

# Fact Sheet



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

Permit Number: **R30-06100134-2018**  
Application Received: **June 15, 2017**  
Plant Identification Number: **061-00134**  
Permittee: **Longview Power, LLC**  
Facility Name: **Longview Power Plant**  
Mailing Address: **1375 Fort Martin Road, Madsville, WV 26541**

*Revised: NA*

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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.

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### 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.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions*</b>	<b>2016 Actual Emissions</b>
Carbon Monoxide (CO)	2954	1223.75
Nitrogen Oxides (NO <sub>x</sub> )	1755	1454.60
Particulate Matter (PM <sub>2.5</sub> )	207	11.39
Particulate Matter (PM <sub>10</sub> )	422	21.65
Total Particulate Matter (TSP)	445	69.82
Sulfur Dioxide (SO <sub>2</sub> )	2418	1898.72
Volatile Organic Compounds (VOC)	97	2.78

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2016 Actual Emissions</b>
Total HAPs ( <i>all individual HAPs are &lt;10 TPY</i> )	15.87	11.54

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

\* The PTE calculations have been updated to include the following:

- Former emission units SA-3, SA-8, SA-9, and SA-12, all within the ash handling system, have been permanently removed from Longview.
- Maximum annual operating hours for emission units EG-1 and EP-1 (emergency generator and fire pump) have each been reduced to 100 hours/year to reflect the limitation of 40 CFR 60 Subpart III.
- Moisture contents used for coal, limestone and ash handling calculations now reflect actual averages observed through ongoing analyses.
- The PM PTE for the coal boiler has been reduced to reflect the 0.015 Ib/MMBtu limit of 40 CFR 60.42Da(c)(2).

### Title V Program Applicability Basis

This facility has the potential to emit 2,954 tons per year of CO, 2,418 tons per year of SO<sub>2</sub>, 1,755 tons per year of NO<sub>x</sub>, and 422 tons per year of PM<sub>10</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Longview Power, LLC's 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Control Of Air Pollution From Combustion Of Refuse
45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers.
45CSR11	Prevention Of Air Pollution Emergency Episodes
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR14	Permits For Construction And Major Modification Of Major Stationary Sources Of Air Pollution For The Prevention Of Significant Deterioration
45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
45CSR30	Requirements For Operating Permits
45CSR33	Acid Rain Provisions And Permits
45CSR34	Emission Standards For Hazardous Air Pollutants
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
40 C.F.R. 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units
40 C.F.R. 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. 60, Subpart Y	Standards of Performance for Coal Preparation Plants
40 C.F.R. 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants
40 C.F.R. 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 C.F.R. 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units
40 C.F.R. Part 64	Compliance Assurance Monitoring
40 C.F.R. Part 72	Permits Regulation
40 C.F.R. Part 73	Sulfur Dioxide Allowance System
40 C.F.R. Part 74	Sulfur Dioxide Opt-ins
40 C.F.R. Part 75	Continuous Emissions Monitoring
40 C.F.R. Part 76	Acid Rain Nitrogen Oxides Emission Reduction Program
40 C.F.R. Part 77	Excess Emissions
40 C.F.R. Part 78	Appeals Procedure (for Acid Rain Program)
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
40 C.F.R. Part 97, Subpart AAAAA	TR NO <sub>x</sub> Annual Trading Program
40 C.F.R. Part 97, Subpart CCCCC	TR SO <sub>2</sub> Group 1 Trading Program
40 C.F.R. Part 97, Subpart EEEEE	TR NO <sub>x</sub> Ozone Season Group 2 Trading Program

State Only:

45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors
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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	
R33-56671-2018-2	December 17, 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

- ❖ This is a renewal of the Title V permit which was issued on May 14, 2013 and modified on September 3, 2015 and October 3, 2016. Significant changes to the most recent version of the Title V Permit consist of the following:

#### 1) Title V Boilerplate changes

- **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.

#### 2) Condition 1.1. - Emission Units Table

- Removed the following emission units from the "Ash-Handling System" section of the table: SA-3, SA-8, SA-12, and SA-9. These emission units have been permanently removed from the facility

- 3) **Condition 3.1.9.** - This condition contained the requirements of 45CSR39 (CAIR NO<sub>x</sub> Annual Trading Program). Since CAIR has been replaced with the Transport Rule (TR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the "TR NO<sub>x</sub> Annual Trading Program" of 40 C.F.R. §97.406. The requirements of the Transport Rule have been added in Appendix A of the permit

- 4) **Condition 3.1.10.** - This condition contained requirements of 45CSR40 (CAIR NO<sub>x</sub> Ozone Season Trading Program). Since CAIR has been replaced with the Transport Rule (TR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the "TR NO<sub>x</sub> Ozone Season Group 2 Trading Program" of 40 C.F.R. §97.806. The requirements of the Transport Rule have been added in Appendix A of the permit.

- 5) **Condition 3.1.11.** - This condition contained requirements of 45CSR41 (CAIR SO<sub>2</sub> Trading Program). Since CAIR has been replaced with the Transport Rule (TR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the “TR SO<sub>2</sub> Group 1 Trading Program” of 40 C.F.R. §97.606. The requirements of the Transport Rule have been added in Appendix A of the permit.
- 6) **Section 5.0**
- The requirements of 40 CFR 63 Subpart UUUUU (MATS) have been added in Section 5 of the permit. See discussion below.
  - Condition 5.1.14 - This condition was previously “Reserved” and has been replaced with the requirements of the subsequent condition. As a result, all subsequent conditions have been renumbered.
  - Conditions 5.1.18. and 5.1.19. (current permit) – These conditions contained generic placeholder requirements for 40 CFR 63 Subpart UUUUU. The placeholder language has been replaced with specific requirements from Subpart UUUUU.
  - Condition 5.2.9 – This condition contained a requirement for the commencement of operation for 40 CFR Part 64 CAM monitoring. The requirement has been satisfied and therefore removed from the renewal permit. As a result, all subsequent conditions have been renumbered.
  - Condition 5.2.15. – This condition contains the requirements from 40 CFR §63.10010(i)(5) and has been added as monitoring using a PM CEMS. The language in §63.10010(i)(5) which specifies the frequency of collecting the CEMS data has the phrase “*and at the intervals specified in paragraph (a) of this section*” as part of the requirement. However, the requirements in paragraph (a) of 40 CFR §63.10010 that are applicable to the Longview Plant do not specify any intervals for collecting data. Therefore, this phrase has not been included in the Title V permit.
- 7) **Condition 7.1.3.** - This condition was previously “Reserved” and has been replaced with the requirements of the subsequent condition.
- 8) **APPENDIX A** – The CAIR requirements have been replaced with the Transport Rule Requirements.
- 9) **APPENDIX C** – This appendix which contains the Acid Rain Permit, has been added to the renewal permit.
- ❖ **40 C.F.R. 63 Subpart UUUUU – National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units**
- This regulation, also known as the “Utility Mercury and Air Toxics (MATS)” rule, applies to coal- and oil-fired EGUs as defined in §63.10042 of 40 C.F.R. Part 63. The Utility MATS rule establishes national emission limitations and work practice standards for mercury, acid gases, and filterable particulate matter, as well as requirements to demonstrate initial and continuous compliance with the emission limitations and work practice standards. Existing affected sources must comply with the requirements of Subpart UUUUU no later than April 16, 2015 (cf. §63.9984(b)). However, in accordance with §64.9984(f), compliance demonstration by conducting the required performance tests and other activities must be completed no later than 180 days after said compliance date. Longview has met the initial compliance requirements.

The coal-fired Unit 1, steam generator is an existing EGU as defined in §63.9982(d), and does not meet any of the exemption criteria in §63.9983. It primarily combusts coal with a heating value

greater than 8,300 Btu/lb. The unit is also capable of combusting natural gas as a secondary fuel for startup, shutdown, and for flame stabilization. Unit 1 meets the criterion of §63.9990(a)(1) for units combusting coal with a heating value greater than 8,300 Btu/lb, and as such does not combust low rank virgin coal.

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

On February 27, 2015 Longview Power Plant shut down for a 3-month maintenance/repair outage. CEMS data from the last 30 boiler operating days prior to shutdown was used to document Longview's compliance status.

- *Filterable Particulate Matter (PM)*

The permittee has elected to comply with the 0.30 lb/MWh filterable particulate matter (PM) limitation (rather than Total non-Hg HAP metals, or Individual HAP metals). The initial compliance was demonstrated in January and February of 2015 resulting in 0.01 lb/MWh. As a result, in accordance with 40 CFR §63.10010(i), compliance will be demonstrated through the certified PM CEMS.

- *Sulfur Dioxide (SO<sub>2</sub>)*

The permittee has elected to comply with the 1.5 lb/MWh sulfur dioxide (SO<sub>2</sub>) limitation (rather than HCl) using SO<sub>2</sub> CEMS (which is the only compliance method for SO<sub>2</sub> as provided in Item #1 of Table 2 to Subpart UUUUU). The initial compliance was demonstrated in January and February of 2015 resulting in 0.6 lb/MWh. Continuous compliance will be demonstrated using the SO<sub>2</sub> CEMS.

- *Mercury (Hg)*

The permittee has elected to comply with the 0.013 lb/GWh mercury (Hg) limitation utilizing an Hg CEMS. The initial compliance was demonstrated in January and February of 2015 resulting in 0.001 lb/GWh. Continuous compliance will be demonstrated using the Hg CEMS.

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

The permittee has implemented neural network combustion optimization and will conduct a tune-up of the EGU burner and combustion controls at least each 48 calendar months as specified in 40 C.F.R. §63.10021(e).

- *Work Practice Standard for Startup & Shutdown*

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

- The applicable requirements for an EGU utilizing PM CEMS, SO<sub>2</sub> CEMS, and Hg CEMS have been included in Section 5 of the permit. The initial compliance demonstration has been completed and the NOCS has been submitted therefore these requirements are not included in the permit.

- The permittee has not indicated the desire to qualify for LEE status and therefore the LEE requirements have not been included in the permit.
- A PM continuous parametric monitoring system (CPMS) is not being utilized, therefore the PM CPMS requirements have not been included in the permit.
- The permittee has indicated emission averaging will not be utilized, therefore the emission averaging requirements are not included in the permit.
- The permittee has not indicated that the facility is required to make corrections for stack gas moisture, therefore stack gas moisture requirements have not been included in the permit.
- Since the permittee has elected to comply with the alternative SO<sub>2</sub> limit instead of HCl, and is not subject to an HF limit, requirements pertaining to HCl and HF are not included in the permit.
- The permittee has elected to comply with the PM limit as opposed to total non-Hg HAP metals or Individual HAP metals, therefore requirements pertaining to non-Hg HAP metals or Individual HAP metals are not included in the permit.

### Non-Applicability Determinations

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

45CSR5	Pursuant to 45CSR5, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR5. 45CSR2 is applicable to the facility.
45CSR17	Pursuant to 45CSR17, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR17. 45CSR2 is applicable to the facility.
40 C.F.R. 60 Subpart Kb	The facility does not include storage vessels greater than or equal to 75 cubic meters that are used to store volatile organic liquids for which construction, reconstruction or modification commenced after July 23, 1984.
40 CFR 63 Subpart JJJJJ	The auxiliary boiler is a gas-fired boiler and therefore not subject to this subpart pursuant to §63.11195(e).

### 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: April 25, 2018  
Ending Date: May 25, 2018

## 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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1215 • 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)

Written comments were received during the public comment period from Mr. Joseph R. Douglass, Asset and Environmental Director at the Longview Power Plant. The comments submitted on the draft permit are listed below with the response to comments and resulting change to the permit:

### Comment

**Provision 5.2.1.a.** - typo in citation at bottom, "*40 CFR 63.10010(i)(1)*" should be "*40 CFR §63.10010(i)(1)*".

### Response:

*The citation has been changed to 40 CFR §63.10010(i)(1).*

### Comment

**Provision 5.2.15.a.1. and 5.2.15.a.2.** - These provisions refer to "*annual deviation reports*". The language of these provisions is correctly quoted from 63.10010(i)(5)(i)(A) and 63.10010(i)(5)(i)(B). However, there is no "*annual deviation report*" under Part 63. This is an apparent error from EPA's rule-writing. Please refer to 63.10031(b) and Table 8 to Subpart UUUUU. The reports in question should correctly be referred to as the Subpart UUUUU "*semi-annual compliance reports*". This terminology is important, as it must not be confused with the Title V annual "compliance certification" as specified at permit provision #3.5.5. or the Title V "semi-annual monitoring report" as specified at permit provision #3.5.6.

### Response:

It appears that "*annual deviation reports*" is in error in the above-mentioned sections of 40 CFR 63 Subpart UUUUU. This subpart does not have requirements to submit an annual deviation report. As you have stated, the reporting requirements in 40 CFR §63.10031(b) and Table 8 contain the requirements to submit semi-annual compliance reports. Table 8 specifies that the information in 40 CFR §63.10031(e) must be included in the semi-annual compliance report if there were periods during which the CMSs, including continuous emissions monitoring systems and continuous parameter monitoring systems, were out of control. Given that Subpart UUUUU requires semi-annual compliance reports and that the "*annual deviation reports*" terminology is in error, "*annual deviation reports*" has been changed to "*semi-annual compliance reports*" in these permit conditions. The USEPA has been consulted and agrees with this determination.

**Comment**

**Provision 5.5.15.** - The first sentence references a "*...performance evaluation test, as defined in §63.2...*". While this language is correctly quoted from 63.10031(f)(1), please note that there is no "*performance evaluation test*" defined at 63.2, or at 63.10042. This is another apparent error from EPA's rule-writing. 63.2 provides separate definitions for "*performance evaluation*" and "*performance test*". 63.10031(f) refers to reporting each "*performance test*". So the first sentence of Provision 5.5.15. should refer to "*performance test*". "*Performance evaluation*" could include daily calibration data from normal operations, which are beyond the scope of the performance test. Also, daily CEMS calibration data for SO<sub>2</sub> and Hg are already reported to EPA via quarterly EDRs.

In the last sentence of Provision 5.5.15, the draft provides that "Owners or operators shall submit calibration error testing, drift checks, and other information required in the performance evaluation as described in §63.2 and as required in this chapter." Longview interprets this to mean the specific "performance evaluation" data directly associated with a "performance test", such as the daily calibration immediately preceding a RATA. Please provide further clarification if necessary.

**Response:**

A clarification has been made by the USEPA. The correct terminology should be "*performance evaluation*" with the performance evaluation being a RATA for non-PM CEMS or an RCA or RRA for PM CEMS. Therefore "*performance evaluation test*" has been revised to "*performance evaluation*" in the final permit.

**Comment**

**Appendix A - "Transport Rule (TR) Trading Program Title V Requirements"** - This Appendix is a lengthy, (10 page) collection of Transport Rule provisions. This Appendix adds considerable length, but very little value to the permit. Aside from the potential for transcription errors or omissions (several were identified in the pre-draft), this static Appendix could conflict with updates to the Transport Rule (which seem highly likely to occur during the 5 year term of this renewal). Appendix A is simply not helpful or necessary. For purposes of brevity and consistency, the permit should reference pertinent citations of the Transport rules, but avoid repeating or paraphrasing them. Longview respectfully requests that this Appendix A be removed entirely, or reduced to concise list of pertinent citations.

**Response:**

The USEPA issued a memorandum regarding Title V Permit Guidance and Template for the Cross-State Air Pollution Rule (CSAPR). The Title V guidance document includes a template to assist states in incorporating the Transport Rule (TR) Trading Program Requirements into the Title V permit to satisfy CSAPR. These template requirements are the requirements in Appendix A. Incorporating the requirements by reference (IBR) is not an option that EPA would approve. Therefore, no changes to the draft permit have been made to Appendix A.