

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-07900006-2016**

Application Received: **June 29, 2015**

Plant Identification Number: **079-00006**

Permittee: **Appalachian Power Company (d.b.a. American Electric Power)**

Facility Name: **John E. Amos Plant**

Mailing Address: **1 Riverside Plaza, Columbus, OH 43215-2373**

Revised: N/A

Physical Location: St Albans, Putnam County, West Virginia
UTM Coordinates: 428.16 km Easting • 4258.42 km Northing • Zone 17
Directions: From Charleston, take Interstate 64 West (towards Huntington). Turn right onto Exit 44 ramp and proceed to Route 817. Turn left onto Route 817 (North). The facility is located approximately 1.5 miles on the right.

Facility Description

The Amos Plant is a fossil fuel fired electric generation facility and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of two (2) coal-fired steam generators with a rated design capacity of 7,020 mmBtu/hr each, one (1) coal-fired steam generator with a rated design capacity of 11,936 mmBtu/hr, one (1) oil-fired auxiliary boiler with a rated design capacity of 642 mmBtu/hr, one (1) oil-fired auxiliary boiler with a rated design capacity of 600 mmBtu/hr, various supporting operations such as coal handling and ash handling, and various tanks with insignificant emissions. 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

This renewal permit includes two minor modifications to permit R30-07900006-2010, MM02 and MM03. MM02 incorporates the requirements of Permit R13-2663D relating to the dry sorbent injection system which was installed for sulfur trioxide (SO₃) mitigation. MM03 incorporates the requirements of Permit R13-2663E for a voluntary heat input capacity limit on the two auxiliary boilers in order for the boilers to be defined as "Limited Use" boilers per 40 CFR 63 Subpart DDDDD.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	9,973.94	1443.58
Nitrogen Oxides (NO _x)	71,046.11	6,086.4
Particulate Matter (PM _{2.5})	1,648.77	86.38
Particulate Matter (PM ₁₀)	4,063.05	190.77
Total Particulate Matter (TSP)	6,599.74*	565.29 PM Filterable and PM Condensable
Sulfur Dioxide (SO ₂)	134,702.14	5,360.24
Volatile Organic Compounds (VOC)	993.54	183.34

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Beryllium	23.42	0.01
Hydrochloric Acid	21,580	49.95
Hydrogen Fluoride	1,874	10.16
Selenium	84.88	1.9
Total of other non-major HAP	33.5	0.22

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

** Note: The previous fact sheet had the PM PTE as 6,681,024 which contained a typo in that the last comma should have been a decimal point making the PTE 6,681.024 tpy*

Title V Program Applicability Basis

This facility has the potential to emit 119,582.19 tons per year of SO₂, 71,046.11 tons per year NO_x, 4,063.05 tons per year PM₁₀, 9,973.94 tons per year CO, 993.54 tons per year VOCs and 23,595.8 tons per year total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, John E. Amos Plant 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
45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers.
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
45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
45CSR30	Requirements For Operating Permits
45CSR33	Acid Rain Provisions And Permits
45CSR34	Emission Standards For Hazardous Air Pollutants
45CSR38	Provisions For Determination Of Compliance With Air Quality Management Rules
40 C.F.R 60, Subpart Y	Standards of Performance for Coal Preparation Plants
40 C.F.R. 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants
40 C.F.R. 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 C.F.R. Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
40 C.F.R. Part 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal- and Oil- Fired Electric Utility Steam Generating Units
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
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
40 C.F.R. Part 97, Subpart AAAAA	TR NO _x Annual Trading Program
40 C.F.R. Part 97, Subpart BBBBB	TR NO _x Ozone Season Trading Program
40 C.F.R. Part 97, Subpart CCCCC	TR SO ₂ Group 1 Trading Program
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.

State Only:

45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors
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CO-R2-E-2005-2	Consent Order Creating a Compliance Program for fugitive fly ash dust control systems.
WVDAQ Letter	Letter dated September 3, 2002 addressed to Mr. Greg Wooten and signed by Jesse D. Adkins regarding the thermal decomposition of boiler cleaning solutions.
WVDAQ Letter	Letter dated January 21, 2004 addressed to Mr. Frank Blake and signed by Jesse D. Adkins regarding the combustion of Demineralizer Resins.

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-480	March 8, 1979	
R13-2663E	September 1, 2015	
CO-E Consent Order No. CO-R2-E-2005-2-	February 8, 2005	
R33-3935-2017-4B	May 17, 2016	This permit is currently in the "Proposed" EPA comment period and is expected to be issued on May 17, 2016.
G60-C063	August 5, 2014	

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 December 28, 2010 and modified on March 27, 2015. A minor modification (MM02) application to R30-07900006-2010 was received on April 9, 2015 to incorporate the requirements of Permit R13-2663D relating to the dry sorbent injection (DSI) system which was installed for control of sulfur trioxide (SO₃). A minor modification (MM03) application was received on April 8, 2015 to incorporate the requirements of Permit R13-2663E for a voluntary heat input capacity limit on the two auxiliary boilers in order for the boilers to be defined as "Limited Use" boilers per 40 CFR 63 Subpart DDDDD. This renewal permit incorporates these minor

modifications. Substantial changes to the most recent version of the Title V Permit consist of the following:

1) Title V Boilerplate changes

- 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.
- Condition 3.5.3. - The USEPA address and office name were updated.

2) Section 1.0 changes:

- Revised the equipment table to reflect updates that have occurred and did not require any revisions to permit terms and conditions. Revisions include:
 - Revised the Emission Point IDs for Unit 1, Unit 2, and Unit 3 to reflect the new stack designations.
 - Removal of the Rotary Dump Coal Railcar Unloader and associated equipment.
 - Removal of Tanks #1, #5, #7 and #10.
 - Replacement of Tanks #4, #6 and #9.
 - Addition of Tanks #70 and #71.
 - In the “Dry Fly Ash Handling System” section, added Unit 3 Dry Fly Ash Fluidized Conveyors A3 and B3 which were installed under an off permit change (OP01) in 2012.

3) Section 2.0 changes:

- The permittee intends to demonstrate compliance with 40 C.F.R. 63Subpart UUUUU using low emitting EGU status for PM if it qualifies after sufficient performance testing; consequently, the acronym “LEE” has been used in multiple places in the permit. Therefore, the acronym has been added to permit section 2.2.

4) Section 3.0 changes:

- Condition 3.1.9. – This condition was previously “Reserved” and has been replaced with the subsequent condition. Likewise each condition after it has been renumbered.
- Conditions 3.1.10. and 3.1.11. (Previously 3.1.11. and 3.1.12.) – Since the requirements of these conditions are in a Rule 13 permit, “State-Enforceable only” has been deleted from the citation of authority.
- Condition 3.1.13. – This condition was previously “Reserved” and has been replaced with the subsequent condition. Likewise each condition after it has been renumbered.
- Condition 3.1.12. (Previously 3.1.14) – This condition contained the requirements of 45CSR39 (CAIR NO_x Annual Trading Program). Since CAIR has been replaced with the Transport Rule (TR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the “TR NO_x Annual Trading Program” of 40 C.F.R. §97.406. The requirements of the Transport Rule have been added in Appendix C of the permit.

- Conditions 3.1.13. (Previously 3.1.15) – This condition contained requirements of 45CSR40 (CAIR NO_x Ozone Season Trading Program). Since CAIR has been replaced with the Transport Rule (TR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the “TR NO_x Ozone Season Trading Program” of 40 C.F.R. §97.506. The requirements of the Transport Rule have been added in Appendix C of the permit.
- Conditions 3.1.14. (Previously 3.1.16) – This condition contained requirements of 45CSR41 (CAIR SO₂ Trading Program). Since CAIR has been replaced with the Transport Rule (TR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the “TR SO₂ Group 1 Trading Program” of 40 C.F.R. §97.606. The requirements of the Transport Rule have been added in Appendix C of the permit.

5) Section 4.0 changes:

- The Emission Point IDs for Unit1, Unit 2 and Unit 3 have been updated throughout Section 4 to reflect the new stack designations. “CS012” has been replaced with “1-E” for Unit 1 and “2-E” for Unit 2. “AM3” has been replaced with a “3-E” for Unit 3. No existing applicable requirements were affected.
- The requirements of R13-2663E (MM03) and 40 CFR 63 Subpart DDDDD (Boiler MACT) have been added to Section 4. See discussion below.
- The requirements of 40 CFR 63 Subpart UUUUU (MATS) have been added to Section 4 of the permit. See discussion below.
- Condition 4.1.17. – At the request of permittee, requirements associated with the NSR Consent Decree C2-99-1182 have been added to the Title V renewal permit as condition 4.1.17. The requirements previously as condition 4.1.17. are now condition 4.1.18. and the subsequent conditions have been renumbered accordingly. *Note – See “Response to Comments (Statement of Basis)” below for revisions to this condition.
- Condition 4.3.1. – Updated the testing results to reflect the most current test performed on March 6, 2014.
- Condition 4.5.5.a. – The Acid Rain Permit has been added to the permit as Appendix B. Therefore “(Acid Rain Permit is included in Appendix B)” has been added to this condition.
 - The Acid Rain Permit (R33-3935-2017-4B) included in the Draft Title V permit is currently under EPA’s comment period. The Final permit is expected to be issued on May 17, 2016 and therefore has been included without the WVDAQ director’s signature. Upon issuance of the Acid Rain permit, the Draft/Proposed Acid Rain permit will be replaced with the ‘Final’ Acid Rain permit in Appendix B of the Title V permit. This is expected to occur during the Title V Draft/Proposed period and prior to the issuance of the Final Title V permit.

6) Section 5.0 changes:

- The requirements of R13-2663D (MM02) for the DSI system for SO₃ control have been added to Section 5. See discussion below.

7) Appendix E:

- This appendix contained Compliance Order #CO-R37-C-2008-4 which held 45CSR37 requirements in abeyance because the federal Clean Air Mercury Rule (CAMR) had been vacated. 45CSR37 was repealed on June 1, 2009. Therefore this compliance order and Appendix E have been removed from the permit

- ❖ **Minor Modification MM02** – MM02 incorporates the requirements of Permit R13-2663D which was updated to satisfy the requirement of Paragraph 6 of Consent Order CO-E-2009-12. Paragraph 6, in part required a Rule 13 permit application for operation of the dry-sorbent injection ("DSI") system for sulfur trioxide ("SO₃") control for Units 1, 2 and 3 at the Amos plant. The requirements of R13-2663D have been incorporated in the Conditions 5.1.14., 5.1.20., 5.1.21., 5.2.12., 5.4.7. and 5.5.2. of the Title V permit. There is no change in potential emissions with this minor modification

- ❖ **Minor Modification MM03/ 40 C.F.R. 63 Subpart DDDDD** - MM03 incorporates the requirements of Permit R13-2663E which incorporates voluntary heat input capacity limits on the two auxiliary boilers (AUX 1 and AUX 3) in order to meet the definition of a "Limited Use" boiler per 40 CFR 63 Subpart DDDDD. The Requirements of Subpart DDDDD for "Limited Use" boilers have also been incorporated into the Title V permit. The requirements of R13-2663E and Subpart DDDDD for the Auxiliary boilers have been incorporated in conditions 4.1.23. through 4.1.28., 4.2.13., 4.4.5. through 4.4.8., 4.5.7. and 4.5.8.
 - Conditions 4.4.10. and 4.4.11 of Permit R13-2663E are requirements from a previous version of 40 C.F.R. 63 Subpart DDDDD (i.e., §63.7555(j) and §63.7555(i)). The revised version of Subpart DDDDD removed these requirements. Since these requirements are no longer in Subpart DDDDD and were included in R13-2663E only because they were Subpart DDDDD requirements at the time R13-2663E was issued, they have not been included in the Title V renewal permit.

 - The initial compliance date for AUX 1 and AUX 3 was January 31, 2016.
 - The requirement to comply with the applicable requirements of Subpart DDDDD by January 31, 2016 (i.e., R13-2663E, 4.1.21. and 40 CFR §63.7495(b)) has been satisfied and therefore not included in this renewal.

 - The requirement to complete an initial tune-up of AUX 1 and AUX 3 by January 31, 2016 (i.e., R13-2663E, 4.1.22. and 40 CFR §63.7510(e)) has been satisfied and therefore not included in this renewal.

 - The requirement to submit the "Notification of Compliance Status" containing results of the initial compliance demonstration (i.e., 40 CFR§63.7530(f)) has been satisfied and therefore not included in this renewal.

 - The change in potential emissions associated with this minor modification are as follows:

Regulated Pollutants	Potential Emissions (ton/year)
Carbon Monoxide (CO)	-204.00
Nitrogen Oxides (NO _x)	-979.19
Particulate Matter (PM ₁₀)	-40.77
Total Particulate Matter (TSP)	-81.60

Sulfur Dioxide (SO ₂)	-2,896.79
Volatile Organic Compounds (VOC)	-8.16

❖ **40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.**

- The Amos Plant is a major source of HAP because it has potential emissions in excess of 25 tpy for total HAP and/or potential emissions in excess of 10 tpy for any individual HAP. Therefore, 40 C.F.R. Part 63, Subpart DDDDD potentially applies to Unit 1, Unit 2 and Unit 3 steam generators and the two auxiliary boilers. The Unit 1, Unit 2 and Unit 3 steam generators are not subject to the Boiler MACT regulation per 40 C.F.R. §63.7491(a) because they are electric utility steam generating units (EGUs) covered by Subpart UUUUU of Part 63 (see discussion below below). The non-EGU auxiliary boilers are considered existing affected units under Subpart DDDDD because construction commenced on the units prior to June 4, 2010 and they have never been reconstructed. It should be noted that the Amos Plant has submitted a timely initial notification to WVDEP in accordance with 40 C.F.R §§ 63.7545(b) and 63.9(b) indicating that the auxiliary boilers are subject to 40 C.F.R. 63 Subpart DDDDD.

Each auxiliary boiler is an oil-fired non-EGU boiler. The boilers are used for heating, startup, and shutdown purposes. The nominal design heat input of boiler AUX 1 is 642 mmBtu/hr. The nominal design heat input of boiler AUX 3 is 600 mmBtu/hr. Permit R13-2663E, condition 4.1.19., limits the annual capacity of AUX 1 to no more than 10 percent by limiting the annual average heat input to 562,392 MMBtu per year and the maximum fuel rate to 128,400 gallons of fuel oil per day (condition 4.1.25.). Permit R13-2663E, condition 4.1.20., limits the annual capacity of AUX 3 to no more than 10 percent by limiting the annual average heat input to 525,600 MMBtu per year and the maximum fuel rate to 120,000 gallons of fuel oil per day (condition 4.1.26.). According to the definition in §63.7575, a *Limited-use boiler or process heater* means any boiler or process heater that burns any amount of solid, liquid, or gaseous fuels and has a federally enforceable average annual capacity factor of no more than 10 percent. The term *Annual capacity factor* means the ratio between the actual heat input to a boiler or process heater from the fuels burned during a calendar year and the potential heat input to the boiler or process heater had it been operated for 8,760 hours during a year at the maximum steady state design heat input capacity. Since the boiler has a federally enforceable operating limitation of 10 percent, it meets the definition of a Limited-use boiler for Subpart DDDDD and falls in that subcategory in §63.7499(o).

Since the auxiliary boilers are existing, the compliance date is January 31, 2016, according to §63.7495(b). See MM03 bullet above for initial compliance discussion.

❖ **40 C.F.R. 63 Subpart UUUUU – National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units**

- This regulation, also known as the “Utility Mercury and Air Toxics (MATS)” rule, applies to coal- and oil-fired EGUs as defined in §63.10042 of 40 C.F.R. Part 63. The Utility MATS rule establishes national emission limitations and work practice standards for mercury, acid gases, and filterable particulate matter, as well as requirements to demonstrate initial and continuous compliance with the emission limitations and work practice standards. Existing affected sources must comply with the requirements of Subpart UUUUU no later than April 16, 2015 (cf. §63.9984(b)). However, in accordance with §64.9984(f), compliance demonstration by conducting the required performance tests and other activities must be completed no later than 180 days after the compliance date.

The coal-fired Unit 1, Unit 2, and Unit 3 steam generators are existing EGUs as defined in §63.9982(d), and do not meet any of the exemption criteria in §63.9983. All three steam generators primarily combust coal with a heating value greater than 8,300 Btu/lb. The units are also capable of combusting fuel oil as a secondary fuel for startup, shutdown, and for flame stabilization. All three units meet the criterion of §63.9990(a)(1) for units combusting coal with a heating value greater than 8,300 Btu/lb, and as such do not combust low rank virgin coal.

➤ Compliance Approach - The permittee has conducted the initial compliance demonstration and submitted the results of the performance testing to DAQ. The test results are briefly discussed below for each pollutant. Additionally, the required NOCS has been submitted.

- *Filterable Particulate Matter (PM)*

The permittee has elected to comply with the 0.030 lb/MMBtu filterable particulate matter (PM) limitation (rather than Total non-Hg HAP metals, or Individual HAP metals). The initial performance testing was conducted in April of 2015 for all three boilers resulting in 0.0022 lb/MMBtu for Unit 1, 0.0015 lb/MMBtu for Unit 2, and 0.0020 lb/MMBtu for Unit 3. Continuous compliance will be demonstrated through quarterly stack tests in accordance with the procedures in 40 CFR 60 Appendix B Method 5, as modified in Table 2 of 40 CFR 63 Subpart UUUUU. Stack samples will be at least twice the method volume to allow the unit to be considered a low emitting EGU upon collection of enough data.

- *Sulfur Dioxide (SO₂)*

The permittee has elected to comply with the 0.20 lb/MMBtu sulfur dioxide (SO₂) limitation (rather than HCl) using SO₂ CEMS (which is the only compliance method for SO₂ as provided in Item #1 of Table 2 to Subpart UUUUU). The permittee currently operates an SO₂ CEMS in accordance with permit condition 4.2.2. Also, the permittee utilizes dry sorbent injection for flue gas desulfurization (FGD) as required under condition 4.1.9. The initial performance testing was conducted in May of 2015 for Units 1 and 3 and in July of 2015 for Unit 2 resulting in 0.053 lb/MMBtu for Unit 1, 0.054 for Unit 2 and 0.095 lb/MMBtu for Unit 3. Continuous compliance will be demonstrated using the SO₂ CEMS.

- *Mercury (Hg)*

The permittee has elected to comply with the 1.2 lb/TBtu mercury (Hg) limitation utilizing a paired sorbent trap monitoring system. The initial performance testing was conducted in May of 2015 for Units 1 and 3 and in July of 2015 for Unit 2 resulting in 0.972 lb/TBtu for Unit 1, 0.920 lb/TBtu for Unit 2, and 0.803 lb/TBtu for Unit 3. Continuous compliance will be demonstrated using the paired sorbent trap monitoring system.

- *Work Practice Standard for Tune-up of Burner & Combustion Controls*

The permittee will conduct a tune-up of the EGU burner and combustion controls at least each 36 calendar months as specified in 40 C.F.R. §63.10021(e).

- *Work Practice Standard for Startup & Shutdown*

The permittee will operate all continuous monitoring systems for the units during periods of *startup* and *shutdown* as those terms are defined in 40 C.F.R. §63.10042. (*The John E Amos Plant plans to utilize paragraph (1) of the start-up definition in §63.10042 for all three units*). During startup of a unit, clean fuel (defined in §63.10042) must be used for ignition. Once coal is fired, all of the applicable control technologies must be engaged. During shutdown of a unit, the permittee must operate all applicable control technologies while firing coal. The permittee must comply with all applicable emissions limits at all times except for periods that meet the definitions of startup and shutdown. All applicable requirements in Items #3 and #4 of Table 3 to Subpart UUUUU will be adhered to.

- Table UUUUU below lists the sections of Subpart UUUUU and their applicability (and non-applicability where necessary) to the EGU boilers, and discusses how applicable requirements are incorporated into the renewal operating permit.

Table UUUUU

Section	Title V	Discussion
Compliance Date		
§63.9984(b)	None.	The applicable compliance date for existing EGUs is April 16, 2015. Since the compliance date is past, and the initial compliance demonstration has been completed and the NOCS has been submitted, no permit condition is required
§63.9984(f)	None	This applicable requirement to demonstrate compliance within 180 days after the compliance date has been completed. No permit condition is required.
Emission Limitations and Work Practice Standards		
§63.9991(a)(1)	None	Requirements in Table 1 are not applicable since the units are existing.
	4.1.5.b.	From Table 2, emission limits in Item #1 for coal-fired unit not low rank virgin coal are applicable. Specifically, Item #1.a. emission limitations available are: Filterable particulate matter (PM); or Total non-Hg HAP metals; or Individual HAP metals. The permittee has elected to comply with filterable PM. Footnote 1 from Table 2 has been added at the end of the permit condition.
	4.1.7.b.	Table 2, Item #1.b. emission limitations are: Hydrogen chloride (HCl) or Sulfur dioxide (SO ₂). The permittee has elected to comply with sulfur dioxide. Since HCl is not applicable, footnote 3 in the regulation table is excluded from the permit condition. A reference specifically to the 45CSR10 limit in revised condition number 4.1.7.a. has been added to the first sentence in permit condition 4.1.8. to avoid applying this requirement to the Subpart UUUUU SO ₂ limit that applies to Units 1, 2 and 3. The Subpart UUUUU has its own requirements regarding demonstrating compliance with its limit.
	4.1.10.	Item #1.c. emission limitation is Mercury (Hg). The permittee has elected to comply using sorbent trap monitoring system; therefore, LEE testing has not been included.
	4.1.11.	Item #1 is an applicable work practice for tune-ups. According to the permittee a neural network is not utilized; therefore, the 48-month frequency is not specified in the permit condition. The specific elements of the tune-up in §§63.10021(e)(1) through (7) have been included in condition 4.1.11. Also, the corresponding recordkeeping and reporting requirements in §§63.10021(e)(8) and (9) have been included with the tune-up standard in subsection 4.1. so that when a tune-up is performed the recordkeeping and

Section	Title V	Discussion
§63.9991(a)(1)		reporting is not as likely to be inadvertently overlooked.
	None	Item #2 is not applicable since the units are existing.
	4.1.12.	Item #3 is an applicable work practice for startup. The facility will utilize paragraph (1) of the startup definition in Subpart UUUUU. Therefore the paragraph (2) definition of startup requirements are excluded from the permit. Further, the paragraph “b.” language regarding syngas is also excluded since it is not applicable. The last statement in paragraphs “a.” and “d.” mentions §63.10011(g), which is not applicable since the initial compliance demonstration has been completed. Therefore, “§63.10011(g)” has been excluded from the permit condition. The first statement in paragraph “d.” mentions §63.10020(e), which is not applicable since the permittee is complying utilizing the paragraph (1) definition of startup. Therefore, §63.10020(e) has been excluded from the permit condition.
	4.1.13.	Item #4 is an applicable work practice for shutdown. The non-applicable paragraph regarding syngas not fired in a combustion turbine is excluded.
§63.9991(a)(2)	None	This section requires compliance with applicable operating limits in Table 4. In Table 4, only item #1 could apply since the units are existing. However, the permittee indicated that it will comply with the PM limitation using stack testing. Therefore, this requirement regarding a PM CPMS is not included in the permit.
§63.9991(b)	None	There is no indication that the permittee has or will request an alternative to the work practice standard; therefore, no permit condition is written based upon this section of the regulation.
§63.9991(c)	4.1.7.b.	The section provides the criteria for electing to comply with the alternate SO ₂ limit in Table 2 to Subpart UUUUU. The permittee utilizes FGD technology, and also operates an SO ₂ CEMS. It may seem, then, that a permit requirement is unnecessary. However, §63.9991(c)(2) requires operation of the FGD system consistent with §63.10000(b), which is “At all times...” Thus, this is an ongoing requirement which is written with the SO ₂ limit in the permit condition.
General Compliance Requirements		
§63.10000(a)	4.1.5.b. 4.1.7.b. 4.1.10. 4.1.12. 4.1.13.	This general requirement to be in compliance with the emission limits and operating limits in Subpart UUUUU is cited after the emission limits and operating standards in the permit conditions.
§63.10000(b)	4.1.14.	This general duty requirement is applicable; therefore, it is written in the permit.
§63.10000(c)(1)(iv)	4.3.17.	This section sets out a procedure and criteria for initial performance testing and monitoring of continuous

Section	Title V	Discussion
		performance. The initial compliance demonstration has been completed. However, §63.10000(c)(1)(iv) specifies that if an EGU does not qualify for LEE status for PM, then the source “must monitor continuous performance through either use of a PM CPMS, PM CEMS, or for an existing EGU, compliance performance testing repeated quarterly.” Note that §63.10000(c)(1)(vi) is not included in the condition since the permittee is utilizing a Hg sorbent trap monitoring system instead of indicating that it intends to qualify for LEE status for Hg.
§63.10000(c)(2)	None	This section is not applicable since the units are coal-fired EGUs.
§63.10000(d)	None	This section is specifically applicable to utilizing a continuous monitoring system (CMS), including CEMS. While the permittee operates a CEMS, this requirement to develop a site-specific monitoring plan is specifically not applicable to affected sources with existing monitoring plans that apply to CEMS prepared under appendix B to part 60 or part 75. The permittee has a monitoring plan prepared under part 75; therefore, this requirement is not applicable.
§63.10000(e)	4.1.11.	This section requires periodic tune-ups to demonstrate continuous compliance; therefore, it is cited with the tune-up work practice condition written under §63.9991(a)(1).
§63.10000(f)	None	The units are EGUs and are subject to Subpart UUUUU; therefore, no permit condition is warranted.
§63.10000(g)	None	The units are EGUs and are subject to Subpart UUUUU; therefore, no permit condition is warranted.
§63.10000(h)	None	The units are EGUs and are subject to Subpart UUUUU; therefore, no permit condition is warranted.
§63.10000(i)	None	The units have been operating as EGUs; therefore, no permit condition is warranted.
§63.10000(j)	None	This section is not applicable since there are no newly applicable emissions limits which apply as a result of the cessation or commencement or recommencement of operations that cause the EGU to meet the definition of an EGU subject to Subpart UUUUU.
§63.10000(k)	None	This section is not applicable since there are no newly applicable emissions limits which apply as a result of the cessation or commencement or recommencement of operations that cause the EGU to meet the definition of an EGU subject to Subpart UUUUU.
§63.10000(l)	None	This section is not applicable because the permittee is not utilizing a monitoring system to demonstrate compliance with the work practice standards for PM or non-mercury HAP metals during periods of startup and shutdown.
§63.10000(m)	None	This section is not applicable since it applies to EGUs using the paragraph (2) definition of startup in §63.10042 and the permittee is utilizing the paragraph (1) definition.
§63.10000(n)	None	This section is not applicable since the EGUs combust

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		coal, and have not permanently converted to natural gas or biomass fuel.
§63.10001	None	This section formerly set forth affirmative defense provisions; however, the section is reserved in the current regulation.
Testing and Initial Compliance Requirements		
§63.10005(a)	None	This section provides requirements for initial compliance demonstrations using performance testing which is required for all EGUs. The permittee has completed the required initial compliance demonstration; therefore, no permit condition is warranted.
§63.10005(b)	None	This section provides requirements for performance testing specific to initial compliance demonstrations. The permittee has completed the required initial compliance demonstration performance testing; therefore, no permit condition is warranted.
§63.10005(c)	None	The EGUs are coal-fired and a PM CPMS is not utilized; therefore, this section does not apply.
§§63.10005(d) and (d)(1) - (d)(4)	None	<p>This section provides requirements for CMS specific to initial compliance demonstrations. The permittee has completed the required initial compliance demonstration utilizing an SO₂ CEMS; therefore, no permit condition is warranted.</p> <p>§63.10005(d)(2) is not applicable since initial performance testing has been completed, and a PM CPMS is not utilized.</p> <p>§63.10005(d)(4) is not applicable since the units are coal-fired.</p>
§63.10005(e)	None	This section requires a tune-up as part of the initial compliance demonstration. Since the initial compliance demonstration has been completed no permit condition is warranted.
§63.10005(f)	None	The permittee has completed the required initial compliance demonstration tune-up and dates specified in the section are past; therefore, no permit condition is warranted.
§63.10005(g)	None	This section does not apply since the units are existing.
§63.10005(h)	4.3.3.	This section establishes LEE requirements. The permittee may pursue this option after the required 3 years of testing. The applicable and elected requirements are incorporated into the operating permit.
§63.10005(j)	None	This section requires following the startup or shutdown requirements in Table 3 to Subpart UUUUU for each coal-fired EGU to demonstrate initial compliance with the emission limits and work practice standards. The permittee has completed the initial compliance demonstration and there are no ongoing requirements in this section of the regulation; therefore, this requirement is neither explicitly written in the permit, nor cited with

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		the startup and shutdown permit conditions 4.1.12. and 4.1.13., respectively.
§63.10005(k)	None	This section requires the NOCS; however, the permittee has already submitted the NOCS for both units. Therefore, no permit condition is warranted for this requirement.
§63.10006(a)	None	The permittee has not elected to utilize a PM CPMS; therefore, this requirement is not applicable.
§63.10006(b)	4.3.4.	Since the permittee is pursuing LEE status for PM this requirement has been written in the operating permit. The permittee is not pursuing LEE for Hg but instead is utilizing sorbent trap monitoring; therefore, the requirement in §63.10006(b)(2) is excluded from the permit condition.
§63.10006(c)	None	§63.10006(b) applies and the permittee has not elected to utilize a PM CPMS; therefore, this requirement is not applicable.
§63.10006(d)	None	§63.10006(b) applies and the permittee is utilizing an SO ₂ CEMS to monitor compliance with the alternate equivalent SO ₂ emission limit; therefore, this requirement is not applicable.
§63.10006(e)	None	§63.10006(b) applies and the units are coal-fired; therefore, this requirement is not applicable.
§63.10006(f)	4.3.5.	This section establishes performance testing intervals, which are applicable to the source.
§63.10006(g)	None	According to the NOCS the permittee is not using emissions averaging; therefore, this requirement is not applicable.
§63.10006(h)	4.3.6.	This section discusses testing intervals for non-mercury LEE units having a test showing greater than 50% of the emission limit where the source later reapplies for LEE status. This requirement is potentially applicable to the units since the permittee is pursuing LEE status for PM. It is noted that this requirement points to “performance tests at the appropriate frequency given in section (c) through (e) of this section”. However, §§63.10006(c) through (e) are not applicable (see discussions above). These sections make an exception for when §63.10006(b) is applicable. Therefore, the appropriate frequency (i.e., quarterly) is in §63.10006(b) instead of §§63.10006(c) through (e). This is reflected in the permit condition language.
§63.10006(i)	4.1.11.	This section requires a tune-up according to either a 36- or 48-month frequency depending upon use of neural network combustion optimization systems. The permittee stated that a neural network is not utilized; therefore, §63.10006(i)(1) has been written in the permit.
§63.10007(a)	4.3.7.	This applicable performance testing requirement IBR certain paragraphs of §63.7, and is written in the permit.
§63.10007(a)(1)	4.3.8.	This paragraph establishes performance testing requirements specific to collecting quality-assured CEMS

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		data when utilizing a CEMS to determine compliance with a 30-boiler operating day rolling average emission limit. The permittee utilizes an SO ₂ CEMS to comply with the elected SO ₂ limit, which according to §63.10005(a)(2) is based upon a 30-boiler operating day rolling average. Consequently, this section is applicable and is written in the operating permit. The pollutants not affected by this are excluded from the condition. Since the permittee is not performing emissions averaging, the reference to 90-boiler operating day average is excluded as well.
§63.10007(a)(2)	4.3.9.	This paragraph establishes performance testing requirements specific to test methods in lieu of continuous monitoring. Since the permittee will be stack testing to demonstrate compliance with PM, this paragraph is included in the operating permit.
§63.10007(a)(3)	None	This paragraph is not applicable since the permittee is not utilizing a PM CPMS.
§63.10007(b)	4.3.10.	This section requires compliance with applicable Table 5 requirements; therefore, it written in the operating permit. Since Table 5 provides testing specifications and methods, this reference is maintained without writing all of the various testing methods contained in Table 5 within this permit condition. This decision agrees with U.S. EPA guidance ¹ regarding IBR in operating permits.
§63.10007(c)	None	The requirements in this section are specific to the filterable PM emission limit and compliance using a PM CPMS. This paragraph is not applicable since the permittee is not utilizing a PM CPMS.
§63.10007(d)	4.3.11.	The substantive requirement of this section is three separate test runs for each performance test (except for 30-boiler operating day test based upon CEMS or sorbent trap monitoring system) and therefore applies to demonstrating compliance with the PM limit. Therefore, this requirement is included in the operating permit. The reference to Table 1 has been excluded since the units are existing.
§63.10007(e)	4.3.12.	This applicable requirement has been written in the permit, but the calculation methodologies in §§63.10007(e)(1)-(3) are IBR.
§63.10007(f)	4.2.14.	This paragraph establishes values for emission rate calculations during periods of startup and shutdown. Since the permittee utilizes an SO ₂ CEMS and Hg sorbent trap monitoring system, this requirement has been included in the operating permit. The language “the following default values” is changed to “the default values in §§63.10007(f)(1) and (2)” in order to IBR the default values.
§63.10007(g)	4.3.13.	This applicable recordkeeping requirement has been

¹ Refer to section II.E.2.c. of U.S. EPA’s White Paper Number 2 for Improved Implementation of the Part 70 Operating Permit Program (March 5, 1996), located at <http://www3.epa.gov/ttn/caaa/t5/memoranda/wtppr-2.pdf> and accessed by the writer on March 2, 2016.

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		written in the testing subsection (4.3.) of the permit so that when this subsection is read it will be understood that such records must be kept. Moreover, writing this requirement with the testing requirements of the regulation provides a better contextual understanding of the requirement as opposed to writing is by itself in the recordkeeping subsection (4.4.).
§63.10008	None	This section of the regulation is reserved.
§63.10009	None	The requirements in this section are specific to emissions averaging. Since the permittee is not using emissions averaging, this section is not applicable.
§63.10010(a)(1)	4.2.15.	<p>Unit 1, Unit 2 and Unit 3 each exhaust through their own individual stack. Therefore, all three units meet the criteria in §63.10010(a)(1), which is a <i>Single unit-single stack configuration</i>.</p> <p>The purpose of the requirement is to specify the location of several potentially applicable devices that may be utilized to demonstrate compliance. Therefore, this general requirement for this stack configuration has been included in the operating permit.</p>
§63.10010(a)(2)	None	This section is not applicable since an affected unit is not utilizing a common stack with one or more other affected units.
§63.10010(a)(3)	None	This section is not applicable since an affected unit is not utilizing a common stack with a non-affected unit.
§63.10010(a)(4)	None	This section is not applicable since an affected unit is not utilizing a main stack and a bypass stack.
§63.10010(a)(5)	None	This section is not applicable since an affected unit is not using a common control device with multiple stack or duct configurations.
§63.10010(a)(6)	None	This section is not applicable since an affected unit is not using multiple parallel control devices with multiple stacks.
§63.10010(b)	4.2.16.	The requirements in this section are specific to CEMS. Since the permittee utilizes an SO ₂ CEMS, the requirements have been included in the operating permit.
§63.10010(c)	4.2.17.	The requirements in this section are specific to certain compliance demonstration methodologies, one or more of which may be utilized by the permittee. Therefore, the requirement has been included in the operating permit.
§63.10010(d)	None	The requirements in this section are specific to certain compliance demonstration methodologies. The permittee's revised Attachments E that specified the applicability of subpart UUUUU requirements did not indicate that this paragraph is applicable. Apparently the permittee is not required to make corrections for stack gas moisture content. Therefore, these specific requirements have not been included in the operating permit.
§63.10010(e)	None	The requirements in this section are specific to HCl and

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		HF CEMS. Since the permittee has elected to comply with the alternative SO ₂ limit instead of HCl, and is not subject to an HF limit, these specific requirements are not included in the operating permit.
§63.10010(f)	4.2.18.	The requirements in this section are specific to SO ₂ CEMS; therefore, the requirements have been included in the operating permit.
§63.10010(g)	4.2.19.	The requirements in this section are specific to Hg CEMS or a sorbent trap monitoring system. Since the permittee uses a sorbent trap monitoring system for Hg, these specific requirements have been included in the operating permit.
§63.10010(h)	None	The requirements in this section are specific to PM CPMS. Since the permittee does not utilize a PM CPMS, these requirements are not applicable.
§63.10010(i)	None	The requirements in this section are specific to PM CEMS. Since the permittee does not utilize a PM CEMS, these requirements are not applicable.
§63.10010(j)	None	The requirements in this section are specific to complying with metal HAP emission limits using CEMS. Since the permittee has elected to comply with the PM limit, these specific requirements have not been included in the operating permit.
§63.10010(k)	None	The requirements in this section are not applicable since the units are coal-fired and are not subject to the HCl and HF emission limits.
§63.10010(l)	None	The permittee is not using a monitoring system to demonstrate compliance with PM or non-mercury metals; therefore, this requirement is not applicable.
§§63.10011(a)-(c)	None	These applicable requirements pertain to demonstrating initial compliance and do not set forth any ongoing requirements. The permittee has already fulfilled the initial compliance demonstration; therefore, no permit condition is warranted for these paragraphs.
§63.10011(d)	4.3.14.	This paragraph requires candidate LEE units to use results of initial performance testing to determine compliance with the applicable limit and to determine if the unit qualifies for LEE status. Since the LEE status determination is yet future and this requires the initial compliance results be used in that determination, then this section remains applicable and has been included in the operating permit.
§63.10011(e)	None	The permittee has already submitted the NOCS for both units; therefore, no permit condition is warranted.
§63.10011(f)	4.1.15.	This paragraph requires the permittee to determine the cleanest fuel for startup and shutdown; therefore, the requirement has been included in the operating permit.
§63.10011(g)	None	This section requires following the startup or shutdown requirements in Table 3 to Subpart UUUUU for each coal-fired EGU to demonstrate initial compliance with the emission limits and work practice standards. The

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		permittee has completed the initial compliance demonstration and there are no ongoing requirements in this section of the regulation; therefore, this requirement is neither explicitly written in the permit, nor cited with the startup and shutdown permit conditions 4.1.12. and 4.1.13., respectively.
Continuous Compliance Requirements		
§63.10020(a)	4.2.20. 4.2.21. 4.2.22.	This paragraph requires monitoring and data collection according to §63.10020 and the site-specific monitoring plan required by §63.10000(d). The site-specific monitoring plan requirements in §63.10000(d) are not applicable (see discussion above). However, the requirement to monitor and collect data according to this section is applicable. Therefore, any permit conditions written based upon applicable requirements in §§63.10020(b) through (e) will also cite this requirement in §63.10020(a).
§63.10020(b)	4.2.20.	This requirement is applicable to a “monitoring system”. Clearly this applies to the SO ₂ CEMS. Additionally, it has been determined that this paragraph applies to the Hg sorbent trap monitoring system for the following reasons: <ul style="list-style-type: none"> (i) The nomenclature “mercury sorbent trap monitoring system” describes it as a “monitoring system”; (ii) Another part of the regulation indicates that a Hg sorbent trap monitoring system is considered a CMS. Specifically, §63.10005(a)(2) reads, “To demonstrate initial compliance using either a CMS that measures HAP concentrations directly (i.e., an Hg, HCl, or HF CEMS, or a sorbent trap monitoring system) or an SO₂ or PM CEMS, the initial performance test consists of...”; and (iii) The title of this section of the regulation reads, “How do I monitor and collect data to demonstrate continuous compliance?” The sorbent trap monitoring system has been elected to demonstrate continuous compliance; therefore, it is subject to the requirements of this section of the regulation. For these reasons this requirement has been incorporated into the operating permit, and applicability to both SO ₂ CEMS and Hg sorbent trap monitoring systems has been specified after the citation of authority.
§63.10020(c)	4.2.21.	This requirement is applicable to the SO ₂ CEMS and Hg sorbent trap monitoring system based upon the same rationale given above for §63.10020(b).
§63.10020(d)	4.2.22.	This requirement is applicable to the SO ₂ CEMS and Hg sorbent trap monitoring system based upon the same rationale given above for §63.10020(b).
§63.10020(e)	None	The permittee has elected to comply under the paragraph (1) definition of “startup” in §63.10042; therefore, the requirements of this paragraph are not applicable and

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§63.10021(a)	<p>4.2.18.</p> <p>4.2.19.</p> <p>4.3.12.</p> <p>4.1.11.</p> <p>4.1.12.</p> <p>4.1.13.</p>	<p>have been excluded from the revised operating permit.</p> <p>This paragraph references requirements in Tables 6 and 7 and requires compliance with §§63.10021(b) through (g) as applicable.</p> <p>Table 6 is not applicable since the permittee does not utilize a PM CPMS.</p> <p>Items in Table 7 are applicable as follows:</p> <ul style="list-style-type: none"> • Item #1 applies to both the SO₂ CEMS and Hg sorbent trap monitoring system. This requirement in Table 7 is identical to that in §§63.10010(f) and (g) for SO₂ CEMS and Hg sorbent trap monitoring system, respectively. Therefore, this requirement will be cited with conditions 4.2.19. and 4.2.20. • Item #4 applies to the quarterly performance testing for PM. The requirement in §63.10007(e) is most congruent with this requirement. Therefore, instead of writing another separate permit condition, this requirement is included with permit condition 4.3.12. • Item #5 applies to the applicable required periodic tune-ups. • Item #6 applies to the applicable startup requirements. • Item #7 applies to the applicable shutdown requirements. <p>Items #2 and #3 are not applicable because the source neither utilizes a PM CPMS, nor is it a liquid oil-fired EGU complying with HCl or HF emissions limit monitoring, respectively.</p>
§63.10021(b)	4.2.23.	<p>The requirements in this section are applicable to the SO₂ CEMS and Hg sorbent trap monitoring system; therefore, the requirement is incorporated into the operating permit. Equation 8 is IBR.</p>
§63.10021(c)	None	<p>The requirements in this section are not applicable since the permittee does not utilize a PM CPMS.</p>
§63.10021(d)	4.3.15.	<p>The requirements in this section are specific to quarterly performance testing which is the elected compliance method for PM; therefore, the requirement is incorporated into the operating permit. References in the rule to Table 1 of Subpart UUUUU are excluded due to being non-applicable. The requirement §63.10021(d)(3) is excluded since it pertains to HCl and HF emission limits, which were not elected by the permittee.</p>
§63.10021(e)	4.1.11.	<p>The permittee is subject to the requirement to conduct periodic tune-ups of the affected units (condition 4.1.11.). The requirements of this section are included in the permit condition.</p>
§63.10021(f)	4.5.9.	<p>This section requires all reports under §63.10031, and is also applicable to different monitoring requirements based upon certain elected emission limitations.</p>

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§63.10021(g)	4.5.10.	This requirement to report instances of not meeting applicable requirements in Tables 1 through 4 of Subpart UUUUU is applicable. Specifically, only requirements in Tables 2 and 3 apply; therefore, this applicable section is written in the operating permit.
§63.10021(h)	4.1.16.	<p>This requirement pertains to startup and shutdown as given in Table 3.</p> <p>§63.10021(h)(1) provides for use of the diluent cap and default electrical loads described in §63.10007(f); therefore, it has been included in the operating permit.</p> <p>§63.10021(h)(2) requires the permittee to operate all CMS, collect data, calculate pollutant emission rates, and record data during startup periods or shutdown periods. As an applicable requirement, it has been included in the operating permit.</p> <p>§63.10021(h)(3) requires the permittee to report as required in §63.10031. As an applicable requirement, it has been included in the operating permit.</p> <p>§63.10021(h)(4) allows the permittee to submit an alternative non-opacity emission standard. The permittee did not indicate that it would exercise this option; therefore, this requirement is not included in the operating permit.</p>
§63.10021(i)	4.5.12.a.(1)	This section requires reports as specified in §63.10031 concerning activities and periods of startup and shutdown. There is no reporting explicitly written or referenced in §63.10031 pertaining to startup and shutdown. The only reference could be the requirement of §63.10031(c)(1), which IBR §63.10(e)(3)(vi). In this Subpart A section, under §63.10(e)(3)(vi)(I) is the mention of a breakdown of the total duration of excess emissions during the reporting period into those that, among other causes, are due to startup/shutdown. Thus, §63.10021(i) is cited with permit condition 4.5.12. as authority specifically for the requirement in permit condition 4.5.12.a.(1).
§§63.10022(a) and (b)	None	The requirements in these sections are specific to the emissions averaging provision. Since the permittee is not utilizing emissions averaging, these requirements are not included in the operating permit.
§§63.10023(a), (b), and (c)	None	The requirements in this section are specific to PM CPMS. Since the permittee is not utilizing a PM CPMS, these requirements are not included in the operating permit.
Notifications		
§63.10030(a)		This section requires submittal of all notifications in §§ 63.7(b) and (c), 63.8 (e), (f)(4) and (6), and 63.9 (b) through (h) that apply to you by the dates specified.

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	4.3.16.	§63.7 sets forth <i>Performance testing requirements</i> . Specifically, §63.7(b) requires a <i>Notification of performance test</i> at least 60 days before the test is initially scheduled to begin. Also, §63.9(e) sets forth the same <i>Notification of performance test</i> at least 60 days before the test. It is noted that §63.10030(d) specifies a 30-day notification period, which is more stringent than the 60-day notice of §§63.7(b) and 63.9(e). Therefore, a streamlining note has been added to the permit condition. Finally, since this requirement pertains to testing, it is written in the testing subsection of the permit.
	4.5.11.	§63.7(c) requires a <i>Quality assurance program</i> for performance testing. The site-specific test plan is required in condition 4.3.7. However, all other applicable notifications in §63.7(c) are IBR in condition 4.5.11.
	4.5.11.	§63.8(e) requires a performance evaluation of CMS. The specific notification is the <i>Notification of performance evaluation</i> in §63.8(e)(2) and <i>Submission of site-specific performance evaluation test plan</i> in §63.8(e)(3), and <i>Reporting performance evaluation results</i> in §63.8(e)(5). Instead of writing these specific Subpart A requirements in the permit, they are effectively made requirements via IBR in condition 4.5.13.
	None	§§63.8(f)(4) and (6) are not applicable since neither an alternative monitoring method, nor an alternative to the relative accuracy test is requested in the application.
	None	Among §§63.9(b) through (h), only the NOCS requirement of §63.9(h) is applicable. However, the NOCS for both units has already been submitted; therefore, this requirement is not included in the operating permit.
§63.10030(b)	None	This Initial Notification requirement is applicable since the EGU started up before April 16, 2012. DAQ received the initial notification from the permittee on August 22, 2012, thereby missing the deadline set in the regulation. However, the notification states that an inadvertent oversight resulted in the submittal being late. There are no further requirements pertaining to this section of the regulation; therefore, no permit condition is necessary.
§63.10030(c)	None	This section is not applicable since the units are not new or reconstructed.
§63.10030(d)	4.3.16.	This 30-day notification requirement replaces the 60-day notification requirement in §63.7(b) discussed above concerning §63.10030(a). The requirement to provide 30-day notification of intent to conduct a performance test is applicable; therefore, it is included in the permit.
§63.10030(e)	None	This section requires submittal of an NOCS since the permittee was required to conduct an initial compliance demonstration. However, the NOCS for each of the three units has already been submitted; therefore, the

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		requirements of this section are not included in the operating permit.
§63.10030(f)	None	The section requires notifications under §§63.10000(h)(2) and (i)(2), which have already been determined to be non-applicable. Nevertheless, it is not expected that the permittee’s EGU will on its own cease being an EGU to which MATS does not apply. At this time, no permit condition is warranted for this requirement.
Reports		
§63.10031(a)	4.5.12.a. 4.5.12.b. 4.5.12.c.	The applicable requirement in Table 8, Item #1, is the Compliance report; therefore, it is included in the permit.
§§63.10031(b)(1)-(5)	4.5.13.	This applicable requirement establishes the schedule for submitting each report in Table 8 to Subpart UUUUU, which is the compliance report. Therefore, this applicable section has been written in the permit.
§§63.10031(c)(1)-(9)	4.5.12.a.	<p>This section specifies part of the contents of the compliance report; therefore, it has been included in the compliance report condition.</p> <p>The permittee has elected to comply under the paragraph (1) definition of “startup” in §63.10042; therefore, the requirements of §63.10031(c)(5) are not applicable and have been excluded from the renewal operating permit.</p> <p>§63.10031(c)(6) requires reporting of emergency bypass information annually from EGUs with LEE status. Since the permittee intends to be a candidate for LEE status for PM this requirement is included in the permit. Refer to permit condition 4.5.12.a.(6).</p> <p>§63.10031(c)(7) through (9) are applicable; therefore, they have been included in the permit as conditions 4.5.12.a.(7) through (9).</p>
§63.10031(d)	4.5.12.d.	This section specifies part of the contents of the compliance report; therefore, it has been included in the compliance report condition.
§63.10031(e)	4.5.14.	This section requires reporting of all Subpart UUUUU deviations in the semiannual monitoring report required in condition 3.5.6. Therefore, this requirement has been written in the permit.
§63.10031(f)	4.5.15.	This section requires reporting performance test results to EPA’s WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is access through EPA’s Central Data Exchange (CDX) (www.epa.gov/cdx). This paragraph has been incorporated into the operating permit. Since this paragraph contains details about submitting CBI, and addresses to send CBI on electronic media, much of this paragraph has not been included in the permit condition. Instead, it has been incorporated by reference (IBR) by

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		referring to this section of the regulation. §63.10031(f)(2) is not applicable since no PM CPMS is utilized. Even though the NOCS has already been submitted, §63.10031(f)(4) has been included since it also covers submittal of compliance reports, which is an ongoing requirement.
§63.10031(g)	4.5.12.e.	This section specifies part of the contents of the compliance report; therefore, it is included in the compliance report condition.
Records		
§63.10032(a)	4.4.11.	This section is applicable since it applies to notifications and reports required to comply with Subpart UUUUU, and it applies to records of stack tests, fuel analyses, and other compliance demonstrations and evaluations under Subpart UUUUU.
§63.10032(b)	4.4.12.	The requirements in this section are specific to CEMS and CPMS. Since the permittee utilizes an SO ₂ CEMS this requirement is incorporated into the operating permit.
§63.10032(c)	4.4.13.	This section requires keeping of records in Table 7 to Subpart UUUUU, including records of all monitoring data and calculated averages for applicable PM CPMS operating limits. The applicable items in Table 7 have been analyzed in the above discussion of §63.10021(a), which are items 1 and 4 through 7 (SO ₂ CEMS, Hg sorbent trap monitoring system, quarterly testing for PM, periodic tune-ups, startup work practices, and shutdown work practices). Compliance with these requirements are specified in conditions 4.1.11. through 4.1.13.
§63.10032(d)	4.4.14.	Since the units are subject to an emission limit, the recordkeeping requirements of this section are applicable.
§63.10032(e)	None	The requirements in this section are specific to the emissions averaging option under §63.10009. Since the permittee is not utilizing emissions averaging, these requirements are not included in the operating permit.
§63.10032(f)	4.4.15.	This applicable requirement to keep records of startups and shutdowns has been included in the operating permit. Since the permittee will comply under the paragraph (1) definition of startup, language in §§63.10032(f)(2) is not applicable. The proposed requirements in §63.10032(f)(1) have been included in the revised operating permit condition.
§63.10032(g)	4.4.16.	This applicable requirement to keep records of malfunctions of an operation, and air pollution control and monitoring equipment is included in the permit.
§63.10032(h)	4.4.17.	This applicable requirement to keep records of actions taken during periods of malfunction to minimize emissions is included in the operating permit.
§63.10032(i)	4.4.18.	This applicable requirement to keep records of fuel types and amounts during each startup or shutdown is included in the operating permit.

Section	Title V	Discussion
§63.10032(j)	None	This requirement is not applicable since the unit does not fire liquid oil, and does not qualify as a limited-use oil-fired EGU.
Format and Retention of Records		
§§63.10033(a), (b), and (c)	4.4.9.	<p>These requirements are identical to those in 40 C.F.R. 63 Subpart DDDDD (applicable to Auxiliary Boilers), with only the following exception shown below in bold font:</p> <p>§63.10033(c) reads “You must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records off site for the remaining 3 years.”</p> <p>While §63.7560(c) reads “You must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records off site for the remaining 3 years.”</p> <p>The Subpart UUUUU requirement could be interpreted as more stringent; however, the difference between the two requirements is negligible. The main point of the requirement is that the records be available, on site, for the first 2 years after they are generated. If the record is in paper form, it must be on site (and therefore meet the requirement of Subpart UUUUU). If the record is electronic, it still is on site by being accessible at the site (thus meeting Subpart UUUUU). Therefore, the requirements of both MACTs are combined into one condition, and redundancy is avoided in this case.</p>

- ❖ **40 C.F.R. 97 Subparts AAAAA, BBBBB, and CCCCC – Transport Rule (TR) Requirements.** These requirements have been incorporated into the operating permit by replacing the CAIR (45CSR39, 45CSR40, 45CSR41) requirements and CAIR application that were previously in permit conditions 3.1.14. through 3.1.16., and permit Appendix D

Non-Applicability Determinations

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

45CSR5	<i>To Prevent And Control Air Pollution From The Operation Of Coal Preparation Plants, Coal Handling Operations And Coal Refuse Disposal Areas:</i> Pursuant to 45CSR5, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR5. 45CSR2 is applicable to the facility.
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45CSR17	<i>To Prevent And Control Particulate Matter Air Pollution From Materials Handling, Preparation, Storage And Other Sources Of Fugitive Particulate Matter:</i> Pursuant to 45CSR17, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR17. 45CSR2 is applicable to the facility.
40 C.F.R. 60 Subpart D	<i>Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction is Commenced After August 17, 1971:</i> The fossil-fuel-fired steam generators potentially affected by this rule have not commenced construction or modification after August 17, 1971.
40 C.F.R. 60 Subpart Da	<i>Standards of Performance for Electric Utility Steam Generating Units for which Construction is Commenced After September 18, 1978:</i> The electric utility steam generating units potentially affected by this rule have not commenced construction or modification after September 18, 1978.
40 C.F.R. 60 Subpart K	<i>Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 18, 1978:</i> The facility does not have storage vessels that are used to store petroleum liquids (as defined in 40 CFR §60.111(b)) and that have a storage capacity greater than 40,000 gallons for which construction, reconstruction or modification was commenced after June 11, 1973 and prior to May 19, 1978.
40 C.F.R. 60 Subpart Ka	<i>Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984:</i> The facility does not have storage vessels that are used to store petroleum liquids (as defined in 40 CFR §60.111a(b)) and that have a storage capacity greater than 40,000 gallons for which construction, reconstruction or modification was commenced after May 18, 1978 and prior to July 23, 1984.
40 C.F.R. 60 Subpart Kb	<i>Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23,1984:</i> Storage vessels potentially affected by this rule are exempted because they contain liquids with a maximum true vapor pressure of less than 3.5 kPa, have a storage capacity of less than 75 cubic meters, or have not commenced construction, reconstruction or modification after July 23, 1984.
40 C.F.R. 60 Subpart Y	<i>Standards of Performance for Coal Preparation Plants:</i> The coal handling equipment potentially affected by this rule, except for the two crushers “CR-70E” and “CR-70W,” has not been constructed or modified after October 24, 1974. The Putnam Terminal coal handling equipment was constructed after October 24, 1974 but does not prepare coal by any of the processes listed in 40 CFR §60.251(e) and therefore is not defined as a “coal preparation and processing plant.”
40 C.F.R. 63 Subpart Q	<i>National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers:</i> This facility does not include industrial process cooling towers that are operated with chromium-based water treatment chemicals.

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: May 14, 2016
Ending Date: June 13, 2016

Point of Contact

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

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Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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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)

- 1). Comments submitted by Mr. Gregory J. Wooten of American Electric Power were received via e-mail on June 8, 2016.
 - **The first comment** was a request to separate the auxiliary boiler requirements from the main boilers due to the implementation of 40 CFR 63 Subpart UUUUU (EGU) MACT and 40 CFR Subpart DDDDD (IB) MACT and the increased complexity of the permit conditions related to the boilers.
 - As a result of this comment request, the auxiliary boiler requirements have been moved to Section 5 of the permit. The “Material Handling” requirements (previously Section 5), have been moved Section 6 and the “Black Start Emergency Generators” requirements (previously Section 6) have been moved to Section 7. There are no changes in any of the applicable requirements. The requirements have only been rearranged. Below is a description of the Section 4 and 5 changes and tables outlining the permit condition numbering changes:
 - Added “Main” to the Section 4 title and deleted emission point IDs, “Aux AM1, and Aux AM3
 - 4.0.1. has been copied and added as 5.0.1. The auxiliary boiler language has been deleted from 4.0.1.b. and the main boiler language has been deleted in 5.0.1.
 - 4.1.1 & 4.1.2. have been copied and added as 5.1.1. and 5.1.2.
 - 4.1.18 - 4.1.28. have been deleted and added in Section 5 as 5.1.3 - 5.1.13
 - 4.2.4. and 4.2.5. have been deleted and added in Section 5 as 5.2.1. and 5.2.2. Subsequent conditions in Section 4.2. have been renumbered.

- 4.2.13. has been deleted and added in Section 5 as 5.2.3. Subsequent conditions in Section 4.2. have been renumbered.
- 4.4.1. & 4.4.2. have been copied and added as 5.4.1 and 5.4.2.
- 4.4.5. and 4.4.6. have been deleted and added in Section 5 as 5.4.3- 5.4.4. Subsequent conditions in Section 4.4. have been renumbered.
- 4.4.7. (*Renumbered to 4.4.5.*) has been copied and added as 5.4.5. The Subpart DDDDD references in 4.4.7. have been deleted from the text and from the citation of authority. “45CSR13, R13-2663, 4.4.12.” has been deleted from the citation of authority in 4.4.7. Likewise, the Subpart UUUUU references in 5.4.5. have been deleted from the text and from the citation of authority.
- 4.4.8. has been deleted and added in Section 5 as 5.4.6. Subsequent conditions in Section 4.4. have been renumbered.
- 4.5.2., 4.5.3. and 4.5.4. have been copied and added as 5.5.1., 5.5.2. and 5.5.3. References to Aux 1 and/or Aux 3 have been deleted from the 4.5 requirements and references to Unit 1, Unit 2, and/or Unit 3 have been deleted in the 5.5 requirements. The “I.B.4” reference to the approved monitoring plan has been deleted in 4.5.2. Likewise, the “I.A.4” and “II.A.4” have been deleted in 5.5.5.
- 4.5.7. and 4.5.8. have been deleted and added in Section 5 as 5.5.4. and 5.5.5. Subsequent conditions in Section 4.5. have been renumbered.
- Since Section 4 now contains requirements only for Unit 1, Unit 2 and Unit 3, the conditions previously designated as requirements only for the main boilers with the designation “(Unit 1, Unit 2 and Unit 3)” have been revised to remove the designation.
- The following table shows the change in Section 4 and Section 5 condition re-numbering resulting from moving the Auxiliary boiler requirements to Section 5 of the permit

Permit Condition Numbering Changes

Main Boiler Conditions Remaining in Section 4			Auxiliary Boiler Conditions Moved From Section 4 to Section 5		
Old		New	Old		New
4.1.1 through 4.1.17.	-----	No Change	4.1.18.	-----	5.1.3.
			4.1.19.	-----	5.1.4.
			4.1.20.	-----	5.1.5.
			4.1.21.	-----	5.1.6.
			4.1.22.	-----	5.1.7.
			4.1.23.	-----	5.1.8.
			4.1.24.	-----	5.1.9.
			4.1.25.	-----	5.1.10.
			4.1.26.	-----	5.1.11.
			4.1.27.	-----	5.1.12.
			4.1.28.	-----	5.1.13.
			4.2.4.	-----	5.2.1.
			4.2.5.	-----	5.2.2.
			4.2.13.	-----	5.2.3.
			4.4.5.	-----	5.4.3.
			4.4.6.	-----	5.4.4.
			4.4.8.	-----	5.4.6.

Permit Condition Numbering Changes

Main Boiler Conditions Remaining in Section 4		
Old		New
4.2.21.	-----	4.2.18.
4.2.22.	-----	4.2.19.
4.2.23.	-----	4.2.20.
Section 4.3	-----	No Change
4.4.7.	-----	4.4.5.

4.4.9.	-----	4.4.6.
4.4.10.	-----	4.4.7.
4.4.11.	-----	4.4.8.
4.4.12.	-----	4.4.9.
4.4.13.	-----	4.4.10.
4.4.14.	-----	4.4.11.
4.4.15.	-----	4.4.12.
4.4.16.	-----	4.4.13.
4.5.9.	-----	4.5.7.
4.5.10.	-----	4.5.8.
4.5.11.	-----	4.5.9.
4.5.12.	-----	4.5.10.
4.5.13.	-----	4.5.11.
4.5.14.	-----	4.5.12.
4.5.15.	-----	4.5.13.

Auxiliary Boiler Conditions Moved From Section 4 to Section 5		
Old		New
4.5.7.	-----	5.5.4.
4.5.8.	-----	5.5.5.

Conditions Common to Main and Auxiliary Boilers and Copied to Section 5		
4.0.1.	-----	5.0.1.
4.1.1.	-----	5.1.1.
4.1.2.	-----	5.1.2.
4.4.1.	-----	5.4.1.
4.4.2.	-----	5.4.2.
4.4.5.*	-----	5.4.5.
4.5.2.	-----	5.5.1.
4.5.3.	-----	5.5.2.
4.5.4.	-----	5.5.3.
*(4.4.7.)Old numbering		

Note: To correlate the condition numbers in Sections 4 and 5 of the Final Permit, to the Permit condition numbers of the Draft Permit, referenced in the “Determinations and Justifications” portion of this fact sheet, use the change in numbering tables above.

- **The second comment** was to update the tank information and to add additional tanks in the equipment table. This request is a result of development and implementation of the new storage tank rules under the WVDEP Division of Water and Waste Management and in conjunction with the review of the Title V renewal permit.
 - As a result of this request the “Emission Unit Description” and/or “Year Installed” and/or “Design Capacity” have been revised for the following tanks: #8, #12, #13, #14, #22, #24, #28, #29, #33, #49 - #54, #60 - #62, #64 and #69. These revisions do not trigger any new applicable requirements.
 - The Equipment Table was also expanded to add Tanks #72 through #101. These tanks do not trigger any new applicable requirements.
- 2). Comments submitted by the USEPA were received via e-mail on June 27, 2016. The following are the comments verbatim, and responses describing the revisions made to the Permit and Fact Sheet as a result of the comments.

➤ **Comment**

Section 4.1.7 of the permit provides for the combined total sulfur dioxide emissions from Unit 1 & 2 stack (1-E, 2-E) and Unit 3 stack (3-E) not to exceed 29,428 lb/hr. Multiplying this value by 8760 operating hours yields an annual value of 128,894 TPY. This conflicts with the facility-wide potential SO₂ emissions listed on page 2 which is 119,582.19 TPY. This conflict needs to be resolved.

Response

After further review, it appears that the facility wide potential SO₂ emissions were incorrect in the 2010 renewal application and therefore incorrect in the fact sheet for the 2010 renewal and carried forward. The 2016 renewal fact sheet has been updated with the corrected facility wide potential SO₂ emissions of 134,702.14.

➤ **Comment for Condition 4.1.9**

Region 3 wants to highlight the fact that EPA has revised its guidance concerning its interpretation of the Clean Air Act (CAA or Act) requirements with respect to treatment in SIPs of excess emissions that occur during periods of SSM. Due to recent court decisions addressing this issue. The EPA issued a finding that certain SIP provisions in 36 states (including WV) are substantially inadequate to meet CAA requirements which resulted in a “SIP call” issued for each of those 36 states to submit corrective SIP revisions. EPA has updated its SSM Policy as it applies to SIP provisions. The SSM Policy provides guidance to states for compliance with CAA requirements for SIP provisions applicable to excess emissions during SSM events. EPA understands that until WV revises its SIP with regards to SSM, EPA cannot object to permits having SSM exemption language in them. The agency should ensure that applicable requirements are added to the permit after applicable regulations satisfying the Federal SIP Call have been included in the SIP and approved by EPA.

Response

Since this requirement is not from a SIP approved state or federal regulation, the SSM exemption has been removed from condition 4.1.9.

➤ **Comment for Condition 4.1.17.**

As noted, this condition incorporates some of the substantive requirements of EPA's consent decree with AEP. Any term or limit established by or under the consent decree shall be enforceable under the consent decree regardless of whether such term or limit has or will become part of a Title V permit. Additionally, the inclusion of some of the consent decree elements in this Title V permit does not satisfy AEP's obligation under paragraph 180 of the consent decree to obtain the necessary federally-enforceable non-Title V permits to incorporate the terms and conditions under the consent decree into a state and federally-enforceable legal instrument to allow for subsequent inclusion into AEP's Title V permit. In other words, AEP must apply to West Virginia for a Regulation 13 permit that includes all of the relevant and identified consent decree requirements. That new Regulation 13 permit will establish the appropriate authority for WVDEP to then incorporate those terms as applicable requirements into AEP's Title V permit (as required by the consent decree at paragraph 179.)

Response

Although these requirements are not currently contained in a Rule 13 permit, the permittee has requested that they be included in this renewal. The citation of authority includes 45CSR§30-12.7. 45 CSR§30-12.7. states “*The Secretary may incorporate any provision into a permit which has been proposed by or agreed to by a permit applicant and which does not conflict with any applicable requirement. All such provisions shall be enforceable after issuance of a final permit.*” To clarify that the authority for including these requirements in this renewal permit is from 45CSR§30-12.7, references to the Consent Decree “C2-99-1182”

have been removed from the citation of authority and from the requirements. West Virginia was not an intervener in this action and at this point in time is not making any determinations on whether or not AEP has satisfied the conditions of the Consent Decree.

➤ **Comment for Condition 4.2.5.**

The frequency of thiw test should be indicated in the permit.

Response

This requirement was part of the 2010 renewal permit and has been satisfied and hence no longer an applicable requirement. Therefore, the requirements of this condition have been deleted and replaced with "Reserved."

➤ **Comment for Condition 6.1.5.**

Identiy each baghouse by assigning it a numbr providing a description and location.

Response

"(Emission Points 6E, 7E, 8E, 11E, 12E, and 15E)" has been added to this requirement after R13-2663E.

➤ **Comment for Condition 6.3.1.**

The term, " sufficient time interval" Should be replacsd with a minimum specified time limit to determine if any visible emissions are present.

Response

"(a minimum of 1 minute)" has been added after the word "interval."

➤ **Comment for Condition 7.1.9.**

Insert the particular equirements in this permit

Response

"(i.e., per-gallon - 15 ppm maximum sulfur content; and a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.)" has been added to this requirement.

➤ **Comment for Monitoring Plan Section II.A.2.b.**

Monitoring Plan Section II.A.2.b. - It should be clearly worded in this monitoring plan that other creditable methods used to monitor SO2 mass emissions from the three flues should be used only if CEMS data cannot be obtained due to malfunction or maintenance of the system if the system cannot be maintained without removing it from service. There should be language requiring that in the event of a malfunction, the data acquisition system be repaired and or corrected as soon as practible

Response

The Amos main boilers are classified as type 'a' fuel burning units. Pursuant to 45CSR§10A type 'a' fuel burning units are required to use a CEMS to satisfy the requirements of an approved monitoring plan. Therefore this section of the monitoring plan cannot be implemented. The WVDAQ has requested that the permittee revise the monitoring plan to delete Section II.A.2.b. It will then be deleted from the Title V permit.