

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 15, 2014.

Permit Number: **R30-05300009-2014**
Application Received: **3/20/15(MM01), 7/20/15(SM01)**
Plant Identification Number: **05300009**
Permittee: **Appalachian Power Company**
Facility Name: **Mountaineer Plant**
Mailing Address: **1 Riverside Plaza, Columbus, OH 43215**

Permit Action Number: *MM01 and SM01* Revised: *Draft/Proposed*

Physical Location: New Haven, Mason County, West Virginia
UTM Coordinates: 419.04 km Easting • 4314.70 km Northing • Zone 17

Directions: From Charleston take Interstate 77 North to Exit 138. Travel west on Route 62 approximately 24 miles to New Haven. Facility is located on the right one mile east of New Haven in Mason County.

Facility Description

The Mountaineer Plant is a fossil fuel fired electric generation facility and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of one (1) coal-fired steam generator with a rated design capacity of 11,960 mm Btu/hr, two (2) oil-fired auxiliary boilers with a rated design capacity of 598 mm Btu/hr each, 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 permit includes minor modification (MM01) which incorporates changes from R13-0075H. R13-0075H limits the annual heat input capacity on the two auxiliary boilers (Emission Unit IDs- 2S and 3S) to

10% or less in order to meet the definition of "Limited Use" boiler per 40 CFR 63 Subpart DDDDD. This limit on the heat input capacity was requested to begin on January 31, 2016.

This permit also includes significant modification (SM01) which incorporates the new requirements of 40 CFR 63 Subpart UUUUU (EGU MATS rule).

Emissions Summary

The change in potential emissions associated with the minor modification (MM01) is as follows:

Pollutants	Change in Potential Emissions, TPY
CO	-224.18
NO _x	-902.7
PM ₁₀	-49.64
SO ₂	-3,204.06
VOC	-9.12

Title V Program Applicability Basis

This facility has the potential to emit 76,090 tons per year of SO₂, 45,247.3 tons per year NO_x, 2,445.36 tons per year PM₁₀, 1,670.82 tons per year CO, 215.88 tons per year VOC, more than 10 tons per year of a single hazardous air pollutant (HAP), and more than 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Mountaineer 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Control of particulate matter emissions from indirect heat exchangers.
	45CSR10	Control of sulfur dioxide emissions from indirect heat exchangers.
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary sources
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants
	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

State Only: None

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 (if any)
R13-0075H	8/14/2015	

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

I. Minor modification (MM01)

- The company utilizes two (2) 598 mmbtu/hr oil fired auxiliary boilers (Emission Unit IDs- 2S and 3S) to provide steam during startups, shut downs and maintenance outages. These boilers are subject to 40 CFR 63 Subpart DDDDD (boiler MACT for major sources). They have a compliance date of January 31, 2016 for existing sources. The rule includes a category for limited use boilers. Boilers in this category have no numeric emission limits and are not subject to any stack testing requirements. They are only required to conduct an initial tune up and subsequent tune ups every five years. To be eligible, the source must obtain a federally enforceable permit to limit the unit's annual capacity factor to 10% or less. R13-0075H limits the annual heat input capacity on the two auxiliary boilers to 10% or less to meet the definition of limited use boiler. The minor modification (MM01) incorporates changes from R13-0075H which are as follows:
 - Conditions 4.1.18, 4.1.20, 4.1.22, 4.1.24 and 4.1.25 were updated for new emission limits of PM₁₀, NO_x, SO₂, CO, and VOC (beginning January 31, 2016).
 - Condition 4.1.26 was changed from a maximum 1% sulfur content limit to a maximum sulfur content limit of 0.5% to be consistent with emission calculations.
 - Condition 4.1.32 was added to limit the two auxiliary boilers to an annual capacity factor of 10%.
 - Conditions 4.1.30 and 4.1.31 were added to incorporate requirements from 40 CFR 63 Subpart DDDDD.

- Condition 4.2.2 was changed to add a requirement to monitor monthly fuel feed rate and fuel heat content for the auxiliary boilers.
- Conditions 4.4.6 through 4.4.9 were added. Condition 4.4.6 requires records of the monthly fuel feed rate and heat content for the auxiliary boilers. Conditions 4.4.7 through 4.4.9 incorporate 40 CFR 63 Subpart DDDDD recordkeeping requirements.
- Condition 4.1.29 was deleted because the company has completed all initial compliance demonstration and performance testing for Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR 63, Subpart DDDDD and has reported the results to the agency.
- Additionally, conditions 4.5.8, 4.5.9, and 4.5.10 include reporting requirements from 40 C.F.R. Part 63, Subpart DDDDD which were not contained in R13-0075H.

II. The significant modification (SM01) includes the following changes to incorporate the requirements of 40 C.F.R 63, Subpart UUUUU:

40 C.F.R. Part 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 HAP, as well as requirements to demonstrate initial and continuous compliance with the emission limitations and work practice standards.

Affected Steam Generating Units & Applicable Emission Standards

Unit1 (1S) meets the definition of EGU in §63.10042 and is subject to Subpart UUUUU. The boiler is considered an existing affected unit under Subpart UUUUU because construction commenced on this unit prior to May 3, 2011 and it has never been reconstructed (cf. §63.9982(d)). Unit1 (1S) does not meet any of the exemptions in §63.9983.

Unit1(1S) does not fire non-agglomerating virgin coal and hence by definition this unit is considered part of the “Unit designed for coal $\geq 8,300$ Btu/lb” subcategory of affected units as defined in 40 C.F.R. §63.10042 and specified in §63.9990(a)(1). This subcategory is subject to emission limits for the following pollutants per Table 2 of Subpart UUUUU:

- Particulate matter or total non-mercury HAP metals or individual HAP metals
- Hydrogen chloride or sulfur dioxide
- Mercury

In addition to emission limits, the regulation also mandates work practice standards that require a periodic tune-up of the burner and combustion controls and impose certain startup and shutdown requirements. A semi-annual report must be submitted to USEPA and WVDAQ documenting compliance with the requirements and containing other information as specified in the rule.

Compliance Approach

Filterable Particulate Matter (PM)

According to NOCS (dated July 16, 2015), 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 permittee must conduct emissions testing quarterly, except as otherwise provided in §63.10021(d)(1).

Sulfur Dioxide (SO₂)

According to NOCS (dated July 16, 2015), 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 conditions 4.2.1. and 4.2.4. Also, the permittee utilizes limestone injection for flue gas desulfurization (FGD). However, there is no current permit condition that specifically requires the permittee to operate the FGD. The SO₂ limitation may be used only if the FGD criteria in §§63.9991(c)(1) and (2) are met; therefore, as part of the condition for the SO₂ limit will be the requirement to operate the FGD in accordance with §§63.9991(c)(1) and (2), which references §63.10000(b).

Mercury (Hg)

According to NOCS (dated July 16, 2015), the permittee has elected to comply with the 1.2 lb/TBtu mercury (Hg) limitation using a 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). The company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.

Work Practice Standard for Startup & Shutdowns

The permittee will operate all continuous monitoring systems for Unit1 (1S) during periods of *startup* and *shutdown* as those terms are defined in 40 C.F.R. §63.10042. During startup of Unit1 (1S), fuel oil must be used for ignition. Once coal is fired, all of the applicable control technologies must be engaged as technically feasible. During shutdown of Unit1 (1S), 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 of 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 Unit1 (1S), and discusses how the applicable requirements are incorporated into this permit.

- Condition 4.1.28 was deleted because the company has completed all initial compliance demonstration and performance testing for Electric Utility Steam Generating Units (EGU) MACT, 40 CFR 63, Subpart UUUUU and has reported the results to the agency.
- Condition 4.2.1 was updated due to changes in condition 4.1.9 and per company’s request.

Table UUUUU

Subpart UUUUU Section	Title V	Discussion
§63.9984(b)	None	The company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.
§63.9984(f)	None	The company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.
§63.9985	None	This section does not apply since the unit is not a new EGU.
Emission Limitations and Work Practice Standards		
§63.9991(a)(1)		This section requires compliance with applicable emission limits and work practice standards in Tables 1 through 3 to Subpart UUUUU.

Subpart UUUUU Section	Title V	Discussion
	<p>None</p> <p>4.1.5.b</p> <p>4.1.9.b</p> <p>4.1.33</p> <p>4.1.34</p> <p>4.1.35</p> <p>4.1.36</p>	<p><u>Table 1</u> Requirements in Table 1 are not applicable since the unit is existing.</p> <p><u>Table 2</u> <i>Particulate Matter</i> From Table 2, emission limits in Item #1 for coal-fired unit not low rank virgin coal are applicable. According to NOCS, 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). This requirement references applicable requirements in Table 5 to Subpart UUUUU. Therefore, the PM performance testing requirements of item #1 in Table 5 are incorporated by reference (IBR).</p> <p><i>Sulfur Dioxide</i> The permittee has elected to comply with the 0.20 lb/MMBtu sulfur dioxide (SO₂) limitation (rather than HCl) since it utilizes FGD technology and an SO₂ CEMS. Compliance demonstration via applicable requirements in Tables 5 and 7 to Subpart UUUUU are IBR.</p> <p><i>Mercury</i> The permittee has elected to comply with the 1.2 lb/TBtu mercury (Hg) limitation using a sorbent trap monitoring system.</p> <p><u>Table 3</u> In Table 3 items 1, 3, and 4 are applicable. Item 2 is not applicable since the boiler is existing.</p> <p>For item #1, the 48-month frequency for neural network optimization is excluded</p> <p>For item #3, the startup requirements are included as a permit condition.</p> <p>For item #4, the shutdown requirements are included as a permit condition.</p>
§63.9991(a)(2)	None	This section requires compliance with applicable operating limits in Table 4 to Subpart UUUUU, which is while using a PM CPMS to maintain the 30-day rolling average PM CPMS output at or below an established threshold. PM CPMS is not the elected compliance option; therefore, there is no permit condition for this section of the regulation.
§63.9991(b)	None	This section is not applicable since the permittee is not requesting any alternative to the work practice standards in §63.9991.
§63.9991(c)	4.1.9.b	The section provides the criteria for electing to comply with the alternate SO ₂ limit in Table 2. The permittee uses FGD technology on the unit, 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

Subpart UUUUU Section	Title V	Discussion
		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 4.1.9.b 4.1.33 4.1.35 4.1.36	This section requires compliance with the emission limits and operating limits in Subpart UUUUU. The section also requires compliance with the startup and shutdown work practices in Table 3 to Subpart UUUUU. Therefore, this section is cited in the listed permit conditions. This section is not cited with the tune-up work practice standard, even though it is from Table 3, because this is not an emission limit, operating limit, or a startup or shutdown requirement. This is a reasonable conclusion because §63.10000(a) is “at all times” which does not apply to a tune-up that is conducted once every 36 months.
§63.10000(b)	4.1.37	This general duty requirement is applicable; therefore, it is included in the permit.
§63.10000(c)	4.3.6.	<p>This section requires initial performance testing to demonstrate compliance with applicable emission limits. The company has completed all initial compliance demonstration and performance testing and has reported the results to the agency, however conditions §§63.10000(c)(1)(iv) and (vi) specify continuous compliance monitoring for PM and Hg units not qualifying as a LEE and are written in the permit.</p> <p>Note that §63.10000(c)(1)(v) is not applicable since the permittee elected to comply with the applicable SO₂ limit instead of HCl.</p> <p>Note that §63.10000(c)(2) is not applicable since the unit is not liquid oil-fired.</p>
§63.10000(d)	None	This requirement applies to sources that “demonstrate compliance with any applicable emissions limit through use of a continuous monitoring system (CMS), where a CMS includes a continuous parameter monitoring system (CPMS) as well as a continuous emissions monitoring system (CEMS)...” This requirement does not apply to CEMS prepared under 40 CFR 75 and therefore the SO ₂ CEMS is not subject to this section.
§63.10000(e)	4.1.34	This section requires periodic tune-ups according to §63.10021(e).
§63.10000(f)	None	The unit is an EGU and is subject to Subpart UUUUU; therefore, no permit condition is warranted.
§63.10000(g)	None	The unit is an EGU and is subject to Subpart UUUUU; therefore, no permit condition is warranted.
§63.10000(h)	None	The unit is an EGU and is subject to Subpart UUUUU; therefore, no permit condition is warranted.
§63.10000(i)	None	The unit has operated as an EGU; 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 your EGU to meet the definition of an EGU subject to Subpart UUUUU.
§63.10000(k)	None	This section is not applicable for the same reason in discussion

Subpart UUUU Section	Title V	Discussion
		above concerning §63.10000(j).
Testing and Initial Compliance Requirements		
§63.10005(a)	None	This section is for initial compliance demonstrations which have already been completed.
§63.10005(b)	None	This section is for initial compliance demonstrations which have already been completed.
§63.10005(c)	None	The permittee uses neither PM CPMS nor is the EGU oil-fired; therefore, this section does not apply.
§§63.10005(d) , (d)(1)and (d)(4)	None	<p>Since the permittee has elected to comply with the SO₂ limit, which must be demonstrated via SO₂ CEMS, §63.10005(d)(1) is applicable but the company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.</p> <p>§63.10005(d)(2) is not applicable since the permittee is not using a PM CPMS.</p> <p>§63.10005(d)(3) is applicable since the permittee is demonstrating initial compliance with the Hg limit using a sorbent trap monitoring system but the company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.</p> <p>§63.10005(d)(4) is not applicable since the unit is not liquid oil-fired.</p>
§63.10005(e)	None	This section is for initial compliance demonstrations which have already been completed.
§63.10005(f)	None	This applicable requirement specifically related to the tune-up is set forth with the 180-day period permit condition based upon §63.9984(f) but the company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.
§63.10005(g)	None	This section is not applicable since the unit is existing.
§63.10005(h)	4.3.15	The EGU is using the low emitting (LEE) option.
§63.10005(i)	None	This section is not applicable since the unit does not fire liquid-oil fuel.
§63.10005(j)	None	These initial compliance demonstration requirements for startup and shutdown were already completed.
§63.10005(k)	4.5.11.	This requirement is to submit the NOCS summarizing results of initial compliance demonstration, however the permittee has already submitted the NOCS.
§63.10006(a)	None	The elected compliance option is not PM CPMS.
§63.10006(b)	4.3.16	LEE is being used.
§63.10006(c)	None	PM CEMS will not be utilized to demonstrate compliance with a filterable PM emissions limit; therefore, §63.10006(c) does not apply.
§63.10006(d)	None	Since an SO ₂ CEMS will be utilized; §63.10006(d) does not apply.
§63.10006(e)	None	This section is not applicable since the unit is not liquid oil-fired.
§63.10006(f)	None	This section applies to sources that “follow the requirements listed in paragraphs (g) and (h) of this section...” The permittee does not intend to use §63.10006(g), or §63.10006(h). Since the

Subpart UUUU Section	Title V	Discussion
		permittee will not follow paragraphs (g) and (h) of §63.10006, this requirement does not apply.
§63.10006(g)	None	The permittee does not plan to use emissions averaging; therefore, this requirement as well as §63.10009 are not applicable.
§63.10006(h)	4.3.17	LEE is being used.
§63.10006(i)	4.1.34	The requirement of §63.10006(i)(1) is applicable since a neural network is not utilized. The applicable regulation language “each performance tune-up...no more than 36 months after the previous...” has been added at the end of the first paragraph in the permit condition.
§63.10007(a)(1)	4.3.7.	This requirement applies to the SO ₂ CEMS that will be used to demonstrate compliance with the elected SO ₂ limit.
§63.10007(a)(2)	4.3.8.	Test methods will be used for demonstrating compliance with the PM and Hg limits. Therefore, this requirement is included in the permit.
§63.10007(a)(3)	None	This section is not applicable since the permittee does not intend to utilize a PM CPMS.
§63.10007(b)	4.3.9.	This applicable performance testing requirement is written in the permit. The reference in the condition to “Table 5” will be retained in order to IBR the applicable test methods and procedures contained in that table.
§63.10007(c)	None	This section is not applicable since the permittee does not intend to utilize a PM CPMS.
§63.10007(d)	4.3.10.	In this case, the exception to this requirement is testing based on SO ₂ CEMS, or sorbent trap monitoring system; thus, the requirement is applicable to PM performance testing and is written in the permit.
§63.10007(e)	4.3.11.	This applicable requirement will be written in the permit, but the calculation methodologies in §§63.10007(e)(1) through (3) are IBR in keeping with the U.S. EPA guidance.
§63.10007(f)	4.2.21	This applicable requirement will be for use in the emission rate calculations during startup periods or shutdown periods (as defined in §63.10042).
§63.10007(g)	4.3.12.	This applicable recordkeeping requirement will be kept 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.
§63.10008	None	This section of the regulation is reserved.
§63.10009	None	See discussion above concerning §63.10006(g).
§63.10010(a)(1)	4.2.16	This requirement applies since there is a single unit-single stack configuration.
§63.10010(a)(2)	None	This requirement does not apply.
§63.10010(a)(3)	None	This monitoring requirement is not applicable since it pertains to units utilizing a common stack with non-affected units.
§63.10010(a)(4)	None	There is no bypass stack for the source. Therefore, this requirement is not applicable.
§63.10010(a)(5)	None	This section does not apply since the unit does not have a common control device or multiple stack or duct configuration.
§63.10010(a)(6)	None	This section does not apply since the unit does not have multiple parallel control devices with multiple stacks.
§63.10010(b)	4.2.16	The permittee utilizes a CO ₂ CEMS as a diluent analyzer. Therefore, this requirement is included in the renewal permit.

Subpart UUUUU Section	Title V	Discussion
§63.10010(c)	4.2.16	The permittee utilizes a stack gas flow rate monitor. Therefore, this requirement is included in the renewal permit.
§63.10010(d)	None	The permittee does not utilize a moisture monitoring system. Therefore, this requirement is not included in the renewal permit.
§63.10010(e)	None	This requirement is not applicable since the permittee does not utilize an HCl or HF CEMS.
§63.10010(f)	4.2.16.	This section is applicable to the SO ₂ CEMS the permittee will utilize to demonstrate compliance with the elected SO ₂ limitation.
§63.10010(g)	4.2.16	The company has a sorbent trap monitoring system so this requirement is applicable.
§63.10010(h)	None	The permittee intends to use quarterly performance testing to demonstrate compliance for PM. Therefore, at this time, a PM CPMS is not utilized and thus this requirement is not applicable.
§63.10010(i)	None	The permittee intends to use quarterly performance testing to demonstrate compliance for PM. Therefore, at this time, a PM CEMS is not utilized and thus this requirement is not applicable.
§63.10010(j)	None	The permittee intends to comply with the applicable filterable PM limitation instead of HAP metals. Therefore, this requirement for a HAP metals CEMS is not applicable.
§63.10010(k)	None	This requirement is not applicable since, the permittee has not elected to comply with the HCl and HF limits. Also, this requirement does not apply since the unit is not liquid oil-fired.
§63.10011(a)	None	This applicable requirement to demonstrate initial compliance using performance testing was already completed.
§63.10011(b)	None	This requirement is not applicable because the permittee is not subject to the PM CPMS requirements in Table 4; does not use a PM CPMS; and the unit is not liquid oil-fired type.
§63.10011(c)(1)	None	The company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.
§63.10011(d)	4.3.18	This applicable requirement was included since it pertains to candidate LEE units, which is an option the permittee intends to use to demonstrate compliance with Subpart UUUUU.
§63.10011(e)	None	The facility has completed all initial compliance demonstration and performance testing and has reported the results to the agency. The NOCS has been submitted.
§63.10011(f)	4.1.38	This requirement applies, and is therefore included in the permit. Note that §§63.10011(f)(1) and (2) are combined for one permit condition.
§63.10011(g)	None	The company has completed all initial compliance demonstrations and performance testing and has reported the results to the agency.
§63.10020(a)	4.2.17, 4.2.18, and 4.2.19	This paragraph requires monitoring and data collection according to §63.10020, so every permit condition which cites§63.10020(b) through (d) will also cite §63.10020(a).
§63.10020(b)	4.2.17	Applicable requirement §63.10010(f)(1) requires use of a CEMS that meets 40 C.F.R. Part 75 for an SO ₂ CEMS under Subpart UUUUU. Since the CEMS must be utilized, and such monitoring is subject to §63.10020(b), this section is applicable.
§63.10020(c)	4.2.18.	This requirement applies to the SO ₂ CEMS, and Hg sorbent trap monitoring system and is therefore included in the permit.

Subpart UUUUU Section	Title V	Discussion
§63.10020(d)	4.2.19.	This requirement applies to the SO ₂ CEMS, and Hg sorbent trap monitoring system and is therefore included in the permit.
§63.10020(e)	None	The permittee has chosen to comply with the paragraph (1) definition of startup.
§63.10021(a)	None	This section requires that continuous compliance with the applicable standards be accomplished through the monitoring in Table 6 and 7 of Subpart UUUUU, as well as §§63.10021(b) through (g) (which are considered separately below).
	None	Table 6 pertains to PM CPMS, which will not be utilized by the permittee; therefore, such requirements are not applicable.
	4.1.9.b	Table 7, Item #1, pertains to SO ₂ CEMS which the permittee is utilizing. Therefore, this section (i.e., §63.10021(a)) is cited with permit condition 4.1.9.b. but Table 7 is IBR in the permit condition.
	None	Table 7, Item #2, pertains to PM CPMS to measure compliance, which the permittee is not utilizing. Therefore, this requirement is not applicable.
	None	Table 7, Item #3, is not applicable since the boiler is not oil-fired.
	4.3.6	Table 7, Item #4, pertains to quarterly performance testing for coal-fired EGUs to measure compliance with one or more non-PM (or its alternative emission limits) applicable emissions limit in Tables 1 or 2, or applicable PM emissions limit (or its alternative emission limits) in Table 2.
	4.1.34	Table 7, Item #5, is applicable to the periodic performance tune-up already discussed in 40 C.F.R. §63.9991(a)(1), Table 3, Item #1. Thus, 40 C.F.R. §63.10021(a), Table 7, Item #5 is cited in condition 4.1.34.
	4.1.35; 4.1.36	Table 7, Items #6 and #7 pertain to startup and shutdown work practice standards. Therefore, 40 C.F.R. §63.10021(a), Table 7, Items #6 and #7 will be cited in conditions 4.1.35. and 4.1.36., respectively.
§63.10021(b)	4.2.20.	This requirement is applicable to the elected SO ₂ limitation and its corresponding requirement for an SO ₂ CEMS to demonstrate compliance. In adherence to the U.S. EPA guidance, the equation is IBR. Non-applicable language (CEMS for HCl and HF) is excluded.
§63.10021(c)	None	This requirement is not applicable since the permittee has elected to utilize quarterly testing instead of using PM CPMS.
§63.10021(d)	4.3.14	This requirement is applicable since the permittee has elected to utilize quarterly testing.
§63.10021(e)	4.1.34	This requirement to conduct periodic tune-ups is included in permit condition 4.1.34. which was incorporated in the permit as discussed above regarding §63.9991(a)(1), Table 3, Item #1.
§63.10021(f)	4.5.11.	Submit reports required under §63.10031, and if applicable, under appendices A and B of Subpart UUUUU. The permittee has

Subpart UUUUU Section	Title V	Discussion
		<p>elected to comply with the SO₂ limitation instead of the limit for HCl, and the permittee is not subject to an HF limitation in the regulation; therefore, the monitoring provisions for HCl and HF in Appendix B are not applicable.</p> <p>The PM CPMS will not be utilized; therefore, such requirements in this section are not applicable. Similarly, the permittee has not elected to comply with the HAP metals limitation; therefore, requirements in this section for this type of CEMS are not applicable.</p>
§63.10021(g)	4.5.12.	This is an applicable requirement to report deviations. The regulation mentions Tables 1 through 4 of Subpart UUUUU. However, Table 1 does not apply since the units are existing. Table 4 does not apply since, a PM CPMS will not be utilized. Therefore, the language is changed to “Tables 2 and 3”.
§63.10021(h)	4.1.39	This section requires the startup or shutdown requirements as given in Table 3.
§63.10021(i)	4.5.13.	This section requires reports as specified in §63.10031 concerning activities and periods of startup and shutdown.
§63.10022	None	See discussion above concerning §63.10006(g).
§63.10023	None	This requirement is not applicable for this renewal since the permittee has elected to utilize quarterly performance testing instead of using PM CPMS.
Notifications		
§63.10030(a)	4.5.17	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.
§63.10030(c)	None	This section is not applicable since the unit is not new or reconstructed.
§63.10030(d)	4.3.13.	This 30-day notification requirement replaces the 60-day notification requirement in §63.7(b) discussed above concerning §63.10030(a).
§63.10030(e)	None	The company has completed all initial compliance demonstration and performance testing and has reported the results to the agency.
Reports		
§63.10031(a)	4.5.13.	Submit reports in Table 8 that are applicable. The only report in Table 8 is the compliance report. Therefore, the applicable requirements of Table 8 are incorporated as a permit condition.
§63.10031(b)	4.5.14.	The requirements of this section are set forth in the compliance report condition as sub-conditions (1) through (5). Note that (5) provides that the Title V source that has semiannual monitoring report due dates established may submit the compliance reports on the same date as the semiannual monitoring report. Thus, (5) is a consolidation of the terms in §63.10031(b)(5) with a reference to semiannual monitoring report condition 3.5.6.
§63.10031(c)	4.5.13.a.	The specific information of this section are included in 4.5.13.a.
§63.10031(d)	4.5.13.d.	This requirement regarding excess emissions while using a CMS is included in condition 4.5.13. Since it is information that must be included in the compliance report.

Subpart UUUUU Section	Title V	Discussion
§63.10031(e)	4.5.15.	The permittee has obtained a Title V permit; therefore, the regulation language is adapted to require the permittee to report all Subpart UUUUU deviations.
§63.10031(f)	4.5.16.	This requirement is to electronically report performance test results using EPA's WebFIRE database using Compliance and Emissions Data Reporting Interface (CEDRI). §63.10031(f)(1) pertains to CEMS performance test reporting; therefore, this requirement is included in the permit as 4.5.16.(1). However, §63.10031(f)(2) is not applicable since the permittee has not elected to utilize PM CEMS or PM CPMS. This explains why there is no condition (2) in 4.5.16. §63.10031(f)(3) is applicable to reports for SO ₂ CEMS, which the permittee has elected to utilize; therefore, this requirement is included in the permit as 4.5.16.(3). §63.10031(f)(4) is applicable and the details of it have been IBR. §63.10031(f)(5) is applicable and is written in the permit.
§63.10031(g)	4.5.13.e.	This section requires that malfunctions be described in the compliance report. Since condition 4.5.13. sets forth the contents of the compliance report, this applicable requirement is included in that permit condition.
Records		
§63.10032(a)	4.4.11.	This section is applicable
§63.10032(b)	4.4.12.	Since an SO ₂ CEMS will be utilized, this section is applicable. The language regarding CPMS will not be included in the condition since this is not elected.
§63.10032(c)	4.4.13.	This section requires keeping of records in Table 7 to Subpart UUUUU to demonstrate continuous compliance. Non-applicable language regarding PM CPMS is excluded.
§63.10032(d)	4.4.14.	Since the unit is subject to an emission limit, the recordkeeping requirements of this section are potentially applicable.
§63.10032(e)	None	See discussion above concerning §63.10009.
§63.10032(f)	4.4.15.	This applicable requirement to keep records of startups and shutdowns is included in the permit.
§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 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 permit.
§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 liquid oil-fired EGU.
Form and Retentions of Records		
§§63.10033(a), (b), and (c)	4.4.10.	These are applicable requirements.

Other requirements in Subpart UUUUU are not applicable to the unit for one or more of the following reasons:

- The unit is not new or reconstructed, as these terms are specified in §§63.9982(b) and (c).
- The unit does not fire oil.

III. CAIR and APPENDIX B – The CAIR requirements in conditions 3.1.13, 3.1.14 and 3.1.15 have been replaced with the Transport Rule (TR) requirements. The CAIR Permit Application has been replaced with Transport Rule (TR) Requirements in Appendix B.

IV. Consent Decree in Civil Action No. C2-99-1182, U.S. v. American Electric Power Service Corp. In technical correspondence dated May 24, 2016, the permittee suggested adding the applicable requirements of this consent decree to the Title V permit. The consent decree was reviewed and compared with the suggested language. Each paragraph in new permit condition 4.1.40. is discussed below.

- Paragraph (1) to continuously operate SCRs on and after January 1, 2008, is based upon paragraph 68 of the Consent Decree.
- Paragraph (2) to continuously operate FGD on and after December 31, 2007, is based upon paragraph 87 of the Consent Decree.
- Paragraph (3) provides the definition of “continuously operate” from paragraph 14 of the Consent Decree.
- Paragraph (4) provides the definition of “malfunction” from paragraph 31 of the Consent Decree.

V. Miscellaneous Change. The following change has been made to the operating permit per company’s request.

- The alternative deadline allowed by §63.7550(b)(5) has been incorporated into permit condition 4.5.10. Since the permittee has a Title V permit that establishes dates for submitting semiannual reports.

Non-Applicability Determinations

The following requirement has been determined not to be applicable to the subject facility due to the following:

40 CFR 60, Subpart Db: *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*. The auxiliary boilers are not subject to 40 CFR 60 Subpart Db because they were constructed before June 19, 1984 (they were constructed in 1974).

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: Tuesday, June 21, 2016
Ending Date: Thursday, July 21, 2016

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
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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)

Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.