West Virginia Department of Environmental Protection
Division of Air Quality

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 December 22, 2014.

Permit Number: **R30-07300022-2014**
Application Received: **February 21, 2019**
Plant Identification Number: **073-00022**
Permittee: **Pleasants Energy, LLC**
Mailing Address: **10319 South Pleasants Highway, St. Marys, WV 26170**

Permit Action Number: *MM01* Revised: *June 28, 2019*

Physical Location:	Waverly, Pleasants County, West Virginia
UTM Coordinates:	468.629 km Easting • 4353.573 km Northing • Zone 17
Directions:	Site is located on the eastern side of State Route 2 in Pleasants County, approximately 1 mile east of Waverly

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Facility Description

The facility is a 300 MW simple cycle electric generating peaking station operating under SIC 4911. The Pleasants Energy Station includes two General Electric (GE) 7FA class simple cycle combustion turbines, each nominally rated at 167.8 MW (while firing natural gas at an ambient temperature of 59° F and 60% relative humidity) including generator, exciter, and associated auxiliary mechanical and electrical systems. The primary fuel is natural gas. Low sulfur distillate fuel oil is utilized as a backup fuel.

Each gas turbine includes an advanced firing combustion turbine air compressor section, gas combustion system with advanced dry low NO_x control, power turbine, and a 60-Hz, 18 (kV) generator.

This modification is about upgrading GT2 from "AGP (Advanced Gas Pathway) Flex" to full "AGP". These changes were approved under R14-0034B.

Emissions Summary

There is no change in potential emissions associated with the minor modification (MM01).

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility has the potential to emit 465.80 tons per year (TPY) of NO_x and 477.40 tons per year of CO. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Pleasants Energy, LLC 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
	45CSR30	Operating permit requirement.
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 *(if any)*
R14-0034B	3/28/2019	

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

- Changes from R14-0034B have been incorporated in the Title V permit. These changes include the following:
  - Table 1.1 was updated to reflect the higher heat input rate for the turbine (Emission Unit ID-GT2).
  - Condition 4.3.1 was changed to recognize that testing on GT1 was performed last year and establish that date as the beginning of the periodic testing requirement.
- In addition to this change, the contact information for EPA in condition 3.5.3 was also revised.

Note:

In the last modification (SM01), condition 4.1.12 was added to incorporate R14-0034A condition 4.1.3. The language incorporated in Title V permit condition 4.1.12 is slightly different than the language in R14-0034A condition 4.1.3. During review of this minor modification (MM01), it was determined that the differing language was intentional and was at the request of the permittee. During the pre-draft period for SM01, the permittee requested the change and offered the following explanation:

"Pleasants agrees to be limited to up to 365 startups and 365 shutdowns per year per turbine. The emission calculations are based on this number of startup/shutdown events. In addition, up to 30 starts can be on fuel oil. Pleasants Energy stated that they will start up on fuel oil, but they will not have any shutdowns on fuel oil, as they will switch over to gas. For that reason, I removed the "30 shutdowns" on fuel oil that was proposed as Pleasants should not have any shutdowns on fuel oil, only startups (and then switching over to natural gas)."

Steve Pursley, the permit writer for R14-0034A and R13-0034B, confirmed in an e-mail dated May 8, 2019 that the permittee's requested change to the language in Title V permit condition 4.1.12 was a reasonable request. Since this language discrepancy caused some confusion during the review of this permit modification (MM01), and justification for the difference could not be found in the fact sheet for SM01, it was determined that the justification would be included in this fact sheet for MM01.

Non-Applicability Determinations

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

None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

None

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.j.modi@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.