

Pleasants Energy, LLC

Waverly Plant

10319 South Pleasants Highway

St. Marys, WV 26170

Title V Operating Permit Renewal Application

Existing Permit No.: R30-07300022-2004

Current Expiration Date: 02/20/2009

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Section 1

Introduction

Section 1 Introduction

On February 20, 2004 the WV Department of Environmental Protection, Division of Air Quality, issued the initial Title V Permit to the Pleasants Energy, LLC's (PE's) Waverly facility located in Pleasants County WV. A minor modification to the Title V Permit was approved on November 15, 2005. There have been no changes made to the facility since the Minor Modification was approved. The existing TV Permit expires on February 20, 2009. The Pleasants Facility is owned and operated by PE, and is located at 10319 South Pleasants Highway, St. Marys, WV 26170. The site is located on the eastern side of State Route 2 approximately 1 mile east of Waverly, WV.

In accordance with 45CSR§30-4.1.a.3 PE is required to submit this renewal application 6 months prior to expiration or by August 20, 2008. The application is setup in the following manner:

- Section 1 – Introduction
- Section 2 – Title V Renewal Application (General Forms)
- Attachment A – Area Map
- Attachment B – Plat Plan(s)
- Attachment C – Process Flow Diagram
- WV Attachment D – Emission Table
- WV Attachment E – Emission Unit Form(s)
- Section 3 – Miscellaneous Information
- Attachment A – Copy of existing TV Permit and Modification
- Attachment B – Copy of recent Natural Gas and Fuel Oil Analysis
- Attachment C – Copy of Revised Account Certificate of Representation (submitted 07/29/08)

Also note that because the facility continues to operate in compliance and because there are no control devices associated with the operation of this facility the following Title V Forms are **not** required to be submitted with this application:

- WV Attachment F – Schedule of Compliance Form(s)
- WV Attachment G – Air Pollution Control Device Form(s)
- WV Attachment H – compliance Assurance Monitoring (CAM) Form(s)

The facility is a 300MW simple cycle peaking power facility consisting of two (2) General Electric (GE) 7FA class simple cycle combustion turbines, each nominally rated at 167.8 MW (while firing natural gas at an ambient temperature of 59° F and 60% relative humidity)

including generator, exciter, and associated auxiliary mechanical and electrical systems. The primary fuel is natural gas with low sulfur distillate fuel oil being used as a backup fuel. General facility information is as follows:

- Permit Number: R30-07300022-2004
- Permittee: Pleasants Energy, LLC
- Facility Name: Pleasants Energy
- Mailing Address: 10319 South Pleasants Highway, St. Marys, WV 26170
- Telephone No.: (804) 273-3467
- SIC Code: 4911 NAICS Code: 221112 (Fossil Fuel Power Generation)
- UTM Coordinates: Zone 17 468.629 km Easting 4,353.573 km Northing

Sources located at this facility include:

- Emission Unit: GT1 Emission Point ID: EP1 (GE 7FA Turbine rated at 1,151MM Btu/hr and 150MW)
- Emission Unit: GT2 Emission Point ID: EP2 (GE 7FA Turbine rated at 1,151MM Btu/hr and 150MW)
- Emission Unit: NG1 Emission Point ID: EP3 (Natural Gas Fired Fuel Heater rated at 6.66MM Btu/hr). Please note that this unit is owned and operated by Dominion, not PE, and is used to provide heated natural gas to the facility. NG1 is located outside of the PE fence line. It has been requested that PE continue to include emissions from the facility in its' annual emission inventory submittal. The only source specific standard for this Emission Unit is that opacity from this unit will not exceed 10% opacity with compliance being demonstrated by using natural gas only. Since this unit is solely owned and operated by Dominion it is questionable if it should be included with this permit. We agree that the emissions should be included in the site inventory because it is adjacent to and dependent upon the PE facility. PE is including NG1 in the application and will leave the decision of whether or not to include it in the permit up to WV DEP.
- Emission Unit: T1 (Fuel Oil Storage Tank with 2,200,000 gallon capacity)
- Emission Unit: T2 (Oil Water Separator with 8,000 gallon capacity)
- Emission Unit: T3 (Portable Gasoline Storage Tank with a 300 gallon capacity)
- Emission Unit: T4 (Portable Diesel Storage Tank with a 300 gallon capacity)
- Various insignificant sources as listed in the General Application Form

It should also be noted that the facility has submitted a Clean Air Interstate Rule (CAIR) application on March 3, 2007. With the vacature of this rule by the Federal District Courts earlier this summer the status of this application is currently unclear. PE will await further guidance from WV DEP in regards to any future actions in regards to any revised CAIR requirements.

If there are any questions concerning this TV Renewal Application submittal the following may be contacted:

- Kevin R. Cahill, P.E.
Director – Health, Safety and Environment
Pleasants Energy LLC c/o International Power America
62 Forest Street, Suite 102, Marlborough, MA 01752
Phone: (508) 382-9337
Fax: (508) 382-9438
Email: kcahill@ipr-us.com

Or:

Joseph P. Pezze, QEP
Principal
The Hillcrest Group, LLC
838 Hillcrest Circle, Wexford, PA 15090
Phone: (724) 935-2730
Fax: (724) 935-2730
Email: jpezze@zoominternet.net

Section 2

Title V Application and Attachments



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475

www.wvdep.org/daq

TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

Form with 9 numbered sections: 1. Name of Applicant (Pleasants Energy, LLC), 2. Facility Name (Pleasants Energy, LLC), 3. DAQ Plant ID No. (073-00022), 4. Federal Employer ID No. (208317078), 5. Permit Application Type (Renewal), 6. Type of Business Entity (Corporation), 7. Is the Applicant the: (Both), 8. Number of onsite employees (6), 9. Governmental Code (Privately owned and operated; 0).

10. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? Yes No

If yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's *"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"* guidance.

11. Mailing Address		
Street or P.O. Box: 62 Forest Street, Suite 102		
City: Marlborough	State: MA	Zip: 01752
Telephone Number: (508) 382-9300	Fax Number: (508) 382-9400	

12. Facility Location		
Street: 10319 South Pleasants Highway	City: St. Mary's	County: Pleasants
UTM Easting: 468.629 km	UTM Northing: 4,353.573 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: Site is located on the Eastern side of State Route 2 in Pleasants County, approximately 1 mile east of Waverly 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? PM 2.5	
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	
Is facility located within 100 km of a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
If no, do emissions impact a Class I Area¹? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
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: Kevin R. Cahill, P.E.		Title: Director-Health, Safety and Environmental
Street or P.O. Box: 62 Forest Street, Suite 102		
City: Marlborough	State: MA	Zip: 01752
Telephone Number: (508) 382-9337	Fax Number: (508) 382-9438	
E-mail address: kcahill@ipr-us.com		
Environmental Contact: Kevin R. Cahill, P.E.		Title: Director-Health, Safety and Environmental
Street or P.O. Box: 62 Forest Street, Suite 102		
City: Marlborough	State: MA	Zip: 01752
Telephone Number: (508) 382-9337	Fax Number: (508) 382-9438	
E-mail address: kcahill@ipr-us.com		
Application Preparer: Joseph P. Pezze, QEP		Title: Principal
Company: The Hillcrest Group, LLC		
Street or P.O. Box: 838 Hillcrest Circle		
City: Wexford	State: PA	Zip: 15090
Telephone Number: (724) 935-2730	Fax Number: (724) 935-2730	
E-mail address: jpezze@zoominternet.net		

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
Natural Gas/Fuel Oil Fired Turbine Engines	Electric Power	221112	4911

Facility is a 300 megawatt natural gas/fuel oil fired electric generating peaking station. The station consists of two (2) General Electric (GE) 7FA class simple cycle combustion turbines including generator, exciter and associated systems.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

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."

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.

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.

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).

	Rule/ Regulation/ R13 Permit	Existing R30 Permit Condition	Name	Requirement
1	45CSR§6-3.1.	3.1.1.	Open Burning	Open burning of refuse prohibited.
2	45CSR§6-3.2.	3.1.2.	Open Burning Exemptions	Stipulation to open burning exemptions of 45CSR§6-3.1.
3	40CFR61	3.1.3.	Asbestos	Asbestos inspection prior to demolition or renovation.
4	45CSR§4-3.1 State Enforceable only.	3.1.4.	Odor	Prohibits discharges of pollutants which cause or contribute to objectionable odors.
5	45CSR§13-10.5 State Enforceable only.	3.1.5.	Permanent Shutdown	Conditions under which a source may be considered permanently shutdown.
6	45CSR§11-5.2.	3.1.6.	Standby Plan for Reducing Emissions	When requested by the Secretary, standby plans for emissions reduction will be prepared.
7	WV Code §22-5-4(a)(14)	3.1.7.	Emission Inventory	Annual submission of an emission inventory.
8	40CFR82 Subpart F	3.1.8.	Ozone-depleting Substances	Requirement to follow: a. 40CFR §§ 82.154 & 82.156; b. 40CFR § 82.158; c. 40CFR § 82.161.
9	40CFR68	3.1.9.	Risk Management Plan	Submission of a risk management plan if required.
10	45CSR§§26-6.1.b. and 20.1. 45CSR§§26-23.2. 45CSR§§26-24.1.	3.1.10.	NO _x Budget Trading Program	Compliance with the NO _x Budget Permit Application and the NO _x Budget Permit requirements in 45CSR26.
11	WV Code § 22-5-4(a)(15) and 45CSR13	3.2.1.	Stack Testing	Requirement to conduct tests to determine compliance with permitted emission limits.
12	45CSR§30-5.1.c.2.A.	3.3.1.	Monitoring Information	Requirement to keep records of monitoring information.
13	45CSR§30-5.1.c.2.B.	3.3.2.	Retention of Records	Requirement to retain records of monitoring and support information at least five (5) years.

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20. Facility-Wide Applicable Requirements, *continued*

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).

	Rule/ Regulation/ R13 Permit	Existing R30 Permit Condition	Name	Requirement
14	45CSR§30-5.1.c. State Enforceable Only	3.3.3.	Odors	Maintain a record of all odor complaints received.
15	45CSR§30-4.4. and 5.1.c.3D.	3.4.1.	Responsible Official	Certification of required documents by a responsible official.
16	45CSR§30-5.1.c.3.E.	3.4.2.	Confidential Treatment	Confidential submission of reporting under 45CSR§30-5.1.c.3.
17	NA	3.4.3.	NA	Procedure and addresses for submissions.
18	45CSR§30-8.	3.4.4.	Certified Emissions Statement	Submission of a certified emission statement and pay fees on an annual basis.
19	45CSR§30-5.3.e.	3.4.5.	Compliance Certification	Certification of compliance with the conditions of the permit.
20	45CSR§30-5.1.c.3.A.	3.4.6.	Semi-Annual Monitoring Reports	Requirement to submit semi-annual reports of required monitoring.
21	NA	3.4.7.	Emergencies	For emergency situations refer to Permit Section 2.17.
22	45CSR§30-5.1.c.3.C. 45CSR§30-5.1.c.3.B. 45CSR§30-5.1.c.3.D.	3.4.8.	Deviations	<ul style="list-style-type: none"> a. Requirement to submit supplemental reports of deviations of: 1. emergency or upset conditions; 2. imminent and substantial danger to public health, safety, or environment; 3. more frequent reporting required by permit; 4. identify cause of deviation. b. Deviation of conditions defined in permit, probable cause and corrective actions. c. Certified by responsible official.
23	45CSR§30-4.3.h.1.B.	3.4.9.	New Applicable Requirements	New applicable requirements promulgated during term of permit must be met on a timely basis.

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.)

	Rule/ Regulation/ R13 Permit	Existing R30 Permit Condition	Name	Method of Compliance
1	45CSR§6-3.1.	3.1.1.	Open Burning	NA. Facility does not conduct open burning.
2	45CSR§6-3.2.	3.1.2.	Open Burning Exemptions	NA
3	40CFR61	3.1.3.	Asbestos	Inspection will occur as required.
4	45CSR§4-3.1 State Enforceable only.	3.1.4.	Odor	Recordkeeping of complaints.
5	45CSR§13-10.5 State Enforceable only.	3.1.5.	Permanent Shutdown	NA
6	45CSR§11-5.2.	3.1.6.	Standby Plan for Reducing Emissions	When requested.
7	WV Code §22-5-4(a)(14)	3.1.7.	Emission Inventory	Reporting.
8	40CFR82 Subpart F	3.1.8.	Ozone-depleting Substances	Requirement to follow: a. 40CFR §§ 82.154 & 82.156; b. 40CFR § 82.158; c. 40CFR § 82.161.
9	40CFR68	3.1.9.	Risk Management Plan	Submission if required.
10	45CSR§§26-6.1.b. and 20.1. 45CSR§§26-23.2. 45CSR§§26-24.1.	3.1.10.	NO _x Budget Trading Program	Compliance with the NO _x Budget Permit Application and the NO _x Budget Permit requirements in 45CSR26.
11	WV Code § 22-5-4(a)(15) and 45CSR13	3.2.1.	Stack Testing	Recordkeeping; Reporting.
12	45CSR§30-5.1.c.2.A.	3.3.1.	Monitoring Information	Recordkeeping.
13	45CSR§30-5.1.c.2.B.	3.3.2.	Retention of Records	Recordkeeping.

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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.) Continued

	Rule/ Regulation/ R13 Permit	Existing R30 Permit Condition	Name	Requirement
14	45CSR§30-5.1.c. State Enforceable Only	3.3.3.	Odors	Recordkeeping of complaints.
15	45CSR§30-4.4. and 5.1.c.3D.	3.4.1.	Responsible Official	Certification of required documents by a responsible official.
16	45CSR§30-5.1.c.3.E.	3.4.2.	Confidential Treatment	Confidential submission of reporting under 45CSR§30-5.1.c.3.
17	NA	3.4.3.	NA	Procedure and addresses for submissions.
18	45CSR§30-8.	3.4.4.	Certified Emissions Statement	Reporting.
19	45CSR§30-5.3.e.	3.4.5.	Compliance Certification	Reporting.
20	45CSR§30-5.1.c.3.A.	3.4.6.	Semi-Annual Monitoring Reports	Reporting.
21	NA	3.4.7.	Emergencies	For emergency situations refer to Permit Section 2.17.
22	45CSR§30-5.1.c.3.C. 45CSR§30-5.1.c.3.B. 45CSR§30-5.1.c.3.D.	3.4.8.	Deviations	Reporting.
23	45CSR§30-4.3.h.1.B.	3.4.9.	New Applicable Requirements	New applicable requirements promulgated during term of permit must be met on a timely basis.

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>
R13-2373A	01/19/2006	
R30-07300022-2004-MMM01	11/15/2005	
CAIR Application	3/22/2007	CAIR Rule vacated by Federal District Courts
Acid Rain Permit R33-55349-2010-2	12/22/2005	
NOx Budget Permit Application	3/5/2007	
	/ /	Note: Certificate of Representation under Acid Rain, CAIR and NO _x budget changed on 7/29/08 (copy of submittal attached)
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Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	116
Nitrogen Oxides (NO _x)	241
Lead (Pb)	NA
Particulate Matter (PM _{2.5}) ¹	75
Particulate Matter (PM ₁₀) ¹	75
Total Particulate Matter (TSP)	75
Sulfur Dioxide (SO ₂)	53
Volatile Organic Compounds (VOC)	12
Hazardous Air Pollutants²	Potential Emissions
PAH	1.2
Benzene	.9
Toluene	.83
Xylenes	.17
Formaldehyde	7
Acetaldehyde	.51
Acrolein	.051
Naphthalene	.9
Ethylbenzene	.15
Arsenic	.0081
Cadmium	.0033
Chromium	.0069
Lead	.011
Nickel	.088
Regulated Pollutants other than Criteria and HAP	Potential Emissions
Sulfuric Acid	5.6
¹ PM _{2.5} and PM ₁₀ are components of TSP. ² For 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 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 type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input 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 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 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 type="checkbox"/>	18. Emergency road flares.
<input checked="" type="checkbox"/>	<p>19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO₂, 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.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:</p> <p><u>T1</u> Fuel Oil Storage Tank (2,250,000 gallons) VOC emissions < 0.5lbs./hr and 744 lbs./yr. (based on API tanks program run on 8/12/08)</p> <p><u>T2</u> Oil-Water Separator (8000 gallon tank) VOC emissions - negligible</p> <p><u>T3</u> Portable Gasoline Storage Tank (300 gallons) VOC emissions - negligible</p> <p><u>T4</u> Portable Diesel Storage Tank (300 gallon tank) VOC emissions - negligible</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

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 type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input 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 type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input 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 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 type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input 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 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 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 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 type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input type="checkbox"/>	54. Steam vents and safety relief valves.
<input 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 type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

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

25. Equipment Table
Fill out the Title V Equipment Table and provide it as ATTACHMENT D . See Attached.
26. Emission Units
For each emission unit listed in the Title V Equipment Table , fill out and provide an Emission Unit Form as ATTACHMENT E . See Attached.
For each emission unit not in compliance with an applicable requirement, fill out a Schedule of Compliance Form as ATTACHMENT F . Not Applicable.
27. Control Devices
For each control device listed in the Title V Equipment Table , fill out and provide an Air Pollution Control Device Form as ATTACHMENT G . Not Applicable.
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 . Not Applicable.

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: Kevin R. Cahill	Title: Director – Health, Safety and Environment
--------------------------	--

Responsible official's signature:

Signature: _____ Signature Date: _____
(Must be signed and dated in blue ink)

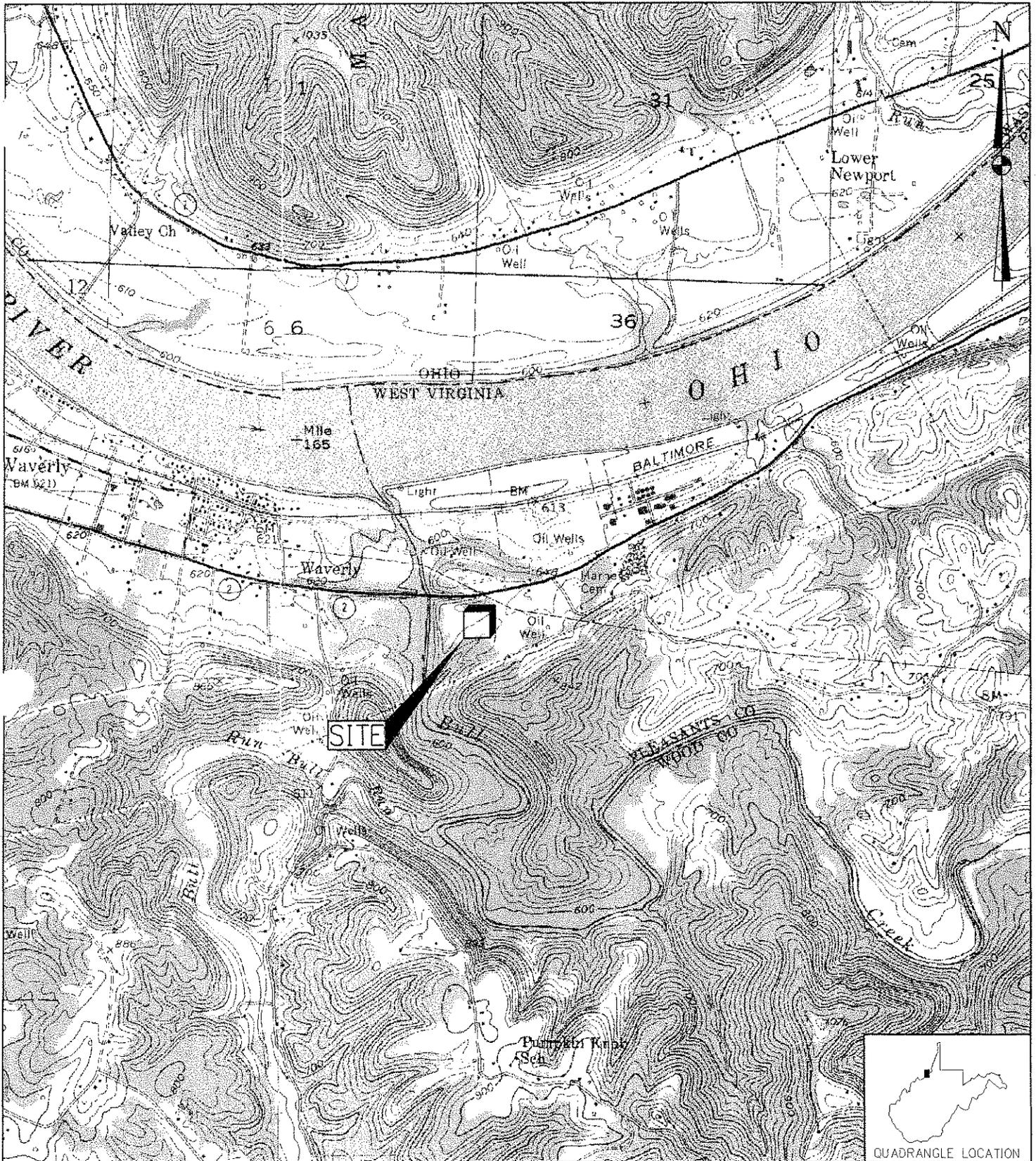
Note: Please check all applicable attachments included with this permit application:

<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 type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input 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.wvdep.org/dag, requested by phone (304) 926-0475, and/or obtained through the mail.

Attachment A

Area Map



REFERENCE: USGS 7.5' QUADRANGLE MAP OF: WILLOW ISLAND, WEST VIRGINIA-OHIO; DATED 1957, PHOTOREVISED 1976.

DRAWN BY	DJF
DATE	9/8/06
CHECKED BY	RAD
SET JOB NO.	206073
SET DWG FILE	PLEASANTSm01.dwg
DRAWING SCALE	1"=2000'



98 Vonadium Road Bridgeville, PA 15017 (412) 221-1100

DOMINION PLEASANTS, INC.

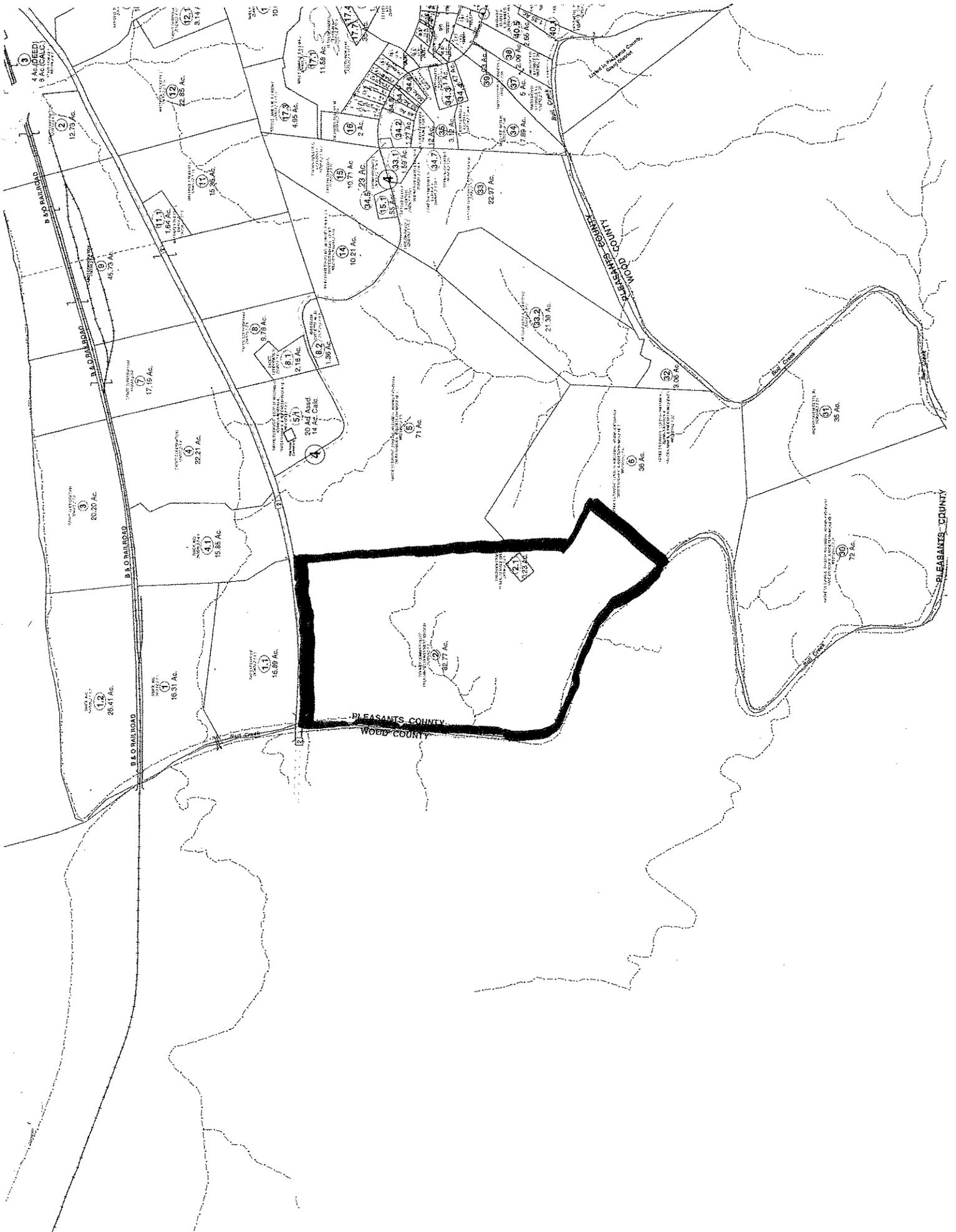
PLEASANTS ENERGY TURBINE STATION
 PLEASANTS COUNTY
 ST. MARY'S, WEST VIRGINIA
 SITE LOCATION MAP

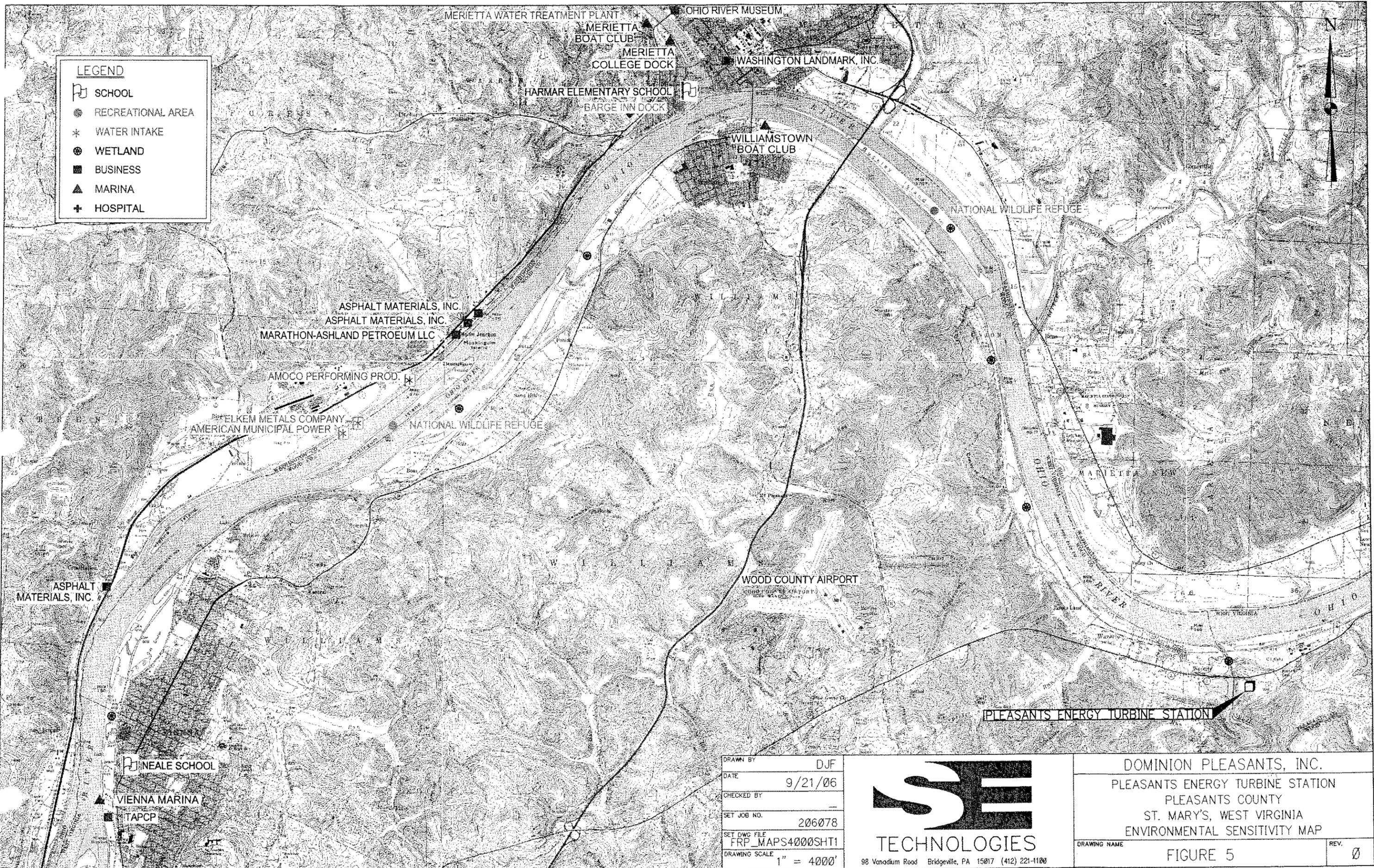
DRAWING NO.

FIGURE 1

REV.

0





DRAWN BY DJF
 DATE 9/21/06
 CHECKED BY --
 SET JOB NO. 206078
 SET DWG FILE FRP_MAPS4000SHT1
 DRAWING SCALE 1" = 4000'



DOMINION PLEASANTS, INC.
 PLEASANTS ENERGY TURBINE STATION
 PLEASANTS COUNTY
 ST. MARY'S, WEST VIRGINIA
 ENVIRONMENTAL SENSITIVITY MAP

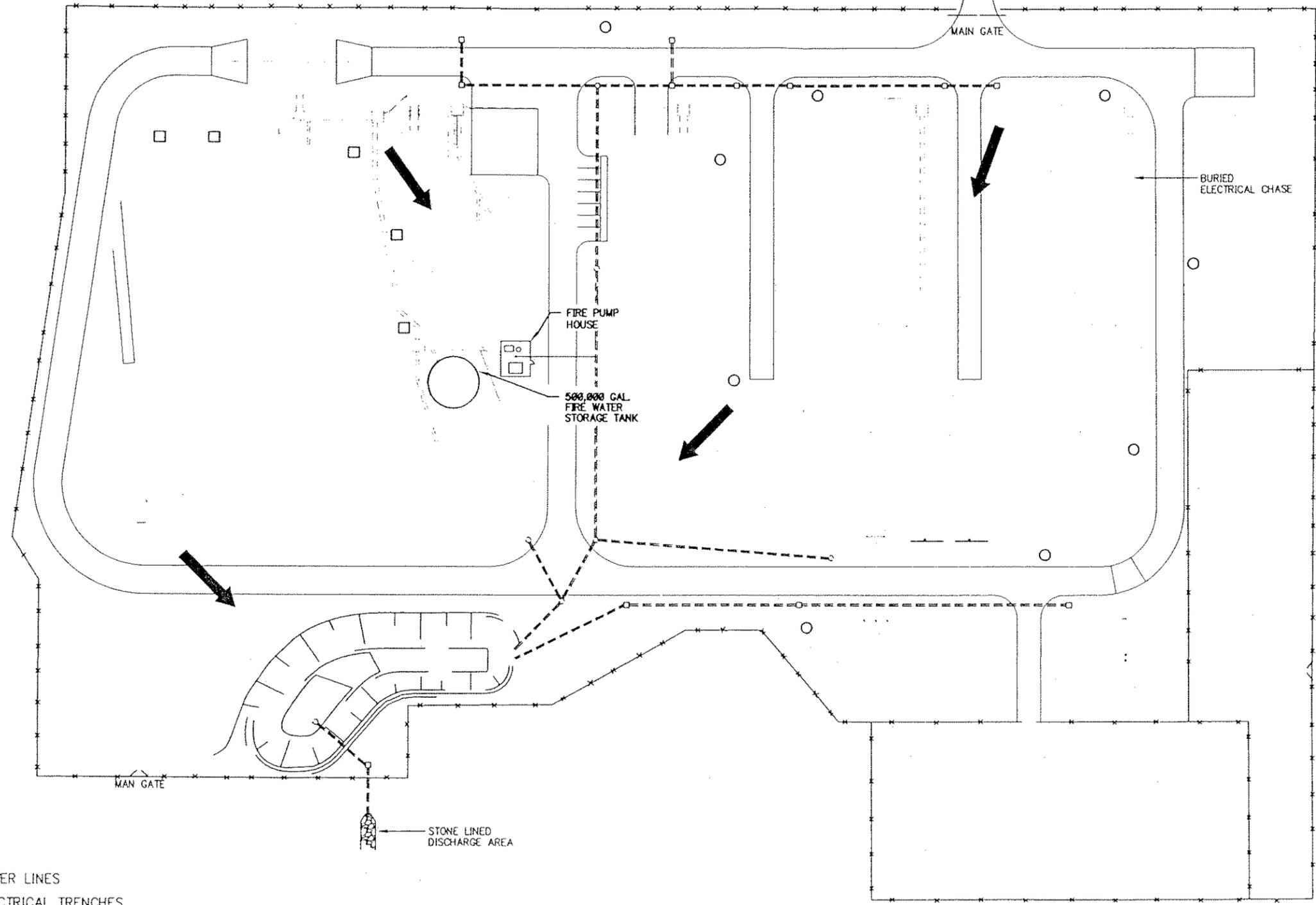
DRAWING NAME FIGURE 5
 REV. 0

Attachment B

Plot Plan(s)

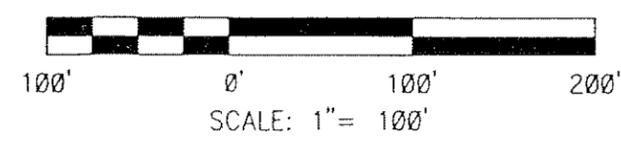
W V State Route 2

P.O.B.



LEGEND:

-  SEWER LINES
-  ELECTRICAL TRENCHES
-  FLOW DIRECTION
-  FIRE HYDRANT
-  FIRE NOZZLE



DRAWN BY	DJF
DATE	9/8/06
CHECKED BY	RAD
SET JOB NO.	206073
SET DWG FILE	DRAIN_PLANb01.dwg
DRAWING SCALE	AS SHOWN



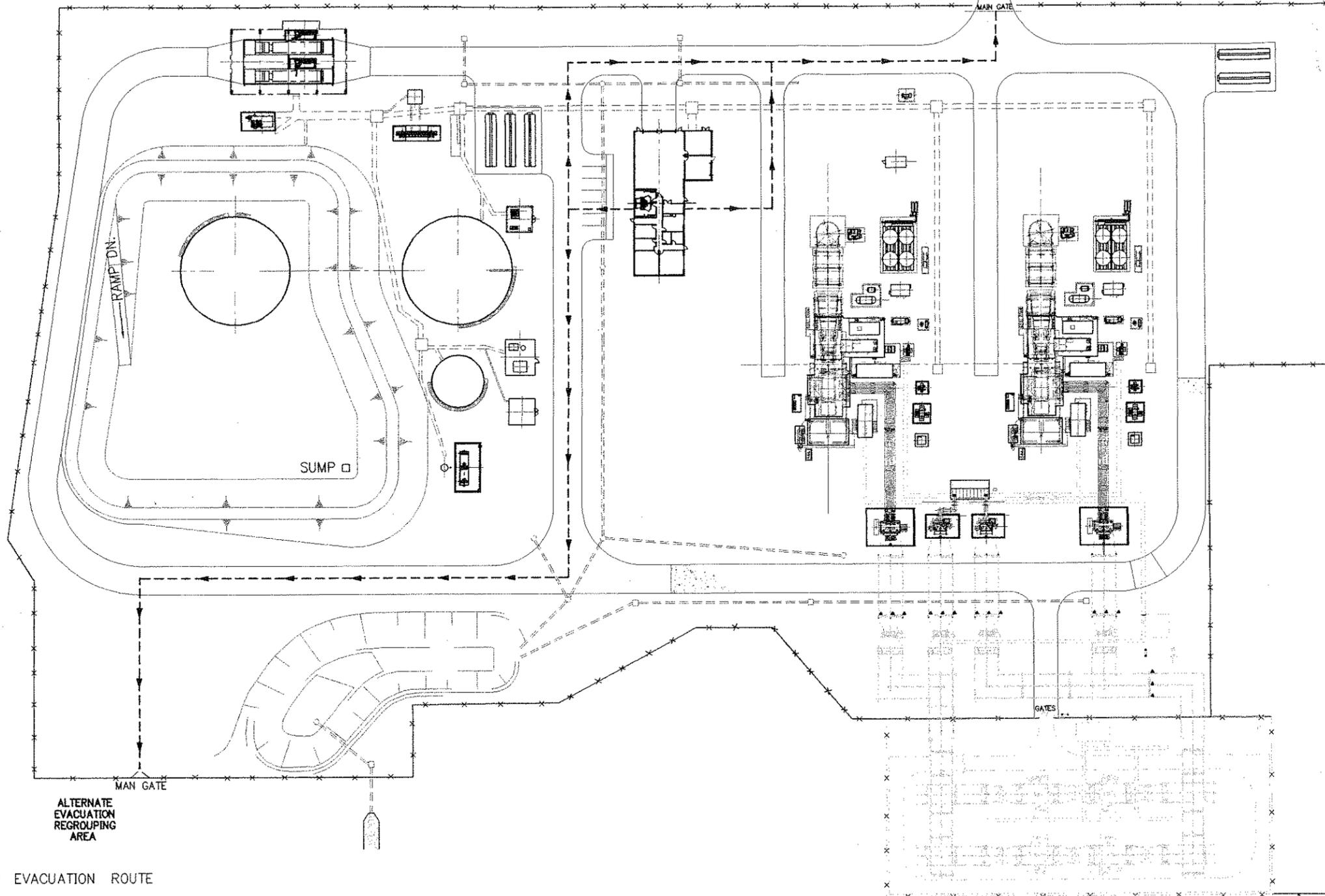
SE
TECHNOLOGIES

98 Vanadium Road Bridgeville, PA 15017 (412) 221-1100

DOMINION PLEASANTS, INC.	
PLEASANTS ENERGY TURBINE STATION PLEASANTS COUNTY ST. MARY'S, WEST VIRGINIA SITE DRAINAGE PLAN	
DRAWING NAME	FIGURE 3
REV.	0

W V State Route 2

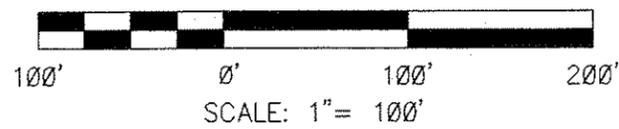
P.O.B.



LEGEND:

---> EVACUATION ROUTE

ALTERNATE
EVACUATION
REGROUPING
AREA



DRAWN BY	DJF
DATE	
CHECKED BY	
SET JOB NO.	206073
SET DWG FILE	EVACUATIONb01.dwg
DRAWING SCALE	AS SHOWN



98 Vanadium Road Bridgeville, PA 15017 (412) 221-1100

DOMINION PLEASANTS, INC.
PLEASANTS ENERGY TURBINE STATION
PLEASANTS COUNTY
ST. MARY'S, WEST VIRGINIA
EVACUATION ROUTE

DRAWING NAME

FIGURE 4

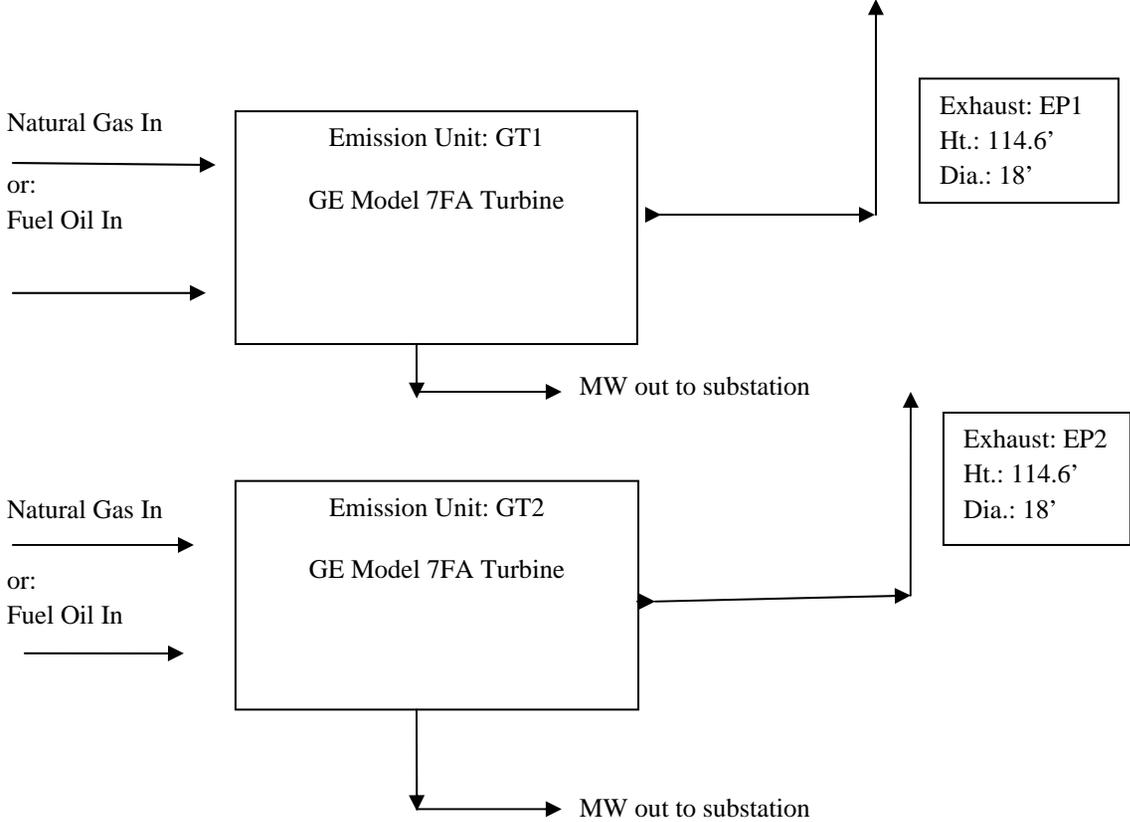
REV.

0

Attachment C

Process Flow Diagram(s)

Simplified Process Flow Diagram
Pleasants Energy, LLC
St. Marys, WV



Attachment D

Equipment Table

Attachment E

Emission Unit Form(s)

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: GT1	Emission unit name: General Electric Model 7FA Turbine	List any control devices associated with this emission unit: none
--	---	--

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
GT1 is a General Electric Model 7FA simple cycle combustion turbine

Manufacturer: General Electric	Model number: 7FA	Serial number:
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Construction date:	Installation date: 2001	Modification date(s): Not applicable
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
167.8 MW while firing natural gas at an ambient temperature of 59° F and 60% relative humidity

Maximum Hourly Throughput: 1,571mm Btu/hr.	Maximum Annual Throughput: 13.77 x 10 ⁶ mm Btu (14.02 x 10 ⁹ scf/yr. both GT1 and GT2. This number is reduced by 889 cu. ft. for each gallon of oil combusted)	Maximum Operating Schedule: 24hrs./day 365 days/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 type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 1,571mmBtu/hr. (167.8 MW while firing natural gas at an ambient temperature of 59° F and 60% relative humidity)	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.
Natural Gas SCC: 2-01-002-01 (primary fuel)
Fuel Oil SCC: 2-02-001-03

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	pipeline	pipeline	931.1/scf (see attached gas analysis)
Fuel Oil	0.05%	0.001	137,000/gal. (see attached Diesel analysis)

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	32 (natural gas) 72 (fuel Oil)	116 (combined- both GT1 and GT2)
Nitrogen Oxides (NO _x)	65 (natural gas) 470 (fuel Oil)	241 (combined- both GT1 and GT2)
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)	18 (natural gas) 39 (Fuel Oil)	75(combined- both GT1 and GT2)
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)	2.5 (Natural Gas) 103 (Fuel Oil)	53 (combined- both GT1 and GT2)
Volatile Organic Compounds (VOC)	3.0 (Natural Gas) 8.0 (Fuel Oil)	12 (combined- both GT1 and GT2)
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	1.7	7 (combined- both GT1 and GT2)
Sulfuric Acid	11 (fuel Oil)	5.6 (combined- both GT1 and GT2)
PAH's		1.2 (combined- both GT1 and GT2)
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.

1. Sulfur content of fuel combusted shall be no more than 0.8% by wt. [40 CFR § 60.333(b) 45CSR13 Permit No. R13-2373 Other Requirements (B)(6)]
2. NO_x from turbine stacks shall not exceed 109 ppmv on a dry basis at 15% O₂ [40 CFR § 60.332(a) (1), 45CSR13 Permit No. R13-2373, Other Requirements (B)(6)]
3. At all times the turbines shall be operated in a manner consistent with good air pollution control practices [40 CFR § 60.333(b) 45CSR13 Permit No. R13-2373, Other Requirements (B)(6)]
4. Emissions from the turbines shall not exceed the limits in existing TV Permit – *compliance with streamlined SO₂ limit assures compliance with 45CSR §10-3.1* [45CSR13 – Permit No. R13-2373 Specific Requirement (A) (1-3); 45 CSR§30-5.1.c]
5. Combustion Turbines (both GT1 & GT2) shall not combust more than 14.02 x 10⁹ scf/yr of fuel cumulatively on a rolling 12-month basis. When fuel oil is combusted the above limit shall be reduced by 889cf of natural gas for each gallon of fuel oil combusted. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(4); 45CSR§30-5.1.c]
6. When low sulfur distillate fuel oil is fired, water injection shall be utilized to control NO_x emissions. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(5).]
7. A dry low NO_x combustion system shall be installed, maintained, and operated so as to control NO_x emissions from the combustion turbines (both GT1 and GT2) when natural gas is fired [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(6).]
8. The annual average sulfur content of the low sulfur distillate fuel shall not exceed 0.05 percent. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(7).]
9. The annual average sulfur content of the natural gas shall not exceed 0.5 grains per 100 scf. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(8).]
10. The gas turbines (GT1 and GT2) are Phase II Acid Rain affected units under 45CSR33 as defined by 40 CFR § 72.6, and as such are required to meet the requirements of 40 CFR Parts 72,73,74,75,76, 77 and 78.

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.)

1. Shall comply with the monitoring requirements as found in 40 CFR 75 [40 CFR § 72.9(b)(1);45CSR33]
2. NO_x monitor on combustion turbine following procedures in 40 CFR 60.13 or 40 CFR Part 75as appropriate [45CSR – Permit No. R13-2373 Specific Requirement (A)(9).]
3. Install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. The system shall be accurate to within 5.0% and approved by the administrator. [40 CFR § 60.334(a); 45CSR13 Permit No. R13-2373 Other Requirements (B)(6), 45CSR16]
4. The sulfur content of the fuel being fired in the turbines shall be monitored and recorded in accordance with 40CFR 75. [40 CFR § 60.334(b)(2); 45CSR13 Permit No. R13-2373 Other Requirements (B)(6) & (B)(7); 45CSR§30-5.1]
5. Stack testing to be conducted on one turbine during term of permit to determine compliance with CO, VOC, PM-10 and sulfuric acid mist in accordance with EPA methods. [45CSR§30-5.1.c]
6. Continual compliance with the mass emission limits in the existing permit. The required calculations must be performed every 15 minutes utilizing average minute data values for the parameters. The hourly averages will then be used to create the monthly and 12-month rolling average emission reports. Calculations are performed for Heat Input, NO_x based on CEMs, SO₂ based on sulfur content, PM-10 based

on most recent source test, VOC based on most recent source test, CO based on most recent source test and H₂SO₄ based on the most recent source test. [45CSR§30-5.1c.]

7. Maintain daily records of the amount of fuel combusted in turbine [45CSR13 – Permit No. R13-2373 Other Requirements(B)(10)]
8. Reporting requirements of 40 CFR§60.334(j) by submitting reports of excess emissions and monitor downtime, in accordance with 40 CFR§60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction. For the purpose of reports required under 40 CFR§60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined by 40 CFR§60.334(j). all required reports shall be submitted to both WV DEP and USEPA in accordance with 3.4.3[40CFR§§60.334(j) and 60.7(c); 45CSR13 – Permit No. R13-2373 Other Requirements (B)(9)]

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

Emission Unit Description

Emission unit ID number: GT2	Emission unit name: General Electric Model 7FA Turbine	List any control devices associated with this emission unit: none
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
GT2 is a General Electric Model 7FA simple cycle combustion turbine

Manufacturer: General Electric	Model number: 7FA	Serial number:
--	-----------------------------	-----------------------

Construction date:	Installation date: 2001	Modification date(s): Not applicable
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
167.8 MW while firing natural gas at an ambient temperature of 59° F and 60% relative humidity

Maximum Hourly Throughput: 1,571mm Btu/hr.	Maximum Annual Throughput: 13.77 x 10 ⁶ mm Btu (14.02 x 10 ⁹ scf/yr. both GT1 and GT2. This number is reduced by 889 cu. ft. for each gallon of oil combusted)	Maximum Operating Schedule: 24hrs./day 365 days/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 type="checkbox"/> Indirect Fired <input checked="" type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 1,571mmBtu/hr. (167.8 MW while firing natural gas at an ambient temperature of 59° F and 60% relative humidity)	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.

Natural Gas SCC: 2-01-002-01 (primary fuel)
Fuel Oil SCC: 2-02-001-03

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	pipeline	pipeline	931.1/scf (see attached gas analysis)
Fuel Oil	0.05%	0.001	137,000/gal. (see attached Diesel analysis)

<i>Emissions Data</i>		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	32 (natural gas) 72 (fuel Oil)	116 (combined- both GT1 and GT2)
Nitrogen Oxides (NO _x)	65 (natural gas) 470 (fuel Oil)	241 (combined- both GT1 and GT2)
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)	18 (natural gas) 39 (Fuel Oil)	75(combined- both GT1 and GT2)
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO ₂)	2.5 (Natural Gas) 103 (Fuel Oil)	53 (combined- both GT1 and GT2)
Volatile Organic Compounds (VOC)	3.0 (Natural Gas) 8.0 (Fuel Oil)	12 (combined- both GT1 and GT2)
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	1.7	7 (combined- both GT1 and GT2)
Sulfuric Acid	11 (fuel Oil)	5.6 (combined- both GT1 and GT2)
PAH's		1.2 (combined- both GT1 and GT2)
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

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.

1. Sulfur content of fuel combusted shall be no more than 0.8% by wt. [40 CFR § 60.333(b) 45CSR13 Permit No. R13-2373 Other Requirements (B)(6)]
2. NO_x from turbine stacks shall not exceed 109 ppmv on a dry basis at 15% O₂ [40 CFR § 60.332(a) (1), 45CSR13 Permit No. R13-2373, Other Requirements (B)(6)]
3. At all times the turbines shall be operated in a manner consistent with good air pollution control practices [40 CFR § 60.333(b) 45CSR13 Permit No. R13-2373, Other Requirements (B)(6)]
4. Emissions from the turbines shall not exceed the limits in existing TV Permit – *compliance with streamlined SO₂ limit assures compliance with 45CSR §10-3.1* [45CSR13 – Permit No. R13-2373 Specific Requirement (A) (1-3); 45 CSR§30-5.1.c]
5. Combustion Turbines (both GT1 & GT2) shall not combust more than 14.02 x 10⁹ scf/yr of fuel cumulatively on a rolling 12-month basis. When fuel oil is combusted the above limit shall be reduced by 889cf of natural gas for each gallon of fuel oil combusted. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(4); 45CSR§30-5.1.c]
6. When low sulfur distillate fuel oil is fired, water injection shall be utilized to control NO_x emissions. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(5).]
7. A dry low NO_x combustion system shall be installed, maintained, and operated so as to control NO_x emissions from the combustion turbines (both GT1 and GT2) when natural gas is fired [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(6).]
8. The annual average sulfur content of the low sulfur distillate fuel shall not exceed 0.05 percent. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(7).]
9. The annual average sulfur content of the natural gas shall not exceed 0.5 grains per 100 scf. [45CSR13 – Permit No. R13-2373 Specific Requirement (A)(8).]
10. The gas turbines (GT1 and GT2 are Phase II Acid Rain affected units under 45CSR33 as defined by 40 CFR § 72.6, and as such are required to meet the requirements of 40 CFR Parts 72,73,74,75,76, 77 and 78.

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.)

1. Shall comply with the monitoring requirements as found in 40 CFR 75 [40 CFR § 72.9(b)(1);45CSR33]
2. NO_x monitor on combustion turbine following procedures in 40 CFR 60.13 or 40 CFR Part 75 as appropriate [45CSR – Permit No. R13-2373 Specific Requirement (A)(9).]
3. Install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. The system shall be accurate to within 5.0% and approved by the administrator. [40 CFR § 60.334(a); 45CSR13 Permit No. R13-2373 Other Requirements (B)(6), 45CSR16]
4. The sulfur content of the fuel being fired in the turbines shall be monitored and recorded in accordance with 40CFR 75. [40 CFR § 60.334(b)(2); 45CSR13 Permit No. R13-2373 Other Requirements (B)(6) & (B)(7); 45CSR§30-5.1]
5. Stack testing to be conducted on one turbine during term of permit to determine compliance with CO, VOC, PM-10 and sulfuric acid mist in accordance with EPA methods. [45CSR§30-5.1.c]
6. Continual compliance with the mass emission limits in the existing permit. The required calculations must be performed every 15 minutes utilizing average minute data values for the parameters. The hourly averages will then be used to create the monthly and 12-month rolling average emission reports. Calculations are performed for Heat Input, NO_x based on CEMs, SO₂ based on sulfur content, PM-10 based

on most recent source test, VOC based on most recent source test, CO based on most recent source test and H₂SO₄ based on the most recent source test. [45CSR§30-5.1c.]

7. Maintain daily records of the amount of fuel combusted in turbine [45CSR13 – Permit No. R13-2373 Other Requirements(B)(10)]
8. Reporting requirements of 40 CFR§60.334(j) by submitting reports of excess emissions and monitor downtime, in accordance with 40 CFR§60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction. For the purpose of reports required under 40 CFR§60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined by 40 CFR§60.334(j). all required reports shall be submitted to both WV DEP and USEPA in accordance with 3.4.3[40CFR§§60.334(j) and 60.7(c); 45CSR13 – Permit No. R13-2373 Other Requirements (B)(9)]

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

Emission Unit Description

Emission unit ID number: NG1	Emission unit name: Natural Gas Heater	List any control devices associated with this emission unit: none
--	--	--

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
 Natural Gas Heater used to heat gas prior to entering the turbines. This unit is located outside the fence line adjacent and contiguous to the facility. The heater is owned and operated by Dominion. Emissions were included in annual emission inventory for the facility.

Manufacturer:	Model number:	Serial number:
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Construction date:	Installation date: 2001	Modification date(s): Not applicable
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
6.6MM Btu/hr

Maximum Hourly Throughput:	Maximum Annual Throughput:	Maximum Operating Schedule:
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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
--	---

Maximum design heat input and/or maximum horsepower rating: 6.6MM Btu/hr	Type and Btu/hr rating of burners: 6.6MM Btu/hr
--	---

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.
 Natural Gas SCC: 2-01-002-01

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

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural gas	pipeline	pipeline	931.1/scf (see attached gas analysis)

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.595	2.61
Nitrogen Oxides (NO _x)	0.709	3.11
Lead (Pb)		
Particulate Matter (PM _{2.5})		
Particulate Matter (PM ₁₀)		
Total Particulate Matter (TSP)	0.054	0.24
Sulfur Dioxide (SO ₂)	0.0042	0.02
Volatile Organic Compounds (VOC)	0.039	0.17
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.00053	0.002
Other HAPs	negligible	negligible
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>AP-42</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.

1. Emissions of smoke and/or particulate matter shall not exceed 10% opacity based on a six minute block average [45CSR§2-3.1, 45CSR13 Permit No. R13-2373 Other Requirements (B)(3).]

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.*)

1. Compliance with the opacity limit shall be demonstrated by using natural gas only in the fuel gas heater [45CSR§30-5.1c.]

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.

Section 3

Miscellaneous Information

Attachment A

Copy of Existing Permit and Modification

Fact Sheet



For Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on February 20, 2004.

Permit Number: **R30-07300022-2004**

Plant Identification Number: **07300022**

Permittee: **Pleasants Energy, LLC**

Facility Name: **Pleasants Energy**

Mailing Address: **10319 South Pleasants Highway, St. Marys, WV 26170**

Permit Action Number: MM01 Revised: November 15, 2005

Physical Location:	Waverly, Pleasants County, West Virginia
UTM Coordinates:	468.629 km Easting • 4,353.573 km Northing • Zone 17
Directions:	The site is located on the eastern side of State Route 2 in Pleasants County, approximately 1 mile east of Waverly.

Facility Description

This facility is a 300 MW simple cycle peaking power facility (SIC 4911) consisting of two General Electric (GE) 7FA class simple cycle combustion turbines, each nominally rated at 167.8 MW (while firing natural gas at an ambient temperature of 59° F and 60% relative humidity) including generator, exciter, and associated auxiliary mechanical and electrical systems. The primary fuel is natural gas, and low sulfur distillate fuel oil is the backup fuel.

Pleasants Energy has requested that the reporting requirements of 4.5.1 be changed to reference the reporting requirements under 40 C.F.R. §60.334(j) for 40 C.F.R. 60, Subpart GG instead of the reporting requirements under 40 C.F.R. §60.49a for 40 C.F.R. 60, Subpart Da. The reporting requirements needed to be changed because the combustion turbines are stationary gas turbines subject to the requirements of 40 C.F.R. 60, Subpart GG and not steam generating units subject to 40 C.F.R. 60, Subpart Da.

This minor modification also includes the addition of three small tanks to the Section 1.0 Emission Units Table which are located on-site and may have inadvertently been omitted from the original Title V Permit. The tanks are the Oil-water Separator (T2), Portable Gasoline Storage Tank (T3), and the Portable Diesel Storage Tank (T4). These sources do not have any applicable requirements.

Emissions Summary

There are no emission rate changes as a result of this minor modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 243 tons per year of NO_x and 118 tons per year of CO. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Pleasants Energy, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30. Additionally, the facility is subject to 40 C.F.R. 60 (NSPS) requirements as well as Title IV (Acid Rain) requirements which also require the permittee to have an operating permit pursuant to Title V of the federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modifications to this facility have been found to be subject to the following applicable rules:

Federal and State: 45CSR30 Operating permit requirement.
 40 C.F.R. 60, Subpart GG Standards of Performance for Stationary Gas Turbines.

State Only: NA

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2373	April 26, 2000	PD01-059
Pleasants Energy Acid Rain Permit	January 1, 2001	None
Pleasants Energy NO _x Budget Permit	February 11, 2002	None

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

No determinations or justifications were made as a result of this minor modification.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

All written comments should be addressed to the following individual and office:

Carrie McCumbers
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Carrie McCumbers
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1226 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

No comments were received.



PLEASANT (AIR)
COR 14
TITLE V
PERMIT

west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone Number: (304) 926-0499
Fax Number: (304) 926-0479

Joe Manchin III, Governor
Stephanie R. Timmermeyer, Cabinet Secretary
www.wvdep.org

November 15, 2005

CERTIFIED MAIL
7003 2260 0006 0056 6074

Mr. David W. Faison
Dominion Energy, Inc.
Director, Fossil & Hydro Operations
5000 Dominion Boulevard
Glen Allen, VA 23060

RE: Title V Minor Modification
Pleasants Energy, LLC
R30-07300022-2004-MM01

Dear Mr. Faison:

Enclosed please find the revised pages of the Title V Minor Permit Modification, Fact Sheet, and Summary of Permitting Actions for Pleasant Energy's Waverly Facility located in Pleasants County, West Virginia. This permit is issued in accordance with the West Virginia Air Pollution Control Law (WV Code § 22-5-1 et. seq.) and legislative rules promulgated thereunder, including 45 C.S.R. 30.

Operation of this facility shall be in accordance with all terms, conditions and limitations of this revised permit. Keep in mind that the permit shield, in accordance with subsection 5.6 of 45CSR30 does not extend to permit changes associated with the minor modification procedure under which this revision was conducted.

Please note that the expiration date of this permit has not changed from the date stated in the initial issuance of the permit, and thus expires on February 20, 2009. A new permit application must be submitted six months prior to this date in order to renew this permit.

If you have any questions or need any further assistance, please feel free to contact me at (304) 926-0499, ext. 1226.

Sincerely,

Carrie McCumbers
Carrie McCumbers
Permit Engineer

cc: Philip Knause
Dominion Resources Services, Inc.

Company: Pleasants Energy, LLC
 Facility: Pleasants Energy
 Permit Number: R30-07300022-2004

SUMMARY OF PERMIT ACTIONS

Action Number	Permit Designation	Affected Page Numbers	Action	Signature	Date	Description
MM01	finalperm2	4, 15, 19, 25	Granted	John A. Benedict	11/15/05	Pleasants Energy has requested the reporting requirements of 4.5.1 be changed to reference the reporting requirements under 40 C.F.R. §60.334(j) for 40 C.F.R. 60, Subpart GG instead of the reporting requirements under 40 C.F.R. §60.49a for 40 C.F.R. 60, Subpart Da. This minor modification also includes the addition of the Oil-water Separator (T2), Portable Gasoline Storage Tank (T3), and the Portable Diesel Storage Tank (T4) to the Section 1.0 Emission Units Table.

¹ AA = Administrative Amendment; RE = Reopening; MM = Minor Modification; SM = Significant Modification; A = Appeal
² Granted, Denied, or Stayed



Title V Operating Permit Revision

Joe Manchin, III
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

For Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Action Number: MM01 **SIC:** 4911
Name of Permittee: Pleasants Energy, LLC
Facility Name/Location: Pleasants Energy/Waverly
County: Pleasants
Facility Address: 10319 South Pleasants Highway, St. Marys, WV 26170

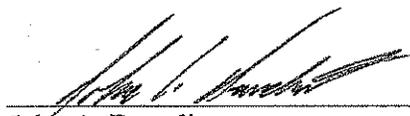
Description of Permit Revision: Pleasants Energy has requested the reporting requirements of 4.5.1 be changed to reference the reporting requirements under 40 C.F.R. §60.334(j) for 40 C.F.R. 60, Subpart GG instead of the reporting requirements under 40 C.F.R. §60.49a for 40 C.F.R. 60, Subpart Da. This minor modification also includes the addition of the Oil-water Separator (T2), Portable Gasoline Storage Tank (T3), and the Portable Diesel Storage Tank (T4) to the Section 1.0 Emission Units Table.

Initial Title V Permit Information:

Permit Number: R30-07300022-2004
Effective Date: March 5, 2004
Expiration Date: February 20, 2009

Directions To Facility: The site is located on the eastern side of State Route 2 in Pleasants County, approximately 1 mile east of Waverly.

THIS PERMIT REVISION IS ISSUED IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL ACT (W.VA. CODE §§ 22-5-1 ET SEQ.) AND 45CSR30 - "REQUIREMENTS FOR OPERATING PERMITS." THE PERMITTEE IDENTIFIED AT THE FACILITY ABOVE IS AUTHORIZED TO OPERATE THE STATIONARY SOURCES OF AIR POLLUTANTS IDENTIFIED HEREIN IN ACCORDANCE WITH ALL TERMS AND CONDITIONS OF THIS PERMIT.


John A. Benedict
Director

11-15-05
Date Issued

West Virginia Department of Environmental Protection

Division of Air Quality

Bob Wise
Governor

Stephanie R. Timmermeyer
Cabinet Secretary

Permit to Operate



Pursuant to
Title V
of the Clean Air Act

Issued to:

Pleasants Energy, LLC
Pleasants Energy, Waverly, WV
R30-07300022-2004

John A. Benedict
Director

Issued: February 20, 2004 • Effective: March 5, 2004
Expiration: February 20, 2009 • Renewal: August 20, 2008

Permit Number: **R30-07300022-2004**
Permittee: **Pleasants Energy, LLC**
Facility Name: **Pleasants Energy**
Mailing Address: **P.O. Box 26532**
Richmond, VA 23261

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: Waverly, Pleasants County, West Virginia
Mailing Address: 10319 South Pleasants Highway, St. Marys, WV 26170
Telephone Number: (804) 273-3467
Type of Business Entity: LLC
Facility Description: Facility is a 300 megawatt peaking power plant consisting of 2 natural gas/fuel oil fired turbines and a fuel gas heater.
SIC Codes: 4911
UTM Coordinates: 468.629 km Easting • 4,353.573 km Northing • Zone 17

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.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
GT1	EP1	General Electric Model 7FA Turbine	2001	1,571 mmbtu/hr	None
GT2	EP2	General Electric Model 7FA Turbine	2001	1,571 mmbtu/hr	None
NG1	EP3	Natural Gas Fired Fuel Heater	2001	6.66 mmbtu/hr	None
T1		Fuel Oil Storage Tank	2001	2,200,000 gallon	None
<u>T2</u>		<u>Oil-water Separator</u>	<u>2001</u>	<u>8,000 gallon</u>	<u>None</u>
<u>T3</u>		<u>Portable Gasoline Storage Tank</u>	<u>2002</u>	<u>300 gallon</u>	<u>None</u>
<u>T4</u>		<u>Portable Diesel Storage Tank</u>	<u>2002</u>	<u>300 gallon</u>	<u>None</u>

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 (45CSR§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	NAAQS	National Ambient Air Quality Standards
CBI	Confidential Business Information	NESHAPS	National Emissions Standards for Hazardous Air Pollutants
CEM	Continuous Emission Monitor	NO _x	Nitrogen Oxides
CES	Certified Emission Statement	NSPS	New Source Performance Standards
C.F.R. or CFR	Code of Federal Regulations	PM	Particulate Matter
CO	Carbon Monoxide	PM ₁₀	Particulate Matter less than 10µm in diameter
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO ₂	Sulfur Dioxide
lbs/hr	Pounds per Hour		
LDAR	Leak Detection and Repair		
M	Thousand		
MACT	Maximum Achievable Control Technology		
MM	Million		
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour		
MMCF/hr or mmcf/hr	Million Cubic Feet Burned per Hour		
NA	Not Applicable		

TAP	Toxic Air Pollutant		Mercator
TPY	Tons per Year	VEE	Visual Emissions
TRS	Total Reduced Sulfur		Evaluation
TSP	Total Suspended Particulate	VOC	Volatile Organic
USEPA	United States Environmental Protection Agency		Compounds
UTM	Universal Transverse		

2.3. Permit Expiration and Renewal

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c. [45CSR§30-5.1.b.]
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration. [45CSR§30-4.1.a.3.]
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.. [45CSR§30-6.3.b.]
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time. [45CSR§30-6.3.c.]

2.4. Permit Actions

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
- Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the

requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

- b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
- c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.

[45CSR§30-6.4.]

2.7. Minor Permit Modifications

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.

[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.

[45CSR§30-6.5.b.]

2.9. Emissions Trading

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.

[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
- b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield.
- d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.
- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The

permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

[45CSR§30-5.8.a.]

2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements.

[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
- b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

- c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

- 2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

- 2.14.1. 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.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

- b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would 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.

[45CSR§30-5.1.f.2.]

2.17. Emergency

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably 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.

[45CSR§30-5.7.a.]

- 2.17.2. 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 45CSR§30-5.7.c. are met.

[45CSR§30-5.7.b.]

- 2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.

[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. 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.

[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

[45CSR§30-5.1.e.]

2.24. Property Rights

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

[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.
- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

[45CSR§30-5.1.a.2.]

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 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). A copy of this notice is required to be sent to the USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health.
[40 C.F.R. 61 and 45CSR15]
- 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 State-Enforceable only.]
- 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 45CSR11.
[45CSR§11-5.2]
- 3.1.7. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.8. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.9. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.

[40 C.F.R. 68]

3.1.10. **NO_x Budget Trading Program.** The permittee shall comply with the standard requirements set forth in the attached NO_x Budget Permit Application (see Appendix A) and the NO_x Budget Permit requirements set forth in 45CSR26 for each NO_x budget source. The complete NO_x Budget Permit Application shall be the NO_x Budget Permit portion of the Title V permit administered in accordance with 45CSR30.

[45CSR§§26-6.1.b. and 20.1.]

- a. The NO_x Budget portion of this permit is deemed to incorporate automatically the definitions of terms under 45CSR§26-2 and, upon recordation by the Administrator under 45CSR§26-50 through 45CSR§26-57 or 45CSR§26-60 through 45CSR§26-62, every allocation, transfer or deduction of a NO_x allowance to or from the compliance accounts of the NO_x Budget units covered by the permit or the overdraft account of the NO_x budget source covered by the permit.

[45CSR§26-23.2.]

- b. Except as provided in 45CSR§26-23.2, the Secretary will revise the NO_x Budget portion of this permit, as necessary, in accordance with the operating permit revision requirements set forth in 45CSR30.

[45CSR§26-24.1.]

3.2. Testing Requirements

3.2.1. **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 will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 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 will be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 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.

[WV Code § 22-5-4(a)(15) and 45CSR13]

3.3. Record keeping Requirements

3.3.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.]

3.3.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

[45CSR§30-5.1.c.2.B.]

3.3.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received. Such record shall contain an assessment of the validity of the complaints as well as any corrective actions taken.

[45CSR§30-5.1.c. State-Enforceable only.]

3.4. Reporting Requirements

3.4.1. **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.

[45CSR§30-4.4. and 5.1.c.3.D.]

3.4.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.

[45CSR§30-5.1.c.3.E.]

- 3.4.3. 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
7012 MacCorkle Avenue, SE
601 57th Street, SE
Charleston, WV 25304-2943

Phone: 304/926-3727 0475
FAX: 304/926-3739 0479

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.4.4. **Certified emissions statement.** 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.

[45CSR§30-8.]

- 3.4.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.

[45CSR§30-5.3.e.]

- 3.4.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.

[45CSR§30-5.1.c.3.A.]

- 3.4.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.4.8. Deviations.

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
 2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
 3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
 4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

- c. Every report submitted under this subsection shall be certified by a responsible official.

[45CSR§30.5.1.c.3.D.]

- 3.4.9. New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

[45CSR§30-4.3.h.1.B.]

3.5. Permit Shield

- 3.5.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.
- 3.5.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.
 - a. **45CSR2 - To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** According to permit #R13-2373 the natural gas turbines (GT1 & GT2) are subject to 45CSR2. However, the turbines are not indirect heat exchangers and by definition are not fuel burning units. The turbines use the combustion gases to turn the turbine blades.
 - b. **40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.** Since the fuel heater used has a maximum design heat input capacity of 6.7 mmbtu/hr (less than 10 mmbtu/hr) subpart Dc does not apply.

4.0. Source-Specific Requirements [GE Gas Turbines GT1 & GT2]

4.1. Limitations and Standards

- 4.1.1. Sulfur content of the fuel combusted in the turbines shall be no more than 0.8 percent by weight. [40 C.F.R. § 60.333(b)., 45CSR13 Permit No. R13-2373 Other Requirements (B)(6).]
- 4.1.2. Nitrogen Oxides emissions from the turbine stacks shall not exceed 109 parts per million by volume on a dry basis at 15% oxygen. [40 C.F.R. § 60.332(a)(1)., 45CSR13 Permit No. R13-2373 Other Requirements (B)(6).]
- 4.1.3. At all times, including periods of startup, shutdown, and malfunction, the turbines and associated water injection system (when combusting distillate fuel oil) shall be, to the extent practicable, maintained and operated in a manner consistent with good air pollution practice for minimizing emissions. [40 C.F.R. § 60.11(d)., 45CSR13 Permit No. R13-2373, Other Requirements (B)(6).]
- 4.1.4. Emissions from the turbine stacks shall not exceed the following limits except during periods of startup and shutdown. Compliance with the annual emission limits shall be demonstrated using a 12 month rolling average.

Pollutant	lbs/hr	lbs/hr	TPY
	(each turbine when firing gas)	(each turbine when firing fuel oil)	(2 turbines combined regardless of fuel)
NO _x	65	470	241
Sulfur Dioxide	2.5	103	53
PM ₁₀	18	39	75
VOCs	3	8	12
CO	32	72	116
Formaldehyde	1.7	na	7
Sulfuric Acid	na	11	5.6
PAH's	na	na	1.2

Compliance with this streamlined SO₂ limit assures compliance with 45CSR§10-3.1.
 [45CSR13 - Permit No. R13-2373 Specific Requirement (A)(1-3)., 45 CSR§30-5.1.c]

- 4.1.5. Combustion turbines (GT1 & GT2) shall not combust more than 14.02 x 10⁹ scf/yr of fuel cumulatively on a rolling 12 month basis. Additionally, whenever fuel oil is combusted, this limit shall be reduced by 889 cubic feet of natural gas for each gallon of fuel oil combusted. [45CSR13 - Permit No. R13-2373 Specific Requirement (A)(4)., 45 CSR§30-5.1.c]
- 4.1.6. When low sulfur distillate fuel oil is fired, water injection shall be utilized to control NO_x emissions. [45CSR13- Permit No. R13-2373 Specific Requirement (A)(5).]

- 4.1.7 A dry low NO_x combustion system shall be installed, maintained, and operated so as to control NO_x emissions from the combustion turbines (GT1 and GT2) when natural gas is fired.
[45CSR13- Permit No. R13-2373 Specific Requirement (A)(6).]
- 4.1.8 The annual average sulfur content of the low sulfur distillate fuel shall not exceed 0.05 percent.
[45CSR13- Permit No. R13-2373 Specific Requirement (A)(7).]
- 4.1.9 The annual average sulfur content of the natural gas shall not exceed 0.5 grains per 100 scf.
[45CSR13- Permit No. R13-2373 Specific Requirement (A)(8).]
- 4.1.10 The gas turbines are Phase II Acid Rain affected units under 45CSR33, as defined by 40 C.F.R § 72.6, and as such are required to meet the requirements of 40 C.F.R. Parts 72, 73, 74, 75, 76, 77 and 78. These requirements include, but are not limited to:
- a. Hold an Acid Rain permit (Acid Rain Permit is included in Appendix B);
 - b. Hold allowances, as of the allowance transfer deadline, in the unit's compliance sub-account of not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit;
 - c. Comply with the applicable Acid Rain emissions for sulfur dioxide;
 - d. Comply with the applicable Acid Rain emissions for nitrogen oxides;
 - e. Comply with the monitoring requirements of 40 C.F.R. Part 75 and section 407 of the Clean Air Act of 1990 and regulations implementing section 407 of the Act;
 - f. Submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 C.F.R. Part 72, Subpart I and 40 C.F.R. Part 75.

[45CSR33, 40 C.F.R. Parts 72, 73, 74, 75, 76, 77, 78.]

4.2. Monitoring Requirements

- 4.2.1 The owners and operators of this facility shall comply with monitoring requirements as found in 40 C.F.R. 75.
[40 C.F.R. § 72.9(b)(1); 45CSR33]
- 4.2.2 The permittee shall install and operate a system to monitor emissions of NO_x from the combustion turbines. The procedures under 40 CFR 60.13 or 40 CFR 75, as appropriate, shall be followed for installation, evaluation and operation of this system.
[45CSR13- Permit No. R13-2373 Specific Requirement (A)(9).]
- 4.2.3 The owner or operator shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. This system shall be accurate to within ± 5.0 percent and shall be approved by the administrator.

[40 C.F.R. § 60.334(a); 45CSR13 Permit No. R13-2373 Other Requirements (B)(6), 45CSR16]

- 4.2.4 In order to demonstrate compliance with the sulfur content limits of sections 4.1.1., 4.1.8. and 4.1.9, the sulfur content of the fuel being fired in the turbines shall be monitored and recorded in accordance with 40 C.F.R. 75.

[40 C.F.R. § 60.334(b)(2).; 45CSR13 Permit No. R13-2373 Other Requirements (B)(6) & (B)(7); 45CSR§30-5.1.c]

4.3. Testing Requirements

- 4.3.1. Stack testing shall be conducted on one combustion turbine to determine CO, VOC, PM₁₀, and sulfuric acid mist emissions in accordance with EPA method 10 or 10B, 25A or 25B, 5, 8 or any other method approved by the Director. The results of the testing shall be used to demonstrate compliance with the CO, VOC, PM₁₀ and sulfuric acid mist emissions limits of 4.1.4. The compliance test shall have been conducted prior to 2000 combined turbine-hours of operation (beginning with the issuance of this permit) or 24 months from the issuance of this permit whichever comes first.

[45CSR§30-5.1.c.1.B]

4.4. Record keeping Requirements

- 4.4.1. Continual compliance with the mass emission limits of section 4.1.4. shall be demonstrated as follows. Required calculations shall be performed every fifteen minutes utilizing average minute data values for the parameters. Each of the mass emissions will then be averaged on a hourly basis and recorded. The hourly averages will then be used to create the monthly and 12-month rolling average emission reports.

Heat Input Calculation

$$HI = (Q_v * GCV) / 10^6$$

Where HI = heat input in mmBtu/hr
 Q_v = volumetric fuel flow in 100scf/hr (10 gal/hr for distillate fuel oil)
 GCV = Btu/100scf (BTU/10 gal. for distillate fuel oil)

NO_x Emission Rate

CEMS

SO₂ Emission Rate

$$MSO_2 = S_{fuel} * Q_{fuel} * C * (64 \text{ lb SO}_2 / 32 \text{ lb S})$$

Where MSO_2 = mass emission for SO₂ in lbs/hr
 S_{fuel} = sulfur content of fuel in grains/100 scf (lb S / lb fuel for distillate fuel)
 Q_{fuel} = amount of fuel combusted/hr in 100 scf (pounds for distillate fuel)
 C = unit Conversion 0.00014 lb/grain (for natural gas only)

PM₁₀ Emission Rate

$$M PM_{10} = HI * ER PM_{10}$$

Where HI = heat input in mmBtu/hr
 $ER PM_{10}$ = Emission Rate in lb/mmBtu determined during the most recent stack test.

VOC Emission Rate

$$M \text{ VOC} = HI * ER \text{ VOC}$$

Where *HI* = heat input in mmBtu/hr
ER VOC = Emission Rate in lb/mmBtu determined during the most recent stack test.

CO Emission Rate

$$M \text{ CO} = HI * ER \text{ CO}$$

Where *HI* = heat input in mmBtu/hr
ER CO = Emission Rate in lb/mmBtu determined during the most recent stack test.

H₂SO₄ Emission Rate

$$M \text{ H}_2\text{SO}_4 = HI * ER \text{ H}_2\text{SO}_4$$

Where *HI* = heat input in mmBtu/hr
ER H₂SO₄ = Emission Rate in lb/mmBtu determined during the most recent stack test.

[45CSR§30-5.1.c.]

- 4.4.2 The permittee shall maintain daily records of the amount of fuel combusted in the turbines.
[45CSR13 - Permit No. R13-2373 Other Requirement (B)(10)]

4.5. Reporting Requirements

- 4.5.1. ~~The permittee shall comply with the reporting requirements under 40 CFR 60.49a except that all required reports shall be certified to the USEPA Administrator and to the Director of the Division of Air Quality, Division of Environmental Protection in accordance with 40 CFR 60.49a(i).
[45CSR13 - Permit No. R13-2373 Other Requirement (B)(9)]~~

The permittee shall comply with the reporting requirements of 40 C.F.R. §60.334(j) by submitting reports of excess emissions and monitor downtime, in accordance with 40 C.F.R. §60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction. For the purpose of reports required under 40 C.F.R. §60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined by 40 C.F.R. §60.334(j). All required reports shall be submitted to both the Division of Air Quality and USEPA in accordance with 3.4.3. [40 C.F.R. §§60.334(j) and 60.7(c); 45CSR13 - Permit No. R13-2373 Other Requirement (B)(9)]

5.0. Source-Specific Requirements [Natural Gas Fired Fuel Heater NG1]

5.1. Limitations and Standards

- 5.1.1. Emissions of smoke and/or particulate matter shall not exceed 10% opacity based on a six minute block average.
[45CSR§2-3.1., 45CSR13 Permit No. R13-2373 Other Requirements (B)(3).]

5.2. Record keeping Requirements

- 5.2.1. Compliance with the opacity limit shall be demonstrated by using only natural gas in the fuel gas heater.
[45CSR§30-5.1.c.]

Attachment B

Copies of Natural Gas and Fuel Analysis



Report of Analysis

Client: INTERTEK - TOLE Client Reference Number: US360-0003627
 Port/Terminal: St Mary, WV
 Our Reference Number:

Sample ID: 2008-CHGO-000662-H-017 Date Taken: 24-Apr-2008
 Drawn By: Intertek Date Submitted: 25-Apr-2008
 Sample Designated As: Diesel Date Tested: 25-Apr-2008
 Representing: Tank 1 All Level

Method	Test	Result	Units
ASTM D240	Gross BTU - LB	19306	BTU_lb
ASTM D445	Kinematic / Dynamic Viscosity		
	Test Temperature	100 °F	
	Kinematic Viscosity @ 100 degF/37.8 degC	2.581	cSt
ASTM D445	Kinematic / Dynamic Viscosity		
	Test Temperature	122 °F/ 50 °C	
	Kinematic Viscosity @ 122 degF/ 50 degC	2.066	cSt
ASTM D445	Kinematic / Dynamic Viscosity		
	Test Temperature	210 °F	
	Kinematic Viscosity @ 210 degF/98.9 degC	1.057	cSt
ASTM D4052	Relative Density @ 15.56/15.56°C	0.8500	
ASTM D4052	Relative Density @ 37.8/37.8°C	0.8393	°C
ASTM D97	Pour Point of Petroleum Products		
	Pour Point	-24	°C
	Pour Point	-11.2	°F
ASTM D93	Pensky-Martens Closed Cup Flash Point		
	Procedure Used	A	
	Corrected Flash Point	158	°F
ASTM D86	Distillation		
	Barometric Pressure	736	mm Hg
	IBP Evaporated	358.1	°F
	5% Evaporated	401.6	°F
	10% Evaporated	418.6	°F
	15% Evaporated	431.9	°F
	20% Evaporated	442.6	°F
	30% Evaporated	462.2	°F
	40% Evaporated	479.8	°F
	50% Evaporated	495.1	°F
	60% Evaporated	512.1	°F
	70% Evaporated	530.8	°F
	80% Evaporated	553.9	°F
	85% Evaporated	568.4	°F
	90% Evaporated	585.7	°F
	95% Evaporated	612.1	°F
	FBP	642.9	°F
	Residue	1.1	Vol %
	Corrected Loss	0.4	Vol %
	Corrected Recovery	98.5	Vol %
ASTM D524	Ramsbottom Carbon Res. (10% Dist.)	0.03	Wt %
ASTM D5453	Sulfur Content	0.02	Wt %

Report of Analysis

Sample ID:	2008-CHGO-000662-H-017	Date Taken:	24-Apr-2008
Drawn By:	Intertek	Date Submitted:	25-Apr-2008
Sample Designated As:	Diesel	Date Tested:	25-Apr-2008
Representing:	Tank 1 All Level		

Method	Test	Result	Units
ASTM D5291	Instrumental Determination of Carbon, Hydrogen and Nitrogen		
	Hydrogen Content	Pending	Wt %
	Nitrogen Content	Pending	Wt %
ASTM D482	Ash @ 775 °C	<0.001	Wt %
ASTM D5863_MOD	Metals by Flame Atomic Absorption Spectrometry		
	Vanadium	<1	mg/kg
	Sodium	9	mg/kg
	Lead	1	mg/kg
	Calcium	6	mg/kg
	Potassium	1	mg/kg
ASTM D1796	Water and Sediment	0.05	Vol %
ASTM D95	Water Content	0.0	Vol %
ASTM D5452	Particulate Contamination of Aviation Fuels by Laboratory Filtration and Gravimetric Determination		
	Sample Volume (Filtered)	0.6	L
	Total Particulate Contamination	1.56	mg/L
ASTM D6371	Cold Filter Plugging Point of Diesel and Heating Fuels		
	Cold Filter Plugging Point (CFPP)	-20	°C
	Cold Filter Plugging Point (CFPP)	-4.0	°F
ASTM D6468	High Temperature Stability of Distillate Fuels		
	Sampling Date	4/24/08	
	Filter Pad Color Rating	2	
	Percent Reflectance (filter pad rating)	89	%
ASTM D613	Cetane Number	47.5	

Signed: _____ Date: _____
Melanie Rehm - Intertek

13006

EMPACT ANALYTICAL SYSTEMS, INC

365 S. MAIN STREET
BRIGHTON, CO 80601
(303) 637-0150

NATURAL GAS ANALYSIS

PROJECT NO. :	200702069	ANALYSIS NO. :	01
COMPANY NAME :	PLEASANTS ENERGY	ANALYSIS DATE:	FEBRUARY 15, 2007
		SAMPLE DATE :	FEBRUARY 12, 2007
ACCOUNT NO. :		CYLINDER NO. :	317
NAME/DESCRIP :	DOMINION PLEASANTS @ 1000		

FIELD DATA

SAMPLED BY :	TOMMY DODGE	SAMPLE TEMP. :	47.1° F
SAMPLE PRES. :	353.48	AMBIENT TEMP.:	
COMMENTS :	SPOT NO PROBE		

<u>COMPONENTS</u>	<u>NORM. MOLE%</u>	<u>GPM @ 14.696</u>	<u>GPM @ 14.73</u>
HELIUM	0.06	-	-
HYDROGEN	0.08	-	-
OXYGEN/ARGON	0.01	-	-
NITROGEN	0.76	-	-
CO2	0.40	-	-
METHANE	94.41	-	-
ETHANE	3.31	0.883	0.885
PROPANE	0.61	0.168	0.168
ISOBUTANE	0.10	0.033	0.033
N-BUTANE	0.14	0.044	0.044
ISOPENTANE	0.05	0.018	0.018
N-PENTANE	0.03	0.011	0.011
<u>HEXANES+</u>	<u>0.04</u>	<u>0.017</u>	<u>0.017</u>
TOTAL	100.00	1.174	1.177

	BTU @ 60 DEG F	14.696	14.73
LOW	NET DRY REAL=	940.3	942.5
	NET SATURATED REAL=	923.9	926.1
HIGH	GROSS DRY REAL =	1043.1	1045.5
	GROSS SATURATED REAL =	1024.9	1027.3

SPECIFIC GRAVITY (AIR=1 @14.696 PSIA 60F) :	0.5896
COMPRESSIBILITY FACTOR :	0.99780

NOTE: REFERENCE GPA 2261(ASTM D1945 & ASME-PTC), 2145, & 2172 CURRENT PUBLICATIONS

EMPACT ANALYTICAL SYSTEMS, INC

365 S. MAIN STREET
BRIGHTON, CO 80601
(303) 637-0150

PROJECT NO: 200702069
COMPANY NAME: PLEASANTS ENERGY
NAME/DESCRIP: DOMINION PLEASANTS @ 1000

SAMPLE NO: 02
ANALYSIS DATE: FEBRUARY 15, 2007
SAMPLE DATE: FEBRUARY 12, 2007
SAMPLED BY: TOMMY DODGE

COMMENTS: SPOT
IL TEDLAR BAG

TEST PROCEDURE / METHOD: SULFUR BY GAS CHROMATOGRAPH SCD350 *

<u>COMPONENT</u>	<u>SULFUR</u>	
	<u>ppm mole</u> <u>(ul/L)</u>	<u>ppm wt</u> <u>(ug/g)</u>
Hydrogen Sulfide (H2S)	BDL	
Carbonyl Sulfide (COS)/Sulfur Dioxide (SO2)	BDL	
Methanethiol (MeSH)	BDL	
Ethanethiol (EtSH)	BDL	
Dimethylsulfide (DMS)	BDL	
Carbon Disulfide (CS2)	BDL	
2-Propanethiol (i-PrSH)	BDL	
t-Butanethiol (t-BuSH)	BDL	
1-Propanethiol (n-PrSH)	BDL	
Methylethylsulfide (MES)	BDL	
s-Butanethiol (s-BuSH)	BDL	
i-Butanethiol (i-BuSH)	BDL	
Thiophene (TP)	BDL	
Diethylsulfide (DES)	BDL	
n-Butanethiol (n-BuSH)	BDL	
Dimethyldisulfide (DMDS)	BDL	
2-Methylthiophene (2-MTP)	BDL	
3-Methylthiophene (3-MTP)	BDL	
2-Ethylthiophene (2-ETP)	BDL	
Methylethyldisulfide (MEDS)	BDL	
Dimethylthiophene (DMTP)	BDL	
Unidentified Sulfurs	BDL	
Diethyldisulfide (DEDS)	BDL	
Benzothiophene (BzTP)	BDL	
Methylbenzothiophenes (MBzTP)	BDL	
Unidentified Sulfurs	BDL	
Dimethylbenzothiophenes (DMBzTP)	BDL	
Unidentified Sulfurs	BDL	
TOTAL SULFUR	0.0	0.0

TOTAL GRAINS OF SULFUR **0.0000 / 100 scf**
GRAINS OF H2S **0.0000 / 100 scf**

- * ASTM D5504
- ** DETECTION LIMIT DETERMINED TO BE 0.1 ppm (ul/L) Sulfur - BDL (BELOW DETECTION LIMIT)
- ** DETECTION LIMIT DETERMINED TO BE .01 grains Sulfur/100cf - BDL (BELOW DETECTION LIMIT)

THE DATA PRESENTED HEREIN HAS BEEN ACQUIRED THROUGH JUDICIOUS APPLICATION OF CURRENT STATE-OF-THE ART ANALYTICAL TECHNIQUES. THE APPLICATIONS OF THIS INFORMATION IS THE RESPONSIBILITY OF THE USER. EMPACT ANALYTICAL SYSTEMS, INC. ASSUMES NO RESPONSIBILITY FOR ACCURACY OF THE REPORTED INFORMATION NOR ANY CONSEQUENCES OF ITS APPLICATION.

Attachment C

Copy of Revised Account Certificate of Representation
(submitted 7/29/08)



International Power

Pleasants Energy, LLC
62 Forest Street, Suite 102
Marlborough, MA 01752
Tel 508 382 9300
Fax 508 382 9400
www.ipplc.com

July 29, 2008

Attn: Designated Representative
West Virginia Department of Environmental Protection
Division of Air Quality
7012 MacCorkle Avenue, South East
Charleston, WV 25304

Via Overnight Courier

**RE: Pleasants Energy, LLC
ORIS Code 55349
Revised Account Certificate of Representation**

Dear Sir or Madam:

Enclosed is a revised Account Certificate of Representation for the Pleasants Energy, LLC plant. This letter serves as an administrative permit amendment pursuant to 40 CFR Part 72.83(a)(2) of a change in the designated representative and alternate designated representative. The owner and operator of the facility have remained the same.

If you have any questions or need any additional information, please contact me at (508) 382-9337 or kcahill@ipr-us.com.

Sincerely,

Pleasants Energy, LLC

By: Kevin R. Cahill, P.E.

Enclosure

cc: USEPA, Clean Air Markets Division, 1310 L Street NW, Second Floor, Washington, DC 20005-4113



International Power

Pleasants Energy, LLC
62 Forest Street, Suite 102
Marlborough, MA 01752
Tel 508 382 9300
Fax 508 382 9400
www.ipplc.com

July 29, 2008

Mr. John A. Benedict
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th St. SE
Charleston, WV 25304-2345

Via Overnight Courier

**RE: CAIR Permit Application
Pleasants Energy, LLC
ORIS Code 55349**

Dear Mr. Benedict:

Enclosed is a revised Certificate of Representation for Pleasants Energy, LLC with respect to the above CAIR Permit Application.

If you have any questions or need any additional information, please contact me at (508) 382-9337 or kcahill@ipr-us.com.

Sincerely,

Pleasants Energy, LLC

By: Kevin R. Cahill, P.E.

Enclosure



International Power

Pleasants Energy, LLC
62 Forest Street, Suite 102
Marlborough, MA 01752
Tel 508 382 9300
Fax 508 382 9400
www.ippic.com

July 29, 2008

Attn: Designated Representative
US EPA
Clean Air Markets Division (6204J)
1310 L Street NW
Second Floor
Washington, DC 20005

Via Overnight Courier

**RE: Pleasants Energy, LLC
ORIS Code 55349
Revised Account Certificate of Representation**

Dear Sir or Madam:

Enclosed is a revised Account Certificate of Representation for the Pleasants Energy, LLC plant. This letter serves as an administrative permit amendment pursuant to 40 CFR Part 72.83(a)(2) of a change in the designated representative and alternate designated representative. The owner and operator of the facility have remained the same.

If you have any questions or need any additional information, please contact me at (508) 382-9337 or kcahill@ipr-us.com.

Sincerely,

Pleasants Energy, LLC

By: Kevin R. Cahill, P.E.

cc: WV DEP, 601 57th Street, SE, Charleston, WV 25304



Certificate of Representation

For more information, see instructions and 40 CFR 72.24; 40 CFR 96.113, 96.213, or 96.313, or a comparable state regulation under the Clean Air Interstate Rule (CAIR) NO_x Annual, SO₂, and NO_x Ozone Season Trading Programs; 40 CFR 97.113, 97.213, or 97.313; or 40 CFR 60.4113, or a comparable state regulation under the Clean Air Mercury Rule (CAMR), as applicable.

FACILITY (SOURCE) INFORMATION

This submission is: • New Revised (revised submissions must be complete; see instructions)

STEP 1
 Provide information for the facility (source).

Pleasant Energy, LLC		WV	55349
Facility (Source) Name		State	Plant Code
Pleasants			
County Name			
39 18' 58" N		81 21' 50" W	
Latitude		Longitude	

STEP 2
 Enter requested information for the designated representative.

Kevin R. Cahill, P.E.		Director - Health, Safety and Environment	
Name		Title	
Pleasants Energy LLC c/o International Power America			
Company Name			
62 Forest Street, Suite 102, Marlborough, MA 01752			
Address			
(508) 382-9337		(508) 382-9438	
Phone Number		Fax Number	
kcahill@ipr-us.com			
E-mail address			

STEP 3
 Enter requested information for the alternate designated representative.

Name		Title	
Company Name			
Address			
Phone Number		Fax Number	
E-mail address			

Pleasants Energy, LLC
 Facility (Source) Name (from Step 1)

UNIT INFORMATION

STEP 4: Complete one page for each unit located at the facility identified in STEP 1 (i.e., for each boiler, simple cycle combustion turbine, or combined cycle combustion turbine) Do not list duct burners. Indicate each program to which the unit is subject and enter all other unit-specific information, including the name of each owner and operator of the unit and the generator ID number and nameplate capacity of each generator served by the unit. If the unit is subject to a program, then the facility (source) is also subject. (For units subject to the NOx Budget Trading Program, a separate "Account Certificate of Representation" form must be submitted to meet requirements under that program.)

Applicable Program(s):		<input checked="" type="checkbox"/> Acid Rain	<input checked="" type="checkbox"/> CAIR NO _x Annual	<input checked="" type="checkbox"/> CAIR SO ₂	<input checked="" type="checkbox"/> CAIR NO _x Ozone Season	<input type="checkbox"/> CAMR (Hg Budget Trading)	<input type="checkbox"/> CAMR (Nontrading)
2	Combustion Turbine						
Unit ID#	Unit Type	Source Category	Electric Utility	NAICS Code	221112	Generator ID Number (Maximum 8 characters)	CAIR-CAMR Nameplate Capacity (MWs)
01/1/2002						337x186 (oil)	210
						337x186 (gas)	210
Date unit began (or will begin) serving any generator producing electricity for sale (including test generation) (mm/dd/yyyy).		Check One:					
		Actual <input checked="" type="checkbox"/>					
		Projected <input type="checkbox"/>					
Company Name:		Pleasants Energy, LLC		<input checked="" type="checkbox"/> Owner		<input type="checkbox"/> CAMR (Nontrading)	
Company Name:				<input checked="" type="checkbox"/> Operator			
Company Name:				<input type="checkbox"/> Owner			
Company Name:				<input type="checkbox"/> Operator			
Company Name:				<input type="checkbox"/> Owner			
Company Name:				<input type="checkbox"/> Operator			

Pleasants Energy, LLC

Facility (Source) Name (from Step 1)

Certificate of Representation - Page 3

STEP 5: Read the appropriate certification statements, sign, and date.

Acid Rain Program

I certify that I was selected as the designated representative or alternate designated representative (as applicable) by an agreement binding on the owners and operators of the affected source and each affected unit at the source (i.e., the source and each unit subject to the Acid Rain Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the Acid Rain Program on behalf of the owners and operators of the affected source and each affected unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the affected source and each affected unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an affected unit, or where a utility or industrial customer purchases power from an affected unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the designated representative or alternate designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the affected source and each affected unit at the source; and

Allowances, and proceeds of transactions involving allowances, will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of allowances, allowances and proceeds of transactions involving allowances will be deemed to be held or distributed in accordance with the contract.

Clean Air Interstate Rule (CAIR) NO_x Annual Trading Program

I certify that I was selected as the CAIR designated representative or alternate CAIR designated representative (as applicable), by an agreement binding on the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source (i.e., the source and each unit subject to the CAIR NO_x Annual Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the CAIR NO_x Annual Trading Program on behalf of the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the CAIR NO_x source and each CAIR NO_x unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, a CAIR NO_x unit, or where a utility or industrial customer purchases power from a CAIR NO_x unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the CAIR designated representative or alternate CAIR designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the CAIR NO_x source and each CAIR NO_x unit at the source; and

CAIR NO_x allowances and proceeds of transactions involving CAIR NO_x allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of CAIR NO_x allowances by contract, CAIR NO_x allowances and proceeds of transactions involving CAIR NO_x allowances will be deemed to be held or distributed in accordance with the contract.

Pleasants Energy, LLC

Facility (Source) Name (from Step 1)

Certificate of Representation - Page 4

Clean Air Interstate Rule (CAIR) SO₂ Trading Program

I certify that I was selected as the CAIR designated representative or alternate CAIR designated representative (as applicable), by an agreement binding on the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source (i.e., the source and each unit subject to the SO₂ Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the CAIR SO₂ Trading Program, on behalf of the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the CAIR SO₂ source and each CAIR SO₂ unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, a CAIR SO₂ unit, or where a utility or industrial customer purchases power from a CAIR SO₂ unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the CAIR designated representative or alternate CAIR designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the CAIR SO₂ source and each CAIR SO₂ unit at the source; and

CAIR SO₂ allowances and proceeds of transactions involving CAIR SO₂ allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of CAIR SO₂ allowances by contract, CAIR SO₂ allowances and proceeds of transactions involving CAIR SO₂ allowances will be deemed to be held or distributed in accordance with the contract.

Clean Air Interstate Rule (CAIR) NO_x Ozone Season Trading Program

I certify that I was selected as the CAIR designated representative or alternate CAIR designated representative (as applicable), by an agreement binding on the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source (i.e., the source and each unit subject to the CAIR NO_x Ozone Season Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all necessary authority to carry out my duties and responsibilities under the CAIR NO_x Ozone Season Trading Program on behalf of the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, a CAIR NO_x Ozone Season unit, or where a utility or industrial customer purchases power from a CAIR NO_x Ozone Season unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the CAIR designated representative or alternate CAIR designated representative (as applicable) and of the agreement by which I was selected to each owner and operator of the CAIR NO_x Ozone Season source and each CAIR NO_x Ozone Season unit; and

CAIR NO_x Ozone Season allowances and proceeds of transactions involving CAIR NO_x Ozone Season allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of CAIR NO_x Ozone Season allowances by contract, CAIR NO_x Ozone Season allowances and proceeds of transactions involving CAIR NO_x Ozone Season allowances will be deemed to be held or distributed in accordance with the contract.

Pleasants Energy, LLC

Facility (Source) Name (from Step 1)

Certificate of Representation - Page 5

Clean Air Mercury Rule (CAMR) Hg Budget Trading Program N/A

I certify that I was selected as the Hg designated representative or alternate Hg designated representative, as applicable, by an agreement binding on the owners and operators of the source and each Hg Budget unit at the source (i.e., the source and each unit subject to the CAMR Hg Budget Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all the necessary authority to carry out my duties and responsibilities under the Hg Budget Trading Program on behalf of the owners and operators of the source and of each Hg Budget unit at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the source and of each Hg Budget unit at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, a Hg Budget unit, or where a utility or industrial customer purchases power from a Hg Budget unit under a life-of-the-unit, firm power contractual arrangement, I certify that:

I have given a written notice of my selection as the Hg designated representative or alternate Hg designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the source and of each Hg Budget unit at the source; and

Hg allowances and proceeds of transactions involving Hg allowances will be deemed to be held or distributed in proportion to each holder's legal, equitable, leasehold, or contractual reservation or entitlement, except that, if such multiple holders have expressly provided for a different distribution of Hg allowances by contract, Hg allowances and proceeds of transactions involving Hg allowances will be deemed to be held or distributed in accordance with the contract.

Clean Air Mercury Rule (CAMR) Program Other Than the Hg Budget Trading Program N/A

I certify that I was selected as the Hg designated representative or alternate Hg designated representative, as applicable, by an agreement binding on the owners and operators of the source and each electric generating unit (EGU) (as defined at 40 CFR 60.24(h)(8)) at the source (i.e., the source and each unit subject to a CAMR Program other than the Hg Budget Trading Program, as indicated in "Applicable Program(s)" in Step 4).

I certify that I have all the necessary authority to carry out my duties and responsibilities under a State Plan approved by the Administrator as meeting the requirements of 40 CFR 60.24(h) on behalf of the owners and operators of the source and of each EGU at the source and that each such owner and operator shall be fully bound by my representations, actions, inactions, or submissions.

I certify that the owners and operators of the source and of each EGU at the source shall be bound by any order issued to me by the Administrator, the permitting authority, or a court regarding the source or unit.

Where there are multiple holders of a legal or equitable title to, or a leasehold interest in, an EGU, or where a utility or industrial customer purchases power from an EGU under a life-of-the-unit, firm power contractual arrangement, I certify that I have given a written notice of my selection as the Hg designated representative or alternate Hg designated representative, as applicable, and of the agreement by which I was selected to each owner and operator of the source and of each EGU at the source.

Pleasants Energy, LLC
Facility (Source) Name (from Step 1)

General

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.

Signature (Designated Representative) 	Date 7/30/08
Signature (Alternate Designated Representative)	Date



International Power

Pleasants Energy, LLC
62 Forest Street, Suite 102
Marlborough, MA 01752
Tel 508 382 9300
Fax 508 382 9400
www.ipplc.com

July 29, 2008

West Virginia Division of Environmental Protection
Division of Air Quality
601 57th St. SE
Charleston, WV 25304-2345

Via Overnight Courier

RE: Pleasants Energy, LLC
ORIS Code 55349
Administrative Update for Title V Permit No. R30-07300022-2004-MM01
and Permit to Construct No. R13-2373A

Dear Sir or Madam:

We wish to notify you of the following contact information changes applicable to the above-referenced permits.

- (a) Facility Mailing Address:
Pleasants Energy, LLC
10319 South Pleasants Highway
St. Marys, WV 26170

- (b) Responsible Official:
Kevin R. Cahill, P.E.
Director-Health, Safety and Environment
Pleasants Energy, LLC
c/o International Power America
62 Forest Street, Suite 102
Marlborough, MA 01752

Please address any future correspondence related to this permit to the contact above. If you have any questions or need any additional information, please contact me at (508) 382-9337 or kcahill@ipr-us.com.

Sincerely,

Pleasants Energy, LLC

By: Kevin R. Cahill, P.E.



International Power

Pleasants Energy, LLC
62 Forest Street, Suite 102
Marlborough, MA 01752
Tel 508 382 9300
Fax 508 382 9400
www.ipplc.com

July 29, 2008

West Virginia Department of Environmental Protection
Division of Air Quality
7012 MacCorkle Avenue, South East
Charleston, WV 25304

Via Overnight Courier

**RE: Pleasants Energy, LLC
ORIS Code 55349
Phase II Acid Rain Permit # R33-55349-2010-2**

Dear Sir or Madam:

We wish to inform you of a change in contact information for the above permit. Please direct future correspondence regarding the permit to my attention at the above address.

If you have any questions or need any additional information, please contact me at (508) 382-9337 or kcahill@ipr-us.com.

Sincerely,

Pleasants Energy, LLC

By: Kevin R. Cahill, P.E.