

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on May 14, 2013.

Permit Number: **R30-06100134-2013**
Application Received: **February 4, 2016**
Plant Identification Number: **03-54-061-00134**
Permittee: **Longview Power, LLC**
Facility Name: **Longview Power Plant**
Mailing Address: **1375 Fort Martin Road, Madsville, WV 26541**

Permit Action Number: *MM01* Revised: *October 3, 2016*

Physical Location: Madsville, Monongalia County, West Virginia
UTM Coordinates: 589.2 km Easting • 4395.7 km Northing • Zone 17
Directions: From Morgantown, take WV Route 19 West to Route 100 North to
Route 53 (Fort Martin Road). Proceed 5.4 miles. Turn left into Gate 2.
Proceed to security.

Facility Description

Longview is an electric generating unit and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of a 6,114 MMBtu/hr pulverized coal fired boiler, steam turbine generator, and a natural gas fired auxiliary boiler, with associated equipment including coal, limestone, and ash handling, a cooling tower, an emergency generator, and a fire pump. 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 minor modification incorporates the requirements of the recently issued permit R14-0024F which is to address the methodology used to determine compliance with the heat input limitation in Condition 5.1.1. and correct the annual capacity factor for the auxiliary boiler into terms as specified in 40 CFR §60.41b.

Emissions Summary

There are no changes in potential emissions associated with this minor modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 2,953 tons per year of CO, 2,420 tons per year of SO₂, 1,791 tons per year of NO_x, and 521 tons per year of PM₁₀. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Longview Power 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:

45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
40 C.F.R. 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

State Only:

N/A

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>)
R14-0024F	July 1, 2016	

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

Below are the revisions made to R30-06100134-2013 in association with this modification:

- 1) The facility mailing address has been updated.
- 2) The Section 1.2 Table “Active R13, R14, and R19 Permits” has been updated for R14-0024F issued on July 1, 2016.
- 3) The language in the following conditions has been updated to match the language in Permit R14-0024F: 3.1.12.f., 3.2.1., 4.1.1.a., 5.1.1.a., 5.2.1.f., 6.1.1.b., 6.2.1. and 7.1.1.

Additionally;

- The citation of authority in condition 3.2.1. has been changed from “45CSR§30-5.1.c” to “45CSR14, R14-0024 §3.2.1.”
- For clarification, the last sentence in condition 5.2.1.f. of the Title V permit has been revised from that of condition 5.2.1.f. in Permit R14-024F. Carbon Monoxide (CO) emissions are not required to be monitored in 40 CFR Part 75. Longview utilizes oxygen (O₂) as the diluent gas for derivation of CO lb/MMBtu. CO is a "Part 60 only" parameter, and O₂ is not used by Longview for any other emission calculations. Carbon dioxide (CO₂) is used as the diluent gas for all Part 75 parameters. Therefore the language in the last sentence has been revised to clarify that the O₂ monitor shall comply with the performance and quality assurance requirements of 40 CFR 60 and the CO₂ monitor shall comply with the performance and quality assurance requirements of 40 CFR 75.
- In R14-0024F, for condition 7.1.1., the old item “e” has been combined with item “d.” A typographical error occurred resulting in the old item “f” being mislabeled as “d” and the old item “g” being mislabeled as “e.” This typo has been corrected in the title V permit resulting in old item “f” being labeled as “e” and old item “g” being labeled as “f.”
- The reference to 7.1.1. in condition 7.2.1. has been updated to include 7.1.1.d.

Non-Applicability Determinations

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

N/A

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: Not Applicable for minor modifications.
Ending Date: N/A

Point of Contact

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

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

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

Not applicable.