

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-04900009-2014**  
Application Received: **July 9, 2013**  
Plant Identification Number: **049-00009**  
Permittee: **Monongahela Power Company**  
Facility Name: **Rivesville Power Station**  
Mailing Address: **800 Cabin Hill Drive, Greensburg, PA 15601**

*Revised: N/A*

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Physical Location:	Rivesville, Marion County, West Virginia
UTM Coordinates:	575.93 km Easting • 4374.28 km Northing • Zone 17
Directions:	Interstate I-79 to exit 137 (SR-310 North). Follow SR-310 North to downtown Fairmont. Turn right on US-250 (Adams Street). Follow Adams Street to the end and turn left onto Quincy Street (US-19). Follow Route 19 North to Rivesville Main Street. Continue on Main Street to the end and turn left onto Jackson Street. Rivesville Power Station will be on the right.

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### Facility Description

Rivesville is a fossil fuel-fired electric generating facility with two (2) main boilers, operating under the Standard Industrial Classification (SIC) code of 4911, identified as Unit 5 (B5) and Unit 6 (B6), with maximum design heat inputs (MDHI) of 639 MMBtu/hr and 1,027 MMBtu/hr, respectively. The facility also contains two (2) 20.1 MMBtu/hr Auxiliary Boilers, identified as AuxB 9A and 9B. In addition, it has a 350 KW emergency generator; and supporting operations including coal handling, ash handling and storage tanks. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day, and fifty-two (52) weeks per year. The units (#5 and #6) have been placed on "Long Term Cold Storage" effective September 1, 2012.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2012 Actual Emissions</b>
Carbon Monoxide (CO)	162.3	0.5
Nitrogen Oxides (NO <sub>x</sub> )	5730.8	25.4
Particulate Matter (PM <sub>2.5</sub> )	120.4	1.0
Particulate Matter (PM <sub>10</sub> )	363.9	4.5
Total Particulate Matter (TSP)	768.2	14.9
Sulfur Dioxide (SO <sub>2</sub> )	13,537.1	22.1
Volatile Organic Compounds (VOC)	19.2	0.3

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2012 Actual Emissions</b>
Hydrogen Chloride	364.9	0.5
Hydrogen Fluoride	45.6	0.1
Other HAP	3.6	0.0
<b>Total HAPs</b>	414.1	0.6

*Some of the above HAPs may be counted as PM or VOCs.*

This facility has the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO<sub>2</sub>e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

### Title V Program Applicability Basis

Due to this facility's potential to emit over 100 tons per year of criteria pollutants (i.e., SO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, & CO), over 10 tons per year of a single HAP, over 25 tons per year of aggregate HAPs, and over 100,000 tons per year CO<sub>2</sub>e and 100 tons per year of GHGs on a mass basis, the Rivesville Power Station 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 facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2

To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers

45CSR6

Control Of Air Pollution From Combustion Of Refuse

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45CSR10	To Prevent And Control Air Pollution From The Emission Of Sulfur Oxides
45CSR11	Prevention Of Air Pollution Emergency Episodes
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30	Requirements For Operating Permits
45CSR33	Acid Rain Provisions and Permits
45CSR34	Emission Standards For Hazardous Air Pollutants
45CSR39	Control Of Annual Nitrogen Oxides Emissions
45CSR40	Control Of Ozone Season Nitrogen Oxides Emissions
45CSR41	Control Of Annual Sulfur Dioxide Emissions
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 CFR Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR Part 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units
40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 64	Compliance Assurance Monitoring
40 C.F.R. Part 72	Permits Regulation
40 C.F.R. Part 73	Sulfur Dioxide Allowance System Permits Regulation
40 C.F.R. Part 74	Sulfur Dioxide Opt-ins
40 C.F.R. Part 75	Continuous Emissions Monitoring
40 C.F.R. Part 76	Acid Rain Nitrogen Oxides Emission Reduction Program
40 C.F.R. Part 77	Excess Emissions
40 C.F.R. Part 78	Appeals Procedure (for Acid Rain Program)
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
 <u>State Only:</u>	
45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

<b>Permit or Consent Order Number</b>	<b>Date of Issuance</b>	<b>Permit Determinations or Amendments That Affect the Permit (if any)</b>
Consent Order	August 31, 1989	
R13-1098B	June 1, 2004	
R33-3945-2017-4	December 19, 2012	Effective January 1, 2013

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," which may be downloaded from DAQ's website.

**Determinations and Justifications**

- ❖ This is a renewal of the Title V permit which was issued on January 9, 2009. Substantial changes to the most recent version of the Title V Permit consist of the following:

**1) Title V Boilerplate changes**

- Condition 2.1.4. – The word “monthly” was added to the definition of “rolling yearly total.”
- Condition 3.1.3. - The citation of authority was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34.
- Condition 3.3.1. – Subsection “d” was added to this condition. Also section 14 of WV Code §§22-5-4 (a) was added in the citation of authority.
- Conditions 3.5.3. and 3.5.5. - These conditions were revised to require electronic submittal of the annual certification to USEPA. The certification shall now only be submitted to the USEPA by e-mail. Also the USEPA address and office name were updated in condition 3.5.3.

**2) 45CSR26 - NO<sub>x</sub> Budget Trading Program as A Means of Control and Reduction of Nitrogen Oxides from Electric Generating Units**

- This Rule has been repealed. Therefore the requirements of this rule have been removed. The NO<sub>x</sub> Budget Permit Application included in Appendix A has also been removed.

**3) 45CSR37 - Mercury Budget Trading Program To Reduce Mercury Emissions**

- This Rule has been repealed. Therefore the CAMR Mercury Budget Trading Program requirements have been removed from the permit.

**4) Section 4.0 changes:**

- Condition 4.1.10. – It has been determined that the Acid Rain permits do not need to be included in the Appendix of the Title V permit. Therefore, the Acid Rain permit has not been included in the renewal permit. Condition 4.1.10.a. has been revised to delete the language stating that the

Acid Rain permit is included in Appendix D. The requirement to hold an Acid Rain permit will remain in section 4.1. of the Title V permit.

- Condition 4.1.11. - Placeholder language and requirements have been added for the Electric Utility Steam Generating Units (EGU) MACT, 40 CFR 63, Subpart UUUUU for which the Rivesville steam generators “B5” and “B6” are subject. (See Below)
- Condition 4.1.21. - Placeholder language and requirements have been added for the Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR 63, Subpart DDDDD for which the Rivesville auxiliary boilers “AuxB 9A” and “AuxB 9B” are subject. (See Below)
- Condition 4.2.7. through 4.2.10. – The CAM related testing and CAM plan Implementation requirements of condition 4.2.7. of permit R30-04900009-2009 have been fulfilled thereby rendering these requirements obsolete. Therefore they have not been included in this renewal permit. “Boilerplate” CAM requirements have been added in conditions 4.2.7. through 4.2.10., inclusive.
- Condition 4.3.1. – Since the frequency of retesting is dependent upon the test results of the previous testing and since it is possible that more than one series of tests may be required during the permit term (e.g. tests are required annually or once/2years) the language in this condition has been revised to exclude the dates of the last tests. Instead, those dates are include here in the fact sheet. Unit 5 (Stack 7) was last tested in August 2008 and is on a “once/2years” schedule. Unit 6 (Stack 8) was last tested in November 2008 and is on a “once/3years” schedule. Since the units are in “cold storage” status, the next tests will be scheduled following start-up of the units.

**5) Section 5.0 (New):**

- This section was added to include the 40 CFR 63 Subpart ZZZZ (RICE MACT) requirements for the Rivesville emergency generator engine “EDG.” (See Below)
- ❖ **40 CFR 63, Subpart UUUUU - National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units (EGU)**
  - The Rivesville’s “B5” and “B6” boilers each commenced construction prior to May 3, 2011 and each one is therefore defined as an existing electric utility steam generating unit (EGU). They are subject to the requirements of Subpart UUUUU which establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from coal- and oil-fired EGUs. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. Pursuant to 40 CFR §63.9984(b) an existing EGU must comply with this subpart no later than April 16, 2015. Therefore, not all of the requirements have been included in the Title V permit. If required to conduct an initial compliance demonstration by performance testing as specified in §63.10011(a), the permittee must submit a Notification of Compliance Status (NOCS) report according to §63.9(h)(2)(ii). If required to submit an NOCS, a complete application for a modification to the Title V permit to incorporate the specific requirements of Subpart UUUUU must also be submitted. (See conditions 4.1.11.)
- ❖ **40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters**
  - The Rivesville’s “AuxB 9A and AuxB 9B” boilers are subject to the requirements of 40 CFR 63 Subpart DDDDD. The following language has been included in condition 4.1.21. for said auxiliary boilers:

- a. The natural gas/oil fired auxiliary boilers (*AuxB 9A and AuxB 9B*), shall comply with all applicable requirements for existing affected sources pursuant to 40 CFR 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters no later than the existing source compliance date of January 31, 2016.  
**[45CSR34; 40 CFR §63.7495(b)]**
- b. If required to submit a Notification of Compliance Status (NOCS) pursuant to 40 CFR 63, Subpart DDDDD, the permittee shall also submit a complete application for significant modification to the Title V permit to incorporate the specific requirements of the rule no later than the maximum time allowed for the NOCS submittal in 40 CFR §63.7545(e).

If requested, this Title V permitting deadline may be changed upon written approval by the Director. The permittee shall request the change in writing at least 30 days prior to the application due date.

**[45CSR34; 40 CFR §63.7545(e); 45CSR§30-6.5.b.]**

❖ **40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

- 1) Rivesville’s emergency generator engine (*EDG*) is an existing stationary compression ignition (CI) RICE less than 500 HP located at a major source of HAP emissions and therefore subject to Subpart ZZZZ. These requirements have been included in Section 5.0 of the permit

❖ **40 CFR Part 64** – This is a 2<sup>nd</sup> renewal. Since CAM was addressed in the first renewal and there were no modifications to the facility that would have triggered a CAM review subsequent to the first renewal, a CAM evaluation was not made. However, CAM “boilerplate” language that was not previously included in the current permit (i.e., R30-04900009-2009) has been added to this renewal.

**Non-Applicability Determinations**

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

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|----------------------------|-----|--|
| 45CSR5                     | --- | The coal handling operations are regulated by 45CSR2 and therefore are exempt in accordance with 45CSR§§5-2.4.b. & 2.14.   |
| 45CSR§10-8                 | --- | The Auxiliary Boilers combust natural gas or distillate oil only and are exempt in accordance with 45CSR§10-10.3   |
| 45CSR17                    | --- | The facility is regulated by 45CSR2 and therefore exempt in accordance with 45CSR§17-6.  |
| 40 CFR Part 60, Subpart D  | --- | The main boilers (B5 & B6) commenced construction prior to August 17, 1971.  |
| 40 CFR Part 60, Subpart Da | --- | The main boilers (B5 & B6) commenced construction prior to September 18, 1978.   |
| 40 CFR Part 60, Subpart Db | --- | The main boilers (B5 & B6) commenced construction prior to June 19, 1984; the auxiliary Boilers (9A & 9B) each have heat input capacities of less than 100 MMBtu/hr. |
| 40 CFR Part 60, Subpart Dc | --- | The auxiliary boilers (9A & 9B) commenced construction prior to June 9, 1989.  |

40 CFR Part 60, Subparts K	--- Rivesville Power Station does not have any tanks storing petroleum liquids (as defined in 40 CFR §60.111) that were constructed after March 8, 1974 and prior to May 19, 1978 and exceed 40,000 gallons in capacity.
40 CFR Part 60, Subparts Ka	Rivesville Power Station does not have any tanks storing petroleum liquids (as defined in 40 CFR §60.111a) that were constructed after May 18, 1978 and exceed 40,000 gallons in capacity.
40 CFR Part 60, Subpart Kb	--- Rivesville Power Station does not have any tanks that were constructed after July 23, 1984 that (a) exceed 75m <sup>3</sup> (19,813 gal) in capacity and store volatile organic liquids (as defined in 40 CFR §60.111b) with a maximum true vapor pressure greater than 15.0 kPa (2.18 psia) or (b) exceed 151m <sup>3</sup> (39,864 gal) in capacity and store volatile organic liquids with a maximum true vapor pressure greater than 3.5 kPa (0.51 psia).
40 CFR Part 60, Subpart Y	--- The coal handling facility commenced construction or modification before October 24, 1974.
40 CFR Part 60, Subpart IIII	--- The emergency generators commenced construction prior to July 11, 2005
40 CFR Part 63, Subpart Q	--- The cooling tower does not use chromium-based water treatment chemicals.
GHG Clean Air Act requirements	This is a renewal Title V permit and there have not been any modifications that would have triggered a PSD permit.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

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

### **Comment Period**

Beginning Date: April 18, 2014

Ending Date: May 19, 2014

### **Point of Contact**

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

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478  
E-mail: frederick.tipane@wv.gov

### **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.

**Response to Comments (Statement of Basis)**

Not applicable.