

# 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 March 15, 2011.*

Permit Number: **R30-02300003-2011**  
Application Received: **May 22, 2012**  
Plant Identification Number: **03-54-023-00003**  
Permittee: **Virginia Electric and Power Company**  
Facility Name: **Mt. Storm Power Station**  
Mailing Address: **5000 Dominion Boulevard, Glen Allen, VA 23060**

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

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Physical Location: Mt. Storm, Grant County, West Virginia  
UTM Coordinates: 649.85 km Easting • 4340.00 km Northing • Zone 17  
Directions: Off of State Route 93, two (2) miles west of Bismark. From the intersection of Route 93 into Davis, WV continue east on Route 93 for approximately 8 miles.

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### Facility Description

Dominion's Virginia Electric and Power Company's Mt. Storm Power Station is a coal-fired electric generation facility and operates under SIC code 4911 and NAICS code 221112. The facility consists of three (3) coal-fired boilers, two with a rated design capacity of 5,779 mmBtu/hr each and one with a rated design capacity of 5,824 mmBtu/hr, an oil-fired auxiliary boiler with a rated design capacity of 150 mmBtu/hr, and various supporting operations such as coal handling, ash handling, limestone handling, and various tanks with insignificant emissions. The Mt. Storm Power Station has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

This significant modification incorporates three changes:

- Removal of R13-1438 for the Fire Training Facility from the Title V Permit because it is inactive.
- Update to incorporate R13-2034D to burn refined coal.
- Incorporation of 40 CFR Part 60, Subpart Da requirements for Unit 2.

**Emissions Summary**

The changes in Potential Emissions due to this modification are an increase in PM<sub>10</sub> emissions of 1.20 tons per year and an increase of total PM emissions of 1.47 tons per year from the handling of the S-Sorb.

**Title V Program Applicability Basis**

With the proposed changes associated with this modification, this facility has the potential to emit 205,560 tons per year of SO<sub>2</sub>; 47,167 tons per year of NO<sub>x</sub>; 1,572 tons per year of CO; 3,077 tons per year of PM<sub>10</sub>; and 710 tons per year of 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, Virginia Electric and Power Company's Mt. Storm Power Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

**Legal and Factual Basis for Permit Conditions**

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

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

Federal and State:

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	New Source Performance Standards
45CSR30	Requirements for Operating Permits
40 C.F.R 60 Subpart Da	Standards of Performance for Electric Utility Steam Generating Units

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

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 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)
R13-656	June 4, 1982	
R13-1660D	May 13, 2003	Supersedes and replaces R13-1660C issued 1/5/2002.
R13-1661/R14-10	August 12, 1994	
R13-2034D	December 3, 2010	Supersedes and replaces R13-2034C issued 8/4/2008, also supersedes and replaces: R13-2593A issued 3/8/2005 which superseded and replaced permit R13-2593 issued 9/21/2004.
R13-2735	December 13, 2007	

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R33-3954-2012-3 (Acid Rain Permit)	December 18, 2007	Effective January 1, 2008
CAIR Permit	June 18, 2007	
Consent Decree: No. 03-CV-517A (US vs. VEPCO)	October 3, 2003	Effective October 10, 2003 (date entered by the courts)
CO-R39-C-2009-11	June 26, 2009	Compliance Order

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

### Determinations and Justifications

This is a significant modification to the renewal Title V permit which was issued on March 15, 2011 and incorporates the changes from NSR Permit R13-2034D, issued on December 3, 2010. Changes to the most recent version of the Title V Permit consist of the following:

1. Company mailing address was changed on Page 1.
2. Condition 1.2. was revised to remove R13-1438, which is now inactive, and to update R13-2034C to R13-2034D.
3. Conditions 3.1.12. and 3.5.10. were removed because the State Rule for Greenhouse Gases, 45CSR42 is in the process of being repealed.
4. Condition 3.5.3. was revised to update the address for U.S. EPA.
5. A typographical error was corrected in Condition 5.3.1. The correct reference is Condition 5.1.9.
6. **R13-2034D changes**
  - Condition 1.1. - The Equipment Table was updated to add new equipment authorized by the NSR permit modification.
  - The Table in Condition 5.1.2. requiring controls was revised to incorporate the new equipment.
  - Conditions 5.1.13. through 5.1.16., Condition 5.2.4., and Condition 5.4.8. were added to incorporate throughput limits, control requirements, monitoring requirements, and recordkeeping requirements from R13-2034D.
7. **Section 7.0** originally contained requirements for the Fire Fighter Training Facility authorized by Permit R13-1438. Permit R13-1438 is no longer an active permit, therefore all requirements from the NSR permit have been removed from the Title V Permit.

## 8. **40CFR60, Subpart Da - Standards of Performance for Electric Utility Steam Generating Units**

- Modifications to Unit 2 Boiler commenced in 2009, therefore Unit 2 boiler is subject to the applicable requirements of 40 CFR Part 60, Subpart Da that affect boilers modified after February 28, 2005 but before May 4, 2011. 40CFR60, Subpart Da has been amended several times since the initial promulgation. To reduce the need to modify the permit in the event more changes are made to the NSPS, it was decided to list the pollutant standards in the permit, but to incorporate the compliance, testing, reporting and recordkeeping requirements by reference. The 40 CFR 60 Subpart Da requirements for Unit 2 boiler have been added as Section 7.0.
- In accordance with 40 CFR §60.42Da(b)(1), the facility is exempt from the opacity standard because the facility utilizes a PM CEMS to monitor opacity.

### **Non-Applicability Determinations**

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

**40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM)** - The S-Sorb handling equipment is not subject to an emission limitation for any criteria pollutant. Instead, PM emissions will be limited, as authorized by Permit R13-2034D, by limiting throughput and requiring control devices. Therefore, CAM is not applicable to this equipment in accordance with 40 CFR §64.2(a)(1).

**Greenhouse Gas Permitting** - This modification does not trigger a PSD permit and total CO<sub>2</sub>e emissions from the new equipment are well below the threshold of 75,000 tpy, therefore, there are no applicable GHG requirements.

### **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: October 2, 2012  
Ending Date: November 1, 2012

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

Bobbie Scroggie  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

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

**Point of Contact**

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

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

N/A

