NO.: **05095-60**
 EAG FILE NAME:
 REV. 2

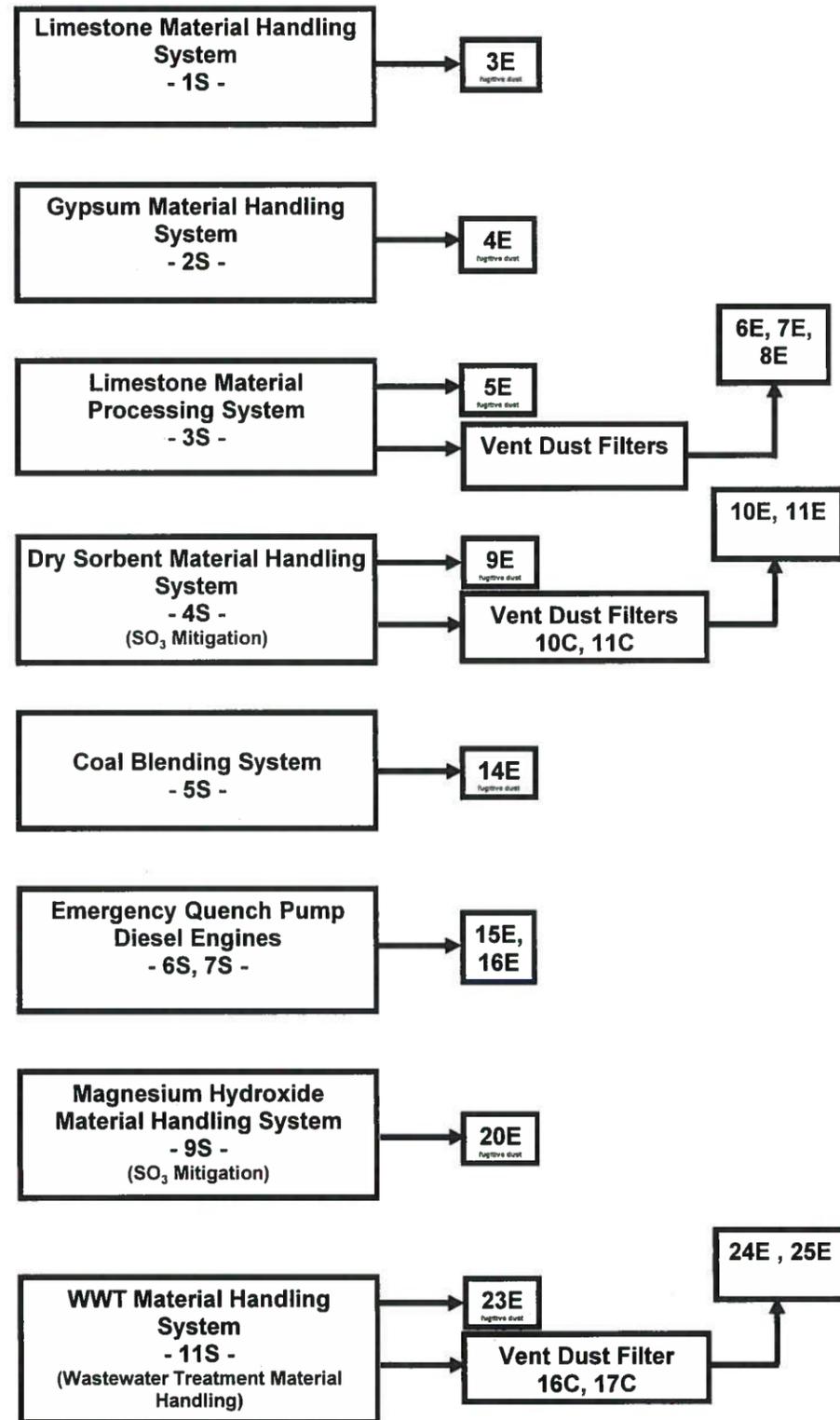
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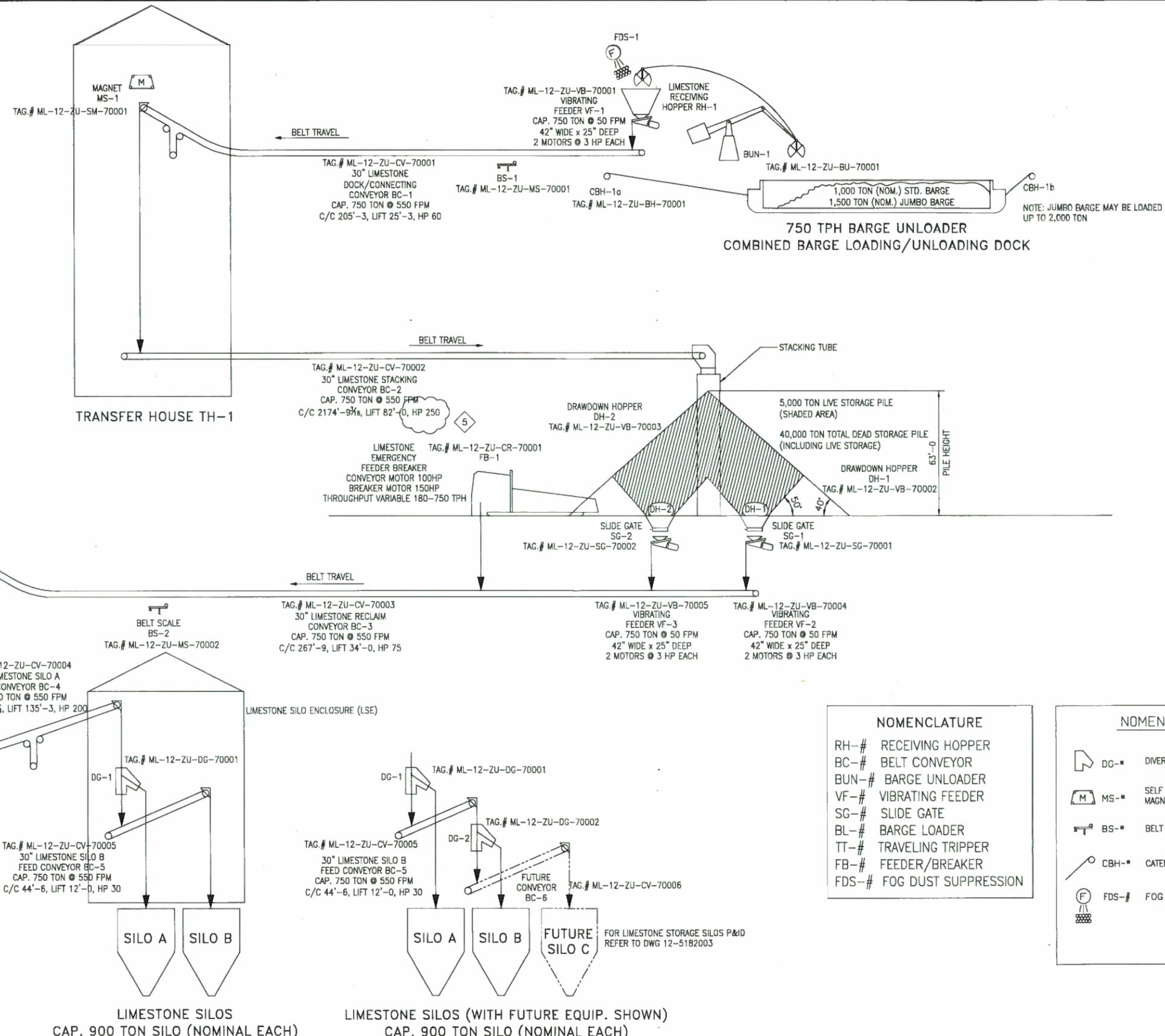
Attachment C
Process Flow Diagrams

Flow Diagram: Steam Generator and Associated Pollution Control Equipment



Process Flow Diagrams





02215- 0420-FS1 - 5
AEPM-0-DV-092602-0420-FS1-R5(8)

PARSONS E & C MITCHELL PLANT
 X REVISED AND ACCEPTED AS NOTED
 (SPECIFIC FOR REVISION)
 - REV ACCEPTED (SPECIFIC FOR PROJECT)
 - FOR INFORMATION ONLY (REVIEW ONLY)

THE REVIEW OF THIS SUBMITTAL IS ONLY FOR GENERAL COMPLIANCE WITH THE DESIGN CONTRACTED BY THE PROJECT AND GENERAL COMPLIANCE WITH THE REQUIREMENTS OF THE PROJECT. THE SUBMITTAL REVIEW IS NOT A GUARANTEE OF ALL INFORMATION IN THE PROJECT. THE INFORMATION IN THIS PROJECT IS FOR INFORMATION ONLY. THE DESIGNER IS NOT RESPONSIBLE FOR THE DESIGN OR CONSTRUCTION OF ANY EQUIPMENT OR STRUCTURE NOT SHOWN IN THIS DRAWING. THE DESIGNER IS NOT RESPONSIBLE FOR THE DESIGN OR CONSTRUCTION OF ANY EQUIPMENT OR STRUCTURE NOT SHOWN IN THIS DRAWING.

DATE 12/1/05

- NOMENCLATURE**
- RH-# RECEIVING HOPPER
 - BC-# BELT CONVEYOR
 - BUN-# BARGE UNLOADER
 - VF-# VIBRATING FEEDER
 - SG-# SLIDE GATE
 - BL-# BARGE LOADER
 - TT-# TRAVELING TRIPPER
 - FB-# FEEDER/BREAKER
 - FDS-# FOG DUST SUPPRESSION

- NOMENCLATURE**
- DG-# DIVERTER GATE
 - MS-# SELF CLEANING MAGNETIC SEPARATOR
 - BS-# BELT SCALE
 - CBH-# CATENARY BARGE HAUL WINCH
 - FDS-# FOG DUST SUPPRESSION

REV	DATE	DESCRIPTION OF REVISION	REV	DATE	DESCRIPTION OF REVISION
1	3-22-05	ISSUE FOR FABRICATOR FEEDER & DRAWDOWN HOPPER TAG # ML-12-ZU-DH-70002	1	3-22-05	ISSUE FOR FABRICATOR FEEDER & DRAWDOWN HOPPER TAG # ML-12-ZU-DH-70002
2	2-25-05	ISSUE FOR FABRICATOR FEEDER & DRAWDOWN HOPPER TAG # ML-12-ZU-DH-70003	2	2-25-05	ISSUE FOR FABRICATOR FEEDER & DRAWDOWN HOPPER TAG # ML-12-ZU-DH-70003
3	12-28-04	ISSUE FOR FABRICATOR FEEDER & DRAWDOWN HOPPER TAG # ML-12-ZU-DH-70004	3	12-28-04	ISSUE FOR FABRICATOR FEEDER & DRAWDOWN HOPPER TAG # ML-12-ZU-DH-70004
4	5-28-05	REVISED PER REVISED COMMENTS	4	5-28-05	REVISED PER REVISED COMMENTS
5	5-28-05	REVISED PER REVISED COMMENTS	5	5-28-05	REVISED PER REVISED COMMENTS

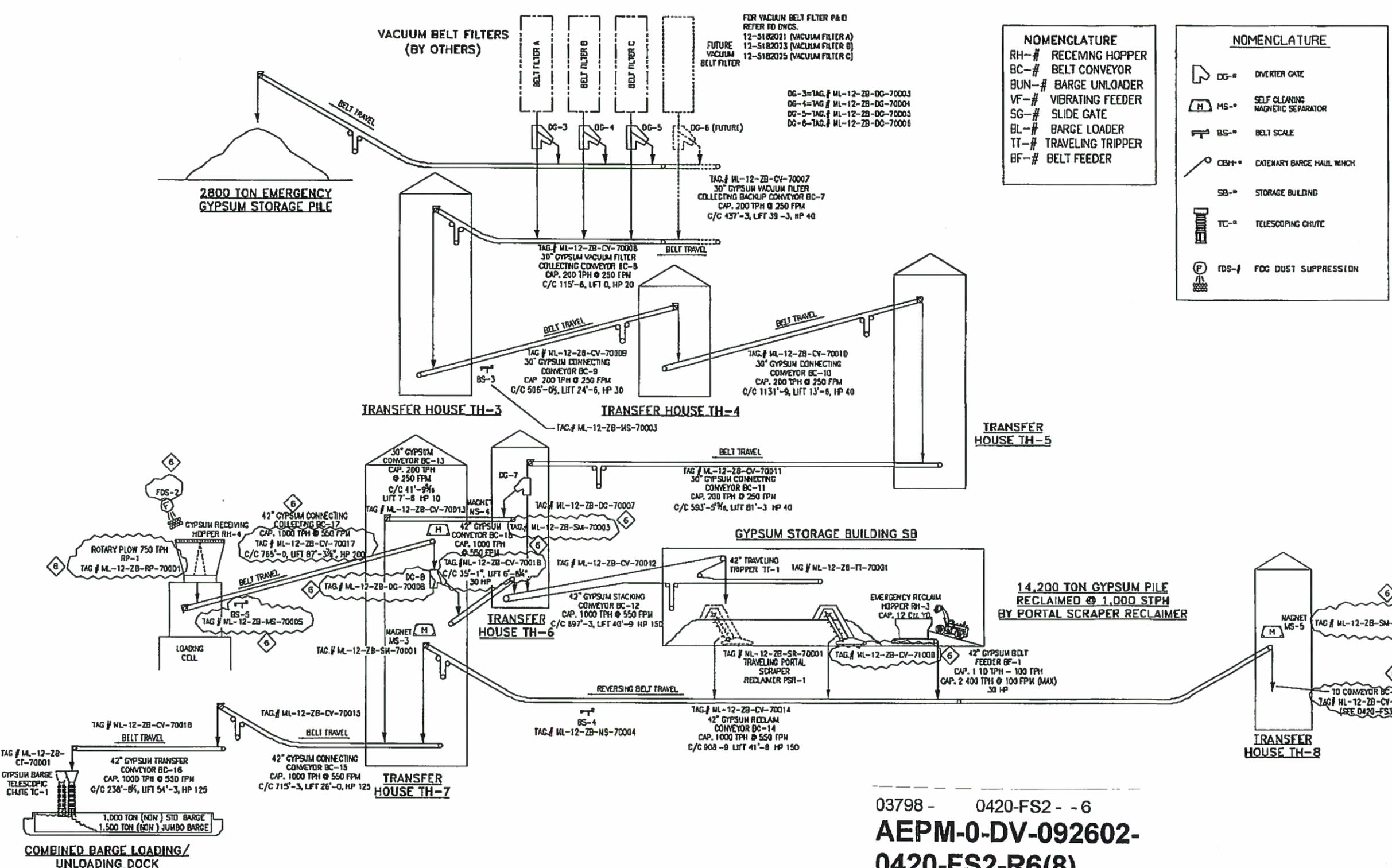
ROBERTS & SCHAEFER
 ENGINEERS AND CONTRACTORS
 CHICAGO - SALT LAKE CITY

FLOW DIAGRAM
 LIMESTONE HANDLING SYSTEM
 LIMESTONE & GYPSUM HANDLING SYSTEM
 OHIO POWER COMPANY
 AEP MITCHELL PLANT, UNITS 1 & 2, CRESAP, WEST VIRGINIA

MADE BY	D.AMIN	SCALE	NONE	DATE	12-3-04
CHECKED BY	APD	DESIGNED BY	RP	DRAWING NO.	0420-FS1
APPROVED BY				CAD FILE NAME	0420-FS1

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03798 - 0420-FS2 - -6
AEPM-0-DV-092602-
0420-FS2-R6(8)

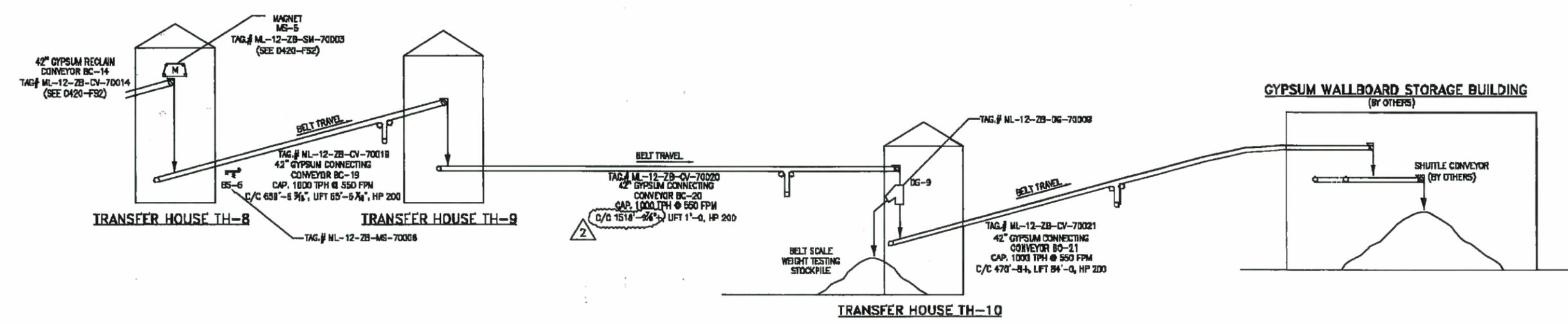
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1	12-3-04	ISSUED FOR CONSTRUCTION	1	12-3-04	ISSUED FOR CONSTRUCTION
2	12-3-04	REVISED FOR P&ID COMMENTS	2	12-3-04	REVISED FOR P&ID COMMENTS
3	12-3-04	REVISED FOR P&ID COMMENTS	3	12-3-04	REVISED FOR P&ID COMMENTS
4	12-3-04	REVISED FOR P&ID COMMENTS	4	12-3-04	REVISED FOR P&ID COMMENTS
5	12-3-04	REVISED FOR P&ID COMMENTS	5	12-3-04	REVISED FOR P&ID COMMENTS

ROBERTS & SCHAEFER
 ENGINEERS AND CONTRACTORS
 CHICAGO - SALT LAKE CITY

FLOW DIAGRAM
 GYPSUM HANDLING SYSTEM
 Limestone & Gypsum Handling System
 OHIO POWER COMPANY
 AEP MITCHELL PLANT, UNITS 1 & 2, CRESAP, WEST VIRGINIA

DATE BY	DAMN	SCALE	NONE	DATE	12-3-04
CREATED BY	ADD	DIRECTED BY	RP	PROJECT NO.	0420-FS2
APPROVED BY				REV.	6

NOMENCLATURE	
	DG-# INERTER GATE
	MS-# SELF CLEANING MAGNETIC SEPARATOR
	BS-# BELT SCALE
	BC-# BELT CONVEYOR



RECEIVED FOR CONSTRUCTION

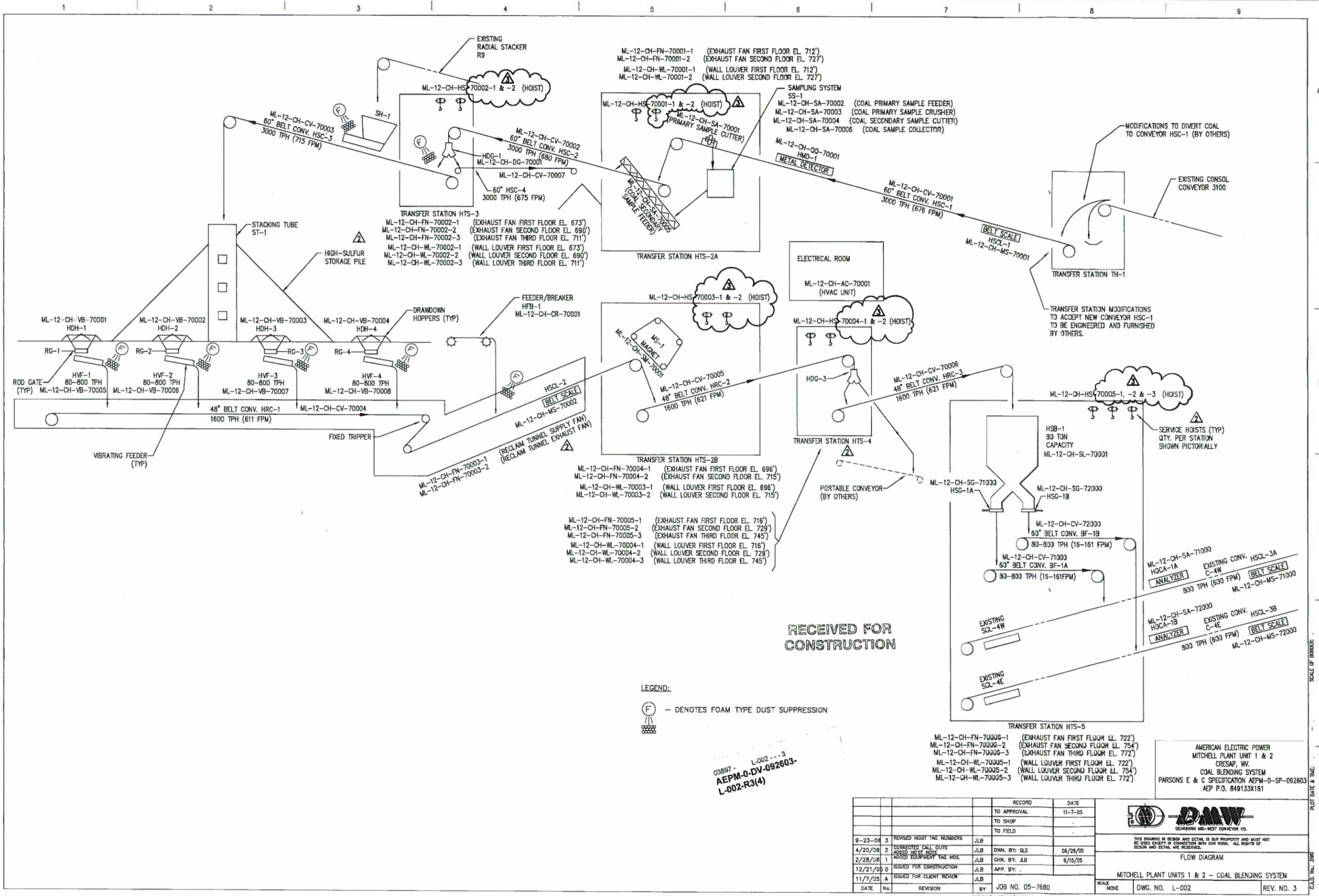
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 AEPM-0-DV-092604-
 0420-FS3-R2(3)

REV.	DATE	DESCRIPTION OF REVISION	REV.	DATE	DESCRIPTION OF REVISION	REV.	DATE	DESCRIPTION OF REVISION

ROBERTS & SCHAEFER
 ENGINEERS AND CONTRACTORS
 CHICAGO - SALT LAKE CITY

FLOW DIAGRAM
 GYPSUM HANDLING SYSTEM
 LIMESTONE & GYPSUM HANDLING SYSTEM
 OHIO POWER COMPANY
 AEP MITCHELL PLANT, UNITS 1 & 2, CRESAP, WEST VIRGINIA

DESIGNED BY RUP	DRAWN BY B TURNEY	SCALE NONE	DATE 12-27-05
APPROVED BY		PROJECT NO. 0420-FS3	REV. 2



RECEIVED FOR CONSTRUCTION

LEGEND:
 (F) - DENOTES FOAM TYPE DUST SUPPRESSION

03897 - L-002 - - - 3
 AEPM-0-DV-092603-
 L-002-R3(4)

ML-12-CH-FN-70006-1 (EXHAUST FAN FIRST FLOOR EL. 722')
 ML-12-CH-FN-70006-2 (EXHAUST FAN SECOND FLOOR EL. 754')
 ML-12-CH-FN-70006-3 (EXHAUST FAN THIRD FLOOR EL. 772')
 ML-12-CH-WL-70005-1 (WALL LOUVER FIRST FLOOR EL. 722')
 ML-12-CH-WL-70005-2 (WALL LOUVER SECOND FLOOR EL. 754')
 ML-12-CH-WL-70005-3 (WALL LOUVER THIRD FLOOR EL. 772')

AMERICAN ELECTRIC POWER
 MITCHELL PLANT UNIT 1 & 2
 CRESAP, WV.
 COAL BLENDING SYSTEM
 PARSONS E & C SPECIFICATION AEPM-0-SP-092603
 AEP P.O. 849133X181

DATE	No.	REVISION	BY	JOB NO. 05-7680
11/7/05	A	ISSUED FOR CLIENT REVIEW	JLB	
12/21/05	0	ISSUED FOR CONSTRUCTION	JLB	
2/28/06	1	ADDED EQUIPMENT TAG NOS.	JLB	
4/20/06	2	CORRECTED CALL OUTS	JLB	
9-23-06	3	REVISED HOIST TAG NUMBERS	JLB	

RECORD DATE

TO APPROVAL	11-7-05
TO SHOP	
TO FIELD	

9-23-06 3
 4/20/06 2
 2/28/06 1
 12/21/05 0
 11/7/05 A

FILE NAME: G:\021\U-002.dwg

PLotted: (A3) 23-SEP-2006 10:59

PLANT SCALE

SCALE NONE

DWG. NO. L-002

REV. NO. 3

AMERICAN ELECTRIC POWER
 MITCHELL PLANT UNIT 1 & 2
 CRESAP, WV.
 COAL BLENDING SYSTEM
 PARSONS E & C SPECIFICATION AEPM-0-SP-092603
 AEP P.O. 849133X181

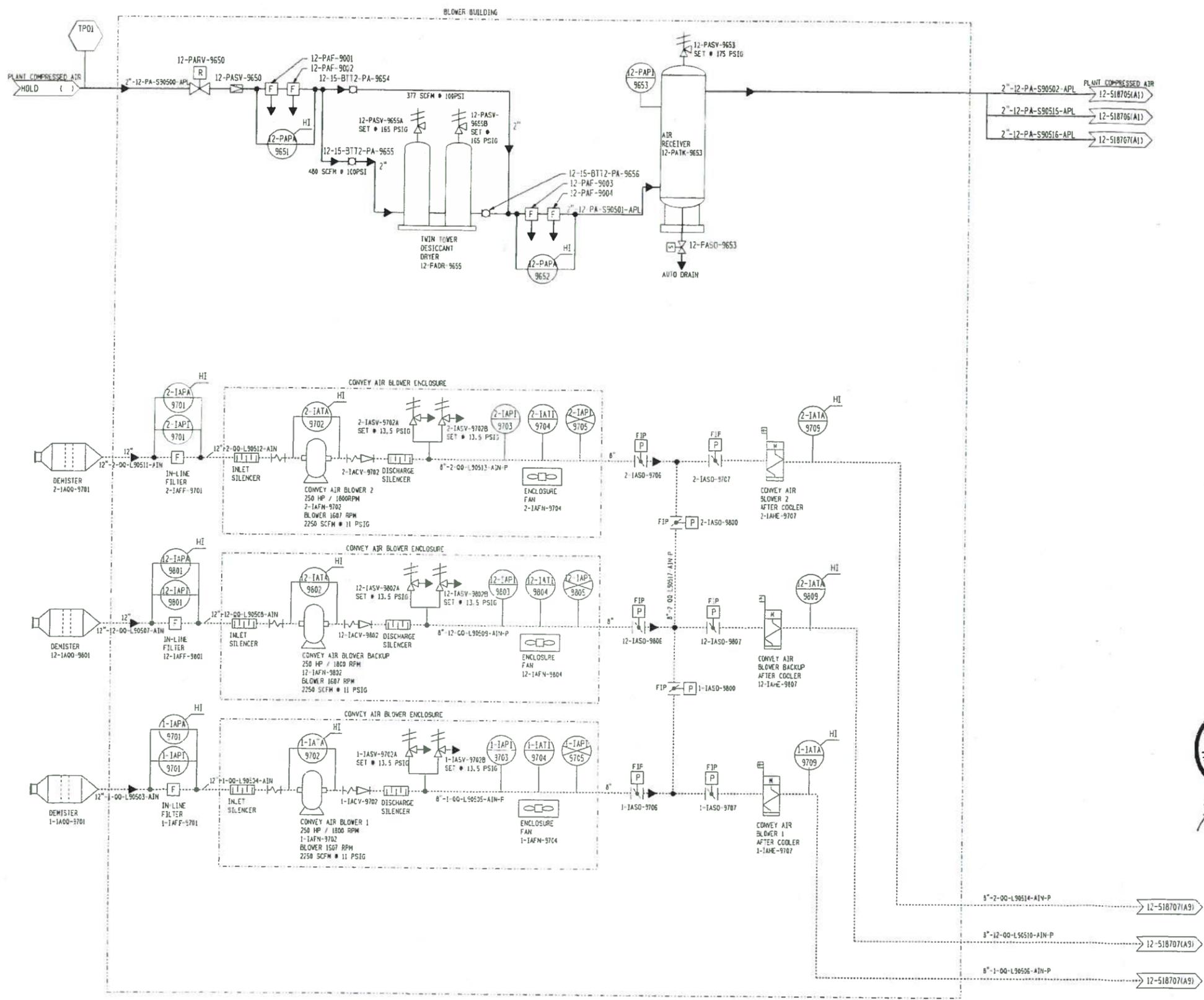
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FLOW DIAGRAM

MITCHELL PLANT UNITS 1 & 2 - COAL BLENDING SYSTEM

SCALE OF WORKS
 PLANT DATE & TIME
 C.A.D. NO. JWB

02815-21 ON DAM



LEGEND

- DSI SUPPLY
- DSI CHUTE WORK
- VENT PIPING
- COMPRESSED AIR
- GLYCOL SYSTEM
- AIR BLOWER LINES
- HYDRAULIC FLUID
- HAMMETT ELBOW
- LONG RADIUS ELBOW

- NOTES**
- (1) DENOTES PIPE & VALVES BY AEP
 1. ALL EQUIPMENT BY F.L. SMITH, UNLESS NOTED.
 2. REFER TO F.L.S. DOCUMENT NO. 700329 FOR PIPE MATERIAL SPECIFICATIONS.
 3. ALL TAG NAMES ARE PRECEDED BY ML- UNLESS NOTED.

REFERENCE DRAWINGS

STANDARD SYMBOLS ----- 504D
 ----- 504E
 ----- 504F

REFERENCE PROJECT PROCEDURE

FE-FL-EN-000

REVISIONS

DATE	NO.	DESCRIPTION	APP'D
06/21/06	0	ISSUED FOR CONSTRUCTION.	



ELSMIDTH 3046 AVENUE C
 BETHLEHEM, PA 18017

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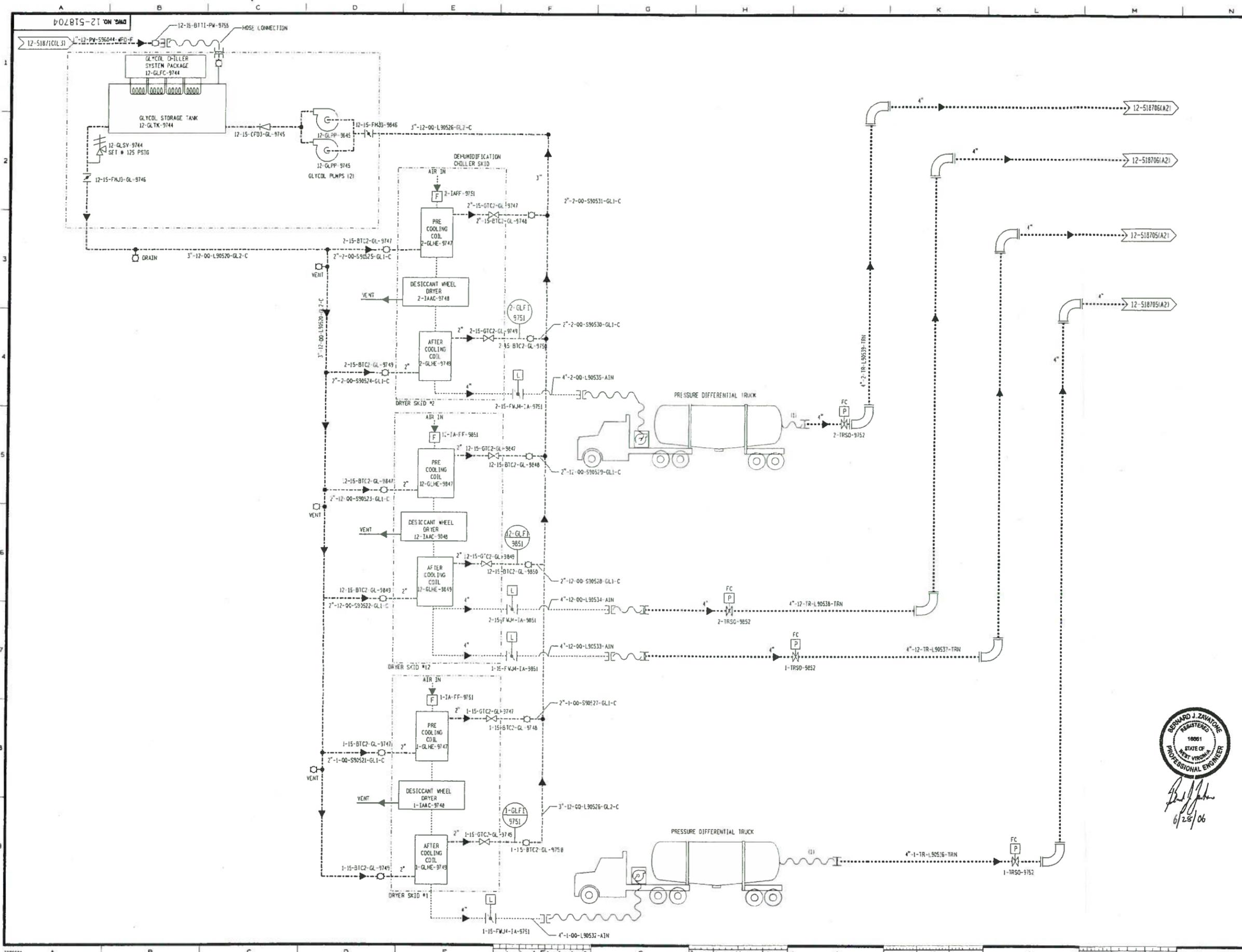
AMERICAN ELECTRIC POWER
MITCHELL PLANT
 CRESAP WEST VIRGINIA

DSI SYSTEM COMPRESSED AIR & PD BLOWERS FLOW DIAGRAM

DWG. NO. 12-518703-0

SCALE: NONE	DATE: 06/21/06
DRN: [blank]	DATE: 06/21/06
DES: [blank]	DATE: 06/21/06
CHK: [blank]	DATE: 06/21/06
APP'D: [blank]	DATE: 06/21/06

AEP AMERICAN ELECTRIC POWER **AEP SERVICE CORP.**
 1 RIVERSIDE PLAZA COLUMBUS, OH 43236



LEGEND

- DSI SUPPLY
- DSI CHUTE WORK
- VENT PIPING
- COMPRESSED AIR
- GLYCOL SYSTEM
- AIR BLOWER LINES
- HYDRAULIC FLUID
- HAMWEXTE ELBOW
- LONG RADIUS ELBOW

NOTES

1. DENOTES PIPE & VALVES BY AEP
1. ALL EQUIPMENT BY F.L. SMITH, UNLESS NOTED.
2. REFER TO F.L.S. DOCUMENT NO. 700399 FOR PIPE MATERIAL SPECIFICATIONS.
3. ALL TAG NAMES ARE PRECEDED BY M. UNLESS NOTED.

REFERENCE DRAWINGS

STANDARD SYMBOLS 5040
 504E
 504A

REFERENCE PROJECT PROCEDURE

PE-FL-EV-0001

DATE	ISSUED FOR CONSTRUCTION.	APPROVED
05/21/06		

FLSMITH
 7840 AVENUE C
 BETHLEHEM, PA 18017

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AMERICAN ELECTRIC POWER
 MITCHELL PLANT
 CHESAP WEST VIRGINIA

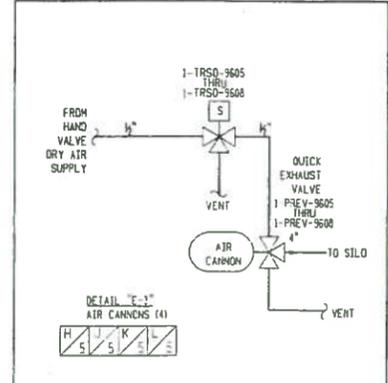
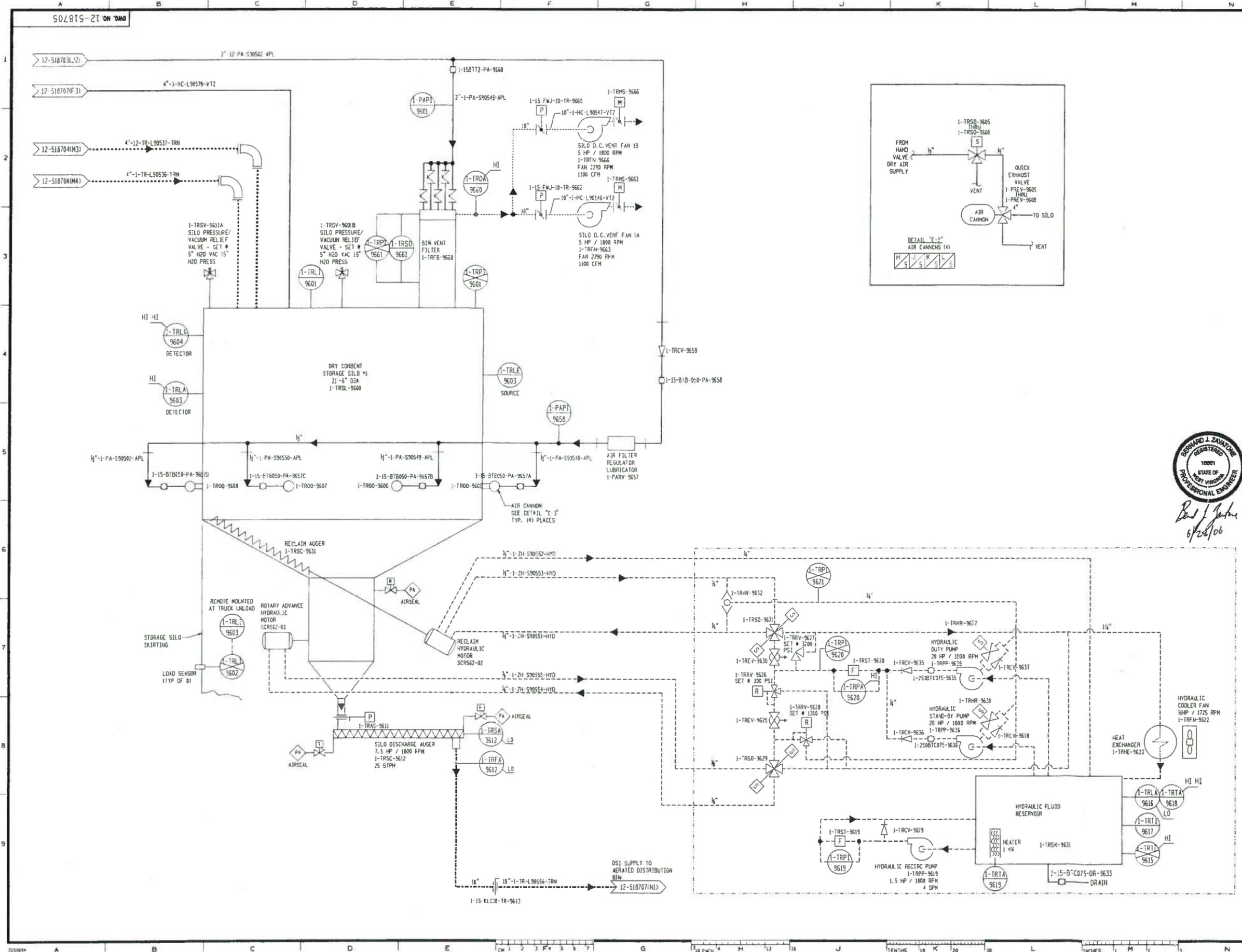
DSI SYSTEM
 CHILLER &
 DEHUMIDIFICATION
 FLOW DIAGRAM

DWG. NO. 12-518704-0

SCALE: NONE
DWG. NO.
DATE
APPROVED BY
DATE

AEP SERVICE CORP.
 1 BUCKINGHAM PLAZA
 COLUMBUS, OH 43215





LEGEND

- DSI SUPPLY
- DSI CHUTE WORK
- VENT PIPING
- COMPRESSED AIR
- GLYCOL SYSTEM
- AIR BLOWER LINES
- HYDRAULIC FLUID
- ⌋ HAMMERTEK ELBOW
- ⌋ LONG RADIUS ELBOW
- ⬠ PLANT AIR

- NOTES**
1. DENOTES PIPE & VALVES BY AEP
 2. ALL EQUIPMENT BY F.L. SMITH, UNLESS NOTED.
 3. REFER TO F.L.S. DOCUMENT NO. 750329 FOR PIPE MATERIAL SPECIFICATIONS.
 4. ALL TAG NAMES ARE PRECEDED BY HL- UNLESS NOTED.

REFERENCE DRAWINGS

STANDARD SYMBOLS	NO.
---	5040
---	504E
---	504



05/25/06 ISSUED FOR CONSTRUCTION.

DATE	DESCRIPTION	APPROV.

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AMERICAN ELECTRIC POWER
MITCHELL PLANT
CRESAP WEST VIRGINIA
DSI SYSTEM
SILO 1
& RECLAIM
FLOW DIAGRAM

DWG. NO. 12-518705-0

SCALE: AS SHOWN

DATE:	APPROVED BY:
DESIGNED BY:	CHECKED BY:
DRAWN BY:	IN CHARGE:

AEP SERVICE CORP. 1 RIVERSIDE PLAZA COLUMBUS, OH 43218

90/875-2T DWG 960

LEGEND

- DSI SUPPLY
- DSI CHUTE WORK
- VENT PIPING
- COMPRESSED AIR
- GLYCOL SYSTEM
- AIR BLOWER LINES
- HYDRAULIC FLUID
- HAMMERTEK ELBOW
- LONG RADIUS ELBOW
- PA
- PLANT AIR

NOTES

- (1) DENOTES PIPE & VALVES BY AEP
1. ALL EQUIPMENT BY F.L.S. SMITH, UNLESS NOTED.
2. REFER TO F.L.S. DOCUMENT NO. 700029 FOR PIPE MATERIAL SPECIFICATIONS.
3. ALL TAG NAMES ARE PRECEDED BY ML - UNLESS NOTED.

REFERENCE DRAWINGS

- STANDARD SYMBOLS ----- 5040
5046
504



Donald J. Zanone
6/23/06

DATE	NO.	DESCRIPTION	APP.
05/25/06	0	ISSUED FOR CONSTRUCTION.	

DATE	NO.	DESCRIPTION	APP.

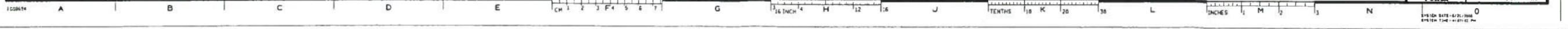
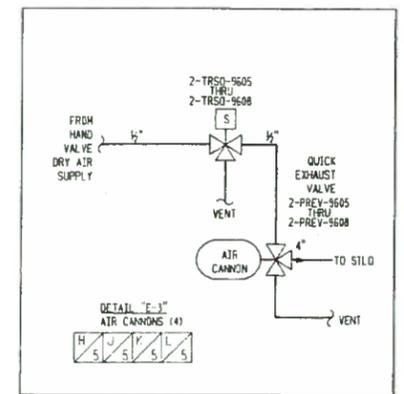
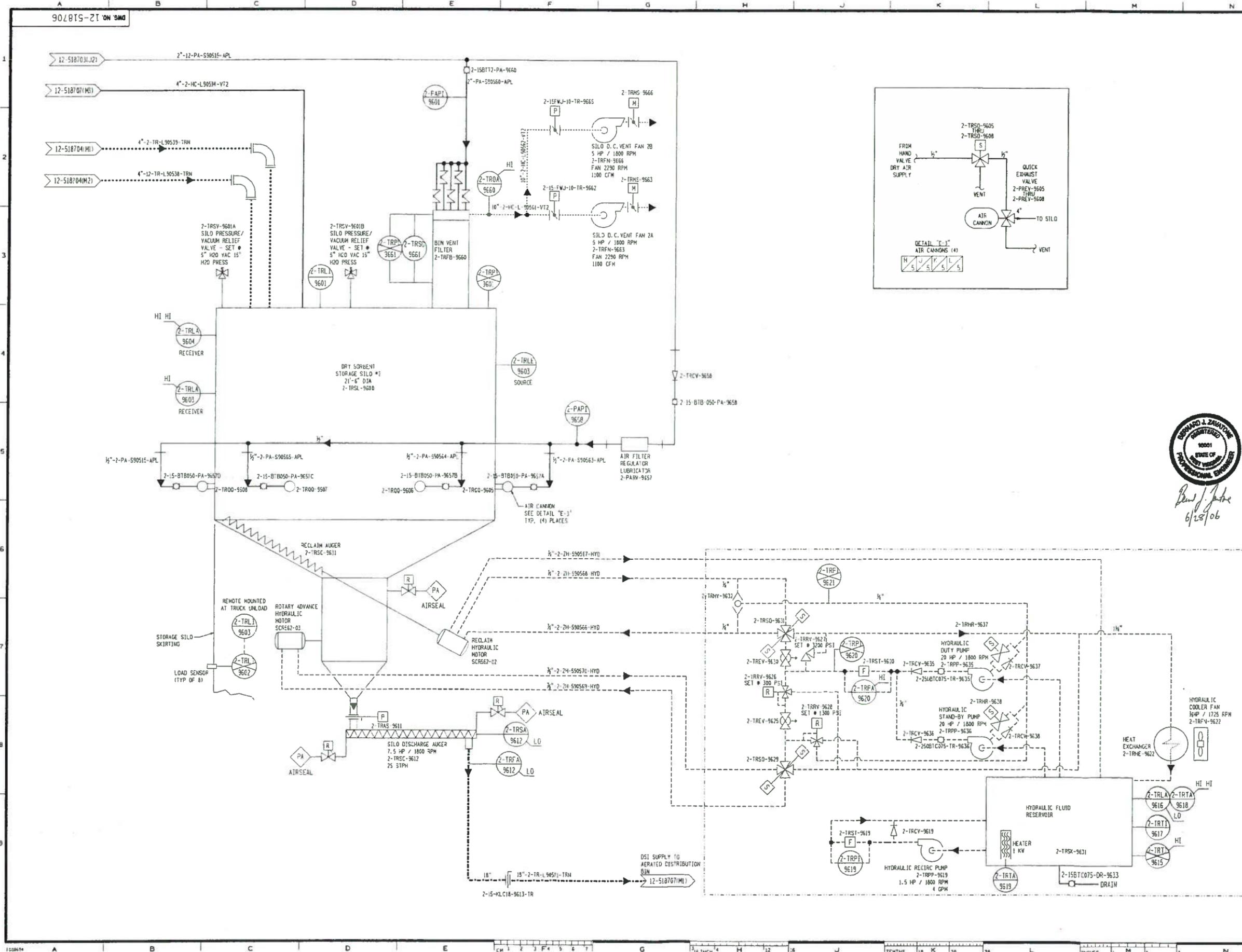
FLSMITH 2640 AVENUE C BETHLEHEM, PA 18017
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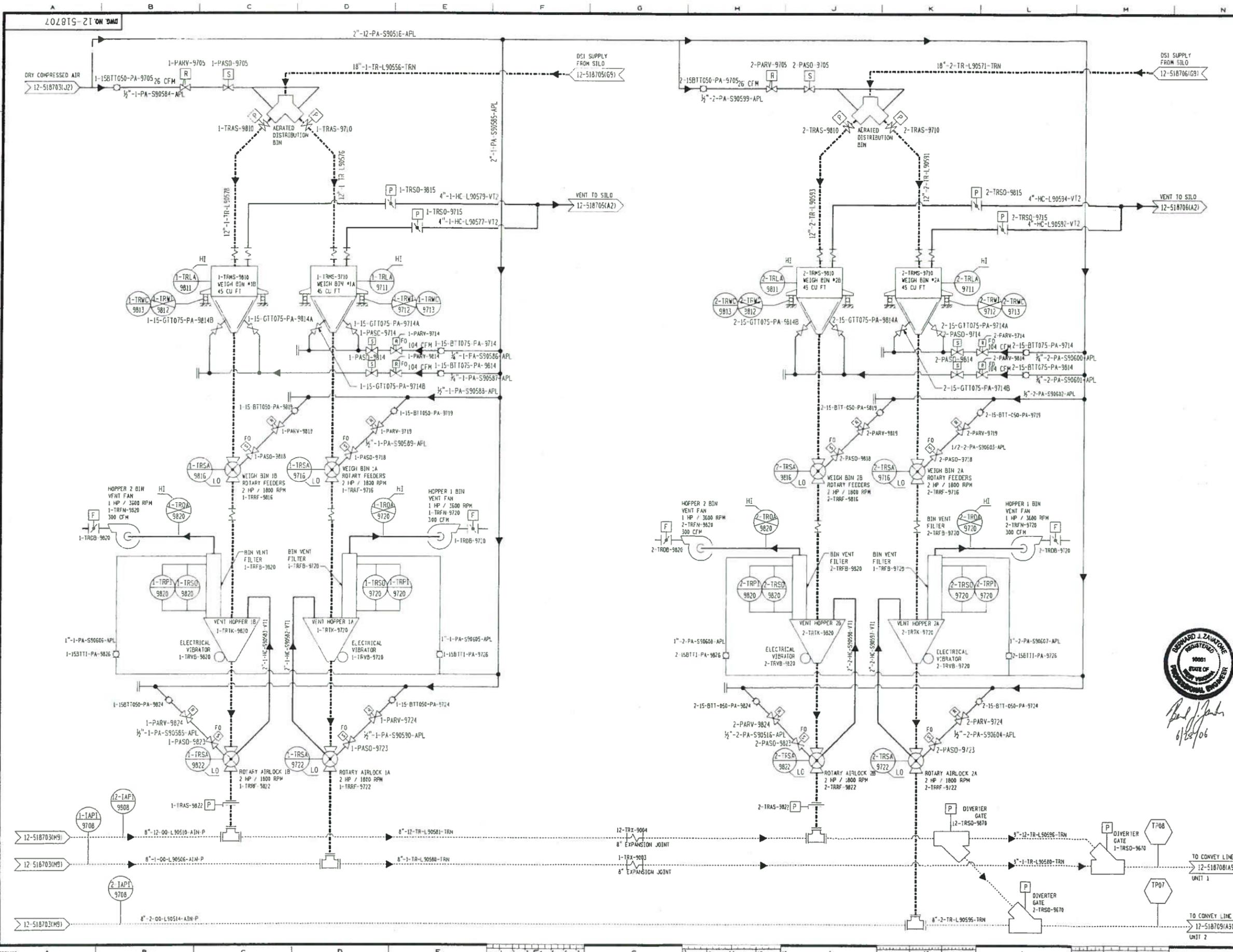
AMERICAN ELECTRIC POWER
 MITCHELL PLANT
 CRESAP WEST VIRGINIA
 DSI SYSTEM
 SILO 2 & RECLAIM
 FLOW DIAGRAM

DWG. NO. 12-518706-0

SCALE: NONE
 DATE: _____
 DRAWN BY: _____
 CHECKED BY: _____
 APPROVED BY: _____
 DATE: _____

AEP SERVICE CORP.
 1 INVERSIDE PLAZA
 COLUMBUS, OH 43226





LEGEND

- DSI SUPPLY
- DSI CHUTE WORK
- VENT PIPING
- COMPRESSED AIR
- GLYCOL SYSTEM
- AIR BLOWER LINES
- HYDRAULIC FLUID
- HAMMERTEK ELBOW
- LONG RADIUS ELBOW

- NOTES**
- (1) DENOTES PIPE & VALVES BY AEP
 1. ALL EQUIPMENT BY F.L. SMITH, UNLESS NOTED.
 2. REFER TO F.L.S. DOCUMENT NO. 7003029 FOR PIPE MATERIAL SPECIFICATIONS.
 3. ALL TAG NAMES ARE PRECEDED BY ML- UNLESS NOTED.

REFERENCE DRAWINGS

STANDARD SYMBOLS 5004D
5004E
5004

REFERENCE PROJECT PROCEDURE

PE-FL-EM-0001



DATE	ISSUED FOR CONSTRUCTION.
DATE	REVISIONS
DATE	REVISIONS

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AMERICAN ELECTRIC POWER
MITCHELL PLANT
CRESAP WEST VIRGINIA
DSI SYSTEM
LW FEEDERS
& TRANSPORT LINE
FLOW DIAGRAM

DWG. NO. 12-518707-0

SCALE: NONE

DATE: 6/15/06

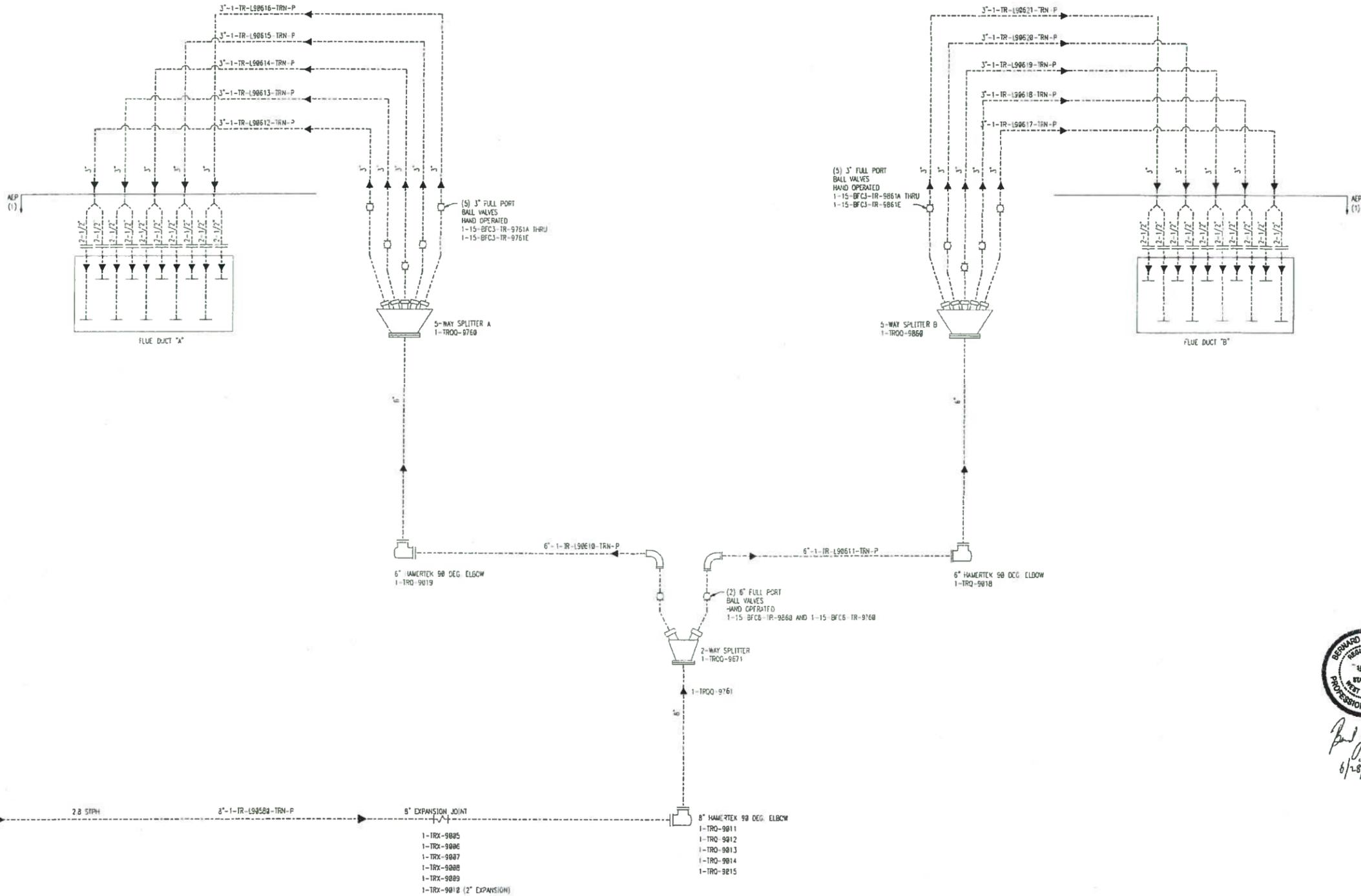
BY: [Signature]

APPROVED BY: [Signature]

DATE: 6/15/06

AMERICAN ELECTRIC POWER
AEP SERVICE CORP.
1 RIVERSIDE PLAZA
COLUMBUS, OH 43215

902815-21 ON DND



LEGEND

- DSI SUPPLY
- DSI CHUTE WORK
- VENT PIPING
- COMPRESSED AIR
- GLYCOL SYSTEM
- AIR BLOWER LINES
- HYDRAULIC FLUID
- HAMERTEK ELBOW
- LONG RADIUS ELBOW

NOTES

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- 3) REFER TO F.L.S. DOCUMENT NO. 780329 FOR PIPE MATERIAL SPECIFICATIONS.
- 4) ALL TAG NAMES ARE PRECEDED BY ML - UNLESS NOTED.

REFERENCE DRAWINGS

STANDARD SYMBOLS	5004D
	5004E
	5004

REFERENCE PROJECT PROCEDURE

FE-FL-EN-0001

DATE	DESCRIPTION	APP'D.
05/25/06	ISSUED FOR CONSTRUCTION.	

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AMERICAN ELECTRIC POWER
MITCHELL PLANT
CRESAP WEST VIRGINIA
DSI SYSTEM
UNIT 1
DUCT INJECTION
FLOW DIAGRAM

DWG. NO. 12-518708-0

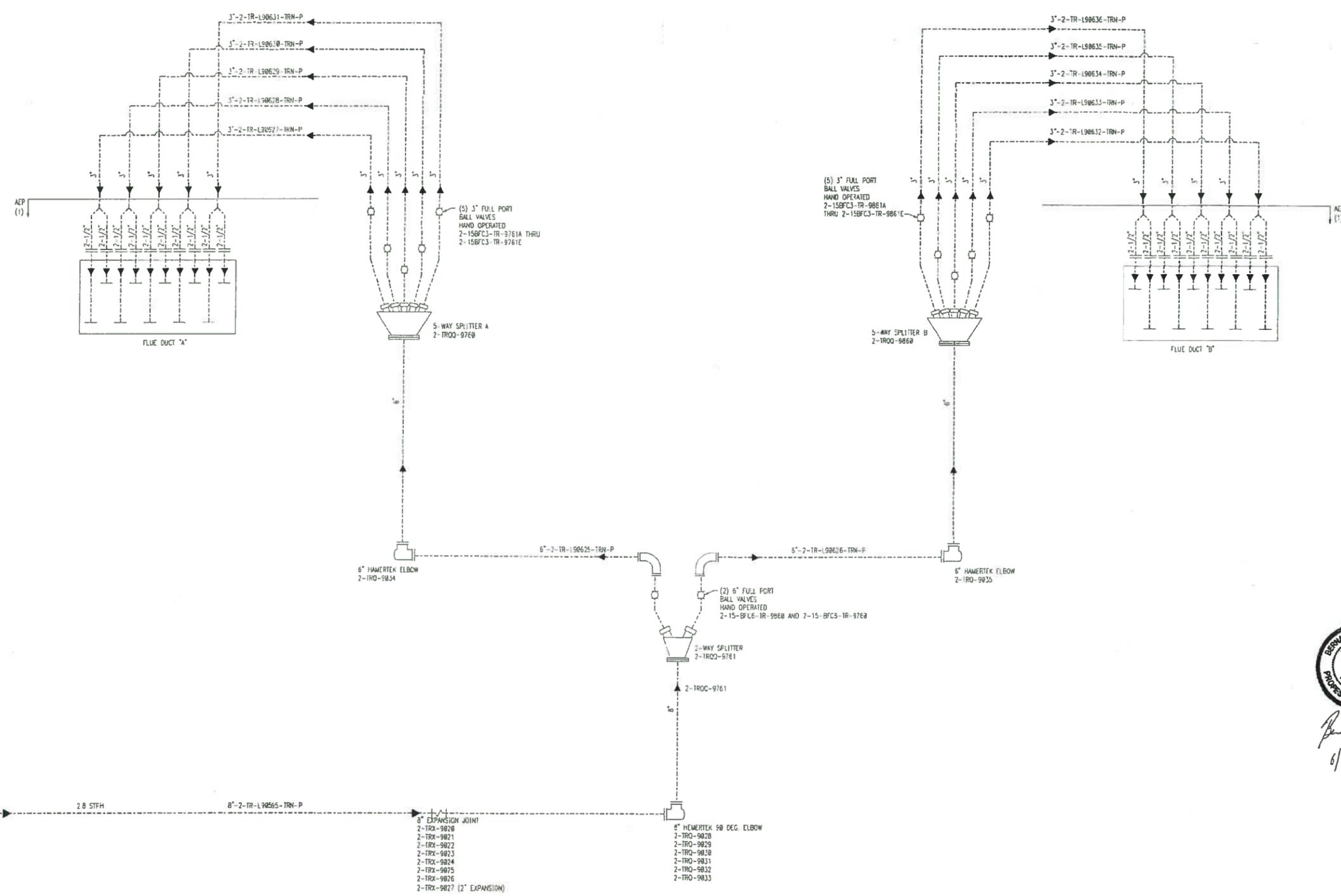
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DESIGNED BY: [Signature]	APPROVED BY: [Signature]
CHECKED BY: [Signature]	DATE: 6/28/06

AEP SERVICE CORP.
1 RIVERSIDE PLAZA
COLUMBUS, OH 43215



Handwritten signature and date: 6/28/06

DWG NO. 12-518709



LEGEND

- DSI SUPPLY
- DSI CHUTE WORK
- VENT PIPING
- COMPRESSED AIR
- GLYCOL SYSTEM
- AIR BLOWER LINES
- HYDRAULIC FLUID
- Hammertek Elbow
- Long Radius Elbow

NOTES

- (1) DENOTES PIPE & VALVES BY AEP
- ALL EQUIPMENT BY F.L. SMITH, UNLESS NOTED.
- REFER TO F.L.S. DOCUMENT NO. 7803029 FOR PIPE MATERIAL SPECIFICATIONS.
- ALL TAG NAMES ARE PRECEDED BY ML - UNLESS NOTED.

REFERENCE DRAWINGS

STANDARD SYMBOLS ----- 5004D
5004E
5004

REFERENCE PROJECT PROCEDURE

PE-FL-EN-0001

05/06	ISSUED FOR CONSTRUCTION.
DATE	DESCRIPTION
REVISIONS	

F.L. SMITH 2640 AVIATION C
BETHLEHEM, PA 18017

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AMERICAN ELECTRIC POWER
MITCHELL PLANT
CRESAP WEST VIRGINIA
DSI SYSTEM
UNIT 2
DUCT INSERTION
FLOW DIAGRAM

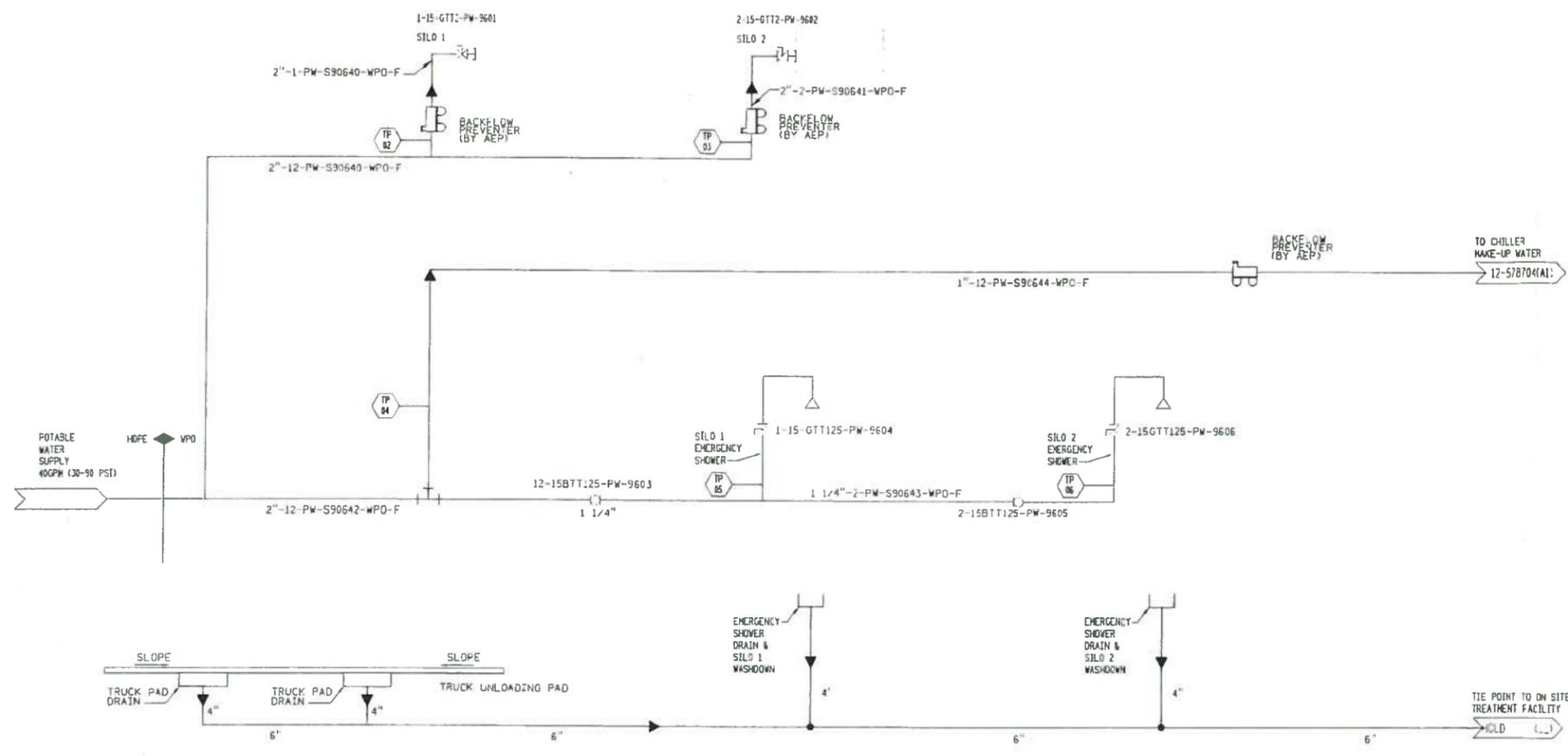
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SCALE: AS SHOWN	DATE: _____
DESIGNED BY: _____	APPROVED BY: _____
CHECKED BY: _____	DATE: _____

15th AMERICAN ELECTRIC POWER AEP SERVICE CORP. 1 RIVERSIDE PLAZA COLUMBUS, OH 43235



DWG. NO. 12-518710



(1) DENOTES PIPE & VALVES BY AEP

NOTES
 FOR GENERAL NOTES SEE DRAWING 1-518701
 1. ALL EQUIPMENT BY F.L. SHDTH, UNLESS NOTED.
 2. REFER TO F.L.S. DOCUMENT NO. 7003023 FOR PIPE MATERIAL SPECIFICATIONS.
 3. ALL TAG NAMES ARE PRECEDED BY ML - UNLESS NOTED.

REFERENCE DRAWINGS
 STANDARD SYMBOLS 5004D
 5004E
 5004

REFERENCE PROJECT PROCEDURE

0	ISSUED FOR CONSTRUCTION	
DATE	DESCRIPTION	APPROVED
REVISIONS		

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APPALACHIAN POWER COMPANY
MITCHELL PLANT
 CRESAP WEST VIRGINIA
 DSI SYSTEM
 SERVICE WATER
 & POTABLE WATER
 FLOW DIAGRAM

DWG. NO. 12-518710-0
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 DESIGNED BY: [Signature]
 CHECKED BY: [Signature]
 APPROVED BY: [Signature]
 DATE: 6/28/06



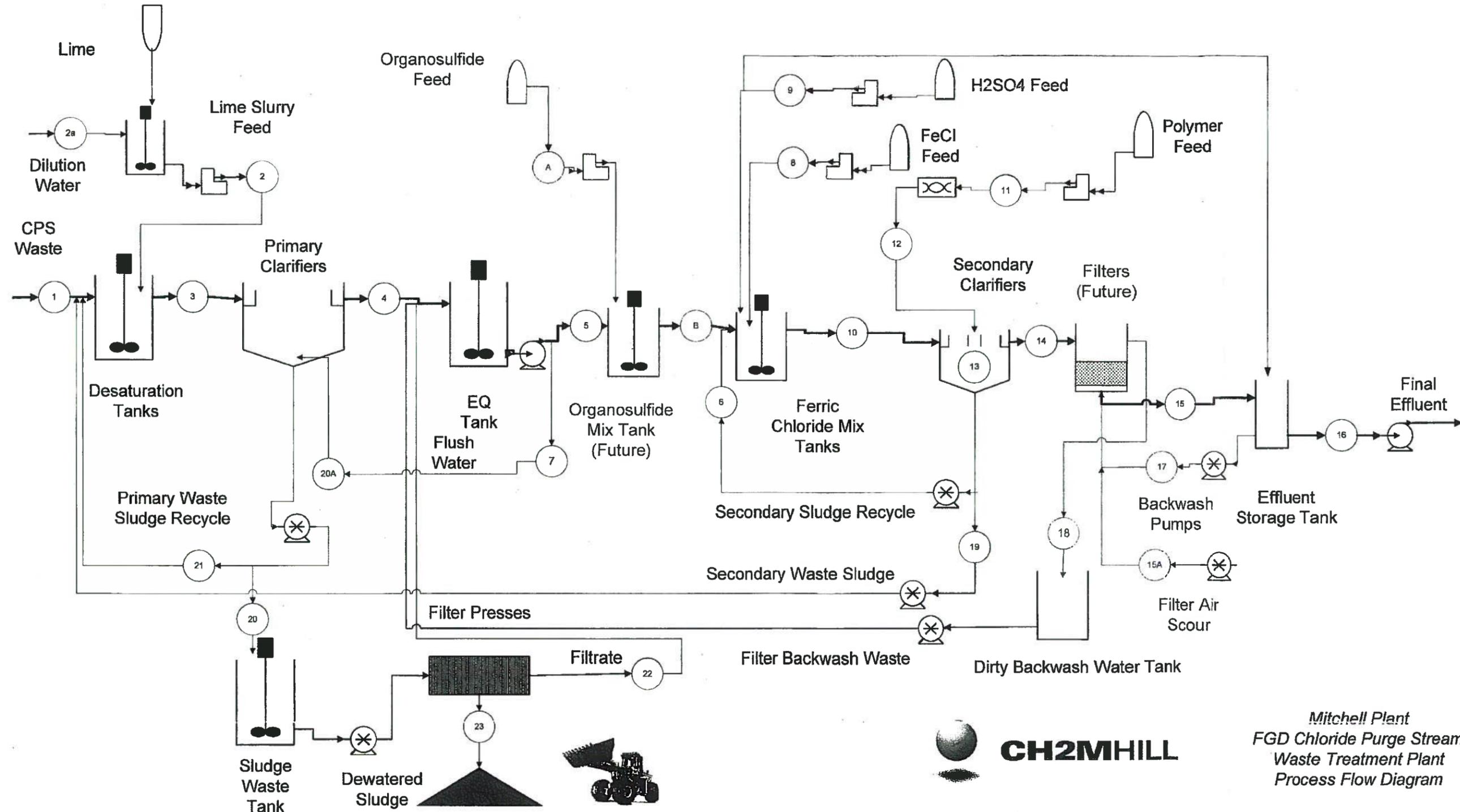
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AEP SERVICE CORP.
 ELECTRIC POWER
 COLUMBUS, OH 43215

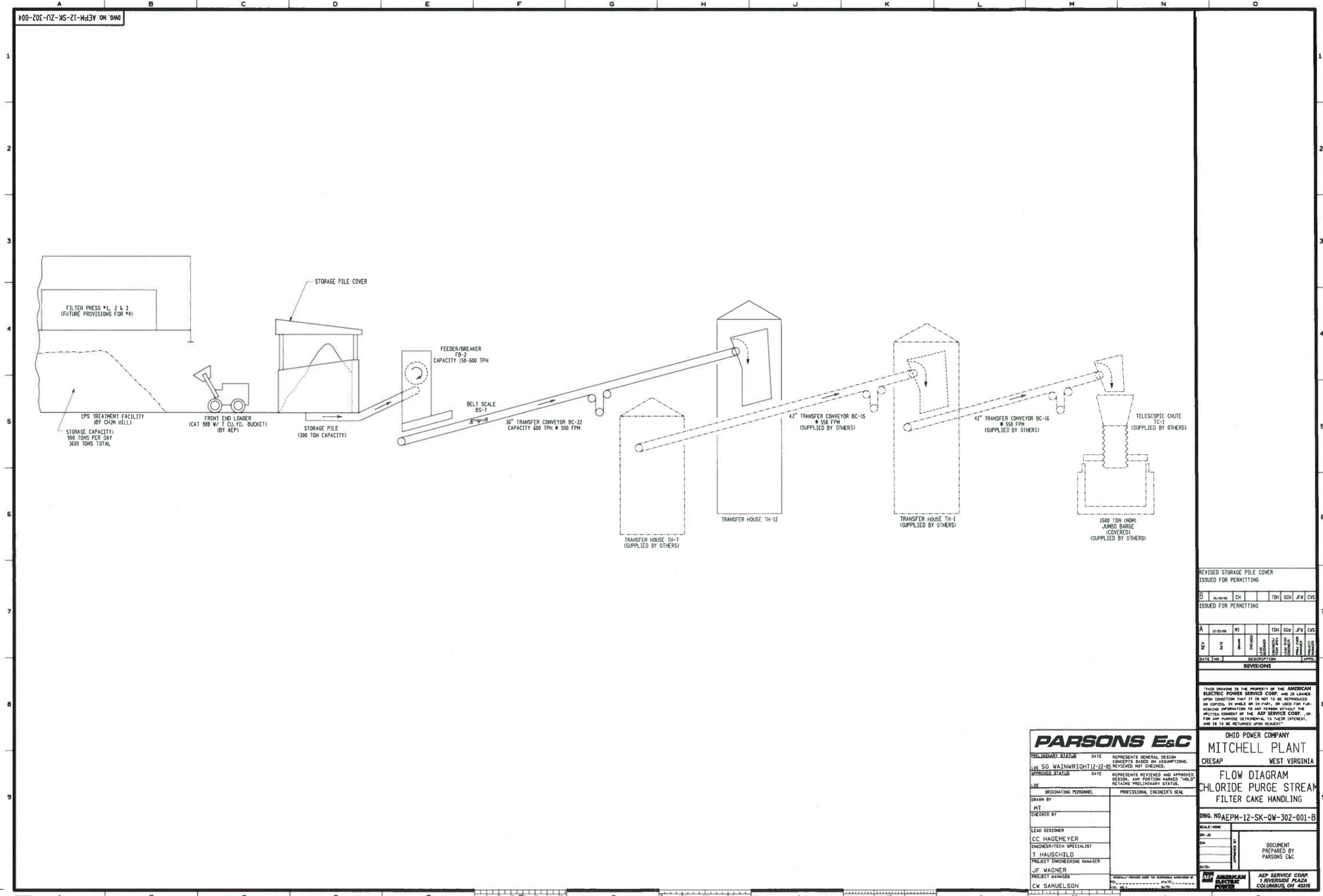
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Attachment 1. FGD CPS Wastewater Treatment System Process Flow Diagram



Mitchell Plant
FGD Chloride Purge Stream
Waste Treatment Plant
Process Flow Diagram

DWG. NO. AEPM-12-SK-ZU-302-004



REVISED STORAGE PILE COVER
ISSUED FOR PERMITTING

11/28/96	CH		TDH	SDV	JFV	CYS
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ISSUED FOR PERMITTING

12/12/96	MT		TDH	SDV	JFV	CYS
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REV	DATE	DESIGN	CHKD	BY	DESCRIPTION	APPROV

REVISIONS

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PARSONS E&C

DESIGN STATUS: DATE REPRESENTS GENERAL DESIGN CONCEPTS BASED ON ASSUMPTIONS.
APPROVED STATUS: DATE REPRESENTS REVIEWED AND APPROVED DESIGN. ANY PORTION MARKED "HOLD" RETAINS PRELIMINARY STATUS.

DESIGNED BY: CC HAGEMeyer
CHECKED BY: T HAUSCHILD
LEAD DESIGNER: CC HAGEMeyer
ENGINEER/TECH SPECIALIST: T HAUSCHILD
PROJECT ENGINEERING MANAGER: JF WAGNER
PROJECT MANAGER: CW SAMUELSON

OHIO POWER COMPANY
MITCHELL PLANT
CRESAP WEST VIRGINIA

**FLOW DIAGRAM
CHLORIDE PURGE STREAM
FILTER CAKE HANDLING**

DWG. NO. AEPM-12-SK-QW-302-001-B

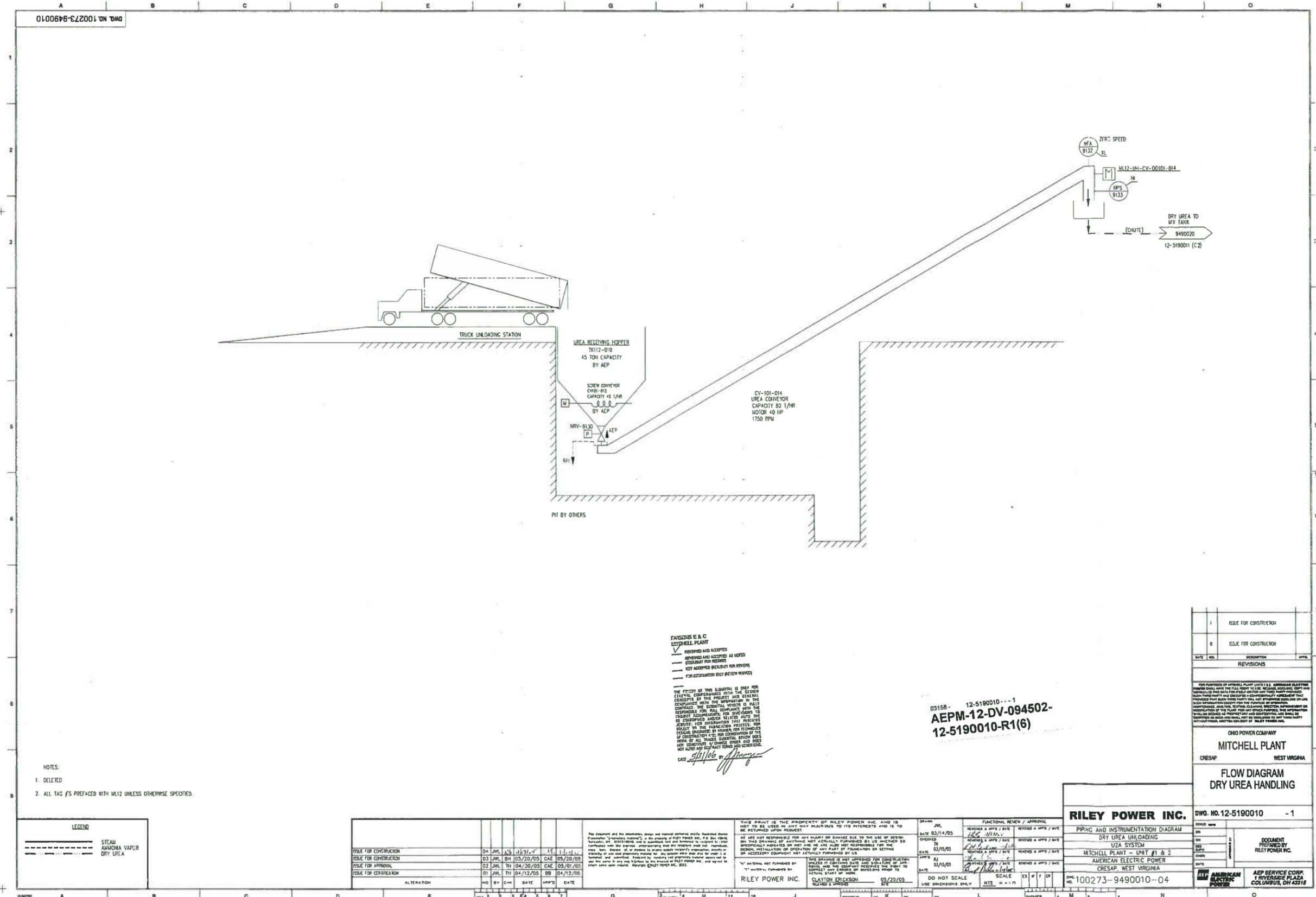
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DATE: 04/09/94

APPROVED BY: [Signature]

DOCUMENT PREPARED BY: PARSONS E&C

AEP SERVICE CORP.
RIVERSIDE PLAZA
COLUMBUS, OH 43215



DWG. NO. 100273-949010

- NOTES:
1. DELETED
 2. ALL TAG #'S PREFACED WITH ML12 UNLESS OTHERWISE SPECIFIED.

LEGEND

---	STEAM
---	AMMONIA VAPOR
---	DRY UREA

ISSUE	NO	BY	DATE	APPROV	DATE
ISSUE FOR CONSTRUCTION	04	JML	04/11/05	CAE	05/20/05
ISSUE FOR CONSTRUCTION	03	JML	05/20/05	CAE	05/20/05
ISSUE FOR APPROVAL	02	JML	04/20/05	CAE	05/01/05
ISSUE FOR CONSTRUCTION	01	JML	04/12/05	BB	04/12/05

FATIGUES E & C
MITCHELL PLANT

REVIEWED AND ACCEPTED AS NOTED
(CIRCLED FOR REVIEW)

NOT ACCEPTED (CHECK FOR REVIEW)

FOR RETAINMENT ONLY (SEE DRAWING)

THE DESIGN OF THIS ELEMENT IS ONLY FOR
GENERAL CONFORMANCE WITH THE DESIGN
CONCEPTS OF THE PROJECT AND GENERAL
CONFORMANCE WITH THE INFORMATION IN THE
CONTRACT. THE DESIGNER ASSUMES NO
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ELEMENT OR FOR THE DESIGN OF ANY OTHER
ELEMENTS OF THE PROJECT. THE DESIGNER
IS NOT RESPONSIBLE FOR THE DESIGN OF
ANY OTHER ELEMENTS OF THE PROJECT.
IF CONSTRUCTION OF THIS ELEMENT IS
DEFERRED, THE DESIGNER ASSUMES NO
RESPONSIBILITY FOR THE DESIGN OF THIS
ELEMENT OR FOR THE DESIGN OF ANY OTHER
ELEMENTS OF THE PROJECT.

DATE 05/11/06 BY [Signature]

03158- 12-5190010 -- 1
AEPM-12-DV-094502-
12-5190010-R1(6)

RILEY POWER INC.

PIPING AND INSTRUMENTATION DIAGRAM
DRY UREA UNLOADING
UREA SYSTEM
MITCHELL PLANT - UNIT #1 & 2
AMERICAN ELECTRIC POWER
CREASAP, WEST VIRGINIA

DWG. NO. 12-5190010 - 04

DATE	NO.	DESCRIPTION	APPROV.
	1	ISSUE FOR CONSTRUCTION	
	0	ISSUE FOR CONSTRUCTION	

REVISIONS

FOR PURPOSES OF MITCHELL PLANT UNIT #1 & 2, AMERICAN ELECTRIC POWER SHALL HAVE THE FULL RIGHT TO USE, REPRODUCE, COPY AND TRANSMIT THIS DATA FOR ANY AND ALL PURPOSES AND FOR ANY AND ALL REASONS WITHOUT LIMITATION AND WITHOUT LIABILITY TO RILEY POWER INC. RILEY POWER INC. SHALL BE RESPONSIBLE FOR THE DESIGN AND CONSTRUCTION OF THE PROJECT AND SHALL BE RESPONSIBLE FOR THE DESIGN AND CONSTRUCTION OF THE PROJECT AND SHALL BE RESPONSIBLE FOR THE DESIGN AND CONSTRUCTION OF THE PROJECT.

ORIO POWER COMPANY
MITCHELL PLANT
CREASAP, WEST VIRGINIA

FLOW DIAGRAM
DRY UREA HANDLING

DWG. NO. 12-5190010 - 1

DOCUMENT PREPARED BY RILEY POWER INC.

AMERICAN ELECTRIC POWER
AEP SERVICE CORP.
1 RIVERSIDE PLAZA
COLUMBUS, OH 43218

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

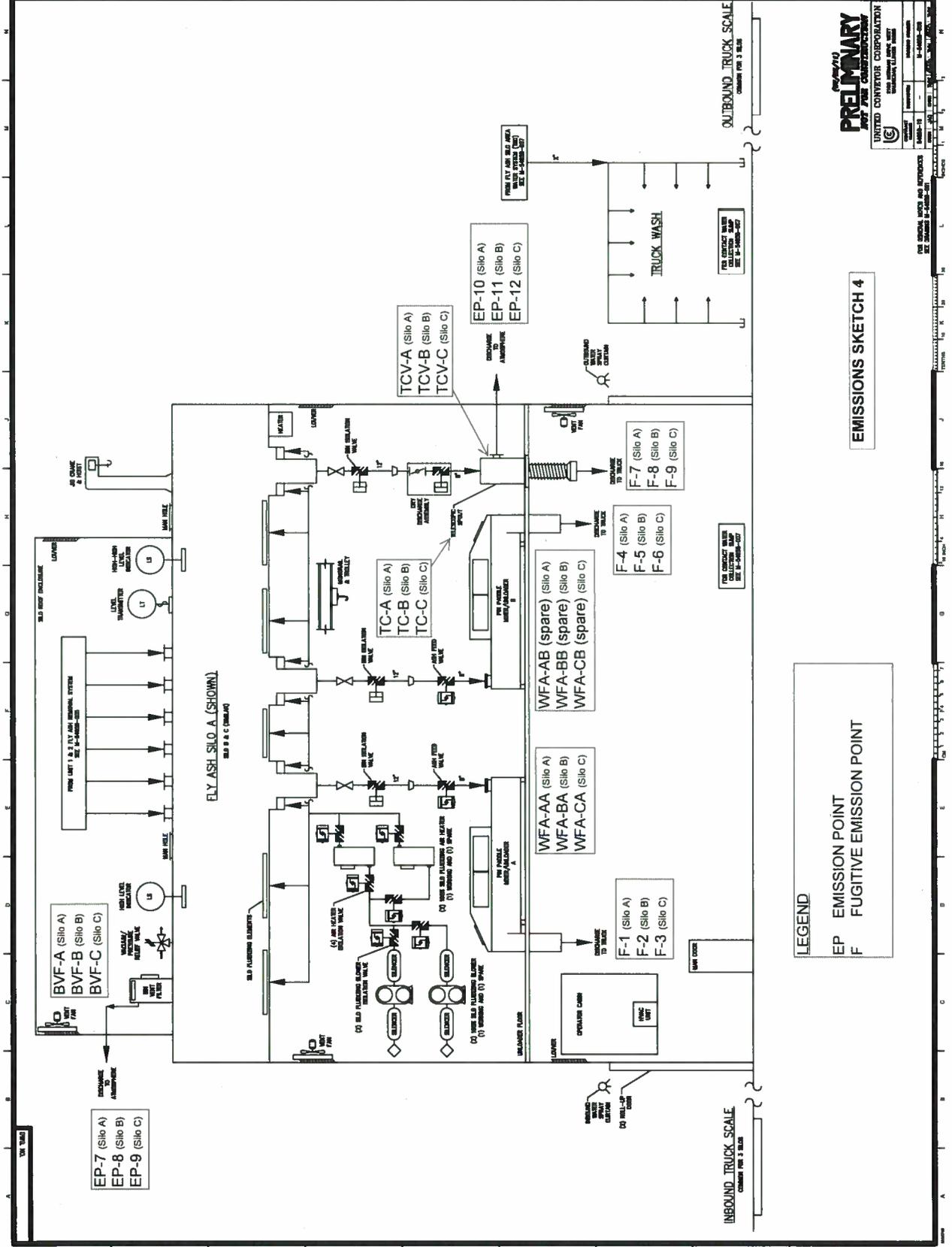
GENERAL NOTES

REFERENCE DRAWINGS

MITCHELL PLANT
 WEST WINDHAM
 DRY FLY ASH CONVERSION
 UNITS 1 & 2
 FLY ASH SILD SYSTEM
 KEY PROCESS DIAGRAM

PRELIMINARY
 KEY PROCESS DIAGRAM

UNIT NO.	1
UNIT NAME	UNIT 1
UNIT TYPE	UNIT 1
UNIT STATUS	UNIT 1
UNIT LOCATION	UNIT 1
UNIT DATE	UNIT 1
UNIT DRAWN BY	UNIT 1
UNIT CHECKED BY	UNIT 1
UNIT APPROVED BY	UNIT 1
UNIT SCALE	UNIT 1
UNIT SHEET NO.	UNIT 1
UNIT TOTAL SHEETS	UNIT 1



EMISSIONS SKETCH 4

LEGEND
 EP EMISSION POINT
 F FUGITIVE EMISSION POINT

INBOUND TRUCK SCALE
CONVERT PER 3 SILS

OUTBOUND TRUCK SCALE
CONVERT PER 3 SILS

UNIT 1
 UNIT 2
 UNIT 3
 UNIT 4
 UNIT 5
 UNIT 6
 UNIT 7
 UNIT 8
 UNIT 9
 UNIT 10
 UNIT 11
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 UNIT 44
 UNIT 45
 UNIT 46
 UNIT 47
 UNIT 48
 UNIT 49
 UNIT 50

Attachment D

Title V Equipment Table

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
Boiler & Associated Equipment					
Unit 1	High efficiency	1E	Boiler: Foster Wheeler, Model # 2-85-303	7020 mmBtu/hr	1971
Unit 2	High efficiency	2E	Boiler: Foster Wheeler, Model # 2-85-304	7020 mmBtu/hr	1971
Aux 1	N/A	Aux ML1	Boiler: Foster Wheeler, Model # SD- 25	663 mmBtu/hr	1970, Reconstructed in 2012
Unit 1 and Unit 2 Emergency Diesel Driven Fire Pumps	N/A	Unit 1 and Unit 2 Engine Driven Fire Pumps	Unit 1 and Unit 2 Emergency Diesel Driven Fire Pumps	230 HP each	Approx. 1971
Coal Handling					
BU	WS, PE, MC	BU	Barge Unloader (unload barge onto Conveyor R1	4,000 TPH	1971
Station R1	FE, MC	Sta-R1	Conveyor R1 and drop points to Conveyor R2	3,000 TPH	1971
C-R2	WS, PE, MC	C-R2	Conveyor R2 (transfer to Station R2)	3,000 TPH	1971
RCU	WS, MC	RCU	Rail Car Unloader (unload rail cars to feeders R6-1, R6-2 and R6-3)	3,000 TPH	April, 1974
R6-1, R6-2, R6-3	PE, MC	R6-1, R6-2, R6-3	Feeders R6-1, R6-2, R6-3 (transfer points to Conveyor R7)	1,400 TPH	April 1974
C-R7	WS, PE, MC	C-R7	Conveyor R7 (transfer to Station R2)	3,000 TPH	April 1974
Station R2	FE, MC	Sta-R2	Drop point to coal crusher or conveyor R3	N/A	April 1974
CR-R2	FE, MC	CR-R2	Coal Crusher	2,500 TPH	1971
C-R3	PE, MC	C-R3	Conveyor R3 (transfer to Station R3)	3,000 TPH	1971
Station R3	FE, MC	Sta-R3	Drop point to conveyor R4 or R1 1	N/A	1971
C-R1 1	PE, MC	C-R1 1	Conveyor R1 1 (transfer to radial portable Conveyor R12)	3,000 TPH	1971
C-R12	MC	C-R12	Radial Portable Conveyor R12 (transfer to temporary storage pile)	3,000 TPH	1971
C-R4	PE, MC	C-R4	Conveyor R4 (transfer to Station R4)	3,000 TPH	1971
Station R4	FE, MC	Sta-R4	Drop point to Sample System and Conveyor R5; and/or Conveyor R8	N/A	1971
C-R8	PE, MC	C-R8	Conveyor R8 (transfer to Radial Stacker Conveyor R9)	3,000 TPH	April 1974
C-R9	MC	C-R9	Radial Stacker Conveyor R9 (transfer to North Yard Storage Pile – Station R7)	3,000 TPH	April 1974
Station R7	FE, MC	Sta-R7	Drop point from North Yard Storage Pile through Crusher R7-1 to Feeder Conveyor BFR7-1	N/A	April 1974
CR-R7-1	FE, MC	CR-R7-1	Coal Crusher	1,000 TPH	April 1974
BFR7-1	FE, MC	BFR7-1	Feeder BFR7-1 (transfer to Conveyor R10)	1,100 TPH	April 1974
C-R1 0	PE, MC	C-R10	Conveyor R10 (transfer to truck load out and Station R4)	1,100 TPH	April 1974

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
 (includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
C-R5	PE, MC	C-R5	Conveyor R5 (transfer to Drive Tower S1)	3,000 TPH	1971
Drive Tower S1	FE, MC	Drive Tower S1	Drop point to Conveyor R6	N/A	1971
C-R6	PE, MC	C-R6	Conveyor R6 (transfer to Station 2)	3,000 TPH	1971
Station 2	FE, MC	Sta-2	Drop point to Radial Stacker Conveyor 2	N/A	1969
RS-2	WS, MC	RS-2	Radial Stacker 2 (transfer to surge pile)	4,000 TPH	1969
Station 1A	FE, MC	Sta-1A	Drop point from frozen coal storage area 4 through crusher CR-1A to Conveyor 1A	N/A	1969
CR-1A	FE, MC	CR-1A	Coal Crusher	1,000 TPH	1969
C-1A	PE, MC	C-1A	Conveyor 1A (transfer to Station 1B)	1,100 TPH	1969
Station 1B	FE, MC	Sta-1B	Drop point to Conveyor 1	N/A	1969
C-1	PE, MC	C-1	Conveyor 1 (transfer to Station 2)	2,600 TPH	1969
CSA-1	MC	CSA-1	Coal Storage Area #1 (Surge Pile)	Approx 40 Acres	1969
CSA-2	MC	CSA-2	Coal Storage Area #2 (North Yard Storage Pile)	Approx 40 Acres	April 1974
CSA-3	MC	CSA-3	Coal Storage Area #3 (Temporary Storage Pile at R3)	Approx 6 Acres	
CSA-4	MC	CSA-4	Coal Storage Area #4 (conveyor from 1B)	Included in CSA-1	1969
SGM1 through SGM16	FE, MC	SGM1 through	Reclaim Hoppers/Vibratory Feeders (Reclaim Area #1 surge pile) transfers to Conveyors 3A, 3B and 3C	300 TPH each	1969
C-3A	FE, MC	C-3A	Conveyor 3A (transfer to Station 3B)	1,100 TPH	1969
Station 3B	FE, MC	Sta-3B	Drop point to Conveyor 3B	N/A	1969
C-3B	FE, MC	C-3B	Conveyor 3B (transfer to Station 3)	1,100 TPH	1969
C-3C	FE, MC	C-3C	Conveyor 3C (transfer to Station 3)	1,100 TPH	1969
Station 3	FE, MC	Sta-3	Drop point to Conveyors 4E and/or 4W	N/A	1969
C-4E/C-4W	PE, MC	C-4E/C-4W	Conveyors 4E and 4W (transfer to Station 4)	1,100 TPH each	1969
Station 4	FE, MC	Sta-4	Drop point to Sample System, Conveyor 7E and/or 7W, and Conveyor 5 or Emergency Conveyors E25 through E2 1	N/A	1969
C-7E/C-7W	PE, MC	C-7E/C-7W	Conveyors 7E and 7W (transfer to Station 5)	1,100 TPH each	1969
C-5	FE, MC	C5	Conveyor 5 (transfer to Unit 2 coal silos 3, 4 or 5 and to Conveyor 6)	1,100 TPH	1969
C-6	FE, MC	C-6	Conveyor 6 (transfer to Unit 2 coal silos 1 or 2)	1,100 TPH	1969

¹For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
C-E25 through C- E21	MC	C-E25 through C-E21	Emergency conveyors E25 through E21 (used in an emergency to transfer coal into Unit 2 coal silos)	500 TPH each	1969
Station 5	FE, MC	Sta-5	Drop point to Conveyor 8 or Emergency Conveyors E1 1 through E15	N/A	1969
C-8	FE, MC	C-8	Conveyor 8 (transfer to Unit 1 coal silos 3, 4, or 5 and to Conveyor 9)	1,100 TPH	1969
C-9	FE, MC	C-9	Conveyor 9 (transfer to Unit 1 coal silos 1 or 2)	1,100 TPH	1969
C-E1 1 through C- E15	MC	C-E1 1 through C-E15	Emergency conveyors E1 1 through E15 (used in an emergency to transfer coal into Unit 1 coal silos)	500 TPH	1969
Fly Ash Material Handling					
Haul Roads	Water Truck	Haul Roads	Fly Ash Material Haul Roads and Landfill	N/A	N/A
EP-1	Filter/Separator	ME-1A	Unit 1 Mechanical Exhauster 1A	N/A	2012
EP-2	Filter/Separator	ME-1B	Unit 1 Mechanical Exhauster 1B	N/A	2012
EP-3	Filter/Separator	ME-1C (spare)	Unit 1 Mechanical Exhauster 1C	N/A	2012
EP-4	Filter/Separator	ME-2A	Unit 2 Mechanical Exhauster 2A	N/A	2012
EP-5	Filter/Separator	ME-2B	Unit 2 Mechanical Exhauster 2B	N/A	2012
EP-6	Filter/Separator	ME-2C (spare)	Unit 2 Mechanical Exhauster 2C	N/A	2012
EP-7	BVF-A	FAS-A	Fly Ash Silo A	2,160 tons	2012
EP-8	BVF-B	FAS-B	Fly Ash Silo B	2,160 tons	2012
EP-9	BVF-C	FAS-C	Fly Ash Silo C	2,160 tons	2012
F-1	MC	WFA-AA	Transfer conditioned fly ash from Fly Ash Silo A to Truck via Pin/Paddle Mixer	360 tph	2012
F-2	MC	WFA-BA	Transfer conditioned fly ash from Fly Ash Silo B to Truck via Pin/Paddle Mixer	360 tph	2012
F-3	MC	WFA-CA	Transfer conditioned fly ash from Fly Ash Silo C to Truck via Pin/Paddle Mixer	360 tph	2012
F-4	MC	WFA-AB (spare)	Transfer conditioned fly ash from Fly Ash Silo A to Truck via Pin/Paddle Mixer	360 tph	2012
F-5	MC	WFA-BB (spare)	Transfer conditioned fly ash from Fly Ash Silo B to Truck via Pin/Paddle Mixer	360 tph	2012
F-6	MC	WFA-CB (spare)	Transfer conditioned fly ash from Fly Ash Silo C to Truck via Pin/Paddle Mixer	360 tph	2012
EP-10, F-7	TC	TC-A	Transfer dry fly ash from Fly Ash Silo A to Truck via Pin/Paddle Mixer	300 tph	2012
EP-11, F-8	TC	TC-B	Transfer dry fly ash from Fly Ash Silo B to Truck via Pin/Paddle Mixer	300 tph	2012
EP-12, F-9	TC	TC-C	Transfer dry fly ash from Fly Ash Silo C to Truck via Pin/Paddle Mixer	300 tph	2012

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ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as
insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
1S - Limestone Material Handling					
BUN-1 (Fugitive)	None	BUN-1	Limestone Unloading Crane	1,000 TPH	2006
RH-1 (Fugitive)	WS, PE	RH-1	Limestone Unloading Hopper	60 Tons	2006
VF-1 (Fugitive)	FE	VF-1	Limestone Unloading Feeder	750 TPH	2006
BC-1 (Fugitive)	PE	BC-1	Limestone Dock/Connecting Conveyor	750 TPH	2006
TH-1 (Fugitive)	FE	TH-1	Limestone Transfer House #1	750 TPH	2006
BC-2 (Fugitive)	PE	BC-2	Limestone Storage Pile Stacking Conveyor	750 TPH	2006
LSSP (Fugitive)	None	LSSP	Limestone Active/Long-Term Stockpile	155,000 Tons	2006/2011
2S - Gypsum Material Handling					
BC-8 (Fugitive)	PE	BC-8	Vacuum Collecting Conveyor	200 TPH	2007
TH-3 (Fugitive)	FE	TH-3	Gypsum Transfer House #3	200 TPH	2007
BC-9 (Fugitive)	PE	BC-9	Connecting Conveyor	200 TPH	2007
TH-4 (Fugitive)	FE	TH-4	Gypsum Transfer House #4	200 TPH	2007
BC-10 (Fugitive)	PE	BC-10	Connecting Conveyor	200 TPH	2007
TH-5 (Fugitive)	FE	TH-5	Gypsum Transfer House #5	200 TPH	2007
BC-11 (Fugitive)	PE	BC-11	Connecting Conveyor	200 TPH	2007
TH-6 (Fugitive)	FE	TH-6	Gypsum Transfer House #6	200 TPH	2007
BC-12 (Fugitive)	PE	BC-12	Stacking Tripper Conveyor	200 TPH	2007
GSP (Fugitive)	FE	GSP	Gypsum Stockpile	15,600 tons	2007
PSR-1 (Fugitive)	FE	PSR-1	Traveling Portal Scraper Reclaimer	1,000 TPH	2007
BC-14 (Fugitive)	PE	BC-14	Reclaim Conveyor	1,000 TPH	2007
TH-7 (Fugitive)	FE	TH-7	Transfer House #7	1,000 TPH	2007
BC-13 (Fugitive)	PE	BC-13	Bypass Conveyer	200 TPH	2007
BC-15 (Fugitive)	PE	BC-15	Connecting Conveyor	1,000 TPH	2007
TH-1 (Fugitive)	FE	TH-1	Transfer House #1	1,000 TPH	2007

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ATTACHMENT D - Title V Equipment Table
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Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
BC-16 (Eugitive)	PE	BC-16	Transfer Conveyor	1,000 TPH	2007
BL-1 (Eugitive)	PE	BL-1	Barge Loader	1,000 TPH	2007
BC-14 (Eugitive)	PE	BC-14	Reclaim Conveyor Extension	1,000 TPH	2007
TH-8 (Eugitive)	FE	TH-8	Transfer House 8	1,000 TPH	2007
BC-19 (Eugitive)	PE	BC-19	Transfer Conveyor	1,000 TPH	2007
TH-9 (Eugitive)	FE	TH-9	Transfer House 9	1,000 TPH	2007
BC-20 (Eugitive)	PE	BC-20	Transfer Conveyor to 20	1,000 TPH	2007
TH-10 (Eugitive)	FE	TH-10	Transfer House 10	1,000 TPH	2007
BC-21 (Eugitive)	PE	BC-21	Transfer Conveyor to 21	1,000 TPH	2007
BUN-1 (Eugitive)		BUN-1	Clamshell Unloading Crane	1,000 TPH	2007
RH-4 (Eugitive)	WS, PE	RH-4	Gypsum Unloading Hopper	30 tons	2007
RP-1 (Eugitive)	FE	RP-1	Gypsum Rotary Plow	750 TPH	2007
BC-17 (Eugitive)	PE	BC-17	Dock/Connecting Conveyor	750 TPH	2007
TH-7 (Eugitive)	FE	TH-7	Transfer House #7	750 TPH	2007
BC-18 (Eugitive)	PE	BC-18	Bypass Conveyor	750 TPH	2007
TH-6 (Eugitive)	FE	TH-6	Transfer House #6	750 TPH	2007
3S - Limestone Mineral Processing					
VF-2 (Eugitive)	FE	VF-2	Limestone Reclaim Feeder 2	750 TPH	2007
VF-3 (Eugitive)	FE	VF-3	Limestone Reclaim Feeder 3	750 TPH	2007
BC-3 (Eugitive)	PE	BC-3	Limestone Tunnel Reclaim Conveyor	750 TPH	2007
FB-1 (Eugitive)		FB-1	Emergency Limestone Reclaim Feeder/Breaker	750 TPH	2007
TH-2 (Eugitive)	FE	TH-2	Limestone Transfer House 2	750 TPH	2007
BC-4 (Eugitive)	PE	BC-4	Limestone Silo A Feed Conveyor	750 TPH	2007
BC-5 (Eugitive)	PE	BC-5	Limestone Silo B Feed Conveyor	750 TPH	2007
BC-6 (Eugitive)	PE	BC-6	Limestone Silo C Feed Conveyor (future)	750 TPH	2007

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ATTACHMENT D - Title V Equipment Table
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Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
6E	BH	LSB-1	Limestone Silo A	900 Tons	2007
7E	BH	LSB-2	Limestone Silo B	900 Tons	2007
8E	BH	LSB-3	Limestone Silo C (future)	900 Tons	2007
(Fugitive)	FE		Vibrating Bin Discharger (one per silo)	68.4 TPH	2007
LSWF-1 (Fugitive) LSWF-2 (Fugitive) LSWF-3 (Fugitive)	FE	LSWF-1 LSWF-2 LSWF-3	Limestone Weigh Feeder (one per silo)	68.4 TPH	2007
(Fugitive)	FE		Wet Ball Mill (one per silo)	68.4 TPH	2007
4S - Dry Sorbent Material Handling					
(Fugitive)	FE		Truck Unloading Connection (2)	25 TPH	2007
10E	BH, FE	DSSB 1	Dry Sorbent Storage Silo #1	500 TPH	2007
11E	BH, FE	DSSB 2	Dry Sorbent Storage Silo #2	500 TPH	2007
(Fugitive)	FE		Aeration Distribution Bins	4.6 TPH	2007
(Fugitive)	FE		De-aeration Bins	4.6 TPH	2007
(Fugitive)	FE		Rotary Feeder	4.6 TPH	2007
5S - Coal Blending System					
HTS-1 (Fugitive)	FE	HTS-1	Transfer House #1	3,000 TPH	2007
HSC-1 (Fugitive)	PE	HSC-1	Stacking Conveyor #1	3,000 TPH	2007
HTS-2A (Fugitive)	FE	HTS-2A	Transfer House #2A	3,000 TPH	2007
HSC-2 (Fugitive)	PE	HSC-2	Stacking Conveyor #2	3,000 TPH	2007
HTS-3 (Fugitive)	FE	HTS-3	Transfer House #3	3,000 TPH	2007
HSC-3 (Fugitive)	PE	HSC-3	Stacking Conveyor #3	3,000 TPH	2007
SH-1 (Fugitive)	FE	SH-1	Stacking Hopper SH-1 Transfer to SC-3 (receive coal from plant radial stacker R9)	3,000 TPH	2007
HSC-1 to High Sulfur Pile (Fugitive) (CSA-2, existing)	Stacking Tube	HSC-1 to High Sulfur Pile (CSA-2, existing)	Transfer from Stacking Conveyor HSC-3 to High Sulfur Pile at existing North Yard Storage Area (CSA-2)	3,000 TPH	2007

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Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
HVF-1 (Fugitive)	FE	HVF-1	Coal Reclaim Feeder 1	800 TPH	2007
HVF-2 (Fugitive)	FE	HVF-2	Coal Reclaim Feeder 2	800 TPH	2007
HVF-3 (Fugitive)	FE	HVF-3	Coal Reclaim Feeder 3	800 TPH	2007
HVF-4 (Fugitive)	FE	HVF-4	Coal Reclaim Feeder 4	800 TPH	2007
HVF-1 through HVF-4 to HRC-1 (Fugitive) (Transfer)	FE	HVF-1 through HVF-4 to HRC-1 (Transfer)	Transfer from Vibrating Feeders HVF-1 through HVF-4 to Reclaim Conveyor HRC-1	1,600 TPH	2007
HRC-1 (Fugitive)	PE	HRC-1	Coal Tunnel Reclaim Conveyor	1,600 TPH	2007
HTS-2B (Fugitive)	FE	HTS-2B	Coal Transfer House #2B	1,600 TPH	2007
HRC-2 (Fugitive)	PE	HRC-2	Reclaim Conveyor #2	1,600 TPH	2007
HTS-4 (Fugitive)	FE	HTS-4	Coal Transfer House #4	1,600 TPH	2007
HRC-3 (Fugitive)	PE	HRC-3	Reclaim Conveyor #3	1,600 TPH	2007
HTS-5 (Fugitive)	FE	HTS-5	Coal Transfer House #5	1,600 TPH	2007
SB-1 (Fugitive)	FE	SB-1	Surge Bin #1	80 Tons	2007
HBF-1A (Fugitive)	PE	HBF-1A	Belt Feeder 1A	800 TPH	2007
HBF-1B (Fugitive)	PE	HBF-1B	Belt Feeder 1B	800 TPH	2007
HBF-1A/1B to BF-4E/4W (Fugitive)	FE	HBF-1A/1B to BF-4E/4W	Transfer from Belt Feeders HBF-1A and HBF-1B to Existing Coal Conveyors 4E and 4W	1,600 TPH	2007
6S, 7S - Emergency Quench Water System					
15E	FE	6S	Diesel Engine on Quench Pump #1	60 HP (approx.)	2007
16E	FE	7S	Diesel Engine on Quench Pump #2	60 HP (approx.)	2007
9S – Magnesium Hydroxide Material Handling System					
MHM-1	N/A	MHM-1	Magnesium Hydroxide Mix Tank #1	1000 Gal.	2007
MHM-2	N/A	MHM-2	Magnesium Hydroxide Mix Tank #2	1000 Gal.	2007
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ATTACHMENT D - Title V Equipment Table
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Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
11S – Wastewater Treatment Material Handling					
Fugitive	FE		Truck Unloading Connection (2)	25 TPH	2007
24E	BH, FE		Lime Storage Silo #1	100 TPH	2007
25E	BH, FE		Lime Storage Silo #2	100 TPH	2007
Fugitive	Building Enclosure		Wastewater Treatment Cake Stockpile	3,600 Tons	2007
Fugitive	PE	FB-2	Filter Cake Feeder/Breaker	600 TPH	2007
Fugitive	PE	BC-22	Transfer Conveyor 22	600 TPH	2007
Fugitive	PE	TH-12	Transfer House #12	600 TPH	2007
Miscellaneous Other					
Tank #1	N/A	Tank #1	Ignition Oil Tank – S. of U1 Cooling Tower	1,500,000 Gal.	~1975
Tank #2	N/A	Tank #2	Ignition Oil Tank – N. of U2 Cooling Tower	500,000 Gal.	1971
Tank #3	N/A	Tank #3	Ignition Oil Tank – N. of U2 Cooling Tower	500,000 Gal.	1971
Tank #4	N/A	Tank #4	Used Oil Tank – S. of U1 Cooling Tower	1,000 Gal.	Relocated ~2004
Tank #5	N/A	Tank #5	Used Oil Tank – Tractor Shed	500 Gal.	~2000
Tank #6	N/A	Tank #6	Sulfuric Acid Tank – W. of Units 1&2	15,000 Gal.	1971
Tank #7	N/A	Tank #7	Ammonium Hydroxide Tank – W. of Units 1 & 2	4,750 Gal.	1971
Tank #8	N/A	Tank #8	Diethylene Glycol Tank – N. of Station R-4	500 Gal.	~2002
Tank #9	N/A	Tank #9	Diethylene Glycol Tank – Station 3	300 Gal.	~2002
Tank #10	N/A	Tank #10	Diethylene Glycol Tank – Station R-4	300 Gal.	~2002
Tank #11	N/A	Tank #11	No.2 Fuel Oil Tank – Coal Transfer Station #3	1,000 Gal.	~2007
Tank #12	N/A	Tank #12	No.2 Fuel Oil Tank – Coal Transfer Station R-2	3,000 Gal	~2004
Tank #13	N/A	Tank #13	No.2 Fuel Oil Tank – Coal Transfer Station R-4	3,000 Gal.	~2004
Tank #14	N/A	Tank #14	No.2 Fuel Oil Tank – Drain Receiver Tank	400 Gal.	1969
Tank #15	N/A	Tank #15	Gasoline Tank – Main Plant Entrance	8,000 Gal.	1991
Tank #16	N/A	Tank #16	Diesel Fuel Tank – Tractor Shed	10,000 Gal	1991

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ATTACHMENT D - Title V Equipment Table
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Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
Tank #17	N/A	Tank #17	Turbine Oil Tank – U1	~14,000 Gal.	1971
Tank #18	N/A	Tank #18	Turbine Oil Tank – U2	~14,000 Gal.	1971
Tank #19	N/A	Tank #19	Lube Oil Tank – U1	~20,000 Gal.	1971
Tank #20	N/A	Tank #20	Lube Oil Tank – U2	~18,000 Gal.	1971
Tank #21	N/A	Tank #21	Chemical Cleaning Solution Tank	1,000,000 Gal.	1989
Tank #22	N/A	Tank #22	EHC System Oil Tank – U1	200 Gal.	1971
Tank #23	N/A	Tank #23	New Lube Oil Tank – U1	1,000 Gal.	1971
Tank #24	N/A	Tank #24	Used Oil Bulk Tank – U1	275 Gal.	~2002
Tank #25	N/A	Tank #25	EHC System Oil Tank – U2	625 Gal.	1971
Tank #26	N/A	Tank #26	New Lube Oil Tank – U2	1,000 Gal.	1971
Tank #27	N/A	Tank #27	Used Oil Bulk Tank – U2	275 Gal.	~2002
Tank #28	N/A	Tank #28	Diesel Fire Pump Fuel Tank – U1	275 Gal.	1971
Tank #29	N/A	Tank #29	Diesel Fire Pump Fuel Tank – U2	275 Gal.	1971
Tank #30	N/A	Tank #30	3 Compartment Oil Tank – Tractor Shed Oil Room	920 Gal.	~1995
Tank #31	N/A	Tank #31	Single Compartment Oil Tank – Tractor Shed	560 Gal.	~1995
Tank #32	N/A	Tank #32	Waste Oil Tank – Tractor Shed Oil Room	500 Gal.	~2000
Tank #33	FE	Tank #33	Urea Receiving Hopper	45 Tons	2007
Tank #34	N/A	Tank #34	No.2 Fuel Oil Tank – Drain Receiver Tank – overflow tank	1,000 Gal.	2001
Tank #35	N/A	Tank #35	TK103-100 Urea Solution Storage Tank	200,000 Gal.	2007
Tank #36	N/A	Tank #36	TK102-100 Urea Mix Tank	2,700 Gal.	2007
Tank #37	N/A	Tank #37	CPS Lime Slurry Tank #1	750 Gal.	2007
Tank #38	N/A	Tank #38	CPS Lime Slurry Tank #2	750 Gal.	2007
Tank #39	N/A	Tank #39	CPS Equalization Tank #1	254,513 Gal.	2007
Tank #40	N/A	Tank #40	CPS Equalization Tank #2	254,513 Gal.	2007
Tank #41	N/A	Tank #41	CPS Ferric Chloride Mix Tank #1	9,200 Gal.	2007

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ATTACHMENT D - Title V Equipment Table
(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
Tank #42	N/A	Tank #42	CPS Ferric Chloride Mix Tank #2	9,200 Gal.	2007
Tank #43	N/A	Tank #43	CPS Ferric Chloride Bulk Storage Tank	8,800 Gal.	2007
Tank #44	N/A	Tank #44	CPS Acid Bulk Storage Tank	10,575 Gal.	2007
Tank #45	N/A	Tank #45	CPS Polymer Totes (2)	225 Gal. (each)	2007
Tank #46	N/A	Tank #46	Emergency Quench Pump #1 Diesel Tank	70 Gal.	2007
Tank #47	N/A	Tank #47	Emergency Quench Pump #2 Diesel Tank	70 Gal.	2007
Tank #48	N/A	Tank #48	Aux. Boiler Collection Tank Return UST	500 Gal.	2006
Tank #49	N/A	Tank #49	No. 2 Fuel Tank – SW Corner of CSA-2	2000 Gal.	2008
Tank #50	N/A	Tank #50	Gypsum Storage Building Fuel Oil Tank	1000 Gal.	2009
Tank #51	N/A	Tank #51	Highway Grade Diesel Tank #1	1000 Gal.	2011
Tank #52	N/A	Tank #52	Limestone Storage Pile Diesel Tank #1	500 Gal.	2011
Fugitive	Enclosure		Rock Salt Storage Pile (roadway ice control)	50 Tons	2010

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Attachment E
Emission Unit Forms

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ATTACHMENT E - Emission Unit Form			
Emission Unit Description Unit 1 Main Boiler			
Emission unit ID number: Unit 1 – ML1	Emission unit name: Unit 1 Boiler	List any control devices associated with this emission unit: ESP, SCR, FGD	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Unit 1 is coal-fired EGU boiler that also utilizes oil for supplemental firing. Oil use includes, but is not limited to, periods of start-up, shutdown, stabilization and emergency operations. The boiler may also periodically combust non-hazardous material such as demineralizer resins, chemical cleaning solution, on-spec used oil, etc. The nominal design of the Unit 1 boiler is 7,020 mmBtu/hr. Coal is delivered to the site via river barge, rail car, truck or conveyor. Oil is delivered to the site via river barge or truck.			
Manufacturer: Foster Wheeler	Model number: 2-85-303	Serial number: Custom	
Construction date: MM/DD/YYYY	Installation date: 05/31/1971	Modification date(s): MM/DD/YYYY	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Nominal 7020 mmBtu/Hr (270 TPH with 13,000 BTU/lb Coal Supply) This heat input value is for operation at the nominal boiler rating. Boiler design enables the boiler to be operated above the nominal rated capacity.			
Maximum Hourly Throughput: Nominal 5,289,000 lb/hr Steam	Maximum Annual Throughput: Nominal 46,331,640,000 lb/yr Steam	Maximum Operating Schedule: 8760 hr/yr	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating: 8590 mmBtu/hr (rating used to model full load operation for FGD permit determination)		Type and Btu/hr rating of burners: LNB – Foster Wheeler	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Primary: Coal; Secondary: Oil; The steam generator is capable of burning coal, and will utilize fuel oil for start-up, shutdown and for flame stabilization. Other materials burned included non-hazardous water treatment resins, chemical cleaning solution, on spec used oil, etc.			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Coal (Bit.)	4.5 lb/mmBtu	12.5%	13,000 BTU/lb
Oil	0.5%	N/A	19,750 BTU/lb

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	531	2324.5
Nitrogen Oxides (NO _x)	4139	18131
Lead (Pb)	0.42	1.8
Particulate Matter (PM _{2.5})	105	461.2
Particulate Matter (PM ₁₀)	237	1037.7
Total Particulate Matter (TSP)	351	1537.4
Sulfur Dioxide (SO ₂)	10243	44862.6
Volatile Organic Compounds (VOC)	64	279
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Arsenic	0.64	2.8
Beryllium	1.53	6.7
Chromium	0.23	1.0
Cobalt	0.08	0.4
Manganese	0.43	1.9
Mercury	0.24	1.1
Nickel	0.19	0.8
Selenium	5.53	24.2
Hydrogen Chloride	1408.3	6168.3
Hydrogen Fluoride	122.3	535.6
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Sections 4.0 through 4.1 (see Attachment I)

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Sections 4.2 through 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X__Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Unit 2 Main Boiler

Emission unit ID number: Unit 2 – ML2	Emission unit name: Unit 2 Boiler	List any control devices associated with this emission unit: ESP, SCR, FGD
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
 Unit 2 is coal-fired EGU boiler that also utilizes oil for supplemental firing. Oil use includes, but is not limited to, periods of start-up, shutdown, stabilization and emergency operations. The boiler may also periodically combust non-hazardous material such as demineralizer resins, chemical cleaning solution, on-spec used oil, etc. The nominal design of the Unit 1 boiler is 7,020 mmBtu/hr. Coal is delivered to the site via river barge, rail car, truck or conveyor. Oil is delivered to the site via river barge or truck.

Manufacturer: Foster Wheeler	Model number: 2-85-304	Serial number: Custom
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Construction date: MM/DD/YYYY	Installation date: 05/31/1971	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Nominal 7020 mmBtu/Hr (270 TPH with 13,000 BTU/lb Coal Supply). This heat input value is for operation at the nominal boiler rating. Boiler design enables the boiler to be operated above the nominal rated capacity.

Maximum Hourly Throughput: Nominal 5,280,000 lb/hr Steam	Maximum Annual Throughput: Nominal 46,252,800,000 lb/yr Steam	Maximum Operating Schedule: 8760 hr/yr
--	---	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? X__Yes ___ No	If yes, is it? X__ Indirect Fired ___ Direct Fired
--	--

Maximum design heat input and/or maximum horsepower rating: 8,481 mmBtu/hr (rating used to model full load operation for FGD permit determination)	Type and Btu/hr rating of burners: LNB – Foster Wheeler
--	---

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
 Primary: Coal; Secondary: Oil; The steam generator is capable of burning coal, and will utilize fuel oil for start-up, shutdown and for flame stabilization. Other materials burned include non-hazardous water treatment resins, chemical cleaning solution, on spec used oil, etc.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Coal	4.5 lb/mmBtu	12.5%	13,000 BTU/lb
Oil	0.5%	N/A	19,750 BTU/lb

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	531	2323.5
Nitrogen Oxides (NO _x)	4139	18131
Lead (Pb)	0.42	1.8
Particulate Matter (PM _{2.5})	105	461.2
Particulate Matter (PM ₁₀)	237	1037.7
Total Particulate Matter (TSP)	351	1537.4
Sulfur Dioxide (SO ₂)	10243	44862.6
Volatile Organic Compounds (VOC)	64	279
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Arsenic	0.64	2.8
Beryllium	1.53	6.7
Chromium	0.23	1.0
Cobalt	0.08	0.4
Manganese	0.43	1.9
Mercury	0.24	1.1
Nickel	0.19	0.8
Selenium	5.53	24.2
Hydrogen Chloride	1408.3	6168.3
Hydrogen Fluoride	122.3	535.6
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Sections 4.0 through 4.1 (see Attachment I)

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Sections 4.2 through 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

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ATTACHMENT E - Emission Unit Form			
Emission Unit Description <i>Auxiliary Boiler 1</i>			
Emission unit ID number: Aux ML1	Emission unit name: Auxiliary Boiler 1	List any control devices associated with this emission unit:	
<p>Provide a description of the emission unit (type, method of operation, design parameters, etc.): Auxiliary Boiler 1 is an oil-fired non-EGU boiler. Use of the auxiliary boiler includes, but is not limited to heating, startup and shutdown purposes. The nominal design of Auxiliary Boiler 1 is 663 mmBtu/hr. Oil is delivered to the site via river barge or truck.</p>			
Manufacturer: Foster Wheeler	Model number: SD-25	Serial number: Custom	
Construction date: MM/DD/YYYY	Installation date: 1970, Rebuild 2012	Modification date(s): MM/DD/YYYY	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Nominal 663 mmBtu/Hr			
Maximum Hourly Throughput: 355,000 lb/hr steam	Maximum Annual Throughput: 310,980,000 lb/yr steam	Maximum Operating Schedule: 876 hr/yr	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? X__ Yes ___ No		If yes, is it? X__ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating: Nominal 663 mmBtu/hr		Type and Btu/hr rating of burners: Front Wall	
<p>List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. Primary: Oil</p>			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Oil	0.3%	N/A	19,750 Btu/lb

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	206.8	90.6
Nitrogen Oxides (NO _x)	99.5	43.56
Lead (Pb)	0.006	0.0026
Particulate Matter (PM _{2.5})	1.18	0.52
Particulate Matter (PM ₁₀)	4.74	2.07
Total Particulate Matter (TSP)	9.47	4.15
Sulfur Dioxide (SO ₂)	39.78	17.42
Volatile Organic Compounds (VOC)	0.95	0.41
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Arsenic	0.0003	0.001
Beryllium	0.0002	0.001
Chromium	0.0002	0.001
Manganese	0.0004	0.002
Mercury	0.0002	0.001
Nickel	0.0002	0.001
Selenium	0.001	0.004
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Sections 4.0 through 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Sections 4.2 through 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description Coal and Ash Handling</i>			
Emission unit ID number: Emission Group 003	Emission unit name: Coal & Ash Handling	List any control devices associated with this emission unit: Conveyor covers, partial and full enclosures, mechanical controls, water sprays.	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): The coal and ash handling system consists of a barge unloader, railcar unloader, chutes and conveyors, transfer stations, crushers, storage piles and silos for coal, as well as a wet ash handling system for ash. Note that a project is currently underway to convert the wet fly ash handling system to a dry fly ash handling system. See attached description of the coal and ash handling systems.			
Manufacturer: Various	Model number: Custom	Serial number: N/A	
Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Coal transfer capacity (nominal) – up to 4,000 ton/hr; Fly Ash Handling – up to 980,000 tons per year.			
Maximum Hourly Throughput: Coal: Nominal 3,000 ton/hr Fly Ash: 720 ton/hr	Maximum Annual Throughput: Coal - Nominal 26,280,000 ton/yr Fly Ash – 980,000 ton/yr	Maximum Operating Schedule: 8760 hrs/yr	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating: N/A		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. N/A			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	7.2	28.6
Particulate Matter (PM ₁₀)	36.1	135.8
Total Particulate Matter (TSP)	92.5	318.4
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Section 5.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently captured in Title V permit:

R30-05100005-2003 Section 5.2 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X__Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Coal and Ash Handling Description:

▪ **Mitchell Plant Coal Handling:**

General Description:

Normally, coal is received at the Mitchell Plant by river barge, rail car, truck or conveyor and is placed on the coal storage piles or transported to the coal silos for immediate plant use.

Railcar Dumping System (Station R-6):

Coal delivered to Mitchell Plant by rail car is unloaded at the rail car dumper and then transported by a feeder/conveyor system to Station R-2

Coal Barge Unloader (Station R-1):

Coal delivered to Mitchell Plant by river barge is unloaded at Station R-1 (coal barge unloader) and then transported via multiple conveyors to Station R-2

Station R-2:

Coal from the rail unloading and barge unloading systems enters Station R-2, where it can be crushed and then transferred to conveyor that transports it to Station R-3.

Station R-3:

At Station R-3, coal can be placed on a conveyor that transports it to Station R-4.

Station R-4:

At Station R-4, coal is sampled and then can be transferred to either a conveyor that transports the coal to Station 2 or to a series of conveyors ending with a radial stacker that discharges the coal to the North Yard long-term storage pile.

Station 2:

At Station 2, coal is transferred to a conveyor and then to a radial stacker for distribution on the South Yard active surge pile.

Station R-7:

Station R-7 is located under the North Yard storage pile. At Station R-7, coal is pushed by dozer into a reclaim hopper where it is transferred via a feeder/conveyor system to Station R-4. As described previously, coal that enters Station R-4 can be diverted via conveyors to the Radial Stacker at Station 2 and placed on the South Yard surge pile.

Stations 3A, 3B, and 3C:

Stations 3A, 3B and 3C are located under the South Yard surge pile. Coal is reclaimed from the surge pile through reclaim hoppers at each of these Stations and transferred via a series of feeders/conveyors to Station 3.

Station 1A:

Station 1A is also located under South Yard surge pile. Coal that is reclaimed from the South Yard surge through reclaim hoppers at Station 1A can be crushed before being transferred via a feeder and conveyor to Station 1B.

Station 1B:

At Station 1B, coal is transferred to a conveyor that transports the coal to Station 2. As described previously, coal that enters Station 2 can be transferred onto the active surge pile via the radial coal stacker and then transferred via conveyors from the reclaim hoppers to Station 3.

Station 3:

At Station 3, coal is transferred to conveyors that transport the coal to Station 4.

Station 4:

At Station 4, coal is sampled and then transferred to either the Unit 2 silo filling system or to conveyors that transport the coal to Station 5.

Unit 2 Silo Filling:

Coal that is diverted from Station 4 to the Unit 2 silo filling system is discharged into the Unit 2 silos via a series of conveyors and diversion gates.

Station 5 and Unit 1 Silo Filling:

At Station 5, coal is diverted to a series of conveyors and diversion gates that discharge coal into the Unit 1 silos.

Emergency Conveyor System:

Emergency conveyor systems, located above the Unit 1 and Unit 2 silos provide emergency filling of the silos if, for any reason, the primary system is inoperable.

Methods of Compliance:

Fugitive emissions from the coal handling and storage systems are controlled by various methods. Typical measures employed at Mitchell Plant to control fugitive dust emissions from the coal handling and coal storage facilities include, but are not limited to full and partial transfer point enclosures, coal wetting, full and partially covered conveyors, compaction, and delivery management techniques. The delivery management techniques generally minimize the amount of coal in storage: however, coal delivery capabilities and practices may vary throughout the year. For example, stockpiles may be periodically increased in size in anticipation of coal unloader outages or temporary mining shutdowns. The Mitchell Plant employs management techniques to control and minimize fugitive emissions from the coal handling system and the coal storage areas. The coal handling and storage areas are inspected periodically in accordance with Title V requirements to insure that compliance with fugitive emissions regulations is being maintained.

- **Mitchell Plant Ash Handling:**

Fly Ash Handling Description:

The Mitchell Plant fly ash removal system conveys fly ash collected in the electrostatic precipitator hoppers. Fly ash is removed from the hoppers by a combined vacuum and pressure pneumatic conveying system. Currently, as the hoppers are emptied, the dry fly ash flows into a transport line where it is entrained by an air stream and conveyed to a hydroveyor exhaustor, where the fly ash is mixed with water and is pumped to the fly ash pond. However, the wet fly ash system is currently being replaced with a dry fly ash system and associated landfill. A description of the dry fly ash system, being constructed, follows.

The Mitchell Dry Fly Ash Conversion Project will convert the existing vacuum conveying system, utilizing a HYDROVEYOR® and dilute slurry system, to a complete dry ash handling system designed to convey dry, free flowing Fly Ash and Economizer Ash from Units 1 and 2 to three new concrete Fly Ash Silos for storage and transport.

The Project is composed of three major Systems: Unit 1 Fly Ash Removal System, Unit 2 Fly Ash Removal System and the Fly Ash Silo System. In conjunction with this project, a new dry fly ash landfill and associated haul road are being constructed for disposal of the fly ash.

Unit 1 Fly Ash Removal System

The Unit 1 Fly Ash Removal System includes the ash handling Vacuum Conveying System from the existing precipitator boxes and Economizer hoppers to the new Vacuum/Pressure Transfer Stations and the ash handling Pressure Conveying System to the new Fly Ash Silos.

There are two Vacuum Conveying Systems, one per precipitator box, provided to convey the ash from the Fly Ash hoppers and the Economizer Ash hoppers (handled by Box 1 ash handling vacuum system) and are operated independently of the other System. Each System is designed to convey to one of two new, dedicated Vacuum/Pressure Transfer Stations (TS-1A, TS-1B or TS-1C, TS-1D). An automatic Transfer Station crossover exists for each conveying System when one Transfer Station is shut down for maintenance. There are a total of four Transfer Stations for Unit 1. A Transfer Station consists of one Filter/Separator assembly and two feeder assemblies.

The vacuum source for the Vacuum Conveying System is supplied by one of three motor driven Mechanical Exhaustors (ME-1A, ME-1B, ME-1C). The three Mechanical Exhaustors are connected such that one is dedicated to each System and one is a spare that can be used by either System. The mixture of

ash and air is conveyed in conveyor lines in a dry state to the Filter/Separator of the selected Transfer Station where ash is removed from the air stream and dumped into the feeder assemblies for pressure conveying to the Fly Ash Silo System for storage and transport. The Filter/Separator is intended to control particulate emissions from the conveying air. When conveying air leaves the separating equipment, it passes through the Mechanical Exhauster and discharges to atmosphere.

There are two Pressure Conveying Systems, one for each unit (one for unit 1 and one for unit 2) serving a pair of Transfer Stations, provided to convey the ash from the Transfer station feeder assemblies to the new Fly Ash Silos. The two systems are operated independently of each other. A common spare pressure conveying line (with automatic crossover) is provided for both conveying Systems. Therefore, there are three pressure conveying lines routed to the new Fly Ash Silos.

Conveying air for each Pressure System is supplied by one of three motor driven Fly Ash Conveying Compressors. The three Compressors are connected such that one is dedicated to each System and one is a spare that can be used by either System.

Two feeder assemblies are located under each Filter/Separator. Each feeder assembly receives material from the Filter/Separator at low pressure and introduces it into the pressurized conveyor line. The row of feeder assemblies empties, in a timed sequence, into the main conveying line. Here, the material is mixed with the conveying air and is transported to the Fly Ash Silos.

The material is collected and stored in the Silos, while the conveying air is vented to atmosphere through a Bin Vent Filter (BVF-A, BVF-B, BVF-C). Each storage silo will be equipped with a bin vent filter. The bin vent filter is intended to control particulate emissions from the displaced air that is discharged from the silos. The air discharging through the bin vent filter is a result of the conveying air, dry unloader vent fan air, the air displacement caused by filling the silo with fly ash, the air displacement caused by expansion due to temperature difference, and also from fly ash fluidizing air that is blown into the bottom of the storage silo.

Unit 2 Fly Ash Removal System

The Unit 2 Fly Ash Removal System is similar to the Unit 1 Fly Ash Removal System.

Unit 2 Mechanical Exhausters (ME-2A, ME-2B, ME-2C)

Transfer Stations (TS-2A, TS-2B or TS-2C, TS-2D)

Fly Ash Silo System

The Fly Ash Silo System includes three new concrete Fly Ash Silos, each equipped with its own dedicated controlled Silo Fluidizing System, Silo Dry Ash Unloading System and Silo Conditioned Ash Unloading System.

The material collected and stored in the Fly Ash Silos can be unloaded into trucks for removal to a disposal point in either a dry or conditioned state. Ash is unloaded from a Silo in a dry state into a closed-top tank truck with a Telescopic Spout (TC-A, TC-B, TC-C). Each spout is equipped with a vent module (TCV-A, TCV-B, TCV-C). If it is not desired to unload the ash in a dry state, ash is unloaded from a Silo in a conditioned state into an open-top truck with a Pin Paddle Mixer/Unloader (WFA-AA, WFA-BA, WFA-CA, WFA-AB, WFA-BB, WFA-CB). The trucks, containing conditioned fly ash, are used to transport the ash to the new Mitchell Plant dry fly ash landfill being that is being constructed in conjunction with the dry fly ash project.

Bottom Ash Handling Description:

The Mitchell Plant bottom ash removal facilities are designed as wet transport and storage systems and therefore have no fugitive emissions. Slag shed from the furnace walls or dislodged by slag blowers falls through the furnace hopper throats and is collected in ash hoppers. Bottom ash accumulated in the ash hoppers is removed periodically by sluicing it from the hoppers through an ash gate and bottom ash jet pump into an ash disposal line. The ash disposal line carries the mixture to the bottom ash disposal ponds.

Methods of Compliance:

As mentioned previously, the current Mitchell Plant fly ash handling and storage systems, and the bottom ash handling and storage systems are primarily wet systems and therefore have no fugitive dust emissions. Periodically, bottom ash is reclaimed from the disposal pond for sale or for transfer to the landfill. Due to

the high moisture content of the material reclaimed, there are no fugitive emissions. Once the dry fly ash system is placed into service, a number of methods will be utilized to control fugitive dust including adding moisture to the fly ash, bin vent filters, etc. as detailed in the equipment table.

ATTACHMENT E - Emission Unit Form			
<i>Emission Unit Description Limestone Handling and Processing</i>			
Emission unit ID number: Emission Groups 1S	Emission unit name: Limestone Handling	List any control devices associated with this emission unit: Conveyor covers, partial and full enclosures, water sprays.	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): The limestone handling system consists of a barge unloader, chutes and conveyors, transfer stations, and storage piles for limestone. See attached description of the limestone handling system.			
Manufacturer: Various	Model number: Custom	Serial number: N/A	
Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Limestone transfer capacity (nominal) – up to 750 ton/hr			
Maximum Hourly Throughput: Nominal 750 ton/hr	Maximum Annual Throughput: Nominal 1,100,000 ton/yr	Maximum Operating Schedule: 8760 hrs/yr	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating: N/A		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. N/A			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.67	0.52
Particulate Matter (PM ₁₀)	4.62	3.68
Total Particulate Matter (TSP)	10.30	8.53
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge. For purposes of determining fugitive emissions associated with this system, the FGD Reg 13 permit application (permit R13-2608A) calculations were used.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Limestone Handling and Processing Description:**Limestone Handling:**

The limestone handling system is the portion of the limestone supply system that is not applicable under 40 CFR 60 Subpart OOO NSPS regulations.

Limestone will be delivered to the Mitchell Plant site in river barges having capacities of up to 2000 tons. New barge docking river cells will be installed parallel to the shoreline near the existing fuel oil unloading pier to store the incoming and outgoing fleet of limestone barges. A barge haul system will be installed to position the barges for unloading. The limestone barge unloading equipment, consisting of a 1000 ton per hour free digging capacity clamshell crane unloader (750 ton per hour average unloading rate), and a receiving hopper/vibratory feeder will be mounted on the new large diameter river cells.

Limestone will be transferred from the clamshell crane Unloader BUN-1 to the fixed, cell mounted hopper RH-1. The hopper RH-1 will discharge via a vibrating feeder VF-1 to the tail end of the limestone dock/connecting conveyor BC-1. The limestone dock/connecting conveyor BC-1 will transfer the limestone from the unloading dock to the first limestone/gypsum Transfer House #1 (TH-1) on shore. Dust will be controlled at the barge unloading operation (hopper load-in area) using a dry fog dust suppression system and windscreens. Nozzles will be mounted around the top of the unloading hopper generating fog to keep any dust generated by dropping the limestone into the hopper, inside the hopper. Further, the dock/connecting conveyor will utilize a $\frac{3}{4}$ cover to minimize fugitive dust.

At Transfer House TH-1, the limestone will be transferred from the dock/connecting conveyor BC-1 to the storage-pile stacking conveyor BC-2. The stacking conveyor BC-2 will convey the limestone to the active/long-term storage area creating the limestone storage pile (LSSP). The limestone storage pile will be uncovered and have a total capacity of approximately 41,300 tons. The limestone storage pile (LSSP) will have a capacity of approximately 15-days at a generator capacity factor of 100%. The long-term portion of the storage pile will be constructed by moving limestone from the active portion of the pile with mobile equipment to place it in the long-term storage portion of the pile. At the Transfer House TH-1, fugitive dust will be controlled with the use of fully enclosed chutework located within an enclosed building. The chutes incorporate closed loading skirts with adjustable rubber seals to minimize free air flow across the chute. The stacking conveyor BC-2 utilizes a $\frac{3}{4}$ cover to minimize fugitive dust and discharges to the limestone storage pile LSSP via a concrete stacking tube ST-1.

ATTACHMENT E - Emission Unit Form			
Emission Unit Description <i>Limestone Handling and Processing</i>			
Emission unit ID number: Emission Groups 3S	Emission unit name: Limestone Processing	List any control devices associated with this emission unit: Conveyor covers, partial and full enclosures, baghouses, water sprays.	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): The limestone processing system consists of chutes and conveyors, transfer stations, ball mills, and silos for limestone. See attached description of the limestone processing system.			
Manufacturer: Various	Model number: Custom	Serial number: N/A	
Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Limestone transfer capacity (nominal) – up to 750 ton/hr			
Maximum Hourly Throughput: Nominal 750 ton/hr	Maximum Annual Throughput: Nominal 1,100,000 ton/yr	Maximum Operating Schedule: 8760 hrs/yr	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No		If yes, is it? ___ Indirect Fired ___ Direct Fired	
Maximum design heat input and/or maximum horsepower rating: N/A		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. N/A			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	1.14	0.82
Particulate Matter (PM ₁₀)	7.50	5.40
Total Particulate Matter (TSP)	15.85	11.43
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge. For purposes of determining fugitive emissions associated with this system, the FGD Reg 13 permit application (permit R13-2608A) calculations were used. The only exception is that baghouse potential emissions were adjusted to reflect a more reasonable potential emission total. Previously, the baghouse emissions were calculated assuming dust loading of the control device was equal to the maximum that the device could handle. The adjustment involves calculating a dust loading that is equal to the maximum that the device will see in the particular installation.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Limestone Processing Description:

Non-Metallic Mineral (Limestone) Processing System:

The "Non-Metallic Mineral Processing" system is the portion of the limestone supply/processing system that is applicable under 40 CFR 60 Subpart OOO NSPS regulations.

Limestone will be reclaimed from the active conical pile through two below grade vibrating pile drawdown hoppers DH-1 and DH-2 that discharge onto two reclaim feeders VF-2 and VF-3. The reclaim feeders VF-2 and VF-3 will discharge onto the tunnel reclaim conveyor BC-3. The tunnel reclaim conveyor BC-3 will discharge onto the silo "A" feed conveyor BC-4. The silo "A" feed conveyor BC-4 terminates in the limestone silo enclosure above the northernmost limestone storage silo LSB-1.

Each of the reclaim feeders (VF-2 and VF-3) will be completely enclosed with loading skirts. The portion of the tunnel reclaim conveyor BC-3 that is located above ground as well as the silo "A" feed conveyor BC-4 utilize $\frac{3}{4}$ covers to minimize fugitive dust. Each of the transfer points utilizes fully enclosed chutework located within an enclosed building. The chutes incorporate closed loading skirts with adjustable rubber seals between the skirtboard and the loaded belt.

An alternate limestone reclaim system has been designed into the Mitchell project. The alternate reclaim system is used when the reclaim feeders VF-2 and VF-3 are out of service for maintenance or repair or for handling limestone during periods of time that it may be frozen in clumps. The system consists of a feeder/breaker to receive limestone directly from under the storage pile or from an end loader. The feeder/breaker discharges to the limestone tunnel reclaim conveyor BC-3. The limestone tunnel reclaim conveyor can then transfer the limestone to the normal limestone feed conveyors

Limestone from the silo "A" feed conveyor BC-4 can be fed directly into the northernmost limestone silo LSB-1, or can be diverted to the silo "B" feed conveyor BC-5 via a diverter gate. The silo "B" feed conveyor BC-5 will convey the material to limestone silo LSB-2 or to the future silo "C" feed conveyor BC-6 via a diverter gate. Future silo "C" feed conveyor BC-6 will convey limestone to future limestone silo LSB-3. Each of the silo feed conveyors utilize a $\frac{3}{4}$ cover to minimize fugitive dust and each of the transfer points utilize fully enclosed chutework located within an enclosed building. The chutes incorporate closed loading skirts with adjustable rubber seals between the skirtboard and the loaded belt.

A bagfilter dust collector system will be provided to serve each of the silos. The limestone silo dust collector will have an open bottom and will be mounted on top of the limestone silo. All material collected on the bags falls via gravity into the limestone silo.

Three (including one future) independent FGD reagent preparation trains are provided, supplying complete redundancy support of 24-hour operation. Provisions have been made in the reagent preparation building design to expand the building and add the third (future) reagent preparation train (ball mill, classifier, ball mill product tank, ball mill slurry pumps, etc.) Each of the preparation trains supply limestone slurry to one recirculating feed loop that distributes slurry to both absorbers (one absorber per generating unit).

The limestone silos LSB-1, LSB-2, and LSB-3 (future) are used to store limestone for feed to the grinding system. Limestone drops by gravity from the vibrating bin discharger to the limestone weigh feeder LSWF-1, LSWF-2 and LSWF-3 (future), which conveys the limestone on a belt to the feed chute on the Wet Ball Mill. The limestone weigh feeder is a weighing, variable speed conveyor with its speed adjusted to set the mass flow. Make-up water is added to the feed chute and the mixture enters the wet ball mill.

The wet ball mill is a horizontal cylinder partially filled with steel balls that is rotated, tumbling the balls and grinding the limestone solids. The wet ball mill is motor driven through a gear reducer and is supplied with an air-operated clutch, which is engaged to start the mill once the mill motor is in operation. The clutch may also be used to stop the ball mill operation without stopping the motor. The size of the limestone particles is reduced in the ball mill by a rotating charge of steel balls. The limestone slurry overflows from the ball mill through the mill trommel and gravity feeds to the ball mill slurry tank. Limestone slurry density is maintained by controlling the make-up water flow rate to the classifier underflow launder proportional to the limestone feed rate. Each of the ball mill trains operates as its own separate loop.

The mill slurry pump transfers the limestone slurry from the mill slurry tank to the ball mill classifier. Two 100% ball mill slurry pumps per ball mill slurry tank are provided. Each limestone slurry classifier for the ball mills contains a battery of cyclones with a minimum of 25% spare capacity. The cyclone classifiers are arranged in a circular configuration and are fed from a cylindrical feed chamber. The feed chamber contains no internal partitions, baffles, and/or obstructions and provides a uniform and constant inlet pressure to each cyclone. Fine product slurry is separated from oversized particles of limestone by the classifier. The fine product collected in the overflow launder gravity flows to a common header, which in turn feeds the two limestone reagent slurry storage tanks, while the slurry containing oversized limestone is collected in the underflow launder and gravity flows back to the corresponding ball mill inlet for regrinding.

The two reagent slurry storage tanks are used to maintain a slurry inventory for feed to the absorbers and to provide the minimum suction pressure required by the reagent slurry feed pumps. The reagent slurry storage tank agitator maintains solids in suspension. The reagent slurry feed pump delivers slurry to one of two recirculating feed loop (one operating, one spare). The reagent slurry feed pump maintains a continuously recirculating flow in the loop and slurry velocities are constantly maintained while at the same time providing the required reagent feed to each absorber. Reagent slurry is added to each reaction tank at the base of the absorber in response to the SO₂ concentration in the flue gas entering the wet FGD system and the pH of the reaction tank slurry.

The entire processing system beginning at the limestone silo fill point is enclosed in the processing building and all conveyors and transfer points are totally enclosed. Furthermore, the grinding operation occurs in water (slurry) and does not produce dust.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Gypsum Handling

Emission unit ID number: Emission Groups 2S	Emission unit name: Gypsum Handling	List any control devices associated with this emission unit: Conveyor covers, partial and full enclosures, water sprays.
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The gypsum handling system consists of a barge loader and unloader, chutes and conveyors, transfer stations, and storage piles for gypsum. See attached description of the gypsum handling system.

Manufacturer: Various	Model number: Custom	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Gypsum transfer capacity (nominal) – up to 1,000 ton/hr.

Maximum Hourly Throughput: Nominal 1,000 ton/hr	Maximum Annual Throughput: Up to Nominal 1,912,000 ton/yr	Maximum Operating Schedule: 8760 hrs/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes <input checked="" type="checkbox"/> No	If yes, is it? ___ Indirect Fired ___ Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners:

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.74	0.63
Particulate Matter (PM ₁₀)	11.78	4.38
Total Particulate Matter (TSP)	47.22	9.99
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge. For purposes of determining potential fugitive emissions associated with this system, the FGD Reg 13 permit application (permit R13-2608A) calculations were used.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Gypsum Handling Description:

Gypsum Handling:

At the Mitchell facility, gypsum is created as a by-product of the Wet FGD Process. The gypsum will be collected from the four vacuum belt filters (including one future vacuum belt filter) that will discharge onto the Gypsum Vacuum Filter Collecting Conveyor BC-8. The Collecting Conveyor BC-8 will be located inside the dewatering building and will convey the material to the outside of the building and into Transfer House #3 where the gypsum is transferred to the gypsum Connecting Conveyor BC-9.

Connecting Conveyor BC-9 conveys the gypsum from Transfer House #3 to Transfer House #4 where it is transferred to gypsum Connecting Conveyor BC-10. Connecting Conveyor BC-10 conveys the gypsum from Transfer House #4 to Transfer House #5 where it is transferred to gypsum Connecting Conveyor BC-11. Connecting Conveyor BC-11 conveys the gypsum from Transfer House #5 to Transfer House #6 where it is transferred to either gypsum Stacking Tripper Conveyor BC-12 or gypsum Bypass Conveyor BC-13.

The head end of the stacking tripper conveyor BC-12 will be equipped with a traveling tripper able to discharge the gypsum to create the Gypsum Stockpile (GSP). The stockpile will be a 14,200-ton pile to store the gypsum prior to transfer for disposal or use. The gypsum stockpile will be located in a fully enclosed building. At the gypsum stockpile area, the gypsum is reclaimed from the stockpile via a Traveling Portal Scraper Reclaimer PSR-1 and discharged to gypsum Reclaim Conveyor BC-14. Reclaim Conveyor BC-14 carries the gypsum to Transfer House #7 where it is transferred to gypsum Connecting Conveyor BC-15. As an alternative to carrying the gypsum on BC-14 to Transfer House #7, Reclaim Conveyor BC-14 will be designed as a reversible conveyor. As discussed later in this system description, Reclaim Conveyor BC-14 (operating in the reverse mode) will be designed for transfer to a conveyor system supplying gypsum to an alternative destination where it will be utilized by a wallboard manufacturing facility.

As an alternative to placing the gypsum in the stockpile via the stacking tripper conveyor BC-12, Bypass Conveyor BC-13 can be used to transport the gypsum from Transfer House #6 to Transfer House #7 where it is transferred directly to Connecting Conveyor BC-15.

Connecting Conveyor BC-15 conveys the gypsum from Transfer House #7 to Transfer House #1 where is transferred to Transfer Conveyor BC-16. Transfer Conveyor BC-16 conveys the gypsum from Transfer House #1 to the gypsum Barge Loader BL-1. Barge Loader BL-1 transfers the gypsum to waiting river barges via a telescopic chute.

As mentioned previously, as an alternative to carrying the gypsum on BC-14 to Transfer House #7 and on to the barge loader BL-1 for loadout, Reclaim Conveyor BC-14 will be designed as a reversible conveyor. In the reverse mode, Reclaim Conveyor BC-14 will be designed for an extension of the gypsum handling system to allow gypsum transfer to a wallboard plant that will be constructed south of the Mitchell plant on the eastern side of West Virginia State Route 2.

At the gypsum stockpile area, the gypsum is reclaimed from the stockpile via Traveling Portal Scraper Reclaimer PSR-1 and discharged to gypsum Reclaim Conveyor BC-14. Reclaim Conveyor BC-14 (operating in the reverse mode) carries the gypsum to Transfer House TH-8 where it is transferred to gypsum Transfer Conveyor BC-19. Transfer Conveyor BC-19 conveys the gypsum to Transfer House TH-9 where it is transferred to gypsum Transfer Conveyor BC-20. Transfer Conveyor BC-20 conveys the gypsum to Transfer House TH-10 where it is transferred to gypsum Transfer Conveyor BC-21 crossing State Highway 2. Transfer Conveyor BC-21 conveys the gypsum to a future wallboard plant. As an alternative to transferring gypsum from Conveyor BC-20 to BC-21 in Transfer House TH-10, gypsum can also be diverted from Conveyor BC-20 to a small stockpile located at the base of Transfer House TH-10. The gypsum in the small stockpile will be reclaimed with end loaders and placed into dump trucks for transport. The purpose of the Transfer House TH-10 diversion gate and small stockpile is to provide a method of performing a periodic material weight test of the Conveyor BC-19 belt scale by re-weighing the material on a truck scale.

In order to support operation of the third-party wallboard plant, it will be necessary for additional gypsum to be delivered to the Mitchell Plant site in river barges having capacities of up to 1500 tons. The gypsum unloading system will utilize the same barge docking river cells, barge haul system and clamshell barge unloader as the limestone handling system. The barge unloader's clamshell bucket will be changed via a quick disconnect when switching from handling limestone to gypsum.

Gypsum will be transferred from the clamshell unloader BUN-1 to the fixed, cell mounted hopper RH-4. The unloading hopper RH-4 will discharge via a rotary plow RP-1 to the tail end of the gypsum dock/connecting conveyor BC-17. The gypsum dock/connecting conveyor BC-17 will transfer the gypsum from the unloading dock to Transfer House TH-7 on shore. Dust will be controlled at the barge unloading operation (hopper load-in area) using a dry fog dust suppression system and windscreens. Nozzles will be mounted around the top of the unloading hopper generating fog to keep any dust generated by dropping the gypsum into the hopper, inside the hopper.

At Transfer House TH-7, the gypsum will be transferred from the dock/connecting conveyor BC-17 to reclaim conveyor BC-14. As previously noted Reclaim Conveyor BC-14 will be designed as a reversible conveyor. In the reverse mode, Reclaim Conveyor BC-14 will be designed for allow gypsum transfer to a wallboard plant located south of the Mitchell plant as previously described.

As an alternative to transferring the gypsum from dock/connecting conveyor BC-17 to reclaim conveyor BC-14 for transport to the wallboard plant, the gypsum can be temporarily diverted to the gypsum stockpile area awaiting transfer to the wallboard plant. Under this scenario, gypsum from BC-14 is diverted to bypass conveyor BC-18 via diverter gate DG-8 inside Transfer House TH-7. Bypass conveyor BC-18 will transfer the material to stacking conveyor BC-12 inside Transfer House TH-6. As previously described, Stacking Conveyor BC-12, equipped with a traveling tripper, will stack the material into the gypsum stockpile.

Subsequently, as previously described, the gypsum is reclaimed from the stockpile via Traveling Portal Scraper Reclaimer PSR-1 and discharged to gypsum Reclaim Conveyor BC-14. Reclaim Conveyor BC-14 carries the gypsum to the gypsum conveyor extension to the wallboard plant.

Because the gypsum material will be damp (10% moisture by weight) from the filtering process, additional dust collection/suppression equipment is not provided. Nevertheless, the transfer points are designed as fully-enclosed transfer points and each of the outdoor conveyors utilize $\frac{3}{4}$ covers.

In the event that the normal gypsum handling system or portions of that system are out of service for maintenance/repair or if the gypsum product is of poor quality, provisions are being made to allow for emergency gypsum handling and disposal. The system consists primarily of an emergency stackout conveyor and stockpile. The gypsum collected from the four vacuum belt filters (including one future vacuum belt filter) is capable of being discharged onto the Gypsum Vacuum Filter Collecting Backup Conveyor BC-7. The Backup Collecting Conveyor BC-7 will be located inside the dewatering building and will convey the gypsum to the outside of the building where it will be stacked out to the emergency gypsum stockpile (GSPE). Gypsum stockpiled on the emergency pile will be reclaimed using front-end loaders and placed into dump trucks for transfer and disposal off-site or transfer to the normal gypsum stockpile (GSP). Since the material will be damp (10% moisture by weight) from the filtering process additional dust collection/suppression equipment is generally not necessary. Nevertheless, a $\frac{3}{4}$ cover will be utilized on the outdoor portion of Backup Collecting Conveyor BC-7.

Furthermore, in the event that the Traveling Portal Scraper Reclaimer is not available for service, backup emergency provisions have been made for reclaiming gypsum from the normal gypsum stockpile (GSP). The emergency reclaim system consists of a receiving hopper (RH-3) to receive gypsum from a front-end loader. The hopper discharges via a belt feeder (BF-1) to Reclaim Conveyor BC-14. Gypsum Reclaim Conveyor BC-14 can then transfer the gypsum to the normal gypsum connecting conveyors. Additionally, the receiving hopper (RH-3) and belt feeder (BF-1) can be used to blend out-of-spec gypsum with in-spec gypsum at capacities of 10-100 tons per hour.

ATTACHMENT E - Emission Unit Form			
Emission Unit Description WWT Handling			
Emission unit ID number: Emission Groups 11S	Emission unit name: WWT Handling	List any control devices associated with this emission unit: Conveyor covers, partial and full enclosures, baghouses, water sprays.	
Provide a description of the emission unit (type, method of operation, design parameters, etc.): The waste water treatment handling system consists of truck unloading equipment, chutes and conveyors, transfer stations, lime storage silos, and storage piles for WWT cake. See attached description of the WWT handling system.			
Manufacturer: Various	Model number: Custom	Serial number: N/A	
Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY	
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): WWT Cake transfer capacity (nominal) up to 600 ton/hr.			
Maximum Hourly Throughput: Nominal 600 ton/hr	Maximum Annual Throughput: Nominal 212,000 ton/yr	Maximum Operating Schedule: 8760 hrs/yr	
Fuel Usage Data (fill out all applicable fields)			
Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired	
Maximum design heat input and/or maximum horsepower rating: N/A		Type and Btu/hr rating of burners:	
List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. N/A			
Describe each fuel expected to be used during the term of the permit.			
Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	14.95	0.87
Particulate Matter (PM ₁₀)	98.90	5.83
Total Particulate Matter (TSP)	219.56	14.63
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).</p> <p>Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge. For purposes of determining potential fugitive emissions associated with this system, the FGD Reg 13 permit application (permit R13-2608A) calculations were used.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___ No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

WWT Handling Description:

Waste Water Treatment Handling System:

The Wastewater Treatment System is used to treat the FGD wastewater prior to discharge of the water into the plant wastewater ponds. The wastewater treatment system is designed to reduce the effluent total suspended solids (TSS) concentration and maintain pH within an acceptable range. In addition to the TSS reduction, the treatment system is designed to be retrofitted should dissolved metals removal be required in the future. A generic treatment system process flow diagram has been supplied with this permit application.

The wastewater treatment system process includes equipment for dissolved sulfate desaturation, primary clarification, chemical addition, mixing and reaction, secondary clarification and filtration. Chemicals are added to the wastewater stream to improve the removal efficiency of the waste stream solids. The solids removed from the water stream are dewatered and stored for disposal. Dewatering is accomplished by filter presses (four, including one future). The design includes a provision to add a polymer at the inlet to the secondary clarifiers if required. Filter cake storage is in concrete bins, or rooms located beneath the filter presses. After desired dryness is achieved, the dewatered filter cake drops through a hole in the floor to a dewatered filter cake storage room. The projected amount of filter cake that will be generated on an annual basis is 212,000 tons/year.

Hydrated lime will be delivered to the site by pneumatic truck equipped with its own positive displacement rotary blower. The lime will be stored on site in two lime storage silos. A bag type bin vent filter, rated at 99.9 percent removal efficiency, will be provided to control escape of dust during transfer. Lime feeders and mix tanks will be located inside an enclosure below the silos.

Along with the lime, several other liquid chemicals will be delivered for use in the wastewater treatment system. These include ferric chloride and acids delivered by bulk tank truck along with organosulfate (future), and a polymer delivered by totes.

Disposal of the filter cake that will be generated by the wastewater treatment system will be accomplished by either placing the material in a barge, or in emergency situations, trucks for transport from the plant site. Each of the cake storage rooms (four) located beneath the filter presses (three with provisions for the fourth) will be open at one of the narrow ends for access by front-end loaders (i.e. the building enclosure consists of three walls and a roof). The filter cake will be removed by front-end loader and deposited into a covered stockpile at the loading end of a feeder/breaker FB-2, (drag flight-type conveyor). Feeder/breaker FB-2 will transport filter cake to the loading end of Transfer Conveyor BC-22 (belt type conveyor). Transport conveyor BC-22 will transport and discharge onto transfer conveyor BC-15 at Transfer House TH-12. Transfer conveyor BC-15 conveys the filter cake to Transfer House TH-1 where it is transferred to Transfer Conveyor BC-16. Transfer Conveyor BC-16 conveys the filter cake from Transfer House TH-1 to the Barge Loader BL-1. Barge Loader BL-1 transfers the filter cake to covered river barges via telescopic chute TC-1. Feeder/breaker FB-2 and Transfer Conveyor BC-22 will limit the maximum load out capacity to 600 tons per hour.

Filter cake storage will be accommodated inside the storage rooms (maximum of 900 tons each) beneath the filter presses as well as at the covered loading area of the feeder/breaker (300 tons). In the event barge load out of the filter cake is disrupted (i.e. high river water conditions stopping barge traffic) and the covered filter cake storage areas are filled, trucks will be used to transport the filter cake to GSPE, the gypsum emergency stockpile area, (2500 tons) normally used for gypsum and covered by tarps. In the extreme condition that the stockpile area is filled or if the facility is able to find a third party interested in purchasing the filter cake, trucks will be used to transport the filter cake off-site.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Coal Blending System

Emission unit ID number: Emission Group 5S	Emission unit name: Coal Blending System	List any control devices associated with this emission unit: Conveyor covers, partial and full enclosures.
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The coal blending system consists of a chutes and conveyors, transfer stations, and storage piles for coal. See attached description of the coal blending system.

Manufacturer: Various	Model number: Custom	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): Coal transfer capacity (nominal) – up to 3,000 ton/hr.

Maximum Hourly Throughput: Nominal 3,000 ton/hr	Maximum Annual Throughput: Nominal 5,732,544 ton/yr	Maximum Operating Schedule: 8760 hrs/yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
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Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	3.65	4.76
Particulate Matter (PM ₁₀)	24.08	31.46
Total Particulate Matter (TSP)	50.92	66.52
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory limits, and engineering knowledge. For purposes of determining potential fugitive emissions associated with this system, the FGD Reg 13 permit application (permit R13-2608A) calculations were used.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X__Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

Coal Blending System Description:

Coal Blending:

At the Mitchell Plant, the installation of the Wet FGD Process will allow the facility to burn a high-sulfur coal potentially available from a local mine. Nevertheless, it will likely be necessary to blend this high sulfur coal with a lower sulfur coal in order to obtain the coal qualities necessary for long-term, reliable combustion of the coal in the Mitchell Units. As such, a coal blending system is planned as an integral part of the FGD retrofit project.

The locally mined coal will enter the Mitchell site via the existing Consol Conveyor 3100. Conveyor 3100's discharge will be modified to transport the coal into the Mitchell coal handling system Transfer Station 1 (HTS-1). In Transfer Station #1, coal will be transferred from Conveyor 3100 to Stacking Conveyor HSC-1. Stacking Conveyor HSC-1 will transport the coal from Transfer Station #1 to Transfer Station #2A (HTS-2A) where the coal will be sampled and transferred to Stacking Conveyor HSC-2. Stacking Conveyor HSC-2 will transport the coal from Transfer Station #2A to Transfer Station #3 (HTS-3) where the coal will be transferred to Stacking Conveyor HSC-3. As an alternative, coal can be transferred to Stacking Conveyor HSC-3 from existing plant radial stacker R9 via Stacking Hopper SH-1.

Stacking Conveyor HSC-3 transfers the coal from Transfer Station #3 to the existing North Yard Storage area where it will be discharged through a new Stacking Tube (ST-1) to help form the high sulfur coal pile.

Coal will be reclaimed from the high sulfur coal pile via four under-pile drawdown hoppers/vibratory feeders. Each of the four vibratory feeders (HVF-1 through HVF-4) transfer coal to Tunnel Reclaim Conveyor HRC-1. Tunnel Reclaim Conveyor HRC-1 transfers the coal from under the pile to Transfer Station #2B where it is transferred to Reclaim Conveyor HRC-2. Reclaim Conveyor HRC-2 will transport the coal from Transfer Station #2 to Transfer Station #4 (HTS-4) where the coal will be transferred to Reclaim Conveyor HRC-3.

Reclaim Conveyor HRC-3 will transport the coal from Transfer Station #4 to Transfer Station #5 where it will discharge via a surge bin (SB-1) to two Belt Feeders (HBF-1A and HBF-1B). Belt Feeder HBF-1A will discharge coal onto existing plant coal conveyor 4E. Belt Feeder HBF-1B will discharge coal onto existing plant coal conveyor 4W. The blending of high sulfur coal with the lower sulfur coal will occur as the high sulfur coal is discharged from Belt Feeders HBF-1A and HBF-1B onto the existing conveyors 4E and 4W that carry low sulfur coal from the existing low sulfur coal pile.

In order to minimize fugitive dust generated from the coal blending system, each of the new transfer points will utilize fully enclosed chutework located within fully enclosed buildings. Furthermore, all outdoor conveyors will utilize $\frac{3}{4}$ covers. To further minimize fugitive dust generated from the coal blending system, conveyor to conveyor transfers will utilize controlled flow transfer chutes.

An alternate high sulfur coal reclaim system has been designed into the Mitchell project. The alternate reclaim system is used when the reclaim feeders (HVF-1 through HVF-4) are out of service for maintenance/repair or in the event it is necessary to separate frozen chunks of coal. The system consists of a feeder/breaker (FB) to receive coal directly from under the storage pile or from a front-end loader. The feeder/breaker discharges to the high sulfur coal tunnel reclaim conveyor (HRC-1). The high sulfur coal tunnel reclaim conveyor can then transfer the coal to the normal high sulfur coal reclaim conveyors.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Emergency Quench Water System

Emission unit ID number: Emission Units 6S and 7S	Emission unit name: Emergency Quench Water System	List any control devices associated with this emission unit: Full enclosures.
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The emergency quench water system consists of two diesel-engine driven quench pumps. See attached description of the emergency quench water system.

Manufacturer: Clark Diesel	Model number: JU 4R-UF-19 or equal	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 60 HP (approx.),

Maximum Hourly Throughput: 5.5 gal./hr (each)	Maximum Annual Throughput: 1,100 gal./yr (combined)	Maximum Operating Schedule: 200 hrs/yr (both engines combined)
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
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Maximum design heat input and/or maximum horsepower rating: 0.8 mmBtu/hr nominal, 60 HP	Type and Btu/hr rating of burners:
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List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Diesel Fuel

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Diesel Fuel	0.2%	N/A	141,000 Btu/gal

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	1.52	0.08
Nitrogen Oxides (NO _x)	7.06	0.35
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.5	0.02
Particulate Matter (PM ₁₀)	0.5	0.02
Total Particulate Matter (TSP)	0.5	0.02
Sulfur Dioxide (SO ₂)	0.46	0.02
Volatile Organic Compounds (VOC)	0.76	0.04
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors and manufacturer's information. For purposes of determining emissions associated with this equipment, the FGD Reg 13 permit application (permit R13-2608A) calculations were used. The estimated potential emissions represent the total emissions for both quench pumps combined.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X__Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Emergency Quench Water System Description:**Emergency Quench Water:**

The existing air heaters are electric powered which could fail in case of plant power failure. In this case, the hot flue gas (600oF) could enter the absorbers. The emergency quench water system is designed to protect the absorbers by spraying water into the flue gas entering the absorber. The emergency quench system is activated in the event of a loss of on-site power. Two 100% pumps (including one spare) are provided for redundancy. The pumps are diesel engine driven to allow operation during blackout conditions. The service water tank provides the water supply.

Each emergency quench pump drive engine is rated at approximately 60 HP. No post-combustion pollution controls are utilized. Because these diesel engines are each rated at less than 500 brake horsepower, the engines are not subject to regulation under 40 CFR 63 Subpart ZZZZ (RICE rule).

The diesel fuel is supplied from a storage tanks holding approximately 70 gallons of fuel (one for each engine). Because the diesel fuel storage tanks are each less than 10,567 gallons capacity and will contain petroleum or organic liquids with a vapor pressure of 1.5 psia or less at storage temperature, and the emissions from both tanks, in the aggregate, are less than 2 tons per year, the tanks are considered de-minimis sources. De-minimis sources are not required to obtain construction permits under 45 CSR 13.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Dry Sorbent Handling System

Emission unit ID number: Emission Group 4S

Emission unit name: Dry Sorbent Handling Systems

List any control devices associated with this emission unit: Full enclosures, baghouses.

Provide a description of the emission unit (type, method of operation, design parameters, etc.): The dry sorbent handling system consists of truck unloading equipment, dry sorbent storage silos, etc. See attached description of the dry sorbent handling system.

Manufacturer: Various

Model number: Custom

Serial number: N/A

Construction date: MM/DD/YYYY

Installation date: See equipment list in Attachment D

Modification date(s): MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 25 TPH Unloading, 500 Ton Dry Sorbent Silos

Maximum Hourly Throughput: Nominal 25 ton/hr

Maximum Annual Throughput: Dry Sorbent 81,000 TPY Nominal

Maximum Operating Schedule: 8760 Hr/Yr

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes ___X___ No

If yes, is it? ___ Indirect Fired ___ Direct Fired

Maximum design heat input and/or maximum horsepower rating: N/A

Type and Btu/hr rating of burners:

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each. N/A

Describe each fuel expected to be used during the term of the permit.

Table with 4 columns: Fuel Type, Max. Sulfur Content, Max. Ash Content, BTU Value. Row 1: N/A, N/A, N/A, N/A.

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	31.31	136.86
Particulate Matter (PM ₁₀)	206.77	903.82
Total Particulate Matter (TSP)	438.69	1912.18
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory/permit limits and engineering knowledge. For purposes of determining potential fugitive emissions associated with this equipment, the FGD Reg 13 permit application (permit R13-2608A) calculations were used.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X__Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Dry Sorbent Handling System Description:**SO₃ Mitigation System:**

The installation and operation of a Selective Catalytic Reduction (SCR) system in conjunction with a wet FGD system on a boiler combusting high sulfur coal can potentially lead to increased concentrations of SO₃. Subsequently, the SO₃ reacts with moisture in the stack plume and the atmosphere to support the secondary formation of H₂SO₄. If not mitigated, the increase in SO₃ and subsequent increase in the formation of H₂SO₄ can impact the visible appearance of the discharge plume downwind of the stack.

The Mitchell Plant SCR installation utilizes a low conversion catalyst that helps minimize the conversion of SO₂ to SO₃ by the SCR system. Nevertheless, a supplemental SO₃ mitigation system is needed to help reduce SO₃ concentrations. Based on AEP's evaluation of various SO₃ mitigation systems at other AEP generating facilities, it was determined that the primary SO₃ mitigation system that would be constructed at Mitchell plant was a dry sorbent injection system. Primarily, the dry sorbent of choice is Trona. Nevertheless, hydrated lime will be used as the dry sorbent as a backup to the Trona injection. If hydrated lime is used, the dry sorbent injection system will need to be supplemented with the injection of liquid magnesium hydroxide. For the purposes of this permit application, each of the options is described.

Dry Sorbent Handling:

The dry sorbent is injected through a pneumatic conveying system to ductwork downstream of the air preheaters as a means to reduce SO₃ in the stack plume. The dry sorbent feed rate for each Mitchell Unit will vary depending on the sorbent (Trona or Hydrated Lime) being utilized and the sulfur content of the fuel. The Trona feed rate is variable with an expected maximum feed of up to 4.6 tons per hour (per unit). The Hydrated Lime feed rate is also variable with an expected maximum feed of up to 4.4 tons per hour (per unit).

Two dry sorbent storage silos at approximately 500 tons each receive dry sorbent from self-unloading trucks. Bin vent filters are supplied on each silo for the filtered venting of the truck blow-off air and the silo's fluidizing air system. An aeration system, consisting of open-type airslides, with operating and standby aeration blowers and routing valves supplies air to the silos, distribution bin, airslides, and de-aeration bins.

Dry sorbent is discharged out of the silo through a distribution bin and airslides into two de-aeration bins. The de-aeration bins are periodically filled and serve to control the fluidity of the material and minimize the head pressure that the material imposes on the downstream variable speed rotary feeders.

The feed stack-up below each de-aeration bin consists of a variable speed rotary feeder, vent hopper, fixed-speed rotary airlock, and material pick-up tee. There are two such stack-ups (one in-service and one stand-by), each with the capability to feed the primary conveying line. A pneumatically operated isolation valve is included at the discharge of the silo bin.

The dry sorbent is fed through a piping system (conveying lines) to injection lances located in the duct downstream of the air preheaters. Conveying air is supplied by three blower skid packages (two operating and one as standby) isolated by air-operated valves. Dry, high-pressure air is supplied for purging the bearings on the rotary feeders and airlocks and for pulsation cleaning of the bags in the bin vent filter at the top of each silo.

Because the dry sorbent handling system is a totally enclosed system using pressurized air as the carrying medium, particulate emissions are eliminated with the exception of those that are emitted as a result of truck traffic and from the baghouses installed on the storage silos. On a short-term basis, truck deliveries of dry sorbent are expected to be up to 2 per hour. At full load conditions, approximately 1550 tons of dry sorbent are potentially required per week. This equates to approximately 3215 trucks per year assuming a 100% capacity factor.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Magnesium Hydroxide Handling System

Emission unit ID number: Emission Group 9S	Emission unit name: Magnesium Hydroxide Handling Systems	List any control devices associated with this emission unit: Full enclosures
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The magnesium hydroxide handling systems consists of truck unloading equipment, mag. hydroxide mix tanks, etc. See attached description of the magnesium hydroxide handling system.

Manufacturer: Various	Model number: Custom	Serial number: N/A
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Construction date: MM/DD/YYYY	Installation date: See equipment list in Attachment D	Modification date(s): MM/DD/YYYY
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 1,000 gallon mag. hydroxide mix tanks (2)

Maximum Hourly Throughput: 8000 gal/hr delivered	Maximum Annual Throughput: Mag. Hyd. 6,600,000 Gal./yr	Maximum Operating Schedule: 8760 Hr/Yr
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
Maximum design heat input and/or maximum horsepower rating: N/A	Type and Btu/hr rating of burners:

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.08	0.03
Particulate Matter (PM ₁₀)	0.51	0.21
Total Particulate Matter (TSP)	2.61	1.08
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory/permit limits and engineering knowledge. For purposes of determining potential fugitive emissions associated with this equipment, the FGD Reg 13 permit application (permit R13-2608A) calculations were used.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.1 (see Attachment I): Where appropriate, revisions to existing language are noted.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:

R13-2608A Section 4.2, 4.3, 4.4, and 4.5 (see Attachment I): Where appropriate, revisions to existing language are noted.

Are you in compliance with all applicable requirements for this emission unit? X__Yes ___No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Magnesium Hydroxide Handling System Description:**SO₃ Mitigation System:**

The installation and operation of a Selective Catalytic Reduction (SCR) system in conjunction with a wet FGD system on a boiler combusting high sulfur coal can potentially lead to increased concentrations of SO₃. Subsequently, the SO₃ reacts with moisture in the stack plume and the atmosphere to support the secondary formation of H₂SO₄. If not mitigated, the increase in SO₃ and subsequent increase in the formation of H₂SO₄ can impact the visible appearance of the discharge plume downwind of the stack.

The Mitchell Plant SCR installation will utilize a low conversion catalyst that will help to minimize the conversion of SO₂ to SO₃ by the SCR system. Nevertheless, it is anticipated that a supplemental SO₃ mitigation system will be needed to help reduce SO₃ concentrations. Based on AEP's evaluation of various SO₃ mitigation systems at other AEP generating facilities, it has been determined that the primary SO₃ mitigation system that will be constructed at Mitchell plant will be a dry sorbent injection system. Primarily, the dry sorbent of choice is Trona. Nevertheless, hydrated lime will be used as the dry sorbent as a backup to the Trona injection. If hydrated lime is used, the dry sorbent injection system will need to be supplemented with the injection of liquid magnesium hydroxide. For the purposes of this permit application, each of the options is described.

Magnesium Hydroxide Injection:

The purpose of magnesium hydroxide injection is to assist in the mitigation of SO₃ in the furnace in the event that Trona dry sorbent injection is not being used. If hydrated lime dry sorbent is injected into the flue gas downstream of the air preheater, magnesium hydroxide injection into the furnace will likely be needed to assist in the mitigation of SO₃. Magnesium hydroxide, if use, will be injected into the furnace as a 15% magnesium hydroxide/water slurry. Approximately 1.5 tons per hour (per unit) of magnesium hydroxide will be required for 90% SO₃ mitigation.

The magnesium hydroxide will be delivered to the Mitchell Plant site by tanker truck in a 60% magnesium hydroxide/water slurry and pumped into one of two storage tanks. The 60% solution is then pumped into a small mixing tank where it will be diluted with filtered water to a 15% slurry. The 15% slurry is then pumped to the furnaces and injected. The tanker trucks are expected to have a nominal capacity of approximately 4000 gallons. The only emissions associated with this material handling system will be fugitive particulate emissions associated with the delivery truck traffic on the plant site. On a short-term basis, tanker truck deliveries for the magnesium hydroxide system are expected to be up to 2 per hour.

At full load conditions, approximately 18,000 gallons of 60% slurry will be required per day. This equates to approximately 1650 truckloads of liquid magnesium hydroxide per year assuming a 100% capacity factor.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Urea Handling System

Emission unit ID number:
N/A

Emission unit name:
Urea Handling Systems

List any control devices associated with this emission unit: Full and partial enclosures.

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
The urea handling systems consists of truck unloading equipment, screw conveyor, mix tanks, etc. See attached description of the urea handling system.

Manufacturer:
Various

Model number:
Custom

Serial number:
N/A

Construction date:
MM/DD/YYYY

Installation date:
See equipment list in Attachment D

Modification date(s):
MM/DD/YYYY

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 48 Ton Unloading Hopper, 200,000 gal. Urea Storage Tank.

Maximum Hourly Throughput:
Nominal 50 ton/hr

Maximum Annual Throughput:
Dry urea 26,000 TPY Nominal,

Maximum Operating Schedule:
8760 Hr/Yr

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes No

If yes, is it?

___ Indirect Fired ___ Direct Fired

Maximum design heat input and/or maximum horsepower rating:
N/A

Type and Btu/hr rating of burners:

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

N/A

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
N/A	N/A	N/A	N/A

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO _x)		
Lead (Pb)		
Particulate Matter (PM _{2.5})	0.036	0.009
Particulate Matter (PM ₁₀)	2.47	0.64
Total Particulate Matter (TSP)	6.93	1.8
Sulfur Dioxide (SO ₂)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Potential emissions are based on a combination of AP-42 emission factors, regulatory/permit limits and engineering knowledge.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

The following permit conditions are considered the applicable requirements for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. Where appropriate, calculation basis is provided. For existing limits that were previously captured in the permit, the calculations were provided in the previous permit application(s). No changes to existing limits are being requested at this time.

Requirements currently not captured in Title V permit:**X.0. Source-Specific Requirements [Urea Handling (Emission points listed in section 1.0. Table)]****X.1. Limitations and Standards**

The Urea handling system is subject to 45CSR§2-5 as outlined in the facility wide section of this permit (condition 3.1.12) regarding fugitive dust control system.

Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

The following permit conditions are considered the applicable requirements for monitoring, testing, recordkeeping and reporting for this emission unit. Where appropriate, the actual permits are attached to provide the applicable language along with the underlying rule/regulatory citation. No changes are being requested at this time.

Requirements currently not captured in Title V permit:**X.2. Monitoring, Recordkeeping, and Reporting Requirements**

See Permit condition 3.3.4. [45 CSR 30-5.1.c]

Are you in compliance with all applicable requirements for this emission unit? X Yes No

If no, complete the Schedule of Compliance Form as ATTACHMENT F.

Dry Sorbent and Magnesium Hydroxide Handling System Description:**Urea Handling System:**

Ammonia is the reagent used in the SCR process to reduce the NO_x , produced in the combustion process to elemental nitrogen and water vapor. The ammonia is generated from the Urea to Ammonia (U2A™) system. The U2A™ system uses dry urea as the feedstock to produce ammonia vapor by hydrolyzing a urea solution to form ammonia vapor, carbon dioxide and water vapor. The urea solution is prepared from dry urea and steam condensate water.

The dry urea unloading system includes the equipment necessary to unload dry urea from trucks and transport it to urea solution mix tank. There is a provision to receive two 25-ton truckloads of dry urea back to back in a hopper located in a pit constructed by AEP at the Truck Unloading Station. Dry urea is then transferred from the hopper to a urea solution mix tank via full enclosed screw/drag conveyor equipment. In the mix tank, urea and condensate water is added in sufficient quantities to convert the dry urea into a 40% (by weight) urea solution for use in the urea to ammonia conversion process. The design is suitable for either prill or granular urea. The urea solution is transferred from the mix tank to a urea solution storage tank for use by the U2A™ system.

Attachment F

Schedule of Compliance (N/A)

Attachment G

Air Pollution Control Device Forms

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: ML1 ESP	List all emission units associated with this control device. Unit 1	
Manufacturer: Wheelabrator Frye	Model number: 1487	Installation date: 12/30/1977
Type of Air Pollution Control Device:		
<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input checked="" type="checkbox"/> Dry Plate Electrostatic Precipitator	
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99.85%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).		
Avg. Pressure Drop = 0.07 inches H ₂ O, Avg. Gas Flow Rate = 3,000x10 ³ acfm, Avg. Operating temp. = 370 °F, Design Removal Efficiency = 99.85%		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If Yes, Complete ATTACHMENT H		
If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device.		
Monitor opacity as an indicator of electrostatic precipitator performance. Periodic stack tests are performed to assure compliance with the particulate mass emissions standard.		

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: ML1 FGD	List all emission units associated with this control device. Unit 1	
Manufacturer: B&W	Model number: Custom	Installation date: 04/28/2007
Type of Air Pollution Control Device: <input type="checkbox"/> Baghouse/Fabric Filter <input type="checkbox"/> Venturi Scrubber <input type="checkbox"/> Multiclone <input type="checkbox"/> Carbon Bed Adsorber <input type="checkbox"/> Packed Tower Scrubber <input type="checkbox"/> Single Cyclone <input type="checkbox"/> Carbon Drum(s) <input checked="" type="checkbox"/> Other Wet Scrubber <input type="checkbox"/> Cyclone Bank <input type="checkbox"/> Catalytic Incinerator <input type="checkbox"/> Condenser <input type="checkbox"/> Settling Chamber <input type="checkbox"/> Thermal Incinerator <input type="checkbox"/> Flare <input type="checkbox"/> Other (describe) _____ <input type="checkbox"/> Wet Plate Electrostatic Precipitator <input type="checkbox"/> Dry Plate Electrostatic Precipitator		
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
SO ₂	100%	95%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.). Full Load Flow Rate = 2.6x10 ⁶ acfm, Outlet temperature = 128 °F, Design Removal Efficiency = 95%		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Complete ATTACHMENT H If No, Provide justification. Continuous Emissions Monitoring Used.		
Describe the parameters monitored and/or methods used to indicate performance of this control device. Monitoring of SO ₂ emissions using CEMS		

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: ML1 SCR	List all emission units associated with this control device. Unit 1
---	---

Manufacturer:	Model number: Custom	Installation date: 05/02/2007
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Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) <u>Selective Catalytic Reduction</u>
<input type="checkbox"/> Wet Plate Electrostatic Precipitator		<input type="checkbox"/> Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
NO _x	100%	90%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).
 NO_x Control Efficiency = 90.0%, Design Temperature = 750 °F, Maximum ammonia slip = 2 ppmvd at 3% O₂

Is this device subject to the CAM requirements of 40 C.F.R. 64? Yes No
 If Yes, **Complete ATTACHMENT H**
 If No, **Provide justification.** Continuous Emissions Monitoring Used.

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Monitoring of NO_x emissions using CEMS

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: ML2 ESP	List all emission units associated with this control device. Unit 2	
Manufacturer: Wheelabrator Frye	Model number: 1487	Installation date: 06/16/1978
Type of Air Pollution Control Device:		
<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input checked="" type="checkbox"/> Dry Plate Electrostatic Precipitator	
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
PM	100%	99.85%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).		
Avg. Pressure Drop = 0.07 inches H ₂ O, Avg. Gas Flow Rate = 3,000x10 ³ acfm, Avg. Operating temp. = 370 °F, Design Removal Efficiency = 99.85%		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If Yes, Complete ATTACHMENT H		
If No, Provide justification.		
Describe the parameters monitored and/or methods used to indicate performance of this control device.		
Monitor opacity as an indicator of electrostatic precipitator performance. Periodic stack tests are performed to assure compliance with the particulate mass emissions standard.		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: ML2 FGD	List all emission units associated with this control device. Unit 2	
Manufacturer: B&W	Model number: Custom	Installation date: 01/15/2007
Type of Air Pollution Control Device:		
<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input checked="" type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> Dry Plate Electrostatic Precipitator	
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
SO ₂	100%	95%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).		
Full Load Flow Rate = 2.6x10 ⁶ acfm, Outlet temperature = 128 °F, Design Removal Efficiency = 95%		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If Yes, Complete ATTACHMENT H		
If No, Provide justification. Continuous Emissions Monitoring Used.		
Describe the parameters monitored and/or methods used to indicate performance of this control device.		
Monitoring of SO ₂ emissions using CEMS		

ATTACHMENT G - Air Pollution Control Device Form		
Control device ID number: ML2 SCR	List all emission units associated with this control device. Unit 2	
Manufacturer:	Model number: Custom	Installation date: 05/02/2007
Type of Air Pollution Control Device:		
<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) Selective Catalytic Reduction
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> Dry Plate Electrostatic Precipitator	
List the pollutants for which this device is intended to control and the capture and control efficiencies.		
Pollutant	Capture Efficiency	Control Efficiency
NO _x	100%	90%
Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).		
NO _x Control Efficiency = 90.0%, Design Temperature = 750 °F, Maximum ammonia slip = 2 ppmvd at 3% O ₂		
Is this device subject to the CAM requirements of 40 C.F.R. 64? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If Yes, Complete ATTACHMENT H		
If No, Provide justification. Continuous Emissions Monitoring Used.		
Describe the parameters monitored and/or methods used to indicate performance of this control device.		
Monitoring of NO _x emissions using CEMS		

Attachment H

Compliance Assurance Monitoring (CAM)
Forms

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at <http://www.epa.gov/ttn/emc/cam.html>

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): YES NO

- a. The PSEU is located at a major source that is required to obtain a Title V permit;
- b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is **NOT** exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
 - Stratospheric Ozone Protection Requirements.
 - Acid Rain Program Requirements.
 - Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
 - An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).
- c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;
 - d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND
 - e. The PSEU is **NOT** an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

- RENEWAL APPLICATION.** **ALL** PSEUs for which a CAM plan has **NOT** yet been approved need to be addressed in this CAM plan submittal.
- INITIAL APPLICATION** (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.
- SIGNIFICANT MODIFICATION TO LARGE PSEUs.** **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, **Only** address the appropriate monitoring requirements affected by the significant modification.

3) ^a BACKGROUND DATA AND INFORMATION

Complete the following table for all PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU in order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.

PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	^b EMISSION LIMITATION or STANDARD	^c MONITORING REQUIREMENT
Unit 1	Coal-Fired Steam Generator	PM	ESP	45CSR2-4.1.a	Monitor Duct Opacity Using COMS
Unit 2	Coal-Fired Steam Generator	PM	ESP	45CSR2-4.1.a	Monitor Duct Opacity Using COMS
<u>EXAMPLE</u> Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

^a If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

^b Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

^c Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA

Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. If more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.

4a) PSEU Designation: Unit 1	4b) Pollutant: PM	4c) ^a Indicator No. 1: Opacity	4d) ^a Indicator No. 2: Opacity
5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators:		Opacity data is measured and recorded by a certified continuous opacity monitoring system (COMS). The 6-minute average data is recorded and will be used to calculate block 3-hour average opacity values.	Opacity data is measured and recorded by a certified continuous opacity monitoring system (COMS). The 6-minute average data is recorded and will be used to calculate block 3-hour average opacity values.
^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		Opacity data has been collected during Method 5 particulate emission testing. The plan will incorporate existing test data along with CAM stack testing to verify a conservative indicator range. The proposed upper threshold value of the indicator range is a 3-hour block average opacity value greater than 10% Opacity	Excess short duration opacity increases occurring during any calendar quarter are not to exceed 5% of the total operating time.
5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy:		The COMs is located in the duct downstream of the ESP in accordance with 40 CFR 60.13(i)(1); the COMs is installed, maintained and provides data accuracy in accordance with 40 CFR 75.	The COMs is located in the duct downstream of the ESP in accordance with 40 CFR 60.13(i)(1); the COMs is installed, maintained and provides data accuracy in accordance with 40 CFR 75.
^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring:		N/A	N/A
Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		QA/QC is performed in accordance with 40 CFR 75.	QA/QC is performed in accordance with 40 CFR 75.
^d Provide the <u>MONITORING FREQUENCY</u> :		Opacity is measured continuously except for periods of monitor malfunction or downtime (e.g. calibration, repairs, etc.)	Opacity is measured continuously except for periods of monitor malfunction or downtime (e.g. calibration, repairs, etc.)
Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used:		Opacity data will be collected and stored in a Data Acquisition System (DAS) on a block 3-hour average basis.	Opacity data will be collected and stored in a Data Acquisition System (DAS) on a block 3-hour average basis.
Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred:		The opacity values used to compare with the upper threshold value of the indicator range is the block 3-hour average opacity (short duration opacity increase).	The opacity values used to compare with the upper threshold value of the indicator range is the block 3-hour average opacity (short duration opacity increase) and the total operating time of the units.

^a Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

^b Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

^c The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

^d Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

CAM MONITORING APPROACH CRITERIA			
Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. If more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: Unit 2	4b) Pollutant: PM	4c) ^a Indicator No. 1: Opacity	4d) ^a Indicator No. 2: Opacity
5a) GENERAL CRITERIA Describe the <u>MONITORING APPROACH</u> used to measure the indicators:		Opacity data is measured and recorded by a certified continuous opacity monitoring system (COMS). The 6-minute average data is recorded and will be used to calculate block 3-hour average opacity values.	Opacity data is measured and recorded by a certified continuous opacity monitoring system (COMS). The 6-minute average data is recorded and will be used to calculate block 3-hour average opacity values.
^b Establish the appropriate <u>INDICATOR RANGE</u> or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		Opacity data has been collected during Method 5 particulate emission testing. The plan will incorporate existing test data along with CAM stack testing to verify a conservative indicator range. The proposed upper threshold value of the indicator range is a 3-hour block average opacity value greater than 10% Opacity	Excess short duration opacity increases occurring during any calendar quarter are not to exceed 5% of the total operating time.
5b) PERFORMANCE CRITERIA Provide the <u>SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA</u> , such as detector location, installation specifications, and minimum acceptable accuracy:		The COMs is located in the duct downstream of the ESP in accordance with 40 CFR 60.13(i)(1); the COMs is installed, maintained and provides data accuracy in accordance with 40 CFR 75.	The COMs is located in the duct downstream of the ESP in accordance with 40 CFR 60.13(i)(1); the COMs is installed, maintained and provides data accuracy in accordance with 40 CFR 75.
^c For new or modified monitoring equipment, provide <u>VERIFICATION PROCEDURES</u> , including manufacturer's recommendations, <u>TO CONFIRM THE OPERATIONAL STATUS</u> of the monitoring:		N/A	N/A
Provide <u>QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES</u> that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		QA/QC is performed in accordance with 40 CFR 75.	QA/QC is performed in accordance with 40 CFR 75.
^d Provide the <u>MONITORING FREQUENCY</u> :		Opacity is measured continuously except for periods of monitor malfunction or downtime (e.g. calibration, repairs, etc.)	Opacity is measured continuously except for periods of monitor malfunction or downtime (e.g. calibration, repairs, etc.)
Provide the <u>DATA COLLECTION PROCEDURES</u> that will be used:		Opacity data will be collected and stored in a Data Acquisition System (DAS) on a block 3-hour average basis.	Opacity data will be collected and stored in a Data Acquisition System (DAS) on a block 3-hour average basis.
Provide the <u>DATA AVERAGING PERIOD</u> for the purpose of determining whether an excursion or exceedance has occurred:		The opacity values used to compare with the upper threshold value of the indicator range is the block 3-hour average opacity (short duration opacity increase).	The opacity values used to compare with the upper threshold value of the indicator range is the block 3-hour average opacity (short duration opacity increase) and the total operating time of the units.

^a Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

^b Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

- ° The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.
- ^d Emission units with post-control PTE \geq 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for EACH PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:
Unit 1

6b) Regulated Air Pollutant:
PM

7) **INDICATORS AND THE MONITORING APPROACH:** Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

Ohio Power believes that the continuous opacity monitoring system (COMS) data is the most appropriate and readily available indicator for continuously evaluating the performance and operations of the electrostatic precipitator and thereby assessing compliance with the applicable particulate emission rate limitation between periodic 40 CFR Part 60, Method 5 compliance testing. Monitoring of other ESP operating parameters such as TR set voltage and current levels may be beneficial in evaluating ESP performance trends on a short term basis as well, however, these are not continuous nor are they direct indicators of conditions in the stack prior to release of the flue gas. For these reasons, a specific corrective action plan has been developed based upon opacity monitoring. This corrective action plan will be implemented at any time there is a short duration or a sustained duration increase in opacity above the upper threshold value of the indicator range.

Monitoring: The permittee shall monitor and maintain 6-minute opacity averages measured by a continuous opacity monitoring system, operated and maintained pursuant to 40 C.F.R. Part 75, including the minimum data requirements, in order to determine 3-hour block average opacity values. The 6-minute opacity averages shall be used to calculate 3-hour block average opacity values. The COM QA/QC procedures shall be equivalent to the applicable requirements of 40 C.F.R. Part 75. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, but not limited to, calibration checks and required zero and span adjustments), the opacity shall be continuously monitored (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs and QA/QC activities shall not be used for purposes of 40 C.F.R. Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement. Data availability shall be at least of 50% of the operating time in the 3-hour block to satisfy the data requirements to calculate the 3-hour average opacity. The number of invalid 3-hour blocks shall not exceed 15% of the total 3-hour blocks during unit operation for a quarterly reporting period.

Recordkeeping: Records of the block 3-hour COMS opacity averages and corrective actions taken during excursions of the CAM plan indicator range shall be maintained on site and shall be made available to the Director or his duly authorized representative upon request. COMS performance data will be maintained in accordance with 40 C.F.R. Part 75 recordkeeping requirements. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Reporting: The permittee shall submit semiannual monitoring reports to the DAQ. A report for monitoring under 40 C.F.R. 64 shall include, at a minimum, the following information: (a) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions and the corrective actions taken; (b) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks); and (c) A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

For purposes of this corrective action plan:

A **short duration increase in opacity** is defined as an increase in opacity that persists for at least a block three-hour period (30 consecutive 6-minute periods), and which measure greater than the upper threshold value of the indicator range.

A **sustained increase in opacity (or an excursion)** is defined as an increase in opacity that persists for two consecutive 3-hour block periods (two consecutive short duration opacity increase periods), and which measure greater than the upper threshold value of the indicator range.

This plan outlines specific corrective action procedures to be implemented by plant personnel for the following scenarios:

Case A: Upon alarm of a Short duration increase in opacity.

Case B: Upon alarm of a sustained increase in opacity.

These corrective action procedures do not apply to opacity increases that occur during exempt periods. Assignment of personnel to carry out each step of this plan will be the sole responsibility of Plant Management and may change based upon specific conditions.

Case A: (Short duration increase in opacity.)

Plant personnel will continue to observe the COMS data and at the same time initiate a review of other available information (such as: TR set status, voltage, current, operating parameters, etc.) in order to validate and/or identify the cause of the opacity increase.

1. If the opacity does not return to and remain at normal operating levels within (within 180 minutes), further corrective action may become necessary.

1. If the cause of the opacity increase is not already known, unit-operating data will be collected for the purpose of determining the cause of the opacity increase.

1. If the opacity increase occurs after normal working hours, on weekends, or holidays; the unit-operations data may be collected the following working day.

1. Once the cause of the opacity increase is determined, plant personnel will take necessary steps to mitigate the unit operating condition or equipment failure that is found to be causing the short duration opacity increase.

B. Case B: (Sustained increase in opacity.)

1. Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

2. If the opacity does not return and remain at normal operating levels within a short duration (within 180 minutes), and the cause of the opacity increase is not already known, further analysis of the unit, and auxiliary operating data will be analyzed and recorded for the purpose of determining the cause of the opacity increase.

3. If the opacity increase occurs after normal working hours, on weekends, or holidays, off-shift personnel may be required to determine the cause of the opacity increase and initiate appropriate corrective actions.

4. Plant personnel will initiate the following corrective actions as necessary to reduce stack opacity to normal operating levels:

- a. Any individual TR sets that are out-of-service or not operating at normal power levels shall be repaired and/or adjusted as appropriate.
- b. ESP rapping procedures may be initiated and/or adjusted as necessary.
- c. Flue gas conditioning systems will be placed in service or adjusted as necessary.
- d. Depending on the specific events found to be the cause of the opacity increase, other corrective actions will be implemented as necessary to reduce the opacity to normal operating levels.

If five (5) percent or greater of the block three (3) hour average COMS opacity values indicate excursions of the 10% opacity threshold during a calendar quarter, the permittee shall develop and implement a QIP. The Director may waive this QIP requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to permit condition 3.3.1.

If the opacity level continues to exceed the upper threshold value of the indicator range Opacity after the corrective actions as outlined above for Case B are implemented, plant personnel will contact appropriate management staff to obtain necessary approvals to reduce load, or in extreme cases, commence a unit shutdown in order to remediate the cause of the opacity increase.

Based on the results of a determination of actions taken by the permittee, the Administrator or the Director may require the permittee to develop and implement a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 C.F.R. §§ 64.8(b) through (e).

8) INDICATOR RANGES: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how EACH indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

The indicator is based upon an opacity/mass relationship of the emissions unit at full load operation. It is anticipated that the 0.05 lb/mmBTU particulate emissions limit will not be exceeded when 3-hour block opacity values remain at or below 10% opacity. Accordingly, the Mountaineer Plant can demonstrate a reasonable assurance of compliance with the particulate mass emission limit as long as the 3-hour block average stack (duct) opacity is maintained below the upper threshold value of 10% opacity.

Ohio Power Company is proposing that the opacity/mass relationship be verified using existing baseline mass particulate emission test results and additional full load "CAM Testing". Based on previous compliance or performance testing of the electrostatic precipitator using 40 CFR Part 60 methods, Ohio Power Company believes that compliance with the upper threshold value of 10% opacity for the 3-hour block average periods will provide reasonable assurance of compliance with the particulate emission standard. The 10% threshold was chosen for two reasons: first, the historic particulate emission test data that has been collected over the past few years shows this source to be in compliance with the 0.05 lb/mmBTU particulate limit by a good margin when stack opacity is less than 10% and second, we presume that DAQ established the 10% 45 CSR 2 opacity SIP limit at a level that DAQ believes sources will likely be in compliance with the mass SIP limit to provide a conservative reasonable assurance of compliance with the mass emission limit. The 3-hour block averaging time period was chosen to provide adequate time to make operational corrections to comply with the particulate mass emission standard.

Historic baseline test data collected in the past recent years and submitted to WV DEP is summarized below:

Test Date	Measured Emission Rate	Average Opacity
8/21/2000	0.0180 lb/mmBtu	7.0
8/5/2003	0.0147 lb/mmBtu	3.3
7/14/2006	0.0134 lb/mmBtu	3.2
4/7/2009	0.0195 lb/mmBtu	5.1
1/24/2012	0.0337 lb/mmBtu	3.7
12/14/2012	0.0037 lb/mmBtu	6.1

No changes have been made that would significantly impact ESP performance. Data collected during future periodic 45CSR2 mass emissions tests will be used to supplement the existing data set in order to verify the continuing appropriateness of the 10% indicator range value.

While the above compliance test data has been used as baseline confirmation of mass emission compliance at full load, additional full load testing was also conducted to supplement the data set with data points collected while operating at or near the 10% opacity threshold. These points were established by "de-tuning" the electrostatic precipitator (making adjustments to operating parameters of the precipitator) and/or making other operational adjustments to the unit to increase the particulate mass loading and opacity downstream of the precipitator. The data set used to establish the opacity/mass relationship and the indicator verification consist of the particulate mass emissions compliance test data and the data collected during the CAM testing program. The CAM testing at elevated opacity levels was performed for one 2-hour test run (as opposed to a full 6-hour time period typical of a compliance test). Limiting the data collection to 2-hours minimized the environmental impacts of operating the particulate control equipment under less than normal operating conditions. Nevertheless, it was understood that more than one run under specific unit operating conditions may be necessary.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of **EACH** indicator and monitoring approach and **EACH** indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:
Unit 2

6b) Regulated Air Pollutant:
PM

7) **INDICATORS AND THE MONITORING APPROACH:** Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

Ohio Power believes that the continuous opacity monitoring system (COMS) data is the most appropriate and readily available indicator for continuously evaluating the performance and operations of the electrostatic precipitator and thereby assessing compliance with the applicable particulate emission rate limitation between periodic 40 CFR Part 60, Method 5 compliance testing. Monitoring of other ESP operating parameters such as TR set voltage and current levels may be beneficial in evaluating ESP performance trends on a short term basis as well, however, these are not continuous nor are they direct indicators of conditions in the stack prior to release of the flue gas. For these reasons, a specific corrective action plan has been developed based upon opacity monitoring. This corrective action plan will be implemented at any time there is a short duration or a sustained duration increase in opacity above the upper threshold value of the indicator range.

Monitoring: The permittee shall monitor and maintain 6-minute opacity averages measured by a continuous opacity monitoring system, operated and maintained pursuant to 40 C.F.R. Part 75, including the minimum data requirements, in order to determine 3-hour block average opacity values. The 6-minute opacity averages shall be used to calculate 3-hour block average opacity values. The COM QA/QC procedures shall be equivalent to the applicable requirements of 40 C.F.R. Part 75. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, but not limited to, calibration checks and required zero and span adjustments), the opacity shall be continuously monitored (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs and QA/QC activities shall not be used for purposes of 40 C.F.R. Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement. Data availability shall be at least of 50% of the operating time in the 3-hour block to satisfy the data requirements to calculate the 3-hour average opacity. The number of invalid 3-hour blocks shall not exceed 15% of the total 3-hour blocks during unit operation for a quarterly reporting period.

Recordkeeping: Records of the block 3-hour COMS opacity averages and corrective actions taken during excursions of the CAM plan indicator range shall be maintained on site and shall be made available to the Director or his duly authorized representative upon request. COMS performance data will be maintained in accordance with 40 C.F.R. Part 75 recordkeeping requirements. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Reporting: The permittee shall submit semiannual monitoring reports to the DAQ. A report for monitoring under 40 C.F.R. 64 shall include, at a minimum, the following information: (a) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions and the corrective actions taken; (b) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks); and (c) A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

For purposes of this corrective action plan:

A **short duration increase in opacity** is defined as an increase in opacity that persists for at least a block three-hour period (30 consecutive 6-minute periods), and which measure greater than the upper threshold value of the indicator range.

A **sustained increase in opacity (or an excursion)** is defined as an increase in opacity that persists for two consecutive 3-hour block periods (two consecutive short duration opacity increase periods), and which measure greater than the upper threshold value of the indicator range.

This plan outlines specific corrective action procedures to be implemented by plant personnel for the following scenarios:

Case A: Upon alarm of a Short duration increase in opacity.

Case B: Upon alarm of a sustained increase in opacity.

These corrective action procedures do not apply to opacity increases that occur during exempt periods. Assignment of personnel to carry out each step of this plan will be the sole responsibility of Plant Management and may change based upon specific conditions.

Case A: (Short duration increase in opacity.)

Plant personnel will continue to observe the COMS data and at the same time initiate a review of other available information (such as: TR set status, voltage, current, operating parameters, etc.) in order to validate and/or identify the cause of the opacity increase.

1. If the opacity does not return to and remain at normal operating levels within (within 180 minutes), further corrective action may become necessary.
3. If the cause of the opacity increase is not already known, unit-operating data will be collected for the purpose of determining the cause of the opacity increase.
3. If the opacity increase occurs after normal working hours, on weekends, or holidays; the unit-operations data may be collected the following working day.
4. Once the cause of the opacity increase is determined, plant personnel will take necessary steps to mitigate the unit operating condition or equipment failure that is found to be causing the short duration opacity increase.

B. Case B: (Sustained increase in opacity.)

1. Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
2. If the opacity does not return and remain at normal operating levels within a short duration (within 180 minutes), and the cause of the opacity increase is not already known, further analysis of the unit, and auxiliary operating data will be analyzed and recorded for the purpose of determining the cause of the opacity increase.
3. If the opacity increase occurs after normal working hours, on weekends, or holidays, off-shift personnel may be required to determine the cause of the opacity increase and initiate appropriate corrective actions.
4. Plant personnel will initiate the following corrective actions as necessary to reduce stack opacity to normal operating levels:
 - a. Any individual TR sets that are out-of-service or not operating at normal power levels shall be repaired and/or adjusted as appropriate.
 - b. ESP rapping procedures may be initiated and/or adjusted as necessary.
 - c. Flue gas conditioning systems will be placed in service or adjusted as necessary.
 - d. Depending on the specific events found to be the cause of the opacity increase, other corrective actions will be implemented as necessary to reduce the opacity to normal operating levels.

If five (5) percent or greater of the block three (3) hour average COMS opacity values indicate excursions of the 10% opacity threshold during a calendar quarter, the permittee shall develop and implement a QIP. The Director may waive this QIP requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to permit condition 3.3.1.

If the opacity level continues to exceed the upper threshold value of the indicator range Opacity after the corrective actions as outlined above for Case B are implemented, plant personnel will contact appropriate management staff to obtain necessary approvals to reduce load, or in extreme cases, commence a unit shutdown in order to remediate the cause of the opacity increase.

Based on the results of a determination of actions taken by the permittee, the Administrator or the Director may require the permittee to develop and implement a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 C.F.R. §§ 64.8(b) through (e).

8) INDICATOR RANGES: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall **INCLUDE** a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall **INCLUDE** the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall **INCLUDE** documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

The indicator is based upon an opacity/mass relationship of the emissions unit at full load operation. It is anticipated that the 0.05 lb/mmBTU particulate emissions limit will not be exceeded when 3-hour block opacity values remain at or below 10% opacity. Accordingly, the Mountaineer Plant can demonstrate a reasonable assurance of compliance with the particulate mass emission limit as long as the 3-hour block average stack (duct) opacity is maintained below the upper threshold value of 10% opacity.

Ohio Power Company is proposing that the opacity/mass relationship be verified using existing baseline mass particulate emission test results and additional full load "CAM Testing". Based on previous compliance or performance testing of the electrostatic precipitator using 40 CFR Part 60 methods, Ohio Power Company believes that compliance with the upper threshold value of 10% opacity for the 3-hour block average periods will provide reasonable assurance of compliance with the particulate emission standard. The 10% threshold was chosen for two reasons: first, the historic particulate emission test data that has been collected over the past few years shows this source to be in compliance with the 0.05 lb/mmBTU particulate limit by a good margin when stack opacity is less than 10% and second, we presume that DAQ established the 10% 45 CSR 2 opacity SIP limit at a level that DAQ believes sources will likely be in compliance with the mass SIP limit to provide a conservative reasonable assurance of compliance with the mass emission limit. The 3-hour block averaging time period was chosen to provide adequate time to make operational corrections to comply with the particulate mass emission standard.

Historic baseline test data collected in the past recent years and submitted to WV DEP is summarized below:

Test Date	Measured Emission Rate	Average Opacity
8/21/2000	0.0180 lb/mmBtu	7.0
8/5/2003	0.0147 lb/mmBtu	3.3
7/14/2006	0.0134 lb/mmBtu	3.2
4/8/2009	0.0099 lb/mmBtu	5.9
1/26/2012	0.0421 lb/mmBtu	6.2
12/13/2012	0.0038 lb/mmBtu	6.1

No changes have been made that would significantly impact ESP performance. Data collected during future periodic 45CSR2 mass emissions tests will be used to supplement the existing data set in order to verify the continuing appropriateness of the 10% indicator range value.

While the above compliance test data has been used as baseline confirmation of mass emission compliance at full load, additional full load testing was also conducted to supplement the data set with data points collected while operating at or near the 10% opacity threshold. These points were established by "de-tuning" the electrostatic precipitator (making adjustments to operating parameters of the precipitator) and/or making other operational adjustments to the unit to increase the particulate mass loading and opacity downstream of the precipitator. The data set used to establish the opacity/mass relationship and the indicator verification consist of the particulate mass emissions compliance test data and the data collected during the CAM testing program. The CAM testing at elevated opacity levels was performed for one 2-hour test run (as opposed to a full 6-hour time period typical of a compliance test). Limiting the data collection to 2-hours minimized the environmental impacts of operating the particulate control equipment under less than normal operating conditions. Nevertheless, it was understood that more than one run under specific unit operating conditions may be necessary.

Attachment I

Existing Applicable Permits



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

November 13, 2012

CERTIFIED MAIL
91 7108 2133 3939 2100 6736

D.L. Moyer
P.O. Box K
Moundsville, WV 26041

Re: Ohio Power Company
Mitchell Plant
Permit No. R13-2608D
Plant ID No. 051-00005

Dear Mr. Moyer:

Your application for a permit as required by Section 5 of 45CSR13 - "Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permit, General Permit, and Procedures for Evaluation" has been approved. The enclosed permit R13-2608D is hereby issued pursuant to Subsection 5.7 of 45CSR13. Please be aware of the notification requirements in the permit which pertain to commencement of construction, modification, or relocation activities; startup of operations; and suspension of operations.

In accordance with 45CSR30- Operating Permit Program, the permittee shall submit a certified emissions statement 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.

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.

Should you have any questions or comments, please contact me at (304) 926-0499, extension 1218.

Sincerely,

Steven R. Pursley, PE
Engineer

Enclosures
c: Jeff Palmer
NPRO

West Virginia Department of Environmental Protection

Division of Air Quality

*Earl Ray Tomblin
Governor*

*Randy C. Huffman
Cabinet Secretary*

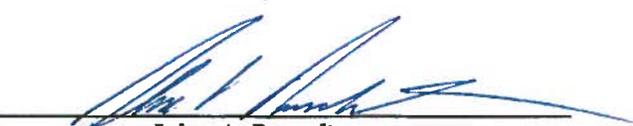
Permit to Modify



R13-2608D

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:
**Ohio Power Company
Mitchell Plant
051-00005**



**John A. Benedict
Director**

Issued: November 13, 2012 • Effective: November 13, 2012

This permit will supercede and replace Permit R13-2608C.

Facility Location: Moundsville, Marshall County, West Virginia

Mailing Address: PO Box K
Moundsville, WV 26041

Facility Description: Power Plant

NAICS Codes: 221112

UTM Coordinates: 516.00 km Easting • 4,409.00 km Northing • Zone 17

Permit Type: Modification

Description of Change:

Modification to increase the permitted CO limit of the auxiliary boiler

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 Unit Description	Design Capacity	Control Device	Emission Point ID
1S Limestone Material Handling				
BUN-1	Limestone Unloading Crane	1,000 TPH	None	Fugitive
RH-1	Limestone Unloading Hopper	60 Tons	Water Spray Partial Enclosure	Fugitive
VF-1	Limestone Unloading Feeder	750 TPH	Full Enclosure	Fugitive
BC-1	Limestone Dock/Connecting Conveyor	750 TPH	Partial Enclosure	Fugitive
TH-1	Limestone Transfer House #1	750 TPH	Full Enclosure	Fugitive
BC-2	Limestone Storage Pile Stacking Conveyor	750 TPH	Partial Enclosure	Fugitive
LSSP	Limestone Active/Long-Term Stockpile	41,300 Tons	None	Fugitive
2S Gypsum Material Handling				
BC-8	Vacuum Collecting Conveyor	200 TPH	Partial Enclosure	Fugitive
TH-3	Gypsum Transfer House #3	200 TPH	Full Enclosure	Fugitive
BC-9	Connecting Conveyor	200 TPH	Partial Enclosure	Fugitive
TH-4	Gypsum Transfer House #4	200 TPH	Full Enclosure	Fugitive
BC-10	Connecting Conveyor	200 TPH	Partial Enclosure	Fugitive
TH-5	Gypsum Transfer House #5	200 TPH	Full Enclosure	Fugitive
BC-11	Connecting Conveyor	200 TPH	Partial Enclosure	Fugitive
TH-6	Gypsum Transfer House #6	200 TPH	Full Enclosure	Fugitive
BC-12	Stacking Tripper Conveyor	200 TPH	Partial Enclosure	Fugitive
GSP	Gypsum Stockpile	15,600 tons	Full Enclosure	Fugitive
PSR-1	Traveling Portal Scraper Reclaimer	1,000 TPH	Full Enclosure	Fugitive
BC-14	Reclaim Conveyor	1,000 TPH	Partial Enclosure	Fugitive
TH-7	Transfer House #7	1,000 TPH	Full Enclosure	Fugitive
BC-13	Bypass Conveory	200 TPH	Partial Enclosure	Fugitive
BC-15	Connecting Conveyor	1,000 TPH	Partial Enclosure	Fugitive
TH-1	Transfer House #1	1,000 TPH	Full Enclosure	Fugitive
BC-16	Transfer Conveyor	1,000 TPH	Partial Enclosure	Fugitive
BL-1	Barge Loader	1,000 TPH	Partial Enclosure	Fugitive
BC-14	Reclaim Conveyor Extension	1,000 TPH	Partial Enclosure	Fugitive
TH-8	Transfer House 8	1,000 TPH	Full Enclosure	Fugitive
BC-19	Transfer Conveyor	1,000 TPH	Partial Enclosure	Fugitive
TH-9	Transfer House 9	1,000 TPH	Full Enclosure	Fugitive

Emission Unit ID	Emission Unit Description	Design Capacity	Control Device	Emission Point ID
BC-20	Transfer Conveyor	1,000 TPH	Partial Enclosure	Fugitive
TH-10	Transfer House 10	1,000 TPH	Full Enclosure	Fugitive
BC-21	Transfer Conveyor to 21	1,000 TPH	Partial Enclosure	Fugitive
BUN-1	Clamshell Unloading Crane	1,000 TPH		Fugitive
RH-4	Gypsum Unloading Hopper	30 tons	Water Spray Partial Enclosure	Fugitive
RP-1	Gypsum Rotary Plow	750 TPH	Full Enclosure	Fugitive
BC-17	Dock/Connecting Conveyor	750 TPH	Partial Enclosure	Fugitive
TH-7	Transfer House #7	750 TPH	Full Enclosure	Fugitive
BC-18	Bypass Conveyor	750 TPH	Partial Enclosure	Fugitive
TH-6	Transfer House #6	750 TPH	Full Enclosure	Fugitive
3S Limestone Mineral Processing				
VF-2	Limestone Reclaim Feeder 2	750 TPH	Full Enclosure	Fugitive
VF-3	Limestone Reclaim Feeder 3	750 TPH	Full Enclosure	Fugitive
BC-3	Limestone Tunnel Reclaim Conveyor	750 TPH	Partial Enclosure	Fugitive
FB-1	Emergency Limestone Reclaim Feeder/Breaker	750 TPH	None	Fugitive
TH-2	Limestone Transfer House 2	750 TPH	Full Enclosure	Fugitive
BC-4	Limestone Silo A Feed Conveyor	750 TPH	Partial Enclosure	Fugitive
BC-5	Limestone Silo B Feed Conveyor	750 TPH	Partial Enclosure	Fugitive
BC-6	Limestone Silo C Feed Conveyor (future)	750 TPH	Partial Enclosure	Fugitive
LSB-1	Limestone Silo A	900 Tons	Baghouse	6E
LSB-2	Limestone Silo B	900 Tons	Baghouse	7E
LSB-3	Limestone Silo C (future)	900 Tons	Baghouse	8E
	Vibrating Bin Discharger (one per silo)	68.4 TPH	Full Enclosure	Fugitive
LSWF-1 LSWF-2 LSWF-3	Limestone Weigh Feeder (one per silo)	68.4 TPH	Full Enclosure	Fugitive
	Wet Ball Mill (one per silo)	68.4 TPH	Full Enclosure	Fugitive
4S Dry Sorbent Material Handling				
	Truck Unloading Connection (2)	25 TPH	Full Enclosure	Fugitive
DSSB 1	Dry Sorbent Storage Silos #1	500 TPH	Baghouse Full Enclosure	10E
DSSB 2	Dry Sorbent Storage Silos #2	500 TPH	Baghouse Full Enclosure	11E

Emission Unit ID	Emission Unit Description	Design Capacity	Control Device	Emission Point ID
	Aeration Distribution Bins	4.6 TPH	Full Enclosure	Fugitive
	De-aeration Bins	4.6 TPH	Full Enclosure	Fugitive
	Rotary Feeder	4.6 TPH	Full Enclosure	Fugitive
5S Coal Blending System				
HTS-1	Transfer House #1	3,000 TPH	Full Enclosure	Fugitive
HSC-1	Stacking Conveyor #1	3,000 TPH	Partial Enclosure	Fugitive
HTS-2A	Transfer House #2A	3,000 TPH	Full Enclosure	Fugitive
HSC-2	Stacking Conveyor #2	3,000 TPH	Partial Enclosure	Fugitive
HTS-3	Transfer House #3	3,000 TPH	Full Enclosure	Fugitive
HSC-3	Stacking Conveyor #3	3,000 TPH	Partial Enclosure	Fugitive
SH-1	Stacking Hopper SH-1 Transfer to SC-3 (receives coal from existing plant radial stacker R9)	3,000 TPH	Full Enclosure	Fugitive
HSC-3 to High Sulfur Pile (CSA-2, existing)	Transfer from Stacking Conveyor HSC-3 to the High Sulfur Coal Pile located at existing North Yard Storage Area (CSA-2)	3,000 TPH	Stacking Tube	Fugitive
HVF-1	Coal Reclaim Feeder 1	800 TPH	Full Enclosure	Fugitive
HVF-2	Coal Reclaim Feeder 2	800 TPH	Full Enclosure	Fugitive
HVF-3	Coal Reclaim Feeder 3	800 TPH	Full Enclosure	Fugitive
HVF-4	Coal Reclaim Feeder 4	800 TPH	Full Enclosure	Fugitive
HVF-1 through HVF-4 to HRC-1 (Transfer)	Transfer from Vibrating Feeders HVF-1 through HVF-4 to Reclaim Conveyor HRC-1	1,600 TPH	Full Enclosure	Fugitive
HRC-1	Coal Tunnel Reclaim Conveyor	1,600 TPH	Partial Enclosure	Fugitive
HTS-2B	Coal Transfer House #2B	1,600 TPH	Full Enclosure	Fugitive
HRC-2	Reclaim Conveyor #2	1,600 TPH	Partial Enclosure	Fugitive
HTS-4	Coal Transfer House #4	1,600 TPH	Full Enclosure	Fugitive
HRC-3	Reclaim Conveyor #3	1,600 TPH	Partial Enclosure	Fugitive
HTS-5	Coal Transfer House #5	1,600 TPH	Full Enclosure	Fugitive
SB-1	Surge Bin #1	80 Tons	Full Enclosure	Fugitive
HBF-1A	Belt Feeder 1A	800 TPH	Partial Enclosure	Fugitive
HBF-1B	Belt Feeder 1B	800 TPH	Partial Enclosure	Fugitive
HBF-1A/1B to BF-4E/4W (Transfer)	Transfer from Belt Feeders HBF-1A and HBF-1B to Existing Coal Conveyors 4E and 4W	1,600 TPH	Full Enclosure	Fugitive
6S, 7S Emergency Quench Water System				
6S	Diesel Engine on Quench Pump #1	60 HP (approx.)	Full Enclosure	15E

Emission Unit ID	Emission Unit Description	Design Capacity	Control Device	Emission Point ID
7S	Diesel Engine on Quench Pump #2	60 HP (approx.)	Full Enclosure	16E
9S Magnesium Hydroxide Material Handling System				
MHM-1	Magnesium Hydroxide Mix Tank #1	1,000 Gallons	Wet Slurry System	
MHM-2	Magnesium Hydroxide Mix Tank #2	1,000 Gallons	Wet Slurry System	
11S Wastewater Treatment System Material Handling				
	Truck Unloading Connection (2)	25 TPH	Full Enclosure	Fugitive
	Lime Storage Silo #1	100 TPH	Baghouse Full Enclosure	24E
	Lime Storage Silo #2	100 TPH	Baghouse Full Enclosure	25E
	Wastewater Treatment Cake Stockpile	3,600 Tons	Building Enclosure	Fugitive
FB-2	Filter Cake Feeder/Breaker	600 TPH	Partial Enclosure	Fugitive
BC-22	Transfer Conveyor 22	600 TPH	Partial Enclosure	Fugitive
TH-12	Transfer House #12	600 TPH	Partial Enclosure	Fugitive
Fly Ash Handling System				
ME-1A	Unit 1 Mechanical Exhauster	NA	Filter/Separator	EP-1
ME-1B	Unit 1 Mechanical Exhauster	NA	Filter/Separator	EP-2
ME-1C	Unit 1 Mechanical Exhauster	NA	Filter/Separator	EP-3
ME-2A	Unit 2 Mechanical Exhauster	NA	Filter/Separator	EP-4
ME-2B	Unit 2 Mechanical Exhauster	NA	Filter/Separator	EP-5
ME-2C	Unit 2 Mechanical Exhauster	NA	Filter/Separator	EP-6
FAS-A	Fly Ash Silo A	2160 tons	Bin Vent Filter	EP-7
FAS-B	Fly Ash Silo B	2160 tons	Bin Vent Filter	EP-8
FAS-C	Fly Ash Silo C	2160 tons	Bin Vent Filter	EP-9
WFA-AA	Conditioned fly ash transfer from Silo A to Truck	360 tph	Moisture Content	F-1
WFA-BA	Conditioned fly ash transfer from Silo B to Truck	360 tph	Moisture Content	F-2
WFA-CA	Conditioned fly ash transfer from Silo C to Truck	360 tph	Moisture Content	F-3
WFA-AB	Conditioned fly ash transfer from Silo A to Truck	360 tph	Moisture Content	F-4
WFA-BB	Conditioned fly ash transfer from Silo B to Truck	360 tph	Moisture Content	F-5
WFA-CB	Conditioned fly ash transfer from Silo C to Truck	360 tph	Moisture Content	F-6
TC-A	Dry ash transfer from Silo A to Truck	300 tph	Telescopic Chute	EP-10
TC-B	Dry ash transfer from Silo B to Truck	300 tph	Telescopic Chute	EP-11
TC-C	Dry ash transfer from Silo C to Truck	300 tph	Telescopic Chute	EP-12
Auxiliary Boiler				
Aux 1	Auxiliary Boiler	663 mmbtu	FGR/LNB	Aux ML1

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

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 supercedes and replaces previously issued Permit R13-2608B. 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 R13-2608, R13-2608A, R13-2608B, R13-2608C and R13-2608D 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 not 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.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible. [45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them. [40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public. [45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown. [45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11. [45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary

exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

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 Enforcement and Permits Review
(3AP12)
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. Limestone transferred across belt conveyor BC-1 to Transfer House #1 [TH-1] shall be limited to a maximum transfer rate of 750 tons per hour and 1,100,000 tons per year.
- 4.1.2. Limestone transferred across belt conveyor BC-3 to Transfer House #2 [TH-2] shall be limited to a maximum transfer rate of 750 tons per hour and 1,100,000 tons per year.
- 4.1.3. Gypsum transferred across belt conveyor BC-9 to Transfer House #4 [TH-4] shall be limited to a maximum transfer rate of 200 tons per hour and 1,700,000 tons per year.
- 4.1.4. Gypsum and wastewater treatment system cake transferred across belt conveyor BC-14 to Transfer House #7 [TH-7] shall be limited to a maximum transfer rate of 1,000 tons per hour and 1,912,000 tons per year.
- 4.1.5. Gypsum transferred across belt conveyor BC-17 to Transfer House #7 [TH-7] shall be limited to a maximum transfer rate of 750 tons per hour and 1,200,000 tons per year.
- 4.1.6. Gypsum transferred across belt conveyor BC-19 to Transfer House #9 [TH-9] shall be limited to a maximum transfer rate of 1,000 tons per hour and 1,700,000 tons per year.
- 4.1.7. Coal transferred across belt conveyor HSC-1 shall be limited to a maximum transfer rate of 3,000 tons per hour and 5,732,544 tons per year.
- 4.1.8. Dry Sorbent (Trona or Hydrated Lime) for SO₂ mitigation shall be delivered to the facility at a maximum annual rate of 81,000 tons per year.
- 4.1.9. Liquid magnesium hydroxide shall be delivered to the facility at a maximum annual rate of 6,600,000 gallons per year.
- 4.1.10. Hydrated lime for the FGD wastewater treatment system shall be delivered to the facility at a maximum annual rate of 3,200 tons per year.
- 4.1.11. Ferric Chloride for the FGD wastewater treatment system shall be delivered to the facility at a maximum annual rate of 110,000 gallons per year.
- 4.1.12. Acid (hydrochloric or sulfuric) for the FGD wastewater treatment system shall be delivered to the facility at a maximum annual rate of 170,000 gallons per year.
- 4.1.13. Polymer and organosulfide for the FGD wastewater treatment facility shall be delivered to the facility at a maximum annual rate of 13,500 gallons per year.
- 4.1.14. The diesel-fired engines [6S and 7S] used to power the emergency quench water system shall be limited to a total maximum combined annual operating schedule of 200 hours per year.
- 4.1.15. Compliance with all annual operating limits shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the quantified operating data at any given time during the previous twelve (12) consecutive calendar months.

- 4.1.16. The permittee shall maintain a water truck on site and in good operating condition, and shall utilize same to apply water as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from haulroads and other work areas where mobile equipment is used. The spraybar shall be equipped with spray nozzles, of sufficient size and number, so as to provide adequate coverage to the area being treated.

The pump delivering the water shall be of sufficient size and capacity so as to be capable of delivering to the spray nozzle(s) an adequate quantity of water and at a sufficient pressure, so as to assure that the treatment process will minimize the atmospheric entrainment of fugitive particulate emissions generated from the haulroads and work areas where mobile equipment is used.

- 4.1.17. Additionally, at least three times per year the permittee shall apply a mixture of water and an environmentally acceptable dust control additive hereafter referred to as solution to all unpaved haul roads. The solution shall have a concentration of dust control additive sufficient to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from haulroads.
- 4.1.18. The permittee shall not 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. [45CSR2.5.1]
- 4.1.19. The installation and operation of the proposed Limestone Processing equipment [3S] shall be applicable to the limits and requirements set forth by 40CFR60 - Subpart OOO, "*Standards of performance for non-metallic mineral processing plants.*"
- a. The material transfers across the conveyors within the enclosed transfer stations and ball mill within the processing building will be limited to the opacity emissions from the building or building vents. The buildings will be limited to emissions of no visible opacity per 40CFR60.672(e)(1), and the vents from the buildings will be limited to an opacity of 7% and particulate emissions of 0.022 grains per dry standard cubic foot, per 40CFR60.672(e)(2).
 - b. The emissions from the baghouse on each of the limestone day bins will be limited to 7% opacity per 40CFR60.672(f).
 - c. All material transfer points outside of the buildings will be limited to a maximum 10% opacity per 40CFR60.672(b).
 - d. In order to comply with the emission and opacity limitations of this Subpart, the permittee shall employ dust suppression methods to minimize particulate emissions from the limestone processing equipment. In order to demonstrate compliance, in accordance to the requirements of the regulation, the applicant shall conduct performance testing and monitoring activities as set forth by this Subpart.
- 4.1.20. The maximum amount of fly ash handled by the fly ash handling system shall not exceed 800,000 tons per year on a dry (1% moisture) basis (i.e 980,000 tons per year at 20% moisture). Compliance with the throughput limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the fly ash transferred for the previous twelve (12) consecutive calendar months.
- 4.1.21. PM emissions from Mechanical Exhausters ME-1A, ME-1B and ME-1C shall not exceed 0.16 lb/hr and 0.69 tpy individually nor 0.32 lb/hr and 1.38 tons per year combined.

- 4.1.22 PM emissions from Mechanical Exhausters ME-2A, ME-2B and ME-2C shall not exceed 0.15 lb/hr and 0.65 tpy individually nor 0.30 lb/hr and 1.30 tons per year combined
- 4.1.23 PM emissions from Bin Vent Filters BVF-A, BVF-B and BVF-C shall not exceed 0.75 lb/hr nor 3.25 tpy combined.
- 4.1.24 PM emissions from the transfer of conditioned fly ash from the silos to trucks (WFA-AA, WFA-AB, WFA-BA, WFA-BB, WFA-CA, and WFA-CB) shall not exceed 0.07 pounds per hour nor 0.09 tons per year combined.
- 4.1.25 Emissions from Boiler Aux 1 shall not exceed the following:

Pollutant	lb/hr	tpy
SO ₂	39.78	17.42
NO _x	99.45	43.56
CO	206.86	90.60
VOC	0.95	0.41
PM (filterable+cond.)	15.63	6.85
PM ₁₀ (filterable+cond.)	10.90	4.77
PM _{2.5} (filterable+cond.)	7.34	3.22
CO ₂	105,606.4	46,255.6
N ₂ O	0.88	0.38
CH ₄	4.38	1.92
CO _{2e} (Total)	105,971.18	46,413.72
Formaldehyde	0.29	0.13
Benzene	0.01	0.01
Ethylbenzene	0.01	0.01
Toluene	0.03	0.02
Xylene	0.01	0.01
Naphthalene	0.01	0.01

- 4.1.26 Boiler Aux 1 shall be fitted with Low NO_x burners and shall utilize Flue Gas Recirculation.
- 4.1.27 Boiler Aux 1 shall not consume more than 4, 736 gallons of fuel oil per hour nor more than 4,148,736 gallons per year.

- 4.1.28 Boiler Aux 1 shall not operate more than 876 hours per year.
- 4.1.29 SO₂ emissions from Boiler Aux 1 shall not exceed 0.06 lb/mmbtu.
- 4.1.30 Boiler Aux 1 shall fire only fuel oil. Said fuel oil shall not contain nitrogen in excess of 0.30% by weight.
[40 CFR§60.48b(i) & 40 CFR§60.44b(j)]
- 4.1.31 Boiler Aux 1 shall not fire fuel oil with a sulfur content of greater than 0.3% by weight.
[40 CFR§60.48b(k)(2) & 40 CFR§60.47b(f)]
- 4.1.32 Opacity from Boiler Aux 1 shall not exceed 20% based on a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
[40 CFR§60.43b(f)]
- 4.1.33 The Boiler Aux 1 shall comply with ONE of the following conditions:
- 4.1.33.1 A continuous opacity monitoring system (COMS) shall be constructed, installed, operated and maintained in accordance with 40 CFR§60.48b(a) OR
- 4.1.33.2 The boiler shall burn only liquid fuel with a potential SO₂ emission rate of no more than 0.06 lb/mmbtu.
[40 CFR§60.48b(a) & 40 CFR§60.44b(j)(2)]
- 4.1.34 Visible emissions from the boiler shall not exceed 10 opacity based on a six minute block average.
[45CSR§2-3.1.]
- 4.1.35 **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. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with the material transfer limits set forth by Section 4.1.1. and 4.1.2. of this permit, the permittee shall monitor the hourly and annual limestone transfer rates across belt conveyor BC-1 to Transfer House #1 [TH-1] and across belt conveyor BC-3 to Transfer House #2 [TH-2].
- 4.2.2. For the purpose of determining compliance with the material transfer limits set forth by Section 4.1.3., 4.1.4., 4.1.5. and 4.1.6. of this permit, the permittee shall monitor the hourly and annual gypsum and wastewater treatment cake transfer rates across belt conveyors BC-9 to Transfer House #4 [TH-4], BC-14 to Transfer House #7 [TH-7], BC-17 to the Transfer House #7 Extension, and BC-19 to Transfer House #9 [TH-9].
- 4.2.3. For the purpose of determining compliance with the material transfer limits set forth by Section 4.1.7. of this permit, the permittee shall monitor the hourly and annual coal transfer rates across belt conveyor HSC-1 to Transfer Station #2A.
- 4.2.4. For the purpose of determining compliance with the limits associated with the delivery of raw materials for the SO₂ mitigation system, as set forth by Section 4.1.8. and 4.1.9. of this permit, the permittee shall monitor the on-site delivery of dry sorbent (including trona and hydrated lime) and liquid magnesium hydroxide.
- 4.2.5. For the purpose of determining compliance with the limits associated with the delivery of raw materials for the FGD wastewater treatment system, as set forth by Sections 4.1.10. through 4.1.13. of this permit, the permittee shall monitor the on-site delivery of hydrated lime, ferric chloride, acid (hydrochloric or sulfuric), polymer and organosulfide.
- 4.2.6. For the purpose of determining compliance with the operating limits set forth by Section 4.1.14. of this permit, the permittee shall monitor the operating schedule of the diesel-fired engine [6S and 7S] used to power the emergency quench water system.
- 4.2.7. For the purpose of determining compliance with the limits associated with disposal of dry fly ash, as set forth by Section 4.1.20 of this permit, the permittee shall monitor and record the amount of dry fly ash disposed of.
- 4.2.8. For the purpose of determining compliance with the operating limits set forth by Section 4.1.17. of this permit, the permittee shall monitor and record the date that chemical solution is applied to the haulroads along with the amount and concentration of the solution applied.
- 4.2.9. In order to determine compliance with Sections 4.1.25, 4.1.27 of this permit, the permittee shall monitor and record the amount of fuel oil combusted by Boiler Aux 1 on a monthly basis. Compliance with fuel usage limitations in 4.1.27 and 4.1.28 will constitute compliance with the emission limitations of 4.1.25.
- 4.2.10. In order to determine compliance with Sections 4.1.29 and 4.1.31 of this permit, the permittee shall keep fuel usage records in accordance with 40 CFR 60.49b(r).
- 4.2.11. If the permittee chooses to comply with Section 4.1.33 by complying with Section 4.1.33.2 of this permit, the permittee shall keep fuel records in accordance with 40 CFR 60.49b(r)(1).

4.3. Testing Requirements

- 4.3.1. For the purpose of determining compliance with the performance testing requirements of 40 C.F.R. Part 60, Subpart OOO, as set forth by Section 4.1.19. of this permit, the permittee shall conduct compliance testing of the permitted facility within 180 days of the equipment start-up. These tests will be used to determine the particulate matter emissions generated from the open transfer points and processing operations. The testing methods to be employed are as follows:

<u>Pollutant</u>	<u>USEPA Test Method*</u>
Determination of the Opacity of Emissions	9

* Per 40CFR60, Appendix A

The permittee shall submit to the Director of the DAQ a test protocol detailing the proposed test methods, date, and time testing is to take place, testing locations, and any other relevant information. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. The Director shall be notified at least fifteen (15) days in advance of the actual dates and times during which the tests will be conducted. The results of emissions testing shall be submitted to the DAQ within thirty (30) days of completion of testing.

- 4.3.2 Within 120 days of startup of the dry ash handling system, the permittee shall perform or have performed EPA approved tests (or other methods as approved by WVDAQ) to determine maximum PM emissions from any one of the Silo Bin Vent Filters (BVF-A, BVF-B or BVF-C).
- 4.3.3 In order to determine compliance with conditions 4.1.32 and 4.1.34 of this permit, the permittee shall comply with ONE of the following:
- 4.3.3.1 Perform Method 9 and/or Method 22 testing in accordance with 40 CFR 60.48b(a) OR
- 4.3.3.2 Install, operate and maintain a continuous opacity monitoring system (COMS) in accordance with 40 CFR§60.48b(a)

4.4. Recordkeeping Requirements

- 4.4.1. **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.
- 4.4.2. **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.

4.4.3. **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.

4.4.4. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.1. of this permit, the permittee shall maintain monthly records of the amount of limestone transferred across the monitored belt conveyors.

4.4.5. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.2. of this permit, the permittee shall maintain monthly records of the amount of gypsum and wastewater treatment cake transferred across the monitored belt conveyors.

4.4.6. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.3. of this permit, the permittee shall maintain monthly records of the amount of coal transferred across the monitored belt conveyor.

4.4.7. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.4. of this permit, the permittee shall maintain monthly records of the amount of dry sorbent (trona and hydrated lime) and liquid magnesium hydroxide delivered to the facility via truck.

4.4.8. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.5. of this permit, the permittee shall maintain monthly records of the amount of hydrated lime, ferric chloride, acid (hydrochloric or sulfuric), polymer and organosulfide delivered to the facility via truck.

4.4.9. For the purpose of demonstrating compliance with the monitoring requirements set forth in Section 4.2.6. of this permit, the permittee shall maintain monthly records of the hours of operation of the diesel-fired engines [6S and 7S].

- 4.4.10. For the purposes of determining compliance with Section 4.1.16., 4.1.17., and 4.1.18. of this permit, the permittee shall maintain records of the amount of dust control additive used at the facility and the dates the solution was applied.
- 4.4.11. All records produced in accordance to the requirements set forth by Section 4.4. of this permit shall be maintained on-site for a period of no less than five (5) years and made available to the Director or his duly authorized representative upon request. At a time prior to being submitted to the Director, all records shall be certified and signed by a "Responsible Official" or a duly authorized representative, utilizing the attached Certification of Data Accuracy statement.
- 4.4.12 For the purposes of determining compliance with the maximum throughput limit set forth in Condition 4.1.20 above, the facility shall maintain monthly (and calculated rolling yearly total) records of the amount of fly ash handled by the Units 1 and 2 fly ash system.
- 4.4.13 For the purposes of determining compliance with Condition 4.3.3, the permittee shall maintain records on any necessary Method 9 or Method 22 testing.
- 4.4.14 For the purposes of determining compliance with Conditions 4.1.35, 4.1.36 and 4.1.37, the permittee shall maintain fuel use records in accordance with 40 CFR§63.7506(a)(1) and (2).

4.5. Reporting Requirements

[Reserved]

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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 _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name and Title _____ Title _____
(please print or type) Name

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.



west virginia department of environmental protection
Division of Air Quality

Phase II Acid Rain Permit

Plant Name: Mitchell Power Station		Permit #: R33-3948-2017-4A
Affected Unit(s): 1, 2		
Operator: Ohio Power Company		ORIS Code: 3948
Effective Date	From: January 1, 2013	To: December 31, 2017

Contents:

1. Statement of Basis.
2. SO₂ allowances allocated under this permit and NO_x requirements for each affected unit.
3. Comments, notes and justifications regarding permit decisions and changes made to permit application forms during the review process, and any additional requirements or conditions.
4. The permit application forms submitted for this source, as corrected by the West Virginia Division of Air Quality. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

1. Statement of Basis

Statutory and Regulatory Authorities: In accordance with W. Va. Code §22-5-4(a)(16) and Titles IV and V of the Clean Air Act, the West Virginia Department of Environmental Protection, Division of Air Quality issues this permit pursuant to 45CSR33 and 45CSR30.

Permit Approval



John A. Benedict, Director
Division of Air Quality



Date

West Virginia Department of Environmental Protection • Division of Air Quality

Plant Name: Mitchell Power Station	Permit #: R33-3948-2017-4A
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2. SO₂ Allocations and NO_x Requirements for each affected unit

Unit No. 1

SO ₂ Allowances	Year				
	2013	2014	2015	2016	2017
Table 2 allowances, as adjusted by 40CFR Part 73	18995	18995	18995	18995	18995
Repowering plan allowances	N/A	N/A	N/A	N/A	N/A

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. The aforementioned condition does not necessitate a revision to the unit SO₂ allowance allocations identified in this permit (See 40 CFR §72.84).

NO _x Requirements	2013	2014	2015	2016	2017
NO _x Limit (lb/mmBtu)	0.50	0.50	0.50	0.50	0.50

Pursuant to 40 CFR §76.11, the West Virginia Department of Environmental Protection, Division of Air Quality approves five (5) NO_x emissions averaging plans for this unit. Each plan is effective for one calendar year for the years 2013, 2014, 2015, 2016 and 2017. Under each plan, the unit's NO_x emissions shall not exceed the annual alternative contemporaneous emission limitation (ACEL) of 0.50 lb/mmBtu.

Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR §76.5, 76.6 or 76.7, except that for early election units, the applicable emission limitations shall be under 40 CFR §76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR §76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.

In accordance with 40 CFR §72.40(b)(2), approval of the averaging plan shall be final only when the Arkansas Department of Environmental Quality, Air Division, Indiana Department of Environmental Management, Office of Air Quality, the Kentucky Department for Environmental Protection, Division for Air Quality, the Ohio Environmental Protection Agency, Division of Air Pollution Control the Oklahoma Department of Environmental Quality, Air Quality Division, Virginia Department of Environmental Quality, Division of Air Quality and the Texas Commission on Environmental Quality, Office of Air have also approved this averaging plan.

In addition to the described NO_x compliance plans, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.

3. Comments, notes and justifications regarding decisions, and changes made to the permit application forms during the review process:

A permit modification application to include and approve a revised Phase II NO_x Averaging Plan for the years 2013, 2014, 2015, 2016 and 2017 was received on December 26, 2012. This permit modification incorporates the requested revision.

4. Permit application forms:

Attached.

West Virginia Department of Environmental Protection • Division of Air Quality

Plant Name: Mitchell Power Station	Permit #: R33-3948-2017-4A
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2. SO₂ Allocations and NO_x Requirements for each affected unit

Unit No. 2

SO ₂ Allowances	Year				
	2013	2014	2015	2016	2017
Table 2 allowances, as adjusted by 40CFR Part 73	19656	19656	19656	19656	19656
Repowering plan allowances	N/A	N/A	N/A	N/A	N/A

The number of allowances actually held by an affected source in a unit account may differ from the number allocated by U.S. EPA. The aforementioned condition does not necessitate a revision to the unit SO₂ allowance allocations identified in this permit (See 40 CFR §72.84).

NO _x Requirements	2013	2014	2015	2016	2017
NO_x Limit (lb/mmBtu)	0.50	0.50	0.50	0.50	0.50

Pursuant to 40 CFR §76.11, the West Virginia Department of Environmental Protection, Division of Air Quality approves five (5) NO_x emissions averaging plans for this unit. Each plan is effective for one calendar year for the years 2013, 2014, 2015, 2016 and 2017. Under each plan, the unit's NO_x emissions shall not exceed the annual alternative contemporaneous emission limitation (ACEL) of 0.50 lb/mmBtu.

Under the plan, the actual Btu-weighted annual average NO_x emission rate for the units in the plan shall be less than or equal to the Btu-weighted annual average NO_x emission rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations under 40 CFR §76.5, 76.6 or 76.7, except that for early election units, the applicable emission limitations shall be under 40 CFR §76.7. If the designated representative demonstrates that the requirement of the prior sentence (as set forth in 40 CFR §76.11(d)(1)(ii)(A)) is met for a year under the plan, then this unit shall be deemed to be in compliance for that year with its alternative contemporaneous annual emission limitation and annual heat input limit.

In accordance with 40 CFR §72.40(b)(2), approval of the averaging plan shall be final only when the Arkansas Department of Environmental Quality, Air Division, Indiana Department of Environmental Management, Office of Air Quality, the Kentucky Department for Environmental Protection, Division for Air Quality, the Ohio Environmental Protection Agency, Division of Air Pollution Control the Oklahoma Department of Environmental Quality, Air Quality Division, Virginia Department of Environmental Quality, Division of Air Quality and the Texas Commission on Environmental Quality, Office of Air have also approved this averaging plan.

In addition to the described NO_x compliance plans, this unit shall comply with all other applicable requirements of 40 CFR Part 76, including the duty to reapply for a NO_x compliance plan and requirements covering excess emissions.

3. Comments, notes and justifications regarding decisions, and changes made to the permit application forms during the review process:

A permit modification application to include and approve a revised Phase II NO_x Averaging Plan for the years 2013, 2014, 2015, 2016 and 2017 was received on December 26, 2012. This permit modification incorporates the requested revision.

4. Permit application forms:

Attached.

Mitchell (WV)
Facility (Source) Name (from STEP 1)

Permit Requirements

STEP 3

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Mitchell (WV)
Facility (Source) Name (from STEP 1)

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.

(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:

(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and

(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:

(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

Mitchell (WV)
Facility (Source) Name (from STEP 1)

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

Mitchell (WV)
Facility (Source) Name (from STEP 1)

Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

- to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
 - (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
 - (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
 - (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name John M. McManus	
Signature <i>John M. McManus</i>	Date <i>6/8/12</i>



Phase II NO_x Compliance Plan

For more information, see instructions and refer to 40 CFR 76.9
This submission is: New Revised

Page 1 of 2

STEP 1

Indicate plant name, State, and ORIS code from NADB, if applicable

Mitchell	WV	3948
Plant Name	State	ORIS Code

STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

1	2				
ID#	ID#	ID#	ID#	ID#	ID#
DBW	DBW				
Type	Type	Type	Type	Type	Type

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(g) Standard annual average emission limitation of 0.86 lb/mmBtu (for cyclone boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(j) NO_x Averaging Plan (Include NO_x Averaging form)

<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	-------------------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging form)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

Mitchell

Plant Name (from Step 1)

STEP 2, cont'd.

1	2				
ID#	ID#	ID#	ID#	ID#	ID#
DBW	DBW				
Type	Type	Type	Type	Type	Type
<input type="checkbox"/>					
<input type="checkbox"/>					
<input type="checkbox"/>					
<input type="checkbox"/>					

(m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17(a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)

(n) AEL (Include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)

(o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing

(p) Repowering extension plan approved or under review

STEP 3

Read the standard requirements and certification, enter the name of the designated representative, sign &

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

John M. McManus	
Name	
Signature	<i>John M. McManus</i>
Date	12/17/2012



Phase II NOx Averaging Plan

formation, see instructions and refer to 40 CFR 76.11

Page 1

This submission is: New Revised

Page 1 of 4

STEP 1

Identify the units participating in this averaging plan by plant name, State, and boiler ID# from NADB. In column (a), fill in each unit's applicable emission limitation from 40 CFR 76.5, 76.6, or 76.7. In column (b), assign an alternative contemporaneous annual emissions limitation (ACEL) in lb/mmBtu to each unit. In column (c), assign an annual heat input limitation in mmBtu to each unit. Continue to page 3 if necessary.

Plant Name	State	ID#	(a) Emission Limitation	(b) ACEL	(c) Annual Heat Input Limit
Big Sandy	KY	BSU1	0.46	0.46	5,183,000
Big Sandy	KY	BSU2	0.46	0.46	21,378,000
Cardinal	OH	1	0.68	0.68	41,432,600
Cardinal	OH	2	0.68	0.68	38,981,200
Cardinal	OH	3	0.46	0.46	36,818,000
Clinch River	VA	1	0.80	0.80	4,056,600
Clinch River	VA	2	0.80	0.80	4,113,800
Clinch River	VA	3	0.80	0.80	237,000
see page 3					

STEP 2

Use the formula to enter the Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan and the Btu-weighted annual average emission rate for the same units if they are operated in compliance with 40 CFR 76.5, 76.6, or 76.7. The former must be less than or equal to the latter.

Btu-weighted annual emission rate averaged over the units if they are operated in accordance with the proposed averaging plan

0.54

$$\frac{\sum_{i=1}^n (R_{Li} \times HI_i)}{\sum_{i=1}^n HI_i}$$

Btu-weighted annual average emission rate for same units operated in compliance with 40 CFR 76.5, 76.6 or 76.7

0.54

$$\frac{\sum_{i=1}^n [R_{Li} \times HI_i]}{\sum_{i=1}^n HI_i}$$

≤

Where,

- R_{Li} = Alternative contemporaneous annual emission limitation for unit i, in lb/mmBtu, as specified in column (b) of Step 1;
- R_{li} = Applicable emission limitation for unit i, in lb/mmBtu, as specified in column (a) of Step 1;
- HI_i = Annual heat input for unit i, in mmBtu, as specified in column (c) of Step 1;
- n = Number of units in the averaging plan

Mitchell
Plant Name (from Step 1)

STEP 3

Mark one of the two options and enter dates.

This plan is effective for calendar year 2013 through calendar year 2017

unless notification to terminate the plan is given.

Treat this plan as identical plans, each effective for one calendar year for the following calendar years: _____, _____, _____, _____ and _____ unless notification to terminate one or more of these plans is given.

STEP 4

Read the special provisions and certification, enter the name of the designated representative, and sign and date.

Special Provisions

Emission Limitations

Each affected unit in an approved averaging plan is in compliance with the Acid Rain emission limitation for NO_x under the plan only if the following requirements are met:

- (i) For each unit, the unit's actual annual average emission rate for the calendar year, in lb/mmBtu, is less than or equal to its alternative contemporaneous annual emission limitation in the averaging plan, and
- (a) For each unit with an alternative contemporaneous emission limitation less stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year does not exceed the annual heat input limit in the averaging plan,
- (b) For each unit with an alternative contemporaneous emission limitation more stringent than the applicable emission limitation in 40 CFR 76.5, 76.6, or 76.7, the actual annual heat input for the calendar year is not less than the annual heat input limit in the averaging plan, or
- (ii) If one or more of the units does not meet the requirements of (i), the designated representative shall demonstrate, in accordance with 40 CFR 76.11(d)(1)(ii)(A) and (B), that the actual Btu-weighted annual average emission rate for the units in the plan is less than or equal to the Btu-weighted annual average rate for the same units had they each been operated, during the same period of time, in compliance with the applicable emission limitations in 40 CFR 76.5, 76.6, or 76.7.
- (iii) If there is a successful group showing of compliance under 40 CFR 76.11(d)(1)(ii)(A) and (B) for a calendar year, then all units in the averaging plan shall be deemed to be in compliance for that year with their alternative contemporaneous emission limitations and annual heat input limits under (i).

Liability

The owners and operators of a unit governed by an approved averaging plan shall be liable for any violation of the plan or this section at that unit or any other unit in the plan, including liability for fulfilling the obligations specified in part 77 of this chapter and sections 113 and 411 of the Act.

Termination

The designated representative may submit a notification to terminate an approved averaging plan, in accordance with 40 CFR 72.40(d), no later than October 1 of the calendar year for which the plan is to be terminated.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

John M. McManus	
Name	
Signature <i>John M. McManus</i>	Date 12/17/2012

Mitchell
Plant Name (from Step 1)

STEP 1
Continue the
identification of
units from Step 1,
page 1, here.

Plant Name	State	ID#	(a)	(b)	(c)
			Emission Limitation	Alt. Contemp. Emission Limitation	Annual Heat Input Limit
Conesville	OH	4	0.45	0.45	20,621,149
Conesville	OH	5	0.40	0.40	16,355,200
Conesville	OH	6	0.40	0.40	15,774,600
Flint Creek	AR	1	0.46	0.46	33,727,600
Gavin	OH	1	0.68	0.68	72,800,400
Gavin	OH	2	0.68	0.68	74,558,000
Glen Lyn	VA	51	0.40	0.40	92,500
Glen Lyn	VA	52	0.40	0.40	92,500
Glen Lyn	VA	6	0.46	0.46	413,000
H. W. Pirkey	TX	1	0.46	0.46	50,944,820
John E. Amos	WV	1	0.46	0.46	45,628,800
John E. Amos	WV	2	0.46	0.46	48,398,200
John E. Amos	WV	3	0.68	0.68	78,137,000
Kammer	WV	1	0.86	0.86	6,817,500
Kammer	WV	2	0.86	0.86	7,397,500
Kammer	WV	3	0.86	0.86	2,485,500
Kanawha River	WV	1	0.80	0.80	7,751,500
Kanawha River	WV	2	0.80	0.80	7,131,000
Mitchell	WV	1	0.50	0.50	46,424,400
Mitchell	WV	2	0.50	0.50	47,334,600
Mountaineer	WV	1	0.46	0.46	75,779,800
Muskingum River	OH	1	0.84	0.84	793,000
Muskingum River	OH	2	0.84	0.84	1,816,649
Muskingum River	OH	3	0.86	0.86	7,420,000
Muskingum River	OH	4	0.86	0.86	1,978,858
Muskingum River	OH	5	0.68	0.68	4,350,500
Northeastern	OK	3313	0.40	0.40	30,914,400

Attachment J
Permit Application -
CAIR Programs



CAIR Permit Application

For sources subject to the Clean Air Interstate Rule Trading Programs under 45CSR39, 45CSR40 and 45CSR41, the West Virginia Department of Environmental Protection, Division of Air Quality has prepared this CAIR Permit Application. Please refer to sections 21 and 22 of 45CSR39, 45CSR40 and 45CSR41, as applicable.

This submission is: **0** New **X** Revised

STEP 1
Identify the source by plant name, and ORIS or facility code

Plant Name Mitchell Plant	West Virginia ID Number 051-00005 ORIS/Facility Code 3948
----------------------------------	---

STEP 2
Enter the unit ID# for each CAIR unit and indicate to which CAIR programs each unit is subject (by placing an "X" in the column)

Unit ID#	NO _x Annual	NO _x Ozone Season	SO ₂ Annual
1	X	X	X
2	X	X	X
AUX1		X	

STEP 3
Read the standard requirements and the certification, enter the name of the CAIR designated representative, and sign and date

Standard Requirements
(a) Permit Requirements.
 (1) The CAIR designated representative of each CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) required to have a Title V operating permit and each CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) required to have a Title V operating permit at the source shall:
 (i) Submit to the Secretary a complete CAIR permit application under 45CSR§39-22, 45CSR§40-22 and 45CSR§41 -22 (as applicable) in accordance with the deadlines specified in 45CSR§39-21, 45CSR§40-21 and 45CSR§41-21 (as applicable); and
 (ii) Submit in a timely manner any supplemental information that the Secretary determines is necessary in order to review a CAIR permit application and issue or deny a CAIR permit.
 (2) The owners and operators of each CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) required to have a Title V operating permit and each CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) required to have a Title V operating permit at the source shall have a CAIR permit issued by the Secretary under sections 20 through 24 of 45CSR39, 45CSR40 and 45CSR41 (as applicable) for the source and operate the source and the unit in compliance with such CAIR permit.
 (3) Except as provided in sections 80 through 88 of 45CSR39, 45CSR40 and 45CSR41, the owners and operators of a CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) that is not otherwise required to have a Title V operating permit and each CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) that is not otherwise required to have a Title V operating permit are not required to submit a CAIR permit application and to have a CAIR permit, under sections 20 through 24 of 45CSR39, 45CSR40 and 45CSR41 (as applicable) for such CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) and such CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable).

Plant Name **Mitchell Plant****STEP 3,
continued****(b) Monitoring, reporting and recordkeeping requirements.**

(1) The owners and operators and the CAIR designated representative, of each CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) and each CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) at the source shall comply with the monitoring, reporting and recordkeeping requirements of sections 70 through 75 of 45CSR39, 45CSR40 and 45CSR41 (as applicable).

(2) The emissions measurements recorded and reported in accordance with sections 70 through 75 of 45CSR39, 45CSR40 and 45CSR41 (as applicable) shall be used to determine compliance by each CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) with the CAIR NO_x Annual emissions limitation, CAIR NO_x Ozone Season emissions limitation and CAIR SO₂ emissions limitation (as applicable) under 45CSR§39-6.3, 45CSR§40-6.3 and 45CSR§41-6.3 (as applicable).

(c) Nitrogen oxides annual emissions requirements.

(1) As of the allowance transfer deadline for the 2009 control period and each control period thereafter, the owners and operators of each CAIR NO_x Annual source and each CAIR NO_x Annual unit at the source shall hold, in the source's compliance account, CAIR NO_x Annual allowances available for compliance deductions for the control period under 45CSR§39-54.1 in an amount not less than the tons of total nitrogen oxides emissions for the control period from all CAIR NO_x Annual units at the source, as determined in accordance with sections 70 through 75 of 45CSR39.

(2) A CAIR NO_x Annual unit shall be subject to the requirements under 45CSR§39-6.3.a for the control period starting on the later of January 1, 2009 or the deadline for meeting the unit's monitor certification requirements under subdivisions 70.2.a, 70.2.b, or 70.2.e of 45CSR39, and for each control period thereafter.

(3) A CAIR NO_x Annual allowance shall not be deducted, for compliance with the requirements under 45CSR§39-6.3.a, for the control period in a calendar year before the year for which the CAIR NO_x Annual allowance was allocated.

(4) CAIR NO_x Annual allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Allowance Tracking System accounts in accordance with sections 50 through 62, and 80 through 88 of 45CSR39.

(5) A CAIR NO_x Annual allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Annual Trading Program. No provision of the CAIR NO_x Annual Trading Program, the CAIR permit application, the CAIR permit, or an exemption under 45CSR§39-5 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.

(6) A CAIR NO_x Annual allowance does not constitute a property right.

(7) Upon recordation by the Administrator under sections 40 through 62, and 80 through 88 of 45CSR39, every allocation, transfer, or deduction of a CAIR NO_x Annual allowance to or from a CAIR NO_x Annual source's compliance account is incorporated automatically in any CAIR permit of the source.

(d) Nitrogen oxides ozone season emissions requirements.

(1) As of the allowance transfer deadline for the 2009 ozone season and each ozone season thereafter, the owners and operators of each CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CAIR NO_x Ozone Season allowances available for compliance deductions for the ozone season under 45CSR§40-54.1 in an amount not less than the tons of total nitrogen oxides emissions for the ozone season from all CAIR NO_x Ozone Season units at the source, as determined in accordance with sections 70 through 75 of 45CSR40.

(2) A CAIR NO_x Ozone Season unit shall be subject to the requirements under 45CSR§40-6.3.a for the ozone season starting on the later of May 1, 2009 or the deadline for meeting the unit's monitor certification requirements under subdivisions 70.2.a, 70.2.b, 70.2.c or 70.2.g of 45CSR40 and for each ozone season thereafter.

(3) A CAIR NO_x Ozone Season allowance shall not be deducted, for compliance with the requirements under 45CSR§40-6.3.a, for an ozone season in a calendar year before the year for which the CAIR NO_x Ozone Season allowance was allocated.

(4) CAIR NO_x Ozone Season allowances shall be held in, deducted from, or transferred into or among CAIR NO_x Ozone Season Allowance Tracking System accounts in accordance with sections 50 through 62, and 80 through 88 of 45CSR40.

(5) A CAIR NO_x Ozone Season allowance is a limited authorization to emit one ton of nitrogen oxides in accordance with the CAIR NO_x Ozone Season Trading Program. No provision of the CAIR NO_x Ozone Season Trading Program, the CAIR permit application, the CAIR permit, or an exemption under 45CSR§40-5 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.

(6) A CAIR NO_x Ozone Season allowance does not constitute a property right.

(7) Upon recordation by the Administrator under subdivision 43.3, sections 51 through 57, 60 through 62, and 80 through 88 of 45CSR40, every allocation, transfer, or deduction of a CAIR NO_x Ozone Season allowance to or from a CAIR NO_x Ozone Season source's compliance account is incorporated automatically in any CAIR permit of the source.

(e) Sulfur dioxide annual emission requirements.

(1) As of the allowance transfer deadline for the 2010 control period and each control period thereafter, the owners and operators of each CAIR SO₂ source and each CAIR SO₂ unit at the source shall hold, in the source's compliance account, a tonnage equivalent of CAIR SO₂ allowances available for compliance deductions for the control period, as determined in accordance with subsections 54.1 and 54.2 of 45CSR§41 in an amount not less than the tons of total sulfur dioxide emissions for the control period from all CAIR SO₂ units at the source, as determined in accordance with sections 70 through 75 of 45CSR41.

(2) A CAIR SO₂ unit shall be subject to the requirements under 45CSR§41 -6.3.a for the control period starting on the later of January 1, 2010 or the deadline for meeting the unit's monitor certification requirements under subdivisions 70.2.a, 70.2.b, or 70.2.e of 45CSR41 and for each control period thereafter.

(3) A CAIR SO₂ allowance shall not be deducted, for compliance with the requirements under 45CSR§41 -6.3.a, for a control period in a calendar year before the year for which the CAIR SO₂ allowance was allocated.

(4) CAIR SO₂ allowances shall be held in, deducted from, or transferred into or among CAIR SO₂ Allowance Tracking System accounts in accordance with sections 51 through 62, and 80 through 88 of 45CSR41.

(5) A CAIR SO₂ allowance is a limited authorization to emit sulfur dioxide in accordance with the CAIR SO₂ Trading Program. No provision of the CAIR SO₂ Trading Program, the CAIR permit application, the CAIR permit, or an exemption under 45CSR§41 -5 and no provision of law shall be construed to limit the authority of the state or the United States to terminate or limit such authorization.

(6) A CAIR SO₂ allowance does not constitute a property right.

(7) Upon recordation by the Administrator under sections 51 through 57, 60 through 62, and 80 through 88 of 45CSR41, every allocation, transfer, or deduction of a CAIR SO₂ allowance to or from a CAIR SO₂ source's compliance account is incorporated automatically in any CAIR permit of the source.

Plant Name **Mitchell Plant****STEP 3,
continued****(f) Excess emissions requirements.**

(1) If a CAIR NO_x Annual source emits nitrogen oxides during any control period in excess of the CAIR NO_x Annual emissions limitation, then:

(i) The owners and operators of the source and each CAIR NO_x Annual unit at the source shall surrender the CAIR NO_x Annual allowances required for deduction under 45CSR§39-54.4.a and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or West Virginia Code §22-5-1 et seq; and

(ii) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 45CSR39, the Clean Air Act, and West Virginia Code §22-5-1 et seq.

(2) If a CAIR NO_x Ozone Season source emits nitrogen oxides during any ozone season in excess of the CAIR NO_x Ozone Season emissions limitation, then:

(i) The owners and operators of the source and each CAIR NO_x Ozone Season unit at the source shall surrender the CAIR NO_x Ozone Season allowances required for deduction under 45CSR§40-54.4.a and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or West Virginia Code §22-5-1 et seq; and

(ii) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 45CSR40, the Clean Air Act, and West Virginia Code §22-5-1 et seq.

(3) If a CAIR SO₂ source emits sulfur dioxide during any control period in excess of the CAIR SO₂ emissions limitation, then:

(i) The owners and operators of the source and each CAIR SO₂ unit at the source shall surrender the CAIR SO₂ allowances required for deduction under 45CSR§41 -54.4.a and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act or West Virginia Code §22-5-1 et seq; and

(ii) Each ton of such excess emissions and each day of such control period shall constitute a separate violation of 45CSR41, the Clean Air Act, and West Virginia Code §22-5-1 et seq.

(g) Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of a CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) and each CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Secretary or the Administrator.

(i) The certificate of representation under 45CSR§39-1 3, 45CSR§40-1 3 and 45CSR§41 -13 (as applicable) for the CAIR designated representative for the source and each CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation under 45CSR§39-1 3, 45CSR§40-1 3 and 45CSR§41 -13 (as applicable) changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with sections 70 through 75 of 45CSR39, 45CSR40 and 45CSR41 (as applicable), provided that to the extent that sections 70 through 75 of 45CSR39, 45CSR40 and 45CSR41 (as applicable) provides for a 3-year period for recordkeeping, the 3-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program and CAIR SO₂ Trading Program (as applicable).

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program and CAIR SO₂ Trading Program (as applicable) or to demonstrate compliance with the requirements of the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program and CAIR SO₂ Trading Program (as applicable).

(2) The CAIR designated representative of a CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) and each CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) at the source shall submit the reports required under the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program and CAIR SO₂ Trading Program (as applicable) including those under sections 70 through 75 of 45CSR39, 45CSR40 and 45CSR41 (as applicable).

(h) Liability.

(1) Each CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) and each NO_x unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) shall meet the requirements of the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program and CAIR SO₂ Trading Program (as applicable).

(2) Any provision of the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program or CAIR SO₂ Trading Program (as applicable) that applies to a CAIR NO_x Annual source, CAIR NO_x Ozone Season source or CAIR SO₂ source (as applicable) or the CAIR designated representative of a CAIR NO_x Annual source, CAIR NO_x Ozone Season source or CAIR SO₂ source (as applicable) shall also apply to the owners and operators of such source and of the CAIR NO_x Annual units, CAIR NO_x Ozone Season units or CAIR SO₂ units (as applicable) at the source.

(3) Any provision of the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program or CAIR SO₂ Trading Program (as applicable) that applies to a CAIR NO_x Annual unit, CAIR SO₂ unit or CAIR NO_x Ozone Season unit (as applicable) or the CAIR designated representative of a CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit or CAIR SO₂ unit (as applicable) shall also apply to the owners and operators of such unit.

(i) Effect on Other Authorities.

No provision of the CAIR NO_x Annual Trading Program, CAIR NO_x Ozone Season Trading Program and CAIR SO₂ Trading Program (as applicable), a CAIR permit application, a CAIR permit, or an exemption under 45CSR§39-5, 45CSR§40-5, or 45CSR§41 -5 (as applicable) shall be construed as exempting or excluding the owners and operators, and the CAIR designated representative, of a CAIR NO_x Annual source, CAIR NO_x Ozone Season source and CAIR SO₂ source (as applicable) or CAIR NO_x Annual unit, CAIR NO_x Ozone Season unit and CAIR SO₂ unit (as applicable) from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

Plant Name Mitchell Plant

STEP 3,
continued

Certification

I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

CAIR Designated Representative John M. McManus	
Signature <i>John M. McManus</i>	Date 10/14/13

Attachment K
45 CSR 2/10 Monitoring Plan

45 CSR 2 and 45 CSR 10 Monitoring and Recordkeeping Plan

Mitchell Plant

Facility Information:

Facility Name: Mitchell Plant

Facility Address: P.O. Box K
State Route 2
Moundsville, WV 26041

Facility Environmental Contact: Mr. J. W. Palmer
Production Support Superintendent - Environmental

A. Facility Description:

Mitchell Plant is a coal-fired electric generating facility with two main combustion units (Units 1 and 2) discharging through a common stack shell that utilizes two separate stack discharge flues. Mitchell plant also has an auxiliary boiler (Aux. 1) that discharges through an independent auxiliary stack (aux 1). Unit 1, Unit 2, and Aux. Boiler 1 each have a design heat input greater than 10 mmBTU/hr making both 45 CSR 2A (Interpretive Rule for 45 CSR 2) and 45 CSR 10A (Interpretive Rule for 45 CSR 10) applicable to these sources.

I. 45 CSR 2 Monitoring Plan:

In accordance with Section 8.2.a of 45 CSR 2, following is the proposed plan for monitoring compliance with opacity limits found in Section 3 of that rule:

A. Main Stack (CS012)

1. Applicable Standard:

45 CSR 2, §3.1. *No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.*

2. Monitoring Method(s):

45 CSR 2, §3.2 *...Continuous opacity monitors shall not be required on fuel burning units which employ wet scrubbing systems for emissions control.*

45 CSR 2, §8.2.a.1. *Direct measurement with a certified continuous opacity monitoring system (COMS) shall be deemed to satisfy the requirements for a monitoring plan. Such COMS shall be installed, calibrated, operated and maintained as specified in 40 CFR Part 60, Appendix B, Performance Specification 1 (PS1). COMS meeting the requirements of 40 CFR Part 75 (Acid Rain) will be deemed to have satisfied the requirements of PS1.*

- a. **Primary Monitoring Method:** While a Continuous Opacity Monitoring System (COMS) would not be required on a wet scrubbed fuel burning unit, Mitchell Plant has chosen to employ COMS on each of the fuel burning units upstream of the wet scrubbers and located in plant ductwork. As such, the primary method of monitoring opacity at Mitchell Plant will be Continuous Opacity Monitors (COMS). The COMS are installed, maintained and operated in compliance with requirements of 40 CFR Part 75.
- b. **Other Credible Monitoring Method(s):** While Mitchell Plant will use COMS as the primary method of monitoring opacity of the fuel burning units, we are also reserving the right to use other appropriate method that would produce credible data. These “other monitoring methods” will generally be used in the absence of COMS data or as other credible evidence used in conjunction with COMS data.

3. Recordkeeping:

a. **Operating Schedule and Quality/Quantity of Fuel Burned**

45 CSR 2A §7.1.a. *The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule, and the quality and quantity of fuel burned in each fuel burning unit as specified in paragraphs 7.1.a.1 through 7.1.a.6, as applicable.*

The applicable paragraphs for Mitchell Plant are the following:

§7.1.a.2: *For fuel burning unit(s) which burn only distillate oil, such records shall include, but not be limited to, the date and time of start-up and shutdown, the quantity of fuel consumed on a monthly basis and a BTU analysis for each shipment.*

§7.1.a.4: *For fuel burning unit(s) which burn only coal, such records shall include, but not be limited to, the date and time of start-up and shutdown, the quantity of fuel consumed on a daily basis and an ash and BTU analysis for each shipment.*

§7.1.a.6: *For fuel burning unit(s) which burn a combination of fuels, the owner or operator shall comply with the applicable Recordkeeping requirements of paragraph 7.1.a.1 through 7.1.a.5 for each fuel burned.*

The date and time of each startup and shutdown of Units 1 and 2 will be maintained. The quantity of coal burned on a daily basis as well as the ash and Btu content will also be maintained. From a fuel oil perspective, the quantity of fuel oil burned on a monthly basis, as well as the Btu content will be maintained. The fuel oil analysis will generally be one that is provided by the supplier for a given shipment but in some cases, we may use independent sampling and analyses. The quantity of fuel oil burned on a monthly basis may be maintained on a facility wide basis.

b. Record Maintenance

45 CSR 2A §7.1.b. *Records of all required monitoring data and support information shall be maintained on-site for a period of at least five (5) years from the date of monitoring, sampling, measurement or reporting. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.*

Records of all required monitoring data and support information will be maintained on-site for at least five (5) years. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.

4. Exception Reporting:

a. Particulate Mass Emissions:

45 CSR 2A, §7.2.a. *With respect to excursions associated with measured emissions under Section 4 of 45CSR2, compliance with the reporting and testing requirements under the Appendix to 45CSR2 shall fulfill the requirement for a periodic exception report under subdivision 8.3.b. or 45CSR2.*

Mitchell Plant will comply with the reporting and testing requirements specified under the Appendix to 45 CSR 2.

b. Opacity:

45 CSR 2A, §7.2.b. COMS – *In accordance with the provisions of this subdivision, each owner or operator employing COMS as the method of monitoring compliance with opacity limits shall submit a “COMS Summary Report” and/or an “Excursion and COMS Monitoring System Performance Report” to the Director on a quarterly basis; the Director may, on a case-by-case basis, require more frequent reporting if the Director deems it necessary to*

accurately assess the compliance status of the fuel burning unit(s). All reports shall be postmarked by the thirtieth (30th) day following the end of each calendar quarter. The COMS Summary Report shall contain the information and be in the format shown in Appendix B unless otherwise specified by the Director.

45 CSR 2A, §7.2.b.1. *If the total duration of excursions for the reporting period is less than one percent (1%) of the total operating time for the reporting period and monitoring system downtime for the reporting period is less than five percent (5%) of the total operating time for the reporting period, the COMS Summary Report shall be submitted to the Director; the Excursion and COMS Monitoring System Performance report shall be maintained on-site and shall be submitted to the Director upon request.*

45 CSR 2A, §7.2.b.2. *If the total duration of excursions for the reporting period is one percent (1%) or greater of the total operating time for the reporting period or the total monitoring system downtime for the reporting period is five percent (5%) or greater of the total operating time for the reporting period, the COMS Summary Report and the Excursion and COMS Monitoring System Performance Report shall both be submitted to the Director.*

45 CSR 2A, §7.2.b.3. *The Excursion and COMS Monitoring System Performance Report shall be in a format approved by the Director and shall include, but not be limited to, the following information:*

45 CSR 2A, §7.2.b.3.A. *The magnitude of each excursion, and the date and time, including starting and ending times, of each excursion.*

45 CSR 2A, §7.2.b.3.B. *Specific identification of each excursion that occurs during start-ups, shutdowns, and malfunctions of the facility.*

45 CSR 2A, §7.2.b.3.C. *The nature and cause of any excursion (if known), and the corrective action taken and preventative measures adopted (if any).*

45 CSR 2A, §7.2.b.3.D. *The date and time identifying each period during which quality- controlled monitoring data was unavailable, except for zero and span checks, and the reason for data unavailability and the nature of the repairs or adjustments to the monitoring system.*

45 CSR 2A, §7.2.b.3.E. *When no excursions have occurred or there were no periods of quality-controlled data unavailability, and no*

monitoring systems were inoperative, repaired, or adjusted, such information shall be stated in the report.

Attached, as Appendices A and B are sample copies of a typical COMS “Summary Report” and “Excess opacity and COM downtime report” that we plan on using to fulfill the opacity reporting requirements. The COMS “Summary Report” will satisfy the conditions under 45 CSR 2A, §7.2.b for the “COMS Summary Report” and will be submitted to the Director according to its requirements. The “Excess opacity and COM downtime report” satisfies the conditions under 45 CSR 2A, §7.2.b.3. for the “Excursion and COMS Monitoring System Performance Report”. The “Excess opacity and COM downtime report” shall be submitted to the Director following the conditions outlined in 45 CSR 2A, §7.2.b.1. and §7.2.b.2.

To the extent that an excursion is due to a malfunction, the reporting requirements in section 9 of 45CSR2 shall be followed – 45 CSR 2A, §7.2.d.

B. Aux. Stack (aux 1)

1. Applicable Standard:

45 CSR 2, §3.1. *No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.*

2. Monitoring Method:

45 CSR 2, §8.2.a.1. *Direct measurement with a certified continuous opacity monitoring system (COMS) shall be deemed to satisfy the requirements for a monitoring plan. Such COMS shall be installed, calibrated, operated and maintained as specified in 40 CFR Part 60, Appendix B, Performance Specification 1 (PS1). COMS meeting the requirements of 40 CFR Part 75 (Acid Rain) will be deemed to have satisfied the requirements of PS1.*

45 CSR 2, §8.4.a. *The owner or operator of a fuel burning unit(s) may petition for alternatives to testing, monitoring, and reporting requirements prescribed pursuant to this rule for conditions, including, but not limited to, the following:*

45 CSR 2, §8.4.a.1. *Infrequent use of a fuel burning unit(s)*

Pursuant to 45 CSR 2, Section 8.4.a and 8.4.a.1, Mitchell Plant previously petitioned the Office of Air Quality (OAQ) Chief for alternative testing, monitoring, and reporting requirements for the auxiliary boiler and associated stack. Based on limited operating hours, the requirement for COMS installation per Section 6.2.a of interpretive rule 45 CSR 2A was determined to be overly-burdensome and sufficient reason for the granting of alternative monitoring

methods. The alternative monitoring method based on USEPA Method 9 visible emission readings is described below.

- **Primary Monitoring Method:** As an alternative to COMS monitoring, a Method 9 reading will be conducted one time per month provided the following conditions are met: 1) The auxiliary boiler has operated at normal, stable load conditions for at least 24 consecutive hours and 2) weather/lighting conditions are conducive to taking proper Method 9 readings. Since the Mitchell auxiliary boiler does not utilize post-combustion particulate emissions controls, operating parameters of control equipment are nonexistent and therefore unable to be monitored.

3. Recordkeeping:

a. Operating Schedule and Quality/Quantity of Fuel Burned

45 CSR 2A §7.1.a. *The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule, and the quality and quantity of fuel burned in each fuel burning unit as specified in paragraphs 7.1.a.1 through 7.1.a.6, as applicable.*

The applicable paragraph for the Mitchell Plant auxiliary boilers follows:

§7.1.a.2: *For fuel burning unit(s) which burn only distillate oil, such records shall include, but not be limited to, the date and time of start-up and shutdown, the quantity of fuel consumed on a monthly basis and a BTU analysis for each shipment.*

As such, the date and time of each startup and shutdown of the auxiliary boiler will be maintained. The quantity of fuel oil burned on a monthly basis, as well as the Btu content will be maintained. The fuel oil analysis will generally be one that is provided by the supplier for a given shipment but in some cases, we may use independent sampling and analyses. The quantity of fuel oil burned on a monthly basis may be maintained on a facility wide basis.

b. Record Maintenance

45 CSR 2A §7.1.b. *Records of all required monitoring data and support information shall be maintained on-site for a period of at least five (5) years from the date of monitoring, sampling, measurement or reporting. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.*

Records of all required monitoring data and support information will be maintained on-site for at least five (5) years. In the case of the auxiliary boilers, strip chart recordings, etc. are generally not available.

4. Exception Reporting:

Pursuant to 45 CSR 2, Section 8.4.a and 8.4.a.1, Mitchell Plant previously petitioned the Office of Air Quality (OAQ) Chief for alternative testing, monitoring, and reporting requirements for the auxiliary boiler and associated stack.

- a. **Particulate Mass Emissions** – As an alternative to the testing and exception reporting requirements for particulate mass emissions from the auxiliary boiler, the following was previously proposed and approved. Based on an average heat content of approximately 139,877 Btu/gallon (calendar year 2000 data) and an AP-42 based particulate mass emissions emission factor of 2 lbs/thousand gallons, the calculated particulate mass emissions of the auxiliary boiler are 0.01 lb/mmBTU. As such, the fuel analysis records maintained under the fuel quality analysis and recordkeeping section of this plan provide sufficient evidence of compliance with the particulate mass emission limit. For the purpose of meeting exception reporting requirements, any fuel oil analysis indicating a heat content of less than 25,000 Btu per gallon will be reported to the OAQ to fulfill the requirement for a periodic exception report under subdivision 8.3.b. or 45 CSR 2 – 45 CSR 2A, §7.2.a. A heat content of 25,000 Btu/gal and a particulate emissions factor of 2 lbs/thousand gallons would result in a calculated particulate mass emissions of approximately 90% of the applicable 45 CSR 2 standard.

- b. **Opacity** – As an alternative to the exception reporting requirements for opacity emissions from the auxiliary boiler, the following was previously proposed and approved. We will maintain a copy of each properly conducted (correct weather/lighting conditions, etc.) Method 9 evaluation performed. Any properly conducted Method 9 test which indicates an exceedance shall be submitted to the OAQ on a quarterly basis (within 30 days of the end of the quarter) along with an accompanying description of the excursion cause, any corrective action taken, and the beginning and ending times for the excursion.

To the extent that an excursion is due to a malfunction, the reporting requirements in section 9 of 45CSR2 shall be followed – 45 CSR 2A, §7.2.d.

If no exceptions have occurred during the quarter, then a report will be submitted to the OAQ stating so. This will identify periods in which no method 9 tests were conducted (e.g. unit out of service) or when no fuel oil was received.

II. 45 CSR 10 Monitoring Plan:

In accordance with Section 8.2.c of 45 CSR 10, following is the proposed plan for monitoring compliance with the sulfur dioxide weight emission standards expressed in Section 3 of that rule:

A. Main Stack (CS012)

1. Applicable Standard:

45 CSR 10, §3.1.b. *For fuel burning units of the Mitchell Plant of Ohio Power Company, located in Air Quality Control Region I, the product of 7.5 and the total actual operating heat inputs for such units discharging through those stacks in million BTU's per hour.*

45 CSR 10, §3.8. *Compliance with the allowable sulfur dioxide emission limitations from fuel burning units shall be based on continuous twenty-four (24) hour averaging time...A continuous twenty-four (24) hour period is defined as one (1) calendar day.*

A new SO₂ limit will likely be established as a result of the installation of the flue gas desulfurization system/new stack configuration and the subsequent NAAQS compliance demonstration modeling. Assuming that revised SO₂ limit is more stringent than the current limit expressed in 45 CSR 10, Mitchell Plant SO₂ emissions will be regulated by the more stringent of the two limits.

2. Monitoring Method:

45 CSR 10, §8.2.c.1. *The installation, operation and maintenance of a continuous monitoring system meeting the requirements 40 CFR Part 60, Appendix B, Performance Specification 2 (PS2) or Performance Specification 7 (PS7) shall be deemed to fulfill the requirements of a monitoring plan for a fuel burning unit(s), manufacturing process source(s) or combustion source(s). CEMS meeting the requirements of 40 CFR Part 75 (Acid Rain) will be deemed to have satisfied the requirements of PS2.*

- a. **Primary Monitoring Method:** The primary method of monitoring SO₂ mass emissions from the two new stack flues (located within one stack shell) will be Continuous Emissions Monitors (CEMS). Data used in evaluating the performance of the Mitchell Units with the applicable standard will be unbiased, unsubstituted data as specified in definition 45 CSR 10A, §6.1.b.1. Data capture of more than 50% constitutes sufficient data for the daily mass emissions to be considered valid. The CEMS are installed, maintained and operated in compliance with requirements of 40 CFR Part 75. Because Units 1 and 2 will discharge through separate flues and both units are "Type a" fuel burning units as defined in 45 CSR 10, the plant-wide limit is calculated by summing the limits from the two flues.
- b. **Other Credible Monitoring Method(s):** While Mitchell Plant will use CEMS as the primary method of monitoring SO₂ mass emissions from the

two flues, we are also reserving the right to use other appropriate methods that would produce credible data. These “other monitoring methods” will generally be used in the absence of CEMS data or as other credible evidence used in conjunction with CEMS data.

3. Recordkeeping:

a. Operating Schedule and Quality/Quantity of Fuel Burned:

45 CSR 10A, §7.1.a. *Fuel burning units - The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule and the quality or quantity of fuel burned in each unit...*

45 CSR 10A, §7.1.c. *The owner or operator of a fuel burning unit or combustion source which utilizes CEMS shall be exempt from the provisions of subdivision 7.1.a. or 7.1.b, respectively.*

As such, Mitchell plant will not maintain records of the operating schedule and the quality and quantity of fuel burned in each unit for purposes of meeting the requirements for a monitoring plan under 45 CSR 10. While fuel sampling and analysis may continue to be performed at this facility, it is done so at the discretion of the owner/operator and is not required by this monitoring plan for the purposes of indicating compliance with SO₂ standards.

b. Record Maintenance

45 CSR 10A, §7.1.d. *For fuel burning units, manufacturing process sources, and combustion sources, records of all required monitoring data as established in an approved monitoring plan and support information shall be maintained on-site for a period of at least five (5) years from the date of monitoring, sampling, measurement or reporting. Support information includes all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, and copies of all required reports.*

As such, CEMS records at Mitchell Plant will be maintained for at least five years.

4. Exception Reporting:

45 CSR 10A, §7.2.a. *CEMS - Each owner or operator employing CEMS for an approved monitoring plan, shall submit a “CEMS Summary Report” and/or a “CEMS Excursion and Monitoring System Performance Report” to the Director quarterly; the Director may, on a case-by-case basis, require more frequent reporting if the Director deems it necessary to accurately assess the compliance status of the source. All reports shall be postmarked no later than forty-five (45)*

days following the end of each calendar quarter. The CEMS Summary Report shall contain the information and be in the format shown in Appendix A unless otherwise specified by the Director.

45 CSR 10A, §7.2.a.1. Submittal of 40 CFR Part 75 data in electronic data (EDR) format to the Director shall be deemed to satisfy the requirements of subdivision 7.2.a.

As such, Mitchell Plant will submit the 40 CFR 75 quarterly electronic data reports (EDRs) to the OAQ to meet the requirements for a CEMS Summary Report and the CEMS Excursion and Monitoring System Performance Report. The EDR reports will be submitted to the OAQ no later than 45 days following the end of the quarter.

When no excursions of the 24-hour SO₂ standard have occurred, such information shall be stated in the cover letter of the EDR submittal.

B. Aux. Stack (aux 1)

1. Applicable Standard:

45 CSR 10, §3.1.e. For type 'b' and Type 'c' fuel burning units, the product of 3.1 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour.

45 CSR 10, §3.8. Compliance with the allowable sulfur dioxide emission limitations from fuel burning units shall be based on continuous twenty-four (24) hour averaging time...A continuous twenty-four (24) hour period is defined as one (1) calendar day.

2. Monitoring, Recordkeeping, Exception Reporting Requirements:

45 CSR 10, §10.3. The owner or operator of a fuel burning unit(s) which combusts natural gas, wood or distillate oil, alone or in combination, shall be exempt from the requirements of section 8.

As such, the Mitchell Plant auxiliary boiler (auxiliary stack) is exempt from Testing, Monitoring, Recordkeeping, and Reporting requirements found in 45 CSR 10, Section 8 because the fuel burning source combusts only distillate oil. 45 CSR 10, Section 8 also contains the requirement for the development of a monitoring plan. The simple nature of burning distillate oil results in an SO₂ emission rate well below the standard.

While fuel sampling and analysis may continue to be performed at this facility, it is done so at the discretion of the owner/operator and is not required by this monitoring plan for the purposes of indicating compliance with SO₂ standards.

Revisions of Monitoring Plan:

Mitchell Plant reserves the right to periodically revise the conditions of this monitoring plan. Any revised plan will become effective only after approval by the OAQ.

Implementation of Revised Monitoring Plan:

Implementation of this revised monitoring plan will occur in concurrence with the installation and operation of the new stack for Units 1 and 2 at Mitchell Plant.

Attachment L
Suggested Title V Permit Language

Ohio Power Suggests that the following changes be made to the Title V Permit Equipment Table

Emission Point ID ¹	Control Device ¹	Emission Unit ID ¹	Emission Unit Description	Design Capacity	Year Installed/Modified
Boiler & Associated Equipment					
Unit 1 and Unit 2 Emergency Diesel Driven Fire Pumps	N/A	Unit 1 and Unit 2 Engine Driven Fire Pumps	Unit 1 and Unit 2 Emergency Diesel Driven Fire Pumps	230 HP each	Approx.. 1971
IS - Limestone Material Handling					
LSSP (Fugitive)	None	LSSP	Limestone Active/Long-Term Stockpile	155,000 Tons	2006/2011
Miscellaneous Other					
Tank #50	N/A	Tank #50	Gypsum Storage Building Fuel Oil Tank	1000 Gal.	2009
Tank #51	N/A	Tank #51	Highway Grade Diesel Tank #1	1000 Gal.	2011
Tank #52	N/A	Tank #52	Limestone Storage Pile Diesel Tank #1	500 Gal.	2011
Fugitive	Enclosure		Rock Salt Storage Pile (roadway ice control)	50 Tons	2010

Note: each of the above Tank and storage pile changes were previously provided to WVDEP via the Title V off permit change process.

Ohio Power Suggests that the following sections concerning MATS and IB MACT requirements be added during this permit renewal. The IB MACT requirements could be used in place of the current section 4.1.16 language. The suggested IB MACT language contains a more detailed summary of the applicable requirements for an affected industrial boiler that qualifies as a limited use boiler.

3.1.17 General Compliance MATS

3.1.17 The National Emission Standards for Hazardous Air Pollutants From Coal- and Oil-Fired Electric Utility Steam Generating Units (EGU MATS) Rule, codified in 40 CFR 63 Subpart UUUUU, became effective on April 16, 2012. The rule applies to existing and new steam electric generation units that utilize oil or coal. This rule is applicable to the Unit 1 and 2 Steam Generators (Unit 1 – emission point 1E, Unit 2 – emission point 2E) and compliance with the emission limits (Table 2) and work practice standards (Table 3) for existing sources is required beginning on 4/16/2015, or later if granted an extension from the compliance date through written approval as allowed through 40 CFR 63.6.i.3, or as amended by US EPA.

[40CFR63 subpart UUUUU, 45 CSR 34]

3.1.18 General Compliance IB MACT

3.1.18 The Industrial Boiler and Process Heater MACT (IB MACT) rule sets out a regulatory approach for limiting the emissions of HAPs codified in 40 CFR Part 63 Subpart DDDDD. This rule applies to sources located at facilities considered major sources of Hazardous Air Pollutants (HAPs). The final reconsideration rule was published in the Federal Register on January 31, 2013. Existing sources will need to be in compliance with this rule on January 31, 2016. The final IB MACT rule includes a limited use boiler subcategory. The Auxiliary Boiler #1 (Aux 1 – emission point Aux ML1) shall be included in this subcategory as long as the unit limits operation to 10% capacity (by heat input) per year.

Units in the limited use subcategory are not subject to numerical limits or the energy assessment. No stack testing is required for limited use boilers and process heaters. Units in this subcategory will have to comply with a work practice standard which will include performing a boiler tune-up initially and then every 5-years. Tune-ups include inspecting the burner, cleaning or replacing any components as necessary, inspect flame pattern and adjust to manufacturer's specs, inspect system controlling air-to-fuel ratio to ensure it is correctly calibrated and functioning properly, optimize CO emissions consistent with manufacturer's specs, measure concentrations in effluent of CO and O2 before and after adjustments are made.

[40 CFR 63.7495, 7499(s), 7500(c), 7540(c), 7550(c), Table 3, 45 CSR 34]

3.2.2 Testing General Requirements MATS

3.2.2 – All performance tests used to demonstrate initial compliance and used in lieu of continuous monitoring to demonstrate compliance with the limitations set forth in 40 CFR 63, Subpart UUUUU will meet the requirements as defined in Tables 2 and 5 of 40 CFR 63, Subpart UUUUU. Where the facility chooses to pursue a low emitting EGU status, the appropriate adjustments to the timing and sample size will be made and provided in the performance test protocol.

[40CFR63 Subpart UUUUU, 45 CSR 34]

4.1.17 Applicability MATS

The Unit 1 and Unit 2 Steam Generators are required to meet the requirements of the EGU MATS rule (40 CFR Part 63, Subpart UUUUU). The sources will meet existing source requirements for individual metal HAPS or total filterable particulate matter, for HCl and HF or for SO2, for Mercury, and perform the work practice standards for meeting the requirements of organic HAPs. The sources shall comply with the monitoring, recordkeeping, testing and reporting requirements as defined in the rule. The rule becomes effective to the main steam

generator sources on 4/16/2015, or later if granted an extension from the compliance date through written approval as allowed through 40 CFR 63.6.i.3, or as amended by US EPA.

[Part 63.9981, 63.9991, 63.10000, 63.10005, 63.10010 (a), (c), (f), and (i), Part 63.10011(c), Part 63 Tables 2, 3, 5 and 9, Part 63 Subpart UUUUU Appendix A]

4.1.18 Applicability IB MACT

The Aux 1 Boiler (Em. Pt. ID No Aux ML1) shall comply with all applicable requirements for existing affected sources in the limited use subcategory, pursuant to 40 C.F.R. 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" no later than the existing source compliance date of January 31, 2016, or as amended by US EPA. Through this permit, the sources will limit the operation to 10% capacity based on heat input or steam output. Units in this subcategory are not subject to numerical limits or the energy assessment. No stack testing is required for limited use boilers and process heaters. Units in this subcategory will have to comply with a work practice standard of performing a boiler tune-up initially and then every 5-years. Tune-ups include inspecting the burner, cleaning or replacing any components as necessary, inspect flame pattern and adjust to manufacturer's specs, inspect system controlling air-to-fuel ratio to ensure it is correctly calibrated and functioning properly, optimize CO emissions consistent with manufacturer's specs, measure concentrations in effluent of CO and O2 before and after adjustments are made.

[40 C.F.R. 63, Subpart DDDDD, 45CSR§30-6.5.b.]

4.2.14 Unit 1 and 2 MATS Rule Monitoring.

The sources will institute monitoring for compliance with the MATS rule in accordance with 40 CFR Part 63, Subpart UUUUU. The monitoring methods will be as defined in the rule, associated tables and appendices. Data will be collected in the form of the applicable standard and will be made available upon request. Monitoring will coincide with the applicable compliance date. Continuous beginning April 16, 2015 or where an extension has been granted, after certification of the monitoring system has been completed not to exceed 180 days of the new compliance date. Assure DAHS is converting data to 30-boiler operation day averages. Perform the daily, weekly, monthly, quarterly and annual QA/QC and maintenance on the monitors and record, as needed. Make quarterly reports of data through ECMPS for CEMS and Trap data. Make Semi-annual and Annual deviation reports. Complete RATA testing annually and submit RATA results electronically. Report start-up and shut-down data but do not include into 30-day compliance calculation.

[40CFR63.10000, 63.10005, 63.10010, 63.10011, 63.10020, 63.10021, 40CFR63 Subpart UUUUU Appendix A]

4.2.15 Auxiliary Boiler IB MACT Monitoring.

The limited use subcategory does not require sources to monitor for compliance with the IB MACT Rule in accordance with 40 CFR Part 63, Subpart DDDDD. Should the boiler exceed the 10% capacity operational limit, this will constitute a deviation of this permit and the source will initiate monitoring methods as defined in the rule, associated tables and appendices. At that time, data will be collected in the form of the applicable standard and will be made available upon request. Monitoring will coincide with the applicable compliance date. The monitoring to verify the unit remains within the limited use subcategory will utilize existing equipment to measure use.

[40 CFR 63.7525(k)]

4.3.3 MATS Rule Testing Requirements.

All performance tests used in lieu of continuous monitoring to demonstrate initial and continuous compliance with the limitations set forth in 40 CFR 63, Subpart UUUUU will meet the requirements as defined in Tables 2 and 5. Where the facility chooses to pursue a low emitting EGU status, the appropriate adjustments to the timing and sample size will be made and provided in the performance test protocol. Timing of performance tests utilized for continuous compliance will follow the requirements of 63.10006(f) for the quarterly performance testing requirement.

[63.7 (c), (d), (e), (f), and (h), 63.10000, 63.10005, 63.10006, 63.10007, 63.10011, 63.10020, 63.10021, Part 63 Subpart UUUUU Tables 2, 3 and 5, Part 63 Subpart UUUUU Appendix A]

4.4.5 Recordkeeping requirements for Unit 1 and 2 EGU MATS Rule –

Records required by the rule will be kept by the source for 5-years, with the first two (2) years being maintained on-site. Records of each notification and report, including but not limited to the initial notification, notification of compliance status, semi-annual compliance and deviation reports, performance stack tests, fuel analysis, and compliance demonstrations. CEMS performance evaluation plan, the date and time of each deviation, startup, shut down and malfunction period and whether these occurred during a startup or shutdown. Monitoring data from Table 7. Monthly fuel use, including changes in fuel and the burning of any secondary fuels such as solid waste. Status of being a low emitting EGU, reviewed annually. If emission averaging, keep the emission averaging plan and applicable record used to support the emission averaging calculations. Occurrence and duration of start-up and shutdown periods. Occurrence and duration of malfunction periods of air pollution control equipment and monitoring equipment, Records of actions taken to minimize emissions during a malfunction. Types and amounts of fuel used during start-up and shutdown periods.

[Part 63.10032, Part 63.10033, 40CFR63 Subpart UUUUU Table 7, 40CFR63 Subpart UUUUU Appendix A, 45 CSR 34]

4.4.6 Recordkeeping requirements for Auxiliary Boiler IB MACT Rule –

Records of the operation of the aux boiler and boiler inspections/tune-ups shall be maintained for 5-years with the first two (2) years maintained on-site. Records of malfunctions will be maintained as required by 40 CFR 63.7555(d)(7). Records of all notifications, reports, and operational data.

[40 CFR 63.7555, 40 CFR 63.7560, 45 CSR 34]

4.5.7 Reporting requirements for Unit I EGU MATS Rule –

All notifications required by the general section of Part 63 along \with those specifically defined in the MATS Rule will be submitted. Data reporting for the CEMS and sorbent traps will be performed quarterly to the US EPA through their ECMPS System. Reporting of stack testing performed in lieu of continuous monitoring will be submitted through the ERT to the US EPA Webfire System within 60-days of the test completion. Semi-annual reports submitted in accordance with condition 3.4.6 of this permit will include the general information required in the subpart along with an emission data summary, excess emissions report, monitor performance summary, monthly fuel usage, and information regarding any boiler inspections or tune-ups, changes to monitor systems, controls or processes and malfunctions. These reports will be signed and certified by a responsible official as required by condition 3.4.1 of this permit. The first semi-annual report is due January 31, 2016 for reporting period 4/16/2015 to 12/31/2015. Subsequent reports covering calendar halves are to be submitted electronically or postmarked as required by condition 3.4.6 of this permit.

[Part 63.9(h), Part 63.10(e), Part 63.10005(k), Part 63.10006(j), Part 63.10007(f), Part 63.10011(e), Part 63.10021(e), Part 63.10030(e), Part 63.10031, 40CFR63 Subpart UUUUU Table 8, 40CFR63 Subpart UUUUU Appendix A]

4.5.8 Reporting requirements for Auxiliary Boilers IB MACT Rule –

Reporting for the Limited Use Boiler subcategory requires that the source provide the dates of the inspections/tune-ups on a biennial timeframe. All notifications required by the general section of Part 63 along \with those specifically defined in the MATS Rule will be submitted.
Initial Notification

[63.9(b), 63.9(h), 63.7545, 63.7550]

Ohio Power Suggests that the affected sources under the RICE rules be expanded to include the emergency diesel driven fire pumps (one per generating unit) by adding the following editorial change during this permit renewal.

6.0 Emergency Quench Water Pump Engines [Emission point ID(s): 15E, 16E], **Emergency Diesel Driven Fire Pumps (1 per generating unit)**