

Fact Sheet



For Final 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 Minor 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 August 24, 2006.

Permit Number: **R30-03900528-2006**

Application Received: **May 22, 2008**

Plant Identification Number: **03900528**

Permittee: **Duke Energy Generation Services (DEGS) of South Charleston, LLC**

Mailing Address: **3200/3300 Kanawha Turnpike, South Charleston, WV 25303**

Permit Action Number: MM01

Revised: December 1, 2008

Physical Location: South Charleston, Kanawha County, West Virginia
UTM Coordinates: 438.67 km Easting • 4,245.47 km Northing • Zone 17
Directions: From Charleston take I-64 west to Kanawha Turnpike exit. Travel west on Kanawha Turnpike approximately ½ mile. The facility is located on the Union Carbide Corporation Technology Center property boundaries.

Facility Description

The permittee operates two (2) natural gas-fired boilers (B1 and B2) which are equipped with low-NO_x burners designed solely for natural gas consumption. Each boiler has a maximum design heat input of 65.93 MMBtu/hour, and each is capable of delivering 50,000 pounds of steam per hour at 240-psig.

This minor modification is based on the permit R13-2604B and doesn't involve installation of new equipment, modification of existing equipment or change in the facility PTE. The revision includes changes to the methods of compliance demonstration with the existing emission limits for Boilers #1 and #2 based on the fact that actual average heat content of natural gas combusted at DEGS is 1,230 BTU/scf, not 1,087 BTU/scf as was stated in the Requirement 4.1.2. The following changes were made:

- 1) Conditions 4.1.2. and 4.1.3. were removed.
- 2) Recordkeeping Requirement 4.4.2. to demonstrate compliance with the emissions limitations in Tables 4.1.2. and 4.1.3. was revised.
- 3) Recordkeeping Requirement 4.4.3. to keep records of fuel heat content and consumption was added.

Also, the Company changed name from Cinergy Solutions of South Charleston, LLC to Duke Energy Generation Services (DEGS) of South Charleston, LLC.

Emissions Summary

There are no emission changes associated with this modification.

Title V Program Applicability Basis

This facility does not have the potential to emit over 100 tons per year of criteria pollutant, 10 tons per year of a single HAP, or 25 tons per year of aggregate HAPs. However, the permittee's facility is considered a support facility that is contiguous and adjacent to the existing Technical Center, which is a major source in accordance with 45CSR30. Therefore, Cinergy Solutions of South Charleston (CSSC) is required 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.

This minor modification has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Preconstruction permits for minor sources.
	45CSR30	Operating permit requirement.

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 (<i>if any</i>)
R13-2604B	June 18, 2008	N/A

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

None.

Non-Applicability Determinations

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:

Natalya Chertkovsky
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

Natalya Chertkovsky
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

N/A