

# Fact Sheet



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

Permit Number: **R30-07300005-2013**  
Application Received: **October 19, 2012**  
Plant Identification Number: **073-00005/073-00004**  
Permittee: **Allegheny Energy Supply Company, LLC**  
Facility Name: **Pleasants-Willow Island Power Stations**  
Mailing Address: **800 Cabin Hill Drive, Greensburg, Pa 15601**

*Revised: N/A*

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Physical Location: Willow Island, Pleasants County, West Virginia  
UTM Coordinates: Pleasants: 474.49 km Easting • 4357.40 km Northing • Zone 17  
Willow Island: 474.13 km Easting • 4357.36 km Northing • Zone 17  
Directions: From Charleston take Interstate 77 North to Exit 179. Travel north on State Route 2 approximately 7 miles to Willow Island. Facility is located on the left in Willow Island, Pleasants County.

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### Facility Description

The Pleasants Power Station is a fossil fuel fired electric generation facility with two 657 (net) MW units and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of two (2) 6245 mmBtu/hr coal-fired boilers, two (2) 222 mmBtu/hr oil/natural gas-fired auxiliary boilers, two (2) 7.67 mmBtu/hr diesel-fired emergency generators, two (2) 215 hp diesel-fired fire pumps, and various supporting operations such as coal handling, ash handling, lime handling, gypsum production and various storage 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.

The Willow Island Power Station is a fossil fuel fired electric generation facility with a 55 (net) MW unit and a 188 (net) MW unit and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of a 619 mmBtu/hr coal-fired boiler, a 1605 mmBtu/hr coal-fired boiler, two 19.89 mmBtu/hr oil/natural gas-fired auxiliary boilers, one 4.22 mmBtu/hr diesel-fired emergency generator, one (1) 340 hp diesel-fired fire pump, and various supporting operations such as coal handling, ash handling

and various tanks with insignificant emissions. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2012 Actual Emissions</b>
Carbon Monoxide (CO)	1,517	845
Nitrogen Oxides (NO <sub>x</sub> )	47,204*	5,282
Particulate Matter (PM <sub>2.5</sub> )	1,274	153
Particulate Matter (PM <sub>10</sub> )	3,005	406
Total Particulate Matter (TSP)	5,638	704
Sulfur Dioxide (SO <sub>2</sub> )	92,579	13,083
Volatile Organic Compounds (VOC)	189	101

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2012 Actual Emissions</b>
Hydrochloric Acid (HCl)	2,559	55.42
Hydrogen Fluoride (HF)	64	15.41
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	2,924	1469
Formaldehyde	15.7	0.40

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

\*Pleasants' NO<sub>x</sub> emission factors were updated to reflect the permit limit of 0.7 lb/mmBtu rather than the NO<sub>x</sub> averaging plan numbers. Willow Island NO<sub>x</sub> emission factors were updated to reflect the new NO<sub>x</sub> averaging plan ACEL limits (U1= 0.58, U2= 0.96 lb/mmBtu). Therefore the NO<sub>x</sub> potential emissions are higher than previously due to these updated calculations.

This facility has the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO<sub>2</sub>e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

## Title V Program Applicability Basis

This facility has the potential to emit 92,579 tons per year of SO<sub>2</sub>, 47,204 tons per year of NO<sub>x</sub>, 3,005 tons per year of PM<sub>10</sub>, 1,517 tons per year of CO, 189 tons per year of VOC, and 5,563 tons per year of HAPS. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, and over 100,000 tons per year of carbon dioxide equivalent and 100 tons per year of greenhouse gases on a mass basis, Pleasants/Willow Island Power Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

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

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
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
45CSR39	Control Of Annual Nitrogen Oxides Emissions
45CSR40	Control Of Ozone Season Nitrogen Oxides Emissions
45CSR41	Control Of Annual Sulfur Dioxide Emissions
40 C.F.R 60, Subpart D	Standards of performance for Fossil Fuel Fired Steam Generators
40 C.F.R 60, Subpart Y	Standards of Performance for Coal Preparation Plants
40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR Part 61, Subpart M	National Emission Standard For Asbestos
40 CFR Part 64	Compliance Assurance Monitoring
40 CFR Part 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters
40 CFR Part 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units
40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR Part 72	Permits Regulation
40 CFR Part 73	Sulfur Dioxide Allowance System
40 CFR Part 74	Sulfur Dioxide Opt-ins
40 CFR Part 75	Continuous Emissions Monitoring
40 CFR Part 76	Acid Rain Nitrogen Oxides Emission Reduction Program
40 CFR Part 77	Excess Emissions
40 CFR Part 78	Appeals Procedure (for Acid Rain Program)
40 CFR Part 82, Subpart F	Ozone depleting substances
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.

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

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 CFR Part 60 (NSPS), 40 CFR Part 61 (NESHAPs), and 40 CFR Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

<b>Permit or Consent Order Number</b>	<b>Date of Issuance</b>	<b>Permit Determinations or Amendments That Affect the Permit (if any)</b>
R13-0071	May 17, 1974	
R13-0335	September 26, 1977	
R13-1099	May 9, 1989	
R13-1559	February 18, 1993	
R13-2319A	November 8, 2007	
R13-3082	September 9, 2013	
CO-R13-99-39	November 8, 1999	
CO-R2-E-2011-17 (Consent Order requiring post performance testing and submission of a 45CSR13 permit application to provide adequate control of SO <sub>3</sub> and opacity)	August 24, 2011	PD12-058 (No permit needed to install an SBS Injection System for SO <sub>3</sub> and opacity control)  <i>Note: This consent order (CO) will be terminated with the issuance of the Title V permit and the company's written notification of full compliance with the "Order for Compliance" section of the CO.</i>
CO-SIP-C-2008-6 (Operation of SCRs)  Letter from David Cannon to John Benedict (Clarification of SCR Operation under Consent Order)	04/09/2008 (Order)  12/22/2008 (Letter)	
R33-6004-2017-4 (Pleasants Acid Rain Permit)	December 19, 2012	Effective January 1, 2013
R33-3946-2017-4 (Willow Island Acid Rain Permit)	December 19, 2012	Effective January 1, 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 April 23, 2008. A minor modification (MM01) application to R30-07300005-2008 was submitted to incorporate the requirements of Permit R13-3082 for the addition of a sorbent injection system. This renewal permit incorporates the minor modification. Substantial changes to the most recent version of the Title V Permit consist of the following:

#### **1) Title V Boilerplate changes**

- Condition 2.1.4. – The word “monthly” was added to the definition of “rolling yearly total.”
- Conditions 3.1.1. and 3.1.2. – These conditions were revised because the language in 45CSR §§6-3.1. & 3.2. was revised.
- Condition 3.1.3. - The citation of authority was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34.
- Condition 3.3.1. – Subsection “d” was added to this condition. Also section 14 of WV Code §§22-5-4 (a) was added in the citation of authority.
- Conditions 3.5.3. and 3.5.5. - These conditions were revised to require electronic submittal of the annual certification to USEPA. The certification shall now only be submitted to the USEPA by e-mail. Also the USEPA address and office name were updated in condition 3.5.3.

#### **2) 45CSR26 - *NO<sub>x</sub> Budget Trading Program as A Means of Control and Reduction of Nitrogen Oxides from Electric Generating Units***

- This Rule has been repealed. Therefore the requirements of this rule have been removed. The NO<sub>x</sub> Budget Permit Application included in Appendix A has also been removed.

#### **3) 45CSR37 - *Mercury Budget Trading Program To Reduce Mercury Emissions***

- This Rule has been repealed. Therefore the CAMR Mercury Budget Trading Program requirements have been removed from the permit.

#### **4) Section 1.0 changes:**

- The emission units (P26, P27 and Haul roads) associated with the sorbent injection system of Permit R13-3082 have been added to the “Pleasants Material Handling Sources” section of the “Emission Units” table.
- The two Pleasants fire pumps and the Willow Island fire pump were not previously included in the emissions unit table. They have been added their respective “Combustion Source” sections.
- The “Emission Unit ID” and “Emission Point ID” for the “Pleasants “Lime Conveyor from Transfer House to Lime Silos” have been revised in that “LCT-2” and “LCT-3” have been deleted.

The Emission Units Table was reflecting the fact that there are 3 conveyors in series. However, “LCT-1” actually refers to the material drop from the transfer house to the first belt as opposed to the drop points into each silo. Therefore “LCT-1” describes more accurately, this transfer point and is consistent with the designation shown in the initial Title V permit issued in 2002.

- The design capacity in the emission units table for “C-L1” and “C-L2” was incorrectly listed as “100 TPH each” in the last renewal permit. The correct design capacity, as evidenced in the initial Title V permit as well as the “Emission Unit Form” in the application, is 750 TPH for each conveyor. Therefore the emission unit table has been corrected to reflect “750 TPH each” for the design capacity.
- A row has been added to the emission units table under “Pleasants Material Handling Sources” for conveyors and transfer points “C-6A/B, C-7A/B, SC-11A/B, SSC-12A/B, SC-21A/B and SSC-22A/B.” These sources were included in the Initial Title V permit issued in 2002 and inadvertently omitted in the first renewal permit issued in 2008.

#### 5) Section 4.0 changes:

- Requirements for the Pleasants emergency generator engines and the emergency fire pump engines have been added to Section 4.0. (see below). Therefore, this section has been re-titled as “Pleasants Combustion Sources.” For the existing boiler requirements, emission unit IDs and/or emission point IDs have been added in conditions 4.1.1., 4.1.4. and 4.1.6.
- Conditions 4.1.1. and 4.1.2. – The NSPS requirements for opacity, 40 CFR §60.42.(a)(2) and particulate matter 40 CFR §60.42.(a)(1) have been streamlined in the previous versions of the permit. However the stream lined language was not included in the permit. Therefore, “streamline” language has been added to these two conditions.
- Condition 4.1.12. – It has been determined that the Acid rain permits do not need to be included in the Appendix of the Title V permit. Therefore, the Acid Rain permits have not been included in the renewal permit. Condition 4.1.12.a. has been revised to delete the language stating that the Acid Rain permit is included in Appendix D. The requirement to hold an Acid Rain permit will remain in section 4.1. of the Title V permit.
- Conditions 4.1.15. through 4.1.19. – The requirements of permit R13-3082 for a sorbent injection system to minimize the formation of SO<sub>3</sub> have been added.
- Condition 4.1.20. - Placeholder language and requirements have been added for the Electric Utility Steam Generating Units (EGU) MACT, 40 CFR 63, Subpart UUUUU for which the Pleasants main steam generators “Unit P1” and “Unit P2” are subject.
- Condition 4.1.21. - Placeholder language and requirements have been added for the Industrial, Commercial, and Institutional Boilers and Process Heaters MACT, 40 CFR 63, Subpart DDDDD for which the Pleasants auxiliary boilers “Aux Blr PA” and “Aux Blr PB” are subject.
- Condition 4.1.22. – 40 CFR 63 Subpart ZZZZ (RICE MACT) requirements have been added for the Pleasants emergency generator engines “Gener. PA” and “Gener. PB” and the Pleasants fire-pump engine “PLS FP-1”
- Condition 4.1.23. – 40 CFR 63 Subpart ZZZZ (RICE MACT) requirements have been added for the Pleasants fire-pump engine “PLS FP-1”

- Condition 4.1.24. – 40 CFR 63 Subpart ZZZZ (RICE MACT) requirements have been added for the Pleasants fire-pump engine “PLS FP-2”
- Conditions 4.1.25. through 4.1.29. – 40 CFR 60 Subpart IIII requirements have been added for the Pleasants fire-pump engine “PLS FP-2”
- Condition 4.1.30. – This condition was added to for the Consent Order Number CO-SIP-C-2008-6, which requires the operation of the SCRs on Pleasants Unit P1 and Unit P2 whenever the units are in operation except for periods of required SCR maintenance. Appendix D which contains a letter for clarification of SCR Operation under Consent Order CO-SIP-2008-6 has been added to the permit.
- Condition 4.2.6. –The CAM related testing and CAM plan Implementation requirements of condition 4.2.6. of permit R30-07300005-2008 have been fulfilled thereby rendering this condition obsolete. Therefore it has not been included in this renewal permit.  
  
The throughput monitoring requirements from Permit R13-3082 have been included as condition 4.2.6.
- Condition 4.2.7. – Daily monitoring and recordkeeping requirements of the daily sorbent usages and system operation from Permit R13-3082 have been added.
- Condition 4.2.8. – “Emission Averaging Time” definition for Permit R13-3082 limits have been added.
- Condition 4.3.2. – Testing requirements from Permit R13-3082 have been added.
- Conditions 4.4.5. and 4.4.6. – Recordkeeping requirements from R13-3082 have been added.
- Conditions 4.4.7. and 4.5.6. – 40 CFR 63 Subpart ZZZZ requirements have been added for the Pleasants fire-pump engine “PLS FP-1”

**6) Section 7.0 changes:**

- Requirements for the Willow Island emergency generator engine and the emergency fire pump engine have been added to Section 7.0. (see below). Therefore, this section has been re-titled as “Willow Island Combustion Sources.” For the existing boiler requirements, emission unit IDs and/or emission point IDs have been added in conditions 7.1.1., 7.1.5., 7.1.7. and 7.1.12.
- Condition 7.1.13. – It has been determined that the Acid rain permits do not need to be included in the Appendix of the Title V permit. Therefore, the Acid Rain permits have not been included in the renewal permit. Condition 7.1.13.a. has been revised to delete the language stating that the Acid Rain permit is included in Appendix D. The requirement to hold an Acid Rain permit will remain in section 7.1. of the Title V permit.
- Condition 7.1.23. - Placeholder language and requirements have been added for the Electric Utility Steam Generating Units (EGU) MACT, 40 CFR 63, Subpart UUUUU for which the Willow Island main steam generators “Unit W1” and “Unit W2” are subject.
- Condition 7.1.24. - Placeholder language and requirements have been added for the Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD for which the Willow Island auxiliary boilers “Aux Blr W3A” and “Aux Blr W3B” are subject.

- Condition 7.1.25. – 40 CFR 63 Subpart ZZZZ (RICE MACT) requirements have been added for the Willow Island emergency generator engine “*Emer Gen WA*” and the Willow Island fire-pump engine “WIL FP-1”
- Conditions 7.1.26., 7.4.5. and 7.5.8. – 40 CFR 63 Subpart ZZZZ requirements have been added for the Willow Island fire-pump engine “WIL FP-1”
- Condition 7.2.7. – The CAM related testing and CAM plan Implementation requirements of condition 7.2.7. of permit R30-07300005-2008 have been fulfilled thereby rendering this condition obsolete. Therefore it has not been included in this renewal permit.

#### 7) Section 8.0 changes:

- Condition 8.1.1. – The fugitive particulate matter control requirements of 45CSR§2-5.1. are included in the facility-wide requirements of condition 3.1.12. Therefore they have been removed from Section 8.1. Consequently, condition 8.1.2. of permit R30-07300005-2008 is now condition 8.1.1. in this renewal permit.

#### ❖ **40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

- 1) Pleasants’ emergency generator engines (*Gener. PA* and *Gener. PB*) and the Willow Island’s emergency generator (*Emer Gen WA*) are existing stationary compression ignition (CI) RICE greater than 500 HP located at a major source of HAP emissions. Pursuant to 40 CFR §63.6590(b)(3)(iii) they do not have to meet the requirements of 40 CFR 63 Subpart ZZZZ and of Subpart A, including initial notification requirements provided that they do not operate or are not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR §§63.6640(f)(2)(ii) and (iii). The requirements of 40 CFR §63.6640(f), except (f)(4) which applies to area sources, have been included in permit conditions 4.1.22. and 7.1.25.
- 2) Pleasants’ Fire Pump 1 engine (*PLS FP-1*) and Willow Island’s Fire Pump 1 engine (*WIL FP-1*) are existing stationary compression ignition (CI) RICE less than 500 HP located at a major source of HAP emissions and therefore subject to Subpart ZZZZ. Although the emission table in Section 1 of the permit has 2007 as the year of installation for “*WIL FP-1*” construction commenced prior to June 12, 2006. These requirements have been included in permit conditions 4.1.23. 4.4.7., 4.5.6., 7.1.26., 7.4.5. and 7.5.8.
- 3) Pleasants’ Fire Pump 2 engine (*PLS FP-2*) is a new stationary compression ignition (CI) RICE less than 500 HP located at a major source of HAP emissions. Therefore pursuant to 40 CFR §63.6590(c)(6), to meet the requirements of Subpart ZZZZ, the engine must meet the requirements of 40 CFR Part 60 Subpart III. The engine is an EPA certified compliant engine and therefore complies with Subpart III. The requirements of 40 CFR §60.6590(c)(6) have been included in permit condition 4.1.24.

#### ❖ **40 CFR 60, Subpart III - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

- 1) Pleasants’ Fire Pump 2 engine (*PLS FP-2*) is 215 HP. It was manufactured after 2006 and is subject to the requirements of Subpart III which establishes emission limits for particulate matter (PM), and non-methane hydrocarbons plus nitrogen oxides (NMHC + NO<sub>x</sub>) as well as operation and maintenance requirements. These requirements are included in the Title V permit in conditions 4.1.25. through 4.1.29.



- The fire pump engine is EPA certified. The fire pump engine is also a National Fire Protection Association (NFPA) fire pump engine. Therefore it meets the requirements of 40 CFR §60.4211(c) and is in compliance with this subpart and is not subject to 40 CFR §60.4211(g) for compliance testing. It also meets the standards applicable to non-emergency engines and therefore, pursuant to 40 CFR §60.4209(a) is not required to install a non-resettable hour meter.
  - The engine is not equipped with a diesel particulate filter to comply with the emission standards in 40 CFR §60.4204 and therefore 40 CFR §60.4209(b) is not applicable.
  - Pursuant to 40 CFR §60.4214(b), initial notification is not required for emergency stationary internal combustion engines.
- ❖ **40 CFR 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters**
- The Pleasants' "Aux Blr PA" and "Aux Blr PB" boilers and Willow Island's "Aux Blr W3A" and "Aux Blr W3B" boilers are subject to the requirements of 40 CFR 63 Subpart DDDDD. The following language has been included in conditions 4.1.21. for Pleasants' auxiliary boilers:
    - a. The natural gas/oil fired auxiliary boilers (*Aux Blr PA and Aux Blr PB*), shall comply with all applicable requirements for existing affected sources pursuant to 40 CFR 63, Subpart DDDDD, "National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters no later than the existing source compliance date of January 31, 2016.  
[45CSR34; 40 CFR §63.7495(b).]
    - b. If required to submit a Notification of Compliance Status (NOCS) pursuant to 40 CFR 63, Subpart DDDDD, the permittee shall also submit a complete application for significant modification to the Title V permit to incorporate the specific requirements of the rule no later than the maximum time allowed for the NOCS submittal in 40 CFR §63.7545(e).  
  
If requested, this Title V permitting deadline may be changed upon written approval by the Director. The permittee shall request the change in writing at least 30 days prior to the application due date.  
  
[45CSR34; 40 CFR §63.7545(e); 45CSR§30-6.5.b.]
  - The same language has been included in condition 7.1.24. for the Willow Island's auxiliary boilers except that "(Aux Blr W3A and Aux Blr W3B)" appears as the emission unit IDs.
- ❖ **40 CFR 63, Subpart UUUUU - National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units (EGU)**
- The Pleasants' "Unit P1" and "Unit P2" boilers and Willow Island's "Unit W1" and "Unit W2" boilers each commenced construction prior to May 3, 2011 and each one is therefore defined as an existing electric utility steam generating unit (EGU). They are subject to the requirements of Subpart UUUUU which establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from coal- and oil-fired EGUs. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. Pursuant to 40 CFR §63.9984(b) an existing EGU must comply with this subpart no later than April 16, 2015. Therefore, not all of the requirements have been included in the Title V permit. If required to conduct an initial compliance demonstration by performance testing as specified in §63.10011(a), the permittee must submit a Notification of Compliance Status (NOCS)

report according to §63.9(h)(2)(ii). If required to submit an NOCS, a complete application for a modification to the Title V permit to incorporate the specific requirements of Subpart UUUUU must also be submitted. (See conditions 4.1.20. and 7.1.23.)

❖ **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**

- A minor modification was submitted to Permit R30-07300005-2008 to incorporate the requirements of Permit R13-3082. R13-3082 is for the addition of a sorbent injection system (specifically, SBS™ Injection) to control SO<sub>3</sub> formation from Pleasants Units 1 and 2. It establishes throughput limits for salt and soda ash used for the sorbent injection system as well as handling and storage requirements. The requirements of R13-3082 have been incorporated in Section 4 of the Title V renewal permit. (see discussion above)

At the time of this writing Permit R13-3082 is currently in the draft stage and is open for public comment. It is anticipated that the permit will be issued sometime during the Title V permit “Draft/Proposed” period. If any revisions are made prior to its issuance, the requirements in the Title V permit will be updated to those of the issued R13-3082 permit. Also the date of issuance will be updated in the Title V permit and fact sheet.

- ❖ **40 CFR Part 64** – This is a 2<sup>nd</sup> renewal. Since CAM was addressed in the first renewal and there were no modifications to the facility that would have triggered a CAM review subsequent to the first renewal, a CAM evaluation was not made.
- ❖ **Pleasants 45CSR2 Monitoring Plan** – A revised 45CSR2 monitoring plan for the Pleasants boilers was submitted to the Director. The revised plan replaces the parametric monitoring with that of the 40 CFR Part 64 CAM plan. The revised plan was approved by the WVDAQ on August 26, 2013 and incorporated into the permit in Appendix B.

### Non-Applicability Determinations

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

45CSR10	Pleasants Power Station does not have an SO <sub>2</sub> weight emission standard under State Rule 10.
45CSR§10-8	The auxiliary boilers for both the Pleasants and Willow Island Stations burn natural gas and/or distillate oil and are exempt pursuant to 45CSR§10-10.3.
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 CFR Part 60 Subpart Da	Pleasants Unit 1 and Unit 2 Boilers commenced construction prior to September 18, 1978.
40 CFR Part 60 Subpart Db	Pleasants Auxiliary Boilers were constructed prior to June 19, 1984.

40 CFR Part 63 Subpart Q	Pleasants Cooling Towers were constructed and in operation prior to September 8, 1994.
40 CFR Part 60 Subpart D	Willow Island Main Boilers were constructed prior to August 17, 1971.
40 CFR Part 60 Subpart Dc	Willow Island Auxiliary Boilers commenced construction prior to June 9, 1989.
40 CFR Part 60 Subpart K	Pleasants and Willow Island stations do not have any tanks storing petroleum liquids (as defined in 40 CFR §60.111) that were constructed after March 8, 1974 and prior to May 19, 1978 and exceed 40,000 gallons in capacity.
40 CFR Part 60 Subpart Ka	Pleasants and Willow Island stations do not have any tanks storing petroleum liquids (as defined in 40 CFR §60.111a) that were constructed after May 18, 1978 and exceed 40,000 gallons in capacity.
40 CFR Part 60 Subpart Kb	Pleasants and Willow Island stations do not have any tanks that were constructed after July 23, 1984 that (a) exceed 75m <sup>3</sup> (19,813 gal) in capacity and store volatile organic liquids (as defined in 40 CFR §60.111b) with a maximum true vapor pressure greater than 15.0 kPa (2.18 psia) or (b) exceed 151m <sup>3</sup> (39,864 gal) in capacity and store a volatile organic liquids with a maximum true vapor pressure greater than 3.5 kPa (0.51 psia)
40 C.F.R Part 60, Subpart OOO	Limestone equipment was in operation prior to August 31, 1983.
GHG Clean Air Act requirements	This is a renewal Title V permit and there have not been any modifications that would have triggered a PSD permit.

### 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, 2013  
Ending Date: September 27, 2013

### 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  
E-mail: 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)**

Comments on the "Draft/Proposed" permit were received from Tonia A. Downs of FirstEnergy Corporation. Below are the comments and responses:

**Comment 1:**

**(Page 8) Section 1.2 Active Permits: Add issuance date 09/09/2013 for SBS System Permit RB-3082. (Fact Sheet also)**

**Response:**

The date of issuance has been updated in the permit and fact sheet.

**Comment 2:**

**(Page 27) Condition 4.1.9 Pleasants NOx Limit: Add language to clarify that NOx limit applies "for any three hour period" per 40 CFR 60.45(g)(3).**

**Response:**

"based on a three (3) hour rolling average" has been added to this requirement and "& §60.45(g)(3)" has been added to the citation of authority.

**Comment 3:**

**(Page 28) Condition 4.1.10 Pleasants S02 Limit: Add language to clarify that S02 limit applies "for any three hour period" per 40 CFR 60.45(g)(2).**

**Response:**

"based on a three (3) hour rolling average" has been added to this requirement and "& §60.45(g)(2)" has been added to the citation of authority.

**Comment 4:**

**(Page 29) Condition 4.1.20 Pleasants MATS Compliance: Add language to reflect the one year compliance extension for Units P1 and P2 for 40 CFR 63 Subpart UUUUU:**

**" ... no later than April 16, 2016, in accordance with the one-year compliance extension approved by WV DEP via letter dated December 28, 2012 to Mr. Ray Evans."**

**Response:**

As per your request, "no later than the existing source compliance date of April 16, 2015" has been replaced with your suggested language.

**Comment 5:**

**(Page 39) Condition 4.5.6.a PLS Fire Pump 1: Revise language to refer to condition 4.1.23 which lists the applicable parts of the regulation:**

- a. **You must report each instance in which you did not meet the requirements of 40 CFR 63 Table 2c to Subpart ZZZZ for existing compression ignition stationary RICE located at a major source of HAP emissions. These requirements pertain to routine maintenance and repair and startup operations, and are listed in condition 4.1.23 of this permit. Non-compliance with these requirements are deviations from the subpart and must be reported according to 40 CFR 63.6650 (i.e. in the semi-annual monitoring report required by condition 3.5.6). There are no emission limits for Pleasants FP-1. [45CSR34; 40 CFR 63.6640(b) and 63.6650(f)]**

**Response:**

The language in condition 4.5.6. has been revised as follows:

- a You must report each instance in which you did not meet each requirement in Table 2c, to 40 CFR 63 Subpart ZZZZ for existing compression ignition stationary RICE located at a major source of HAP emissions that apply to you. (*The Table 2c requirements for “PLS FP-1” pertain to routine maintenance and repair and startup operations and are listed in condition 4.1.23 of this permit*). These instances are deviations from 40 CFR 63 Subpart ZZZZ and must be reported according to the requirements in 40 CFR §63.6650 (i.e., in the semiannual monitoring report required by condition 3.5.6.).  
**[45CSR34; 40 CFR §§63.6640(b) and 63.6650(f)]**

**Comment 6:**

**(Page 53, Willow Island) Condition 7.2.6 CAM Test Data: Delete this condition referring to a requirement to validate the TSP emissions data collected during CAM testing using the TEOM 7000. The test plan has been approved and the data is already used in the opacity correlation equation to estimate TSP emissions.**

**Response:**

Since the testing and validation requirements, have been fulfilled in accordance with the CAM plan requirements, this condition is no longer an applicable requirement and has been deleted from the renewal permit.

**Comment 7:**

**(Page 56, Willow Island) Condition 7.5.8 WIL Fire Pump 1: Revise language to refer to condition 7.1.26 which lists the applicable parts of the regulation:**

- a. You must report each instance in which you did not meet the requirements of 40 CFR 63 Table 2c to Subpart ZZZZ for existing compression ignition stationary RICE located at a major source of HAP emissions. These requirements pertain to routine maintenance and repair and startup operations, and are listed in condition 7.1.26 of this permit. Non-compliance with these requirements are deviations from the subpart and must be reported according to 40 CFR 63.6650 (i.e. in the semi-annual monitoring report required by condition 3.5.6). There are no emission limits for Willow Island FP-1.  
**[45CSR34; 40 CFR 63.6640(b) and 63.6650(f)]**

**Response:**

The language in condition 7.5.8. has been revised as follows:

- a. You must report each instance in which you did not meet each requirement in Table 2c, to 40 CFR 63 Subpart ZZZZ for existing compression ignition stationary RICE located at a major source of HAP emissions that apply to you. (*The Table 2c requirements for “WIL FP-1” pertain to routine maintenance and repair and startup operations and are listed in condition 7.1.26 of this permit*). These instances are deviations from 40 CFR 63 Subpart ZZZZ and must be reported according to the requirements in 40 CFR §63.6650 (i.e., in the semiannual monitoring report required by condition 3.5.6.).  
**[45CSR34; 40 CFR §§63.6640(b) and 63.6650(f)]**

**Comment 8:**

**(Appendix 8.2. Willow Island 45CSR2&10 Monitoring Plan): Update Facility Contact to: Dale E. Evans, Director, Pleasants Plant. The telephone and FAX numbers remain the same.**

**Response:**

Willow Island’s 45CSR2&10 Monitoring Plan has been updated as requested.