

Fact Sheet



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

Permit Number: **R30-05100005-2014**
Application Received: **October 17, 2013**
Plant Identification Number: **03-054-05100005**
Permittee: **Kentucky Power Company**
Facility Name: **Mitchell Plant**
Mailing Address: **1 Riverside Plaza, Columbus, Ohio 43215-2373**

Revised: N/A

Physical Location:	Cresap/Moundsville, Marshall County, West Virginia
UTM Coordinates:	516.00 km Easting • 4409.00 km Northing • Zone 17
Directions:	From Charleston take Interstate 77 North to Exit 179. Travel north on US Route 2 approximately 70 miles to Cresap. Facility is located on Route 2 approximately nine (9) miles south of Moundsville, WV.

Facility Description

The Mitchell 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 7020 mmBtu/hr each, one (1) oil-fired auxiliary boiler with a rated design capacity of 663 mmBtu/hr, various supporting operations such as coal and ash handling, limestone 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.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions ²	2012 Actual Emissions ¹
Carbon Monoxide (CO)	4,763.13	764.01
Nitrogen Oxides (NO _x)	36,394.08	1,868.07
Particulate Matter (PM _{2.5})	1,100	27.2
Particulate Matter (PM ₁₀)	3,173.19	66.2
Total Particulate Matter (TSP)	5,428	111.58
Sulfur Dioxide (SO ₂)	89,750.11	3,454.72
Volatile Organic Compounds (VOC)	565.54	92.21
Hazardous Air Pollutants	Potential Emissions ²	2012 Actual Emissions ¹
Hydrogen Chloride	12,337	13.51
Hydrogen Fluoride	1,071	12.37
Selenium	48.5	1.01
Manganese	3.8	0.11
Nickel	1.7	0.21
Arsenic	5.6	0.044
Mercury compounds	2.1	0.068
Beryllium	13.4	0.000056
Chromium	2.0	0.091
Cobalt	0.7	0.023
Lead	3.7	0.041

¹ With the exceptions of PM_{2.5} and PM₁₀, the actual emissions are transcribed from the 2013 Certified Emissions Statement (CES) Invoice, which were emitted from January 1, 2012 through December 31, 2012. The PM_{2.5} and PM₁₀ values are from technical correspondence received from the permittee via email on 12/2/2013.

² The potential emissions are from technical correspondence received from the permittee via email on 12/19/2013, and include changes due to inclusion of the LPG-driven emergency generator and the Unit 1 and Unit 2 fire pumps. Additionally, the PTE increases of regulated pollutants specified for the emergency generators EG-1 and EG-2 discussed in Section X of this Fact Sheet have been added to the values provided by the permittee.

Title V Program Applicability Basis

This facility has the potential to emit 4,763.13 tpy of CO; 36,394.08 tpy of NO_x; 3,173.19 tpy of PM₁₀; 89,750.11 tpy of SO₂; 565.54 tpy of VOC; 12,337 tpy of HCl; 1,071 tpy of HF; 48.5 tpy of Selenium; and 13.4 tpy of Beryllium. 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, Kentucky Power Company's Mitchell 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	Control of particulate matter emissions from indirect heat exchangers
	45CSR2A	Testing and MRR requirements under 45CSR2
	45CSR6	Open burning prohibited.
	45CSR10	Control of sulfur dioxide emissions from indirect heat exchangers
	45CSR10A	Testing and MRR requirements under 45CSR10
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction/modification
	45CSR16	Standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR33	Acid Rain Provisions and Permits
	45CSR34	Emission Standards for HAPs for Source Categories Pursuant to 40 C.F.R. Parts 61 and 63
	45CSR38	Determination of Compliance with Air Quality Management Rules
	45CSR39	CAIR NOx Annual Trading Program
	45CSR40	CAIR NOx Ozone Season Trading Program
	45CSR41	CAIR SO ₂ Trading Program
	40 C.F.R. Part 60 Subpart Db	Standards of Performance for Industrial–Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 60 Subpart OOO	NSPS for Non-metallic mineral processing plants
	40 C.F.R. Part 60 Subpart IIII	NSPS for Compression Ignition IC Engines
	40 C.F.R. Part 60 Subpart JJJJ	NSPS for Spark Ignition IC Engines
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart ZZZZ	RICE MACT
	40 C.F.R. Part 63 Subpart DDDDD	Boiler MACT for Major Sources of HAP
	40 C.F.R. Part 63 Subpart UUUUU	Utility Mercury and Air Toxics (MATS) MACT
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 72	Permits Regulation
	40 C.F.R. Part 73	Sulfur Dioxide Allowance System Permits Regulation
	40 C.F.R. Part 74	Sulfur Dioxide Opt-ins
	40 C.F.R. Part 75	Continuous Emissions Monitoring
	40 C.F.R. Part 76	Nitrogen Oxides 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
State Only:	45CSR4	No objectionable odors.

WVDAQ 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 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>)
R13-2608E	May 12, 2014	
G60-C057A	August 8, 2014	
Phase II Acid Rain Permit # R33-3948-2017-4A	May 14, 2013	

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

Determinations and Justifications

Unless otherwise noted or specified by the context, in the following discussions the term “current permit” means Title V operating permit R30-05100005-2009 (MM03). The following regulations and rules are evaluated and applicable requirements from them are incorporated into this renewal operating permit.

- I. **40 C.F.R. 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.** Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

Subpart ZZZZ requirements applicable to Emergency Quench Water System engines 6S and 7S are included in the current permit. The italicized reference following the citations of authority in all section 6.0 permit conditions (except 6.1.1.) of the current permit are removed for the renewal permit since the compliance date is now past.

In the renewal application the permittee requested adding the Emergency Diesel-Driven Fire Pumps (Em. Unit IDs: 17S and 18S; Em. Pt. IDs: 17E and 18E) to the 6.0 Section heading, thereby noting the applicability of all requirements in the section to the Emergency Diesel-Driven Fire Pumps. The following relevant facts characterize both Emergency Diesel-Driven Fire Pumps:

- Compression ignition (CI)
- Combust No. 2 fuel oil
- Rated at approximately 230-hp each
- No post-combustion air pollution control devices are utilized
- Construction commenced in approximately 1971

The facility is a major source of HAPs. Using the stated horsepower and construction commencement date criteria, the engines are *Existing stationary RICE* pursuant to §63.6590(a)(1)(ii). Furthermore, it is determined from their names that the Emergency Diesel-Driven Fire Pumps are used in emergency service and are not utilized to generate electricity.

As such, the two (2) Emergency Diesel-Driven Fire Pumps' engines meet the same applicability criteria and are subject to the same Subpart ZZZZ requirements as engines 6S and 7S already covered by permit Section 6.0., and have therefore been incorporated in the applicability of this section by adding them to the heading of Section 6.0.

Permit condition 6.1.7. has been updated based on the January 30, 2013 regulation change. §63.6640(f)(4) is excluded since the facility is not an area source. Similarly, condition 6.4.2. is updated to reflect additional language.

Further discussion of the applicability of this regulation to the Leachate Pond Emergency Back-up Generator (Em. Unit ID: LPG) is provided below concerning Minor Modification MM04 of R30-05100005-2009.

- II. **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 Mitchell 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 both the Unit 1 and Unit 2 steam generators and the auxiliary boiler (Em. Unit ID: Aux ML1). The Unit 1 and Unit 2 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 Section III. of this Fact Sheet below). The non-EGU auxiliary boiler is considered an existing affected unit under Subpart DDDDD because construction commenced on the unit prior to June 4, 2010 and it has never been reconstructed (cf. §§63.7490(b) through (d)). It should be noted that the Mitchell 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 boiler is subject to 40 C.F.R. 63 Subpart DDDDD.

The auxiliary boiler is an oil-fired non-EGU boiler. The boiler is used for heating, startup, and shutdown purposes. The nominal design heat input of the boiler is 663 mmBtu/hr. Permit R13-2608E, condition 5.1.1.c., limits the annual capacity of the boiler to no more than 10 percent by limiting the annual average heat input to 580,788 MMBtu per year (condition 4.1.9.c.). 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).

The current operating permit contained a placeholder condition specifying the applicability of Subpart DDDDD, the future compliance date, and requirement to submit a significant modification application with the required Notification of Compliance Status (NOCS). At the time of this renewal, all applicable Subpart DDDDD requirements have been determined based upon the characteristics of the auxiliary boiler. Unlike the EGUs subject to MACT Subpart UUUUU, there are not multiple compliance options that may be selected. Instead, all Boiler MACT requirements are known. Therefore, instead of placeholder language for Subpart DDDDD, all applicable requirements have been written in the renewal permit. With the exception of the compliance date condition (4.1.13.) and initial tune-up condition (4.1.14.), all other Subpart DDDDD conditions (which are primarily recordkeeping and reporting) include a note following the citation of authority specifying that the condition is subject to the compliance date.

Since the boiler is existing, the compliance date is January 31, 2016, according to §63.7495(b). Table DDDDD below lists the sections of Subpart DDDDD and their applicability (and non-applicability where necessary) to the auxiliary boiler, and discusses how applicable requirements are incorporated into the renewal operating permit.

Table DDDDD

Subpart DDDDD Section	Title V	Discussion
§63.7495(b)	4.1.13.	The applicable compliance date requirement for existing sources is included in the renewal permit, which is January 31, 2016. The substantive requirements for the auxiliary boiler is the initial tune-up and subsequent tune-ups every 5 years thereafter (cf. discussion below of §63.7500(a)), of which the initial tune-up must be complete no later than the compliance date in accordance with §63.7510(e) (also discussed below).
§63.7495(d)	None	This section references the notification requirements in §63.7545. In particular, the requirements of §63.7545(b) are applicable, and the permittee has submitted the initial notification accordingly. Since at the time of this renewal the 120-day period after January 31, 2013 has passed, and there are no on-going requirements in this section, no permit condition is required.
§63.7500(a)	None	<u>Work Practice Standards:</u> §63.7500(a)(1) requires the permittee to meet each limit and standard in Tables 1 through 3, and 11 through 13 of Subpart DDDDD, except as provided in §§63.7500(b) through (e). §63.7500(c) provides that limited-use boilers must complete a tune-up every 5 years as specified in §63.7540. Further, they are not subject to emission limits in Tables 1 and 2, or 11 through 13 to Subpart DDDDD. They also are not subject to the annual tune-up, energy assessment requirements in Table 3, or the operating limits in Table 4 to Subpart DDDDD. Therefore, §63.7500(a)(2) is not applicable. The requirement in §63.7500(a)(3) is not applicable since exception to it is granted by qualifying as a limited-use boiler under §63.7500(c).

Subpart DDDDD Section	Title V	Discussion
§63.7500(b)	None	The application does not mention any request (or intent to request) alternative work practice standards; therefore, this requirement is not applicable.
§63.7500(c)	4.1.14.	This section for limited-use boilers is applicable to Aux 1.
§63.7500(d)	None	This requirement is not applicable to the unit since it has a design heat input (DHI) greater than 5 MMBtu/hr and is not in either the Gas 2 or light liquid fuel subcategories.
§63.7500(e)	None	The unit does not qualify for the ranges of design heat input (DHI) in this requirement.
§63.7500(f)	None	This section requires compliance with the standards at all times the affected unit is operating, except during periods of startup and shutdown during which time the permittee must comply only with Table 3 to Subpart DDDDD. However, the startup and shutdown requirements of Table 3 (items #5 and #6) are not applicable since they pertain to standards in Tables 1 or 2 or 11 through 13 of Subpart DDDDD. Moreover, the requirement to conduct a tune-up every 5 years is not affected whether the unit is normally operating, or in startup or shutdown. Thus, this section of the regulation does not apply.
§63.7505(a)	4.1.14.	This section requires compliance with the emission limits, work practice standards, and operating limits in Subpart DDDDD. The section is cited with the condition for the 5-year tune-up work practice standard.
§63.7510(e)	4.1.14.	This section states that the initial tune-up described in §§63.7540(a)(10)(i) through (vi) must be completed before the compliance date. Thus, language from this section is added at the end of condition 4.1.14.
§63.7515(d)	4.1.14.	This section specifies the deadline to conduct subsequent periodic tune-ups and is therefore included in the permit condition.
§63.7525(k)	4.4.9.	This recordkeeping requirement applies to limited-use boilers and is therefore included in the renewal permit.
§63.7530(a)	None	This section regarding initial performance tests and fuel analyses is not applicable since the boiler is not subject to emission limits.
§63.7530(b)	None	This section regarding performance testing and fuel analyses is not applicable since the boiler is not subject to emission limits, and thereby is not subject to Subpart DDDDD testing and fuel analyses.
§63.7530(c)	None	This section regarding fuel analyses is not applicable since the boiler is not subject to emission limits.
§63.7530(d)	None	This section is not applicable since the boiler is greater than 10 mmBtu/hr and is not in the unit designed to burn gas 1 subcategory.
§63.7530(e)	None	This requirement is not applicable since the energy assessment is not applicable.
§63.7530(f)	4.5.7.	This requirement states the NOCS must contain the results of the initial compliance demonstration according to §63.7545(e). Since the boilers are not subject to initial compliance demonstration using either performance testing or fuel analyses according to §63.7530, only the last sentence in §63.7545(e) is applicable to the boilers, which is: "If you are not required to conduct an initial compliance demonstration as specified in §63.7530(a), the Notification of Compliance Status must only contain the information specified in paragraphs (e)(1) and (8)." However, only items (1), (7), (8)(i), and (8)(iii) are applicable since the units are not subject to emission limits; are not subject to performance testing or fuel analyses; and do not utilize CEMS. §63.7545(e)(7) is applicable since any deviations from the applicable work practice standard (i.e., initial

Subpart DDDDD Section	Title V	Discussion
		tune-up) must be reported in the NOCS. Not applicable language about emission and operating limits is not included in condition 4.5.7.(7). Note that §63.7545(e)(6) is not necessary since it is covered by the more specific applicable requirements in §63.7545(e)(8). Finally, the deadline to submit the NOCS is included pursuant to §63.9(h)(2)(ii), and language “to the Director (and a copy to U.S. EPA)” is added since §63.9(a)(4)(ii) is applicable.
§63.7533	None	The boiler is not complying using the alternative equivalent output-based emission limits.
§63.7535	None	The boiler is not subject to a Subpart DDDDD requirement to monitor and collect data pursuant to this section.
§63.7540(a)(10)	4.1.14.	<p>The annual frequency for tune-ups in this section does not apply since the boiler is limited-use. However, applicable requirement §63.7540(a)(12) refers to the requirements §63.7540(a)(10)(i) through (vi), and are applicable in this way; therefore, §63.7540(a)(10) will be cited.</p> <p>Since Aux 1 does not produce electricity for sale, the non-applicable language of §§63.7540(a)(10)(i) and (iii) has been excluded from permit condition 4.1.14.(i) and (iii).</p> <p>Since Aux 1 is permitted to only combust distillate fuel oil (conditions 4.1.9.d. and 4.2.14.) the requirement in §63.7540(a)(10)(vi)(C) is not applicable and is not included in the permit condition. Accordingly, condition 4.1.14.(vi) is changed to refer to “paragraphs (vi)(A) and (B)”.</p> <p>Since Aux 1 is subject to 5-year frequency for tune-ups, the reference to “an annual report” in §63.7540(a)(10)(vi) is changed to “a report”.</p>
§63.7540(a)(11)	None	This section does not apply since the boiler is greater than 10 MMBtu/hr heat input.
§63.7540(a)(12)	4.1.14.	This section applies since the boiler is limited-use.
§63.7540(a)(13)	4.1.14.	This requirement allows a 30-day delay for the tune-up if the unit is not operating the day the tune-up is scheduled. Since this pertains to the tune-up it is written with condition 4.1.14.
§63.7540(b)	4.5.8.	The purpose of this requirement is to report deviations to applicable requirements. While the requirement reads that it pertains to emission limits and operating limits (to which the units are not subject), it also pertains to those requirements in Tables 1 through 4 or 11 through 13. The units are subject to the initial and 5-year thereafter work practice standard in Table 3, item #1 (condition 4.1.14.). Therefore, the condition has been written to refer to this work practice standard in Table 3.
§63.7540(c)	None	This section is not applicable since the boiler is not subject to Subpart DDDDD mercury limitations or standards.
§63.7540(d)	None	This section is not applicable since item #5 in Table 3 applies to units subject to emission limits in Table 1 or 2 or 11 through 13 to Subpart DDDDD, to which the boilers are not subject.
§63.7545(a)	4.5.7.	<p>§§63.7(b) and (c) are not applicable since the boilers are not subject to Subpart DDDDD performance testing.</p> <p>§63.8(e) is not applicable since no CMS is utilized.</p> <p>§§63.8(f)(4) and (6) are not applicable since neither an alternative monitoring method, nor an alternative to the relative accuracy test is utilized.</p>

Subpart DDDDD Section	Title V	Discussion
		Among §§63.9(b) through (h), only the NOCS requirement of §63.9(h) is applicable. Therefore, this section is cited in condition 4.5.7.
§63.7545(b)	None	This operating permit renewal is past the 120-day period after January 31, 2013; therefore, no permit condition is required.
§63.7545(c)	None	This section is not applicable since the boiler was constructed prior to January 31, 2013.
§63.7545(d)	None	This section is not applicable since the boiler is not subject to a Subpart DDDDD performance testing requirement.
§63.7545(e)	4.5.7.	This requirement has been discussed under §63.7530(f).
§63.7545(f)	None	This requirement is not applicable since the boiler does not burn natural gas, refinery gas, or other gas 1 fuels.
§63.7545(g)	None	This section is not applicable since the boiler will not combust solid waste.
§63.7545(h)	None	This requirement is not applicable since the permittee has not switched fuels or made a physical change to the boiler that would result in the applicability of a different subcategory.
§63.7550(a)	4.5.9.	This section points to Table 9 of Subpart DDDDD, which requires a compliance report. The requirements in Table 9 are based on items that can vary as to applicability. Therefore, the condition is written based on applicable requirements in Table 9. Non-applicable language (e.g., emission limits, operating limits, and CMS-related) is excluded from the condition. Furthermore, since the boiler is subject to the 5-year frequency for tune-ups, the compliance report frequency will be submitted at the same frequency.
§63.7550(b)	4.5.9.	The requirements of this section are referenced by §63.7550(a), Table 9. Since the boiler is on a 5-year tune-up frequency, the applicable language of §63.7550(b)(1) through (4) is included in condition 4.5.9.
§63.7550(c)	4.5.9.a.	The requirements of this section are referenced by §63.7550(a), Table 9. Only certain sections of the requirements in §63.7550(c)(1) through (5) are applicable. Requirement §63.7550(c)(2) is not applicable since fuel analyses is not utilized. Requirement §63.7550(c)(3) is not applicable since there are no applicable emission limits and performance testing is not utilized. Requirement §63.7550(c)(4) is not applicable since there are no applicable emission limits and a CMS is not utilized. Only §63.7550(c)(1) is applicable, which references §63.7550(c)(5).
§63.7550(d)	None	This section is not applicable since the boiler is not subject to Subpart DDDDD emission limits.
§63.7550(e)	None	This section is not applicable since the boiler is not subject to Subpart DDDDD emission limits, operating limits, or CMS requirements.
§63.7550(f)	None	This section is reserved.
§63.7550(g)	None	This section is reserved.
§63.7550(h)(1)	None	This requirement is not applicable since no Subpart DDDDD performance test is required.
§63.7550(h)(2)	None	This requirement is not applicable since no CEMS is utilized or required by Subpart DDDDD.
§63.7550(h)(3)	4.5.9.	Since this requirement pertains to the report required by Table 9 of Subpart DDDDD, then it is also written with the compliance report condition 4.5.9.
§63.7555(a)	4.4.5.	This applicable recordkeeping requirement is set forth as a permit condition.

Subpart DDDDD Section	Title V	Discussion
§63.7555(b)	None	This section is not applicable since CEMS, COMS, and CMS are not utilized under Subpart DDDDD.
§63.7555(c)	None	None of the requirements in this section, or Table 8 that it references, are applicable since the boiler is not subject to emission limitations and is not equipped with air pollution control devices.
§63.7555(d)	None	This section is not applicable since the boiler is not subject to emission limitations and operating limitations in Tables 1, 2, or 11 through 13 of Subpart DDDDD.
§63.7555(e)	None	This section is not applicable since the boiler is not subject to emission limitations, and thus emissions averaging is not applicable.
§63.7555(f)	None	This section is not applicable since efficiency credits are not being utilized.
§63.7555(g)	None	This section is not applicable since the boiler is not required to meet the specification for mercury.
§63.7555(h)	None	This section is not applicable since the boiler is not in the unit designed to burn gas 1 subcategory.
§63.7555(i)	4.4.6.	This applicable recordkeeping requirement is set forth as a permit condition.
§63.7555(j)	4.4.7.	This applicable recordkeeping requirement is set forth as a permit condition.
§63.7560	4.4.8.	These applicable recordkeeping requirements are set forth as a permit condition.

Other requirements in Subpart DDDDD not addressed in the table above are not applicable to the units for one or more of the following reasons:

- The unit is not new or reconstructed, as these terms are specified in §§63.7490(b) and (c).
- The unit is not subject to pollutant emission limits pursuant to 40 C.F.R. 63 Subpart DDDDD.
- The unit is not an EGU.
- The unit is not equipped with an add-on air pollution control device.
- The fuel subcategory for the requirement does not apply to the unit.
- The heat input range for the requirement does not apply to the unit.
- The unit does not utilize a CEMS to comply with any Subpart DDDDD requirement.

III. **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. 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.

Affected Steam Generating Units & Applicable Emission Standards

The coal-fired Unit 1 and Unit 2 steam generators are existing EGUs as defined in §63.9982(d), and do not meet any of the exemption criteria in §63.9983. According to Attachments E in the renewal application, both steam generators primarily combust coal with a heating value of 13,000 Btu/lb. The units are also capable of combusting fuel oil as a secondary fuel for startup, shutdown, and for flame stabilization. The fuel oil combusted has a heating value of 19,750 Btu/lb. Therefore, both 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

According to technical correspondence¹ received from the permittee, the compliance plan for Mitchell Plant is in the development stages. The permittee stated that it believes it is premature to try to predict the details of the compliance plan nearly one and one-half years prior to the compliance deadline. The permittee stated that it prefers to use a very generic incorporation of the regulation at this renewal and then the permit can be later clarified to include details of the compliance plan once it is in place.

Placeholder Language for the Title V Permit Renewal

In cases such as this where multiple potential compliance options in the MACT may be utilized and the compliance date is yet future, it has been DAQ's practice to include a permit condition that serves as a placeholder for the particular applicable regulation. This permit condition typically specifies (i) the affected source(s); (ii) the applicable regulation; (iii) the applicable compliance date; and (iv) if required by the regulation to submit a Notification of Compliance Status (NOCS) report, with it to also submit a complete application for a significant modification of the Title V permit in order to incorporate the specific requirements of the regulation, including operating parameters determined during the initial compliance demonstration. Recently, this practice has been supported by a U.S. EPA Order² which states, "Absent a specific requirement in the applicable NESHAP, a source is not required to have determined which of the available compliance approaches it will use to comply with the rule prior to the compliance date....Selection of the particular compliance options for an affected source can be a complex determination. Thus, when a permit is issued prior to the NESHAP compliance date, a source may not have yet determined the provisions that will describe NESHAP applicability beyond the subpart level." Furthermore, the Order refers to a previous EPA statement:

When a permit is issued prior to the MACT compliance date, the EPA believes that it is acceptable for the initial permit to describe MACT applicability at the Subpart level, and for all other compliance requirements (including compliance options and parameter ranges) of the MACT that apply below the Subpart level to be added at a later time as a significant permit modification.

Based upon these facts, the Subpart UUUUU placeholder language and NOCS/title V significant modification submittal requirements are written as permit condition 4.1.15. All other applicable Subpart UUUUU requirements and any required operational parameters resulting from the initial compliance demonstration will be incorporated into the operating permit at a later time utilizing significant modification permitting procedures.

¹ E-mail dated December 2, 2013 from Mr. Jeffrey Palmer, Environmental & Lab Supervisor at the Mitchell Plant.

² Order Responding to Petitioners' Requests that the Administrator Object to Issuance of State Operating Permits (Petition Nos. IV-2012-1, IV-2012-2, IV-2012-3, IV-2012-4, and IV-2012-5) given by Gina McCarthy, Administrator, dated April 14, 2014.

- IV. **40 C.F.R. 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.** The auxiliary boiler (Aux 1) is subject to the applicable requirements of this regulation because it is a steam generating unit of greater than 100 MMBtu/hr heat input capacity and the permittee has acknowledged that recent extensive repairs (permitted in R13-2608C) meet the definition of “reconstruction” under 40 C.F.R. §60.15. As such, Aux 1 meets the applicability criteria under §60.40b(a). Applicable requirements were included in minor modification MM03 during the current operating permit term. Certain requirements that are applicable to Aux 1 are also contained in the requirements of R13-2608E discussed in Section IX of this Fact Sheet.
- V. **Minor Modification MM04 of R30-05100005-2009 & General Permit G60-C057.** The application for this action was received on September 3, 2013. The purpose of the Title V permit minor modification is to incorporate the applicable requirements of Class II Emergency Generator General Permit G60-C057, which was issued by the Director on 10/11/2013 for a four stroke lean burn (4SLB) liquid propane vapor-driven emergency generator. Due to the timing of both this minor modification and the present renewal, the former will be integrated into the renewal operating permit.

Project Description

The proposed project involves the installation of an emergency backup generator at the Mitchell Plant dry fly ash leachate pond lift station. The purpose of the lift station pumping system is to transport leachate from the lift station to the leachate storage pond. The remote location of the lift station requires that the pumps be serviced from an AEP residential distribution line. An emergency liquid propane (LP) vapor fired engine/generator is included in the design to power one pump during a distribution line failure or outage. The generator provides redundancy to the system. The LP vapor driven engine/generator will be served by a dedicated LP tank (500 gallons). In the event of an overflow situation, there would potentially be a direct discharge of leachate to a tributary that flows to Fish Creek. The emergency LP generator is included to help mitigate the risk of having an environmental release.

With the exception of CO, the calculated hourly, daily and annual potential emissions from the LP engine are below the 45CSR13 permitting thresholds. Because the CO emissions are greater than the permitting thresholds, a 45CSR13 permit or general permit registration is required. The permittee has chosen to register the emergency generator under the G60 emergency generator general permit. The engine that is being specified for the installation is one that has been issued a USEPA 2013 Model Year Certificate of Conformity. The engine is approximately 127 brake horsepower and is expected to be operated 500 hours or less per year.

Emissions Changes

According to Attachment S in the minor modification application, the changes in potential emissions (based upon 500 hours per year operation) for this action are:

Pollutant	Increase in Potential Emissions (TPY)
SO ₂	0.003
NO _x	0.186
PM ₁₀	0.0018
CO	5.437
CO ₂	37.19

Pollutant	Increase in Potential Emissions (TPY)
VOC	0.0543

These changes are accounted for in the Emissions Summary of this Fact Sheet.

40 C.F.R. 63 Subpart ZZZZ

The Leachate Pond Emergency Back-up Generator engine is a stationary RICE at a major source of HAP emissions, and is an affected source under §63.6590(a). Specifically, the engine is a *New stationary RICE* due to meeting the criteria in §63.6590(a)(2)(ii). Due to its horsepower rating, the engine does not meet any of the criteria in §63.6590(b) for RICE subject to limited requirements. The engine meets the criteria of §63.6590(c)(3); therefore, the engine must meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R. 60 Subpart JJJJ for spark ignition engines. No further Subpart ZZZZ requirements apply to the engine. Therefore, 40 C.F.R. 63 Subpart ZZZZ is applicable to the engine. The general permit applies NSPS Subpart JJJJ requirements to the engine. Thus, where each NSPS Subpart JJJJ requirement is incorporated into the renewal permit, the applicable Subpart ZZZZ requirement (*i.e.*, 40 C.F.R. §§63.6590(c) and (c)(3)) will be cited as well.

Incorporation of Applicable Requirements into the Title V Permit

The registration provides specific hourly and annual mass rate emission limits for NO_x, CO, and VOC, which are incorporated into the permit as condition 7.1.1. According to the G60-C057 registration (and G60-C057A discussed below), sections 5 and 8 of the general permit are applicable to the engine, which are incorporated into the permit as condition 7.1.2. However, according to the registration for G60-C057 the catalytic reduction device requirements of sections 5.1.4. and 5.2.1. of the general permit are not applicable. Since renewal condition 7.1.2. sets forth the requirement to comply with NSPS Subpart JJJJ, and it is the means of complying with MACT Subpart ZZZZ, 40 C.F.R. §§63.6590(c) and (c)(3) are cited in renewal condition 7.1.2. and an italicized streamlining note is added for clarity in the permit condition.

Condition 5.4.1. of G60-C is utilized to demonstrate compliance with emission limits and operating limits. Conditions 7.4.1. and 7.4.2. are written to (i) detail the specific records necessary to demonstrate compliance with the requirements of condition 7.1.1.; and (ii) to specify that annual emission limits and operating hours are demonstrated on a 12-month rolling total, which is why 45CSR§30-5.1.c. is cited. These conditions are applicable to LPG, as well as to EG-1 and EG-2 that are discussed below in Section X.

Section 6 is used to set emission limits and throughput limits on tanks. No such limitations are recorded in the registration for G60-C057A for LPT. Therefore, Section 6 is not included in permit condition 7.1.2. for the 500-gallon liquid propane tank LPT. However, the tank is listed in permit subsection 1.1.

Refer to the discussion below in Section VIII regarding the non-applicability of 40 C.F.R. Part 64 to the engine LPG.

- VI. **45CSR2 PM Testing.** The current permit condition 4.3.1. states that the next testing shall be performed by July 14, 2009. The deadline to test both units was 12/14/2013, and they were scheduled to be completed then. However, Unit 1 was temporarily taken out of service when high vibrations occurred in a Unit 1 steam turbine. The permittee discussed this issue with Robert Keatley (DAQ Compliance and Enforcement Supervisor) on 11/26/2013, and the plan was to complete the compliance testing within 30 days of both units being returned to normal service. According to 8/11/2014 technical correspondence from the permittee, both units are back in service and PM testing was completed on March 18 and 20, 2014 for Unit 1 and Unit 2, respectively. The emission rates for Unit 1 and Unit 2

are 0.0033 lb/MMBtu and 0.0035 lb/MMBtu, respectively. This test represents the second consecutive compliance test with results less than 80% of the standard. Because the facility was previously on an annual retest schedule, the two most recent test results will now qualify the facility for a two year retest cycle. Therefore, the next testing of Units 1 and 2 must be completed by March 20, 2016.

VII. Emission Source and Equipment Additions and Changes. The following table lists the additions within subsection 1.1. of the permit that are made for this renewal.

Additional Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Boiler & Associated Equipment					
17S	17E	Unit 1 Emergency Diesel Driven Fire Pump	Approx. 1971	230 HP	None
18S	18E	Unit 2 Emergency Diesel Driven Fire Pump	Approx. 1971	230 HP	None
Miscellaneous Other					
Tank #50	Tank #50	Gypsum Storage Building Fuel Oil Tank	2009	1,000 gal.	None
Tank #51	Tank #51	Highway Grade Diesel Tank #1	2011	1,000 gal.	None
Tank #52	Tank #52	Limestone Storage Pile Diesel Tank #1	2011	500 gal.	None
19S	Fugitive	Rock Salt Storage Pile (roadway ice control)	2010	50 tons	Enclosure

Tank #52 was installed at the site and documented in off-permit change OP02. Other off permit changes submitted during the current permit term were mentioned in the renewal application for the addition of Tank #50, Tank #51, and the Rock Salt Storage Pile.

Change to Existing Limestone Storage Pile

The design capacity of the Limestone Active/Long-Term Stockpile (Em. Unit ID: LSSP) is changed from 41,300 tons to 155,000 tons. DAQ was notified of this change in the permittee's letter of September 12, 2011, which provided notification of the change being accomplished as an Off-Permit Change in accordance with operating permit section 2.10. DAQ acknowledged the off-permit change and designated it as OP01. The installation date is also modified to indicate that the off-permit change occurred in 2011.

VIII. 40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM). The 2009 renewal permit accounted for the applicability of CAM to the particulate emissions from the Unit 1 and Unit 2 steam generators. However, there were three minor modifications of the current permit during its term. The applicability of CAM is not evaluated as part of minor modifications; however, it must be performed as part of significant modifications (for large PSEUs) and at permit renewal (for all PSEUs) for past permit actions that were not required to evaluate CAM applicability. In the current permit term, minor modification MM01 incorporated several permitted sources for the Dry Fly Ash Conversion Project. Those sources, as well as others permitted in other minor modification applications, are evaluated in the following discussion.

Sources not subject to CAM

The definition of *Control device* in 40 C.F.R. §64.1 excludes *Inherent process equipment*. According to technical correspondence³ received from the permittee, the mechanical exhausters and filter separators are to be installed for the purpose of properly transporting fly ash from the fly ash hoppers to the transfer stations. Due to their design purpose and function, the Filter/Separators ME-1A, ME-1B, ME-1C, ME-2A, ME-2B, and ME-2C are considered *Inherent process equipment* as this term is defined in 40 C.F.R. §64.1. Therefore, the mechanical exhausters and filter separators are not control devices for CAM purposes and the Filter/Separators ME-1A, ME-1B, ME-1C, ME-2A, ME-2B, and ME-2C are not subject to 40 C.F.R. Part 64.

Fly Ash Silos FAS-A, FAS-B, and FAS-C each have potential pre-control device emissions of 4.6 tons per year (this assumes that all dry fly ash is processed through only one silo, which would not be the normal operating scenario). Therefore, the silos do not meet the applicability criterion of 40 C.F.R. §64.2(a)(3) and consequently are not subject to 40 C.F.R. Part 64.

Particulate matter emissions from the transfer of conditioned fly ash from the silos to trucks (Em. Unit IDs: WFA-AA, WFA-AB, WFA-BA, WFA-BB, WFA-CA, and WFA-CB) are controlled using moisture control (MC). Moisture control in this case does not meet the definition of *Control device* in §64.1 since MC is not equipment used to destroy or remove air pollutants, and is a passive control measure. Therefore, these particular transfer sources do not meet the control device criterion of 40 C.F.R. §64.2(a)(2) and thus CAM does not apply to them.

Telescopic chutes TC-A, TC-B, and TC-C are not subject to an emission limitation or standard, and therefore do not meet the criterion of 40 C.F.R. §64.2(a)(1) and thus CAM does not apply to them.

The emergency generator engine LPG is incorporated into this renewal permit as described above in the discussion of minor modification MM04 of R30-05100005-2009 and General Permit G60-C057. The engine LPG does not have pre-control potential emissions, in tons per year, of a pollutant greater than its major source threshold. Furthermore, no air pollution control device is utilized for the engine. Therefore, the applicability criteria in §§64.2(a)(2) and (3) are not met and CAM does not apply to LPG. This same determination is applicable to the engine's tank LPT with the addition that the tank is not subject to an emission limitation or standard.

The emergency generator engines EG-1 and EG-2 are incorporated into this renewal permit as described below in the discussion of minor modification MM06 of R30-05100005-2009 and General Permit G60-C057A. Neither EG-1 nor EG-2 have individual pre-control potential emissions, in tons per year, of a pollutant greater than its major source threshold. Furthermore, no air pollution control devices are utilized for the engines. Therefore, the applicability criteria in §§64.2(a)(2) and (3) are not met and CAM does not apply to EG-1 and EG-2. This same determination is applicable to the engines' tanks EGT01 and EGT02 with the addition that the tanks are not subject to an emission limitation or standard.

CAM Testing

Condition 4.2.7. of the current permit required the permittee to perform testing in order to verify the CAM opacity requirements in condition 4.2.6. as being adequate and accurate for purposes of satisfying 40 C.F.R. Part 64. Such testing has been completed within 180 days of the issuance of the last renewal permit. Any subsequent need for CAM-related testing will be documented and reported in accordance with §64.7(e) (Documentation of Need of Improved Monitoring, condition 4.2.9.) and potentially §64.8 (Quality Improvement Plan, condition 4.2.10.). Therefore, current permit condition 4.2.7. for CAM-related testing and CAM plan implementation is not included in the renewal operating permit.

³ E-mail dated December 19, 2013 from Mr. Jeffrey Palmer, Environmental & Lab Supervisor at the Mitchell Plant.
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R13-2608E	Title V	Discussion
5.2.3.	4.2.15.	The underlying requirement is written in the renewal permit. However, the second paragraph provides for Method 22 observations if the most recent observation was less than 10% opacity. But the last sentence in the second paragraph of the underlying requirement reads “Record of Method 9 observation shall contain...” Since Method 9 requirements are covered in the first paragraph, and the second paragraph specifies the requirements for Method 22, the last sentence of the second paragraph is changed to “Record of Method 22 observations shall contain...” Finally, 45CSR16 is added to the citation of authority.
Recordkeeping		
5.4.1.	3.4.1.	The requirement is already embodied in boilerplate condition 3.4.1. Therefore, the underlying requirement for Aux 1 is cited at the end of the permit condition.
5.4.2.	3.4.5.	The requirement is already embodied in boilerplate condition 3.4.5. Only condition number 5.4.2. is added to the citation of authority.
5.4.3.	3.4.6.	The requirement is already embodied in boilerplate condition 3.4.6. Only condition number 5.4.3. is added to the citation of authority.
5.4.4.	4.1.14.(vi)	The underlying requirement is already included in the condition written directly from 40 C.F.R. 63 Subpart DDDDD. Therefore, the underlying requirement 5.4.4. is cited for Title V condition 4.1.14.
Reporting		
5.5.1.	4.5.7.	The underlying requirement is already included in the condition written directly from 40 C.F.R. 63 Subpart DDDDD. Therefore, the underlying requirement 5.5.1. is cited for Title V condition 4.5.7. While the underlying permit cites §63.7530(d), this section will not be cited in the Title V permit since it is not applicable. Refer to the above discussion in Table DDDDD.
5.5.2.	4.5.9.	The underlying requirement is already included in the condition written directly from 40 C.F.R. 63 Subpart DDDDD. Therefore, the underlying requirement 5.5.2. is cited for Title V condition 4.5.9.
5.5.3.	4.5.10.	The underlying requirement is written in the renewal permit. 45CSR16 is added to the citation of authority.

- X. **Minor Modification MM06 of R30-05100005-2009 and Class II Emergency Generator General Permit G60-C057A.** The application for this action was received on June 13, 2014. General permit G60-C057A was issued for the installation of two new emergency generators EG-1 and EG-2, each powered by a dedicated reciprocating internal combustion engines (RICE). To support the engines, two (2) new 4,800-gallon storage tanks EGT01 and EGT02 will be installed.

The generator identified as EG-1 will be a 2014 model year Caterpillar generator set rated to deliver 2,500 kW of electricity at 4,160 volts. The engine for this set is a CAT® C175-16 diesel engine with a power output rating of 3,717 horsepower (bhp) at 1,800 revolutions per minute (rpm). EG-2 is another Caterpillar Generator Set but rated to deliver 2,050 kW at 13,800 Volts. The engine for EG-2 is a 2014 model year CAT® 3516C diesel engine with a power output rating of 3,004 bhp at 1,800 rpm. As the manufacturer, Caterpillar has certified both of these engine models conform to emission standards of Part 60 as an emergency stationary engine. No air pollution control devices are utilized for the engines.

Emissions Changes

According to the Engineering Evaluation for G60-C057A, the changes in potential emissions (based upon 500 hours per year of operation) accounting for both engines are:

Pollutant	Increase in Potential Emissions (TPY)
SO ₂	0.11
NO _x	24.08
PM ₁₀	0.19
CO	3.13
VOC	0.54

These changes are accounted for in the Emissions Summary of this Fact Sheet.

40 C.F.R. 60 Subpart III

This subpart applies to stationary compression ignition engines and the owners and operators of such engines that commence construction after July 11, 2005 where the engine is manufactured after April 1, 2006 and is not a fire pump engine (cf. §60.4200(a)(2)(i)). The permittee will commence construction after July 11, 2005 of emergency generators equipped with CI engines manufactured after April 1, 2006. To comply with the applicable provisions in 40 C.F.R. §60.4205(b), the permittee has elected to purchase certified engines as allowed under 40 C.F.R. §60.4211(c) and operate such emergency engines according to the manufacturer’s emission-related written instructions.

40 C.F.R. 63 Subpart ZZZZ

The emergency generator engines EG-1 and EG-2 are stationary RICE at a major source of HAP emissions, and are affected sources under §63.6590(a). Specifically, the engine is a *New stationary RICE* due to meeting the criteria in §63.6590(a)(2)(i). The engines are permitted to operate up to 500 hours per calendar year since the emission limits in the registration for G60-C057A are based on 500 hours per year. Even though both engines are emergency generators, they are not considered *Limited use stationary RICE* since they are permitted to operate more than 100 hours per year (cf. definition in §63.6675). The units are considered *Emergency stationary RICE* as this term is defined in §63.6675.

Since the engines are new affected sources; are considered *Emergency stationary RICE*; their horsepower ratings are greater than 500-bhp; and the engines are located at a major source of HAPs; therefore, the engines meet the criteria in §63.6590(b)(1)(i) for RICE subject to limited requirements. According to §63.6590(b)(1), such RICE do not have to meet the requirements of Subpart ZZZZ and Subpart A *except* for the initial notification requirements of §63.6645(f). 40 C.F.R. §63.6645(f) requires the initial notification to include items in §63.9(b)(2)(i) through (v) (i.e., Subpart A requirements). So while §63.6590(b)(1) states that the source is not subject to Subpart A, it also reads “except” for the requirements in §63.6645(f). Since §63.6645(f) incorporates Subpart A requirements, they are applicable.

New permit condition 7.5.2. is based upon the initial notification requirements in §63.6645(f). This section IBRs §63.9(b)(2), which reads:

The owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under this part shall notify the Administrator in writing that the source is subject to the relevant standard. The notification, which shall be submitted not later than 120 calendar

days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the information in 63.9(b)(2)(i) through (v).

The initial startup will be after the effective date of Subpart ZZZZ since the units become subject to Subpart ZZZZ upon initial startup. The initial notification must be submitted within 120 calendar days after the startup. The language of §63.9(b)(2) is simplified for this case and is written as the second paragraph of condition 7.5.2.

Incorporation of Applicable Requirements into the Title V Permit

The registration provides specific hourly and annual mass rate emission limits for NO_x, CO, and VOC, which are incorporated into the permit as condition 7.1.1. There is a typographical error in the underlying registration G60-C057A. For EG-2 the annual VOC limitation is 0.03 tpy in the registration, but it should have been 0.30 tpy. The Engineering Evaluation for the underlying permit lists 0.3 tpy in two places. Also, the Emission Summary Sheets (Attachment O of the NSR application) reads 0.30 tpy of VOC for EG-2. Since the annual VOC for EG-2 will be corrected, then the total of all three sources in the table will change from 0.33 tpy to 0.60 tpy.

Sections 5 and 7 of the general permit are applicable to the engines, and these requirements are incorporated into the permit as condition 7.1.3. Section 6 is used to set emission limits and throughput limits on tanks. No such limitations are recorded in the registration for G60-C057A. Therefore, Section 6 is not included in permit condition 7.1.3. for the 4,800-gallon diesel fuel tanks EGT01 and EGT02. However, the tanks are listed in permit subsection 1.1.

Condition 5.4.1. of G60-C is utilized to demonstrate compliance with emission limits and operating limits. Conditions 7.4.1. and 7.4.2. are written to (i) detail the specific records necessary to demonstrate compliance with the requirements of condition 7.1.1.; and (ii) to specify that annual emission limits and operating hours are demonstrated on a 12-month rolling total, which is why 45CSR§30-5.1.c. is cited. These conditions are applicable to LPG, EG-1, and EG-2.

Refer to the discussion above in Section VIII regarding the non-applicability of 40 C.F.R. Part 64 to the engines EG-1 and EG-2.

XI. Miscellaneous Changes

- a. **Phase II Acid Rain Permit.** The previous Acid Rain Permit R33-3948-2012-3 was removed from the current Title V permit as part of an Administrative Amendment during the permit term. As a practice, DAQ is not appending Acid Rain permits to Title V permits. Therefore, the current Acid Rain permit R33-3948-2017-4A is not included in this renewal Title V permit as Appendix B. Note, however, that the Acid Rain requirements are retained in conditions 4.2.2. and 4.5.5. of the renewal permit.
- b. **Appendices.** Appendix B was reserved in the current permit since the Acid Rain permit was deleted. However, for this renewal, Appendix B is no longer reserved. The other appendices following it have been renamed in the renewal permit. Consequently, the appendices' alphabetic designations are revised in permit conditions 3.1.11., 3.1.12., 3.1.13., 4.1.2., 4.1.11., and 5.4.8.
- c. Condition 5.1.18. was evaluated to ensure that the requirements and NSPS Subpart OOO citations were still accurate since the regulation was revised on April 28, 2009.. The only change made was in condition 5.1.18.a. where the phrase “no visible opacity per 40 C.F.R. §60.672(e)(1)” was changed to “7% opacity per 40 C.F.R. §60.672(e)(1)”.

- d. **Emission Units Table.** The following changes are made to the emission units table based upon technical correspondence received from the permittee on 8/20/2014.
- i. Under Fly Ash Material Handling, the year installed is “Future” for FAS-C, WFA-CA, WFA-CB (spare), and TC-C.
 - ii. Under 3S – Limestone Mineral Processing, the year installed is “Future” for LSB-3.
 - iii. Under 11S – Wastewater Treatment Material Handling, the following are removed.

Em. Unit	Em. Pt.	Description	Year	Design Capacity	Control Device
Tank #4	Tank #4	Used Oil Tank – S. of U1 Cooling Tower	Relocated ~2004	1,000 gal	N/A
Tank #8	Tank #8	Diethylene Glycol Tank – N. of Station R-4	2002	500 gal	N/A
Tank #9	Tank #9	Diethylene Glycol Tank – Station 3	2002	300 gal	N/A
Tank #10	Tank #10	Diethylene Glycol Tank – Station R-4	2002	300 gal	N/A
Tank #32	Tank #32	Waste Oil Tank – Tractor Shed Oil Room	~2000	500 gal	
Tank #48	Tank #48	Aux. Boiler Collection Tank Return UST	2006	500 gal	N/A

The permittee noted that Tank #32 is a second listing of Tank #5 Used Oil Tank – Tractor Shed.

- iv. Under 11S – Wastewater Treatment Material Handling, the year is changed to 2014 for Tank #16.
- v. Under 11S – Wastewater Treatment Material Handling, the description “U1” is changed to “U0” for Tank #24.

Non-Applicability Determinations

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

- a. **45CSR5 – To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations and Coal Refuse Disposal Areas.** Since the facility is subject to 45CSR2, according to 45CSR§5-2.4.b. the facility is not included in the definition of a “Coal Preparation Plant”. Therefore, 45CSR5 does not apply to the facility, and particularly to its coal crushing operations and associated coal handling.
- b. **45CSR7 – To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations.** Since the facility is subject to 45CSR2, 45CSR§7-10.1. provides an exemption from 45CSR7.
- c. **45CSR17 – To Prevent and Control Particulate Matter Air Pollution from Material Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter.** The facility is characterized by the handling and storage of materials that have the potential to produce fugitive particulate if not properly controlled. However, since the facility is subject to 45CSR2, it is not subject to this rule in accordance with the exemption granted in 45CSR§17-6.1.

- d. **40 C.F.R. 60 Subpart D – Standards of Performance for Fossil-fuel-fired Steam Generators for which Construction is Commenced after August 17, 1971.** The fossil-fuel-fired steam generators potentially affected by this rule have not commenced construction or modification after August 17, 1971. Therefore, the units do not meet the applicability criteria under §60.40(c), and hence the NSPS does not apply.
- e. **40 C.F.R. 60 Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for which Construction is Commenced After September 18, 1978.** The electric utility steam generating units (i.e., Unit 1 and Unit 2) potentially affected by this rule have not commenced construction or modification after September 18, 1978. Therefore, the units do not meet the applicability criteria under §60.40Da(a)(2), and hence the NSPS does not apply to Unit 1 and Unit 2. The auxiliary boiler (Aux 1) was not constructed or reconstructed “for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW net-electrical output to any utility power distribution system for sale.” As such, Aux 1 does not meet the definition of an *Electric utility steam-generating unit* in §60.41Da, and therefore, does not meet the applicability criteria of §60.40Da(a). Consequently, NSPS Subpart Da does not apply to Aux 1.
- f. **40 C.F.R. 60 Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.** The facility does not include storage vessels that are used to store petroleum liquids (as defined in 40 C.F.R. §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. Therefore, the tanks do not meet the applicability criteria under §60.110, and hence the NSPS does not apply.
- g. **40 C.F.R. 60 Subpart Ka - 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.** The facility does not include storage vessels that are used to store petroleum liquids (as defined in 40 C.F.R. §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. Therefore, the tanks do not meet the applicability criteria under §60.110a(a), and hence the NSPS does not apply.
- h. **40 C.F.R. 60 Subpart Kb - 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.** 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. Therefore, the tanks do not meet the applicability criteria under §60.110b, and hence the NSPS does not apply.
- i. **40 C.F.R. 60 Subpart Y – Standards of Performance for Coal Preparation Plants.** The coal handling equipment potentially affected by this rule has not been constructed or modified after October 24, 1974. Therefore, the equipment does not meet the applicability criteria set forth in 40 C.F.R. §60.250(b), and hence this NSPS does not apply.
- j. **40 C.F.R. 63 Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers.** This facility does not include *industrial process cooling towers* that have operated with chromium-based water treatment chemicals. Therefore, the facility does not meet the applicability criteria set forth in §63.400(a), and hence this MACT does not apply to the facility.

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: August 28, 2014
Ending Date: September 29, 2014

Point of Contact

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

Denton B. McDerment
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

No comments were received from U.S. EPA. The permittee submitted the following comment via e-mail on September 29, 2014:

The facility owner/operator listed in a number of locations throughout the fact sheet and draft permit appears to have inadvertently been left as "Ohio Power Company." Instead, Ohio Power Company should be replaced by Kentucky Power Company. This transfer of the Title V permit from Ohio Power Company to Kentucky Power Company was effective January 1, 2014.

DAQ administrative files for the source concur with the requested change; therefore, all occurrences of the name have been revised in the final permit and fact sheet.