

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 July 16, 2019.

Permit Number: **R30-06100027-2019**

Application Received: **January 31, 2020 - MM02, June 11, 2021 - MM03,
November 3, 2021 - MM04, September 21, 2022 - MM05**

Plant Identification Number: **03-54-061-00027**

Permittee: **Morgantown Energy Associates**

Mailing Address: **555 Beechurst Avenue, Morgantown, WV 26505**

Permit Action Number: *MM02, MM03, MM04, MM05*

Revised: *August 1, 2023*

Physical Location:	Morgantown, Monongalia County, West Virginia
UTM Coordinates:	589.20 km Easting • 4388.10 km Northing • Zone 17
Directions:	From Charleston take Interstate 79 North to Exit 152. Bear right onto Fairmont Rd (US-19) approximately 1.9 miles. Turn right onto Holland Ave. (US-19) approximately 1.4 miles to University Avenue. Turn left on Beechurst Ave. Facility is located on the left approximately 0.8 miles.

Facility Description

The Morgantown Energy Associates (MEA) is a fossil fuel fired cogeneration facility and operates under SIC code 4911. The facility consists of two (2) 375 MMBtu/hr waste coal and coal fired circulating fluidized bed (CFB) boilers and related facilities, including a steam transmission line and two (2) 132 MMBtu/hr auxiliary natural gas-fired boilers. Combined operation of the CFB and auxiliary boilers occurs occasionally. Typically, combined operation occurs when one CFB boiler is taken off-line for maintenance causing one or both auxiliary boilers to be brought on-line. Combined operation may also occur during periods of high steam demand from West Virginia University. When this occurs, combined operation consists of both CFBs being on-line as well as one or both auxiliary boilers. It is also occasionally necessary to take both CFBs off-line. The auxiliary boilers are brought on-line in this situation to meet the steam demand for West Virginia University. Other supporting operations include coal handling, limestone handling, and ash handling, as well as 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.

This permit modification combines four minor modification applications (MM02 through MM05) associated with revisions to R14-0007 (versions F through I) with the end result of 1) removing the solid fuel and ash handling systems associated with Ahlstrom Pyroflow CFB boilers and operating the CFB boilers combusting solely natural gas through the “start-up” burners. 2) Retrofitting and operating the two Zurn Auxiliary Boilers to fire natural gas and ultra-low sulfur diesel (ULSD) fuel. 3) Installing and operating two new Victory Energy Boilers firing natural gas and ULSD fuel. Although the generator is still in place, the facility has shut down the power generating operations and will only produce steam to supply West Virginia University.

Emissions Summary

This modification results in the following potential emission changes:

Regulated Pollutants	Change In PTE (tpy)				Total Net Change in PTE (tpy)	Facility PTE After Modification (tpy)
	MM02	MM03	MM04	MM05		
CO	-422.48	+28.85	--	+48.79	-344.84	213.66
NO _x	-1097.98	+196.94	--	+38.0	-863.04	450.96
PM	-68.39	-1.70	--	+8.85	61.24	39.06
PM ₁₀	-51.79	-1.70	--	+8.44	-45.05	37.75
PM _{2.5}	-44.86	-1.63	--	+8.42	-38.07	37.63
SO ₂	-1247.39	+13.68	--	+0.60	-1233.11	14.89
VOC	-20.40	+1.30	--	+3.70	-15.4	17.5
Total HAPs	-28.38	+1.90	--	+1.21	-25.27	5.73

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 213.66 tpy of CO and 450.96 tpy of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Morgantown Energy Associates 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:

- 45CSR2 To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
- 45CSR10 Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers.
- 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
45CSR34	Emission Standards For Hazardous Air Pollutants
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 Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 63 Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
40 C.F.R. Part 97, Subpart GGGGG	CSAPR NO _x Ozone Season Group 3 Trading Program

State Only: NA

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R14-0007I	December 22, 2022	

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

As mentioned previously, this permit modification incorporates MM02, MM03, MM04 and MM05. MM02, MM03 and MM04 were put on hold at the request of MEA while they performed tests and explored different operating scenarios. With the issuance of R14-0007I for which MM05 is associated, MM02, 03 and 04 have been removed from the “on hold” status and are being processed with and under MM05.

- MM02 was received on January 31, 2020 and incorporates the changes associated with permit R14-0007F to shut down the two (2) “coal waste” fired Ahlstrom Pyroflow Circulating Fluidized Bed (CFB) boilers and thereby shut down the power generating operations. Under R14-0007F, the two (2) existing Zurn Auxiliary Boilers were authorized to be modified and retrofitted for dual fuel capability and two (2) new dual fuel 100 MMBtu/hr Victory Energy rental boilers were to be installed. The primary fuel for the auxiliary boilers and the new rental boilers is natural gas. The back-up fuel is ultra-low sulfur diesel (ULSD) fuel. With this modification the facility became a steam only

production facility. Furthermore, with the shutdown of the CFB boilers, the facility became an area source of HAP emissions.

- MM03 was received on June 11, 2021 and incorporates the changes associated with permit R14-0007G to operate the Ahlstrom Pyroflow CFB Boilers No. 1 and No. 2 with the existing natural gas start-up burners as the primary boiler units at the facility. There was no physical change to the boilers. MEA also planned to cease operating the Victory Energy Boilers No. 1 and No. 2 and remove them from the site. The CFB boilers were to be considered natural gas boilers and called Primary Boiler No. 1 and Primary Boiler No. 2 and operate based on their existing design. The Zurn Auxiliary boilers were to become back-up systems. The facility remained an area source of HAP emissions.
- MM04 was received on November 3, 2021 and incorporates the changes associated with permit R14-0007H to clarify boiler transition timing and necessary operational flexibility pertaining to the startup of Primary Boilers No. 1 and No. 2 and the shutdown/removal of the Victory Energy Boilers No. 1 and No. 2.
- MM05 was received on September 21, 2022 and incorporates the changes associated with permit R14-0007I for operational flexibility by maintaining the Victory Energy Boilers onsite to meet steam demand at West Virginia University in case of potential natural gas shortages causing a fuel supply curtailment to the facility.

NOTE: In the following discussions, “COA” means Citation of Authority and “CP” means current permit (R30-06100027-2019 (MM01))

Substantial changes to R30-06100027-2019 (MM01) resulting from this modification consist of the following:

1) Title V Boilerplate changes. *(these revisions are not associated with the modification application)*

- **Condition 2.1.3.** – Revised resulting from the revised Rule 30 (45CSR30).
- **Condition 2.11.4.** – The COA has been corrected.
- **Condition 2.17.** – Deleted and marked as reserved resulting from the revised Rule 30.
- **Condition 2.22.1.** – The COA has been updated to remove 45CSR38 which has been repealed.
- **Condition 3.5.3.** – This condition was revised to update the US EPA mailing address.
- **Condition 3.5.4.** – Revised as revised in Rule 30.
- **Condition 3.5.7.** – Deleted and marked as reserved resulting from the revised Rule 30.
- **Condition 3.5.8.a.1.** – Deleted and marked as reserved resulting from the revised Rule 30.
- **Condition 3.5.8.a.2.** – Revised as revised in Rule 30.

2) Table of Contents

- Updated the TOC to reflect the new Section 4 and Section 5 Titles.

3) Section 1.1. Emission Units

- Removed the Fuel Handling, Limestone Handling, Ash Handling and Fuel Receiving & Emergency Fuel Feed Fugitives sections of the table in their entirety.
- Renamed the “Boiler & Associated Equipment” section as “Boilers” and removed the associated equipment “S009A” through “S009H” conveyor equipment.
- Updated the information for the CFB boilers and the Zurn auxiliary boilers and added the Victory Energy boilers.
- Renamed the “Storage Tank Fugitives” section by deleting “Fugitives” and reidentified the Emission Point IDs from “Fugitive Emission” to “Tanks Vent.” Also deleted S00F21 and S00F22 and added S00F26 and S002F7.
- Updated Footnote 1 and added Footnote 2 for a description of the Design capacity for the CFB boilers. Also added an asterisk for the Zurn Auxiliary Boilers’ Modification date.

4) Section 1.2. Active R13, R14, and R19 Permits - The table has been updated to Permit R14-0007I issued on December 22, 2022.

5) Condition 3.1.9. – Deleted the streamlining language and the note regarding the additional emission unit IDs. Since the sources of fugitive particulate matter listed in this condition are no longer relevant to the facility, the last sentence in this requirement, and 3.1.9.a. through c. have been deleted per a request by the permittee. The requirement is still applicable to the facility and therefore the primary language of the requirement has been retained. Additionally, the COA has been updated to remove “45CSR14, R14-0007, 5.1.3.” and to revise “45CSR§2-5” to “45CSR§2-5.1.”

6) Condition 3.1.12. – Revised CSAPR Group 2 to Group 3. Revise the COA to remove “45CSR43” and update 40 CFR §97.806 to §97.1006. *(this revision is not associated with the modification application)*

7) Condition 3.1.14. – Deleted this condition since the requirements have been added in Conditions 4.1.11 and 5.1.6. of the permit.

8) Condition 3.4.4. – Since the sources of fugitive dust that were previously listed in condition 3.1.9. (45CSR§2-5.1.a. 5.1.b., 5.1.c.) are no longer relevant to the facility, the portion of this requirement pertaining to inspections of fugitive dust control systems has been removed from this permit condition per a request by the permittee. However, since 45CSR§2-5.1. is still applicable to the facility the first sentence of this requirement has been retained.

9) Condition 3.7.2.

- Revised the non-applicable permit shield to delete 40 CFR 60 Subpart Dc for which the new Victory Energy boilers are subject.
- Revised the language for 45CSR60 Subpart Kb since the facility has added two tanks greater than 75 m³ with a maximum vapor pressure less than 15.0 kPa.
- Revised the language for 45CSR60 Subpart OOO since the facility has decommissioned all equipment potentially subject to this subpart and it is not a “nonmetallic mineral processing plant”.
- Revised the language for 45CSR60 Subpart CCCC since the CFB boiler burns solely natural gas and no longer burns solid fuel.

- Deleted 40 CFR 63 Subpart JJJJJ since the facility is now an area source of HAP emission and subject to this subpart.
- Added 40 CFR 63 Subpart UUUUU as requested by the permittee since the CFB boilers are designated as “gas-fired” units and therefore no longer subject to this subpart.
- Deleted 45CSR5 since the facility has decommissioned the coal crushing and handling equipment.
- Revised the language for 45CSR33 since the facility no longer produces electricity.
- Added 40 CFR Part 64 as requested by the permittee.
- Re-numbered the list resulting from the deletions and additions.

10) Section 4.0.

Section 4.0 has been revised to contain the requirements for the Primary Boilers 1 and 2 (S009J and S009K) only. The Auxiliary Boiler requirements have been removed from Section 4 of the permit and are contained in Section 5. The Title for Section 4 has been revised to reflect the changes. The Section 4 requirements of R14-0007I have been incorporated in Section 4 of the title V permit.

- **Condition 4.2.1.a.** – Permit R14-0007I contained language in condition 4.2.1.a. pertaining to initial certification of flow meters to measure the natural gas flow rate to each of the Primary Boilers that states “*The permittee shall conduct the initial certification of these instruments within 90 unit operating days or 180 calendar days (whichever occurs first) after restarting the respective Primary Boiler using only natural gas.*” MEA met this requirement effective January 1, 2023. Therefore, this language has not been included in the Title V permit.
- **40 CFR 63 Subpart UUUUU** - The Primary Boilers (CFB) were shut down in 2020 and later restarted under Permit R14-0007G which allows the units to operate utilizing only natural gas as fuel. Vicinity Energy (Vicinity) on behalf of its subsidiary Morgantown Energy Associates (MEA) submitted a petition under 40 CFR §75.66 to the USEPA to request a waiver for units CFB1 and CFB2 regarding the requirement to submit operating data to qualify as “gas-fired” units under 40 CFR §72.2. Because the units are subject to a federally enforceable permit condition that prohibits them from combusting fuels other than natural gas after November 5, 2021, and because Vicinity has certified that the coal handling equipment has been disabled, EPA granted the petition in a letter dated November 9, 2022. Although the facility no longer produces electricity, given that the generator is still in place, it remains an EGU. Since the CFB units are now natural gas-fired units that meet the definition of natural gas-fired EGU in 40 CFR §63.10042, they are no longer subject to the requirements of 40 CFR 63 Subpart UUUUU (MAT Rule) which is applicable to coal- and oil-fired electric utility steam generating units. Therefore, the Subpart UUUUU requirements have been removed from the permit.
- **40 CFR 60 Subpart Da** - Restarting and operating the CFB Units on the existing natural gas burners did not change or require an applicability review under Part 60 since there was no modification to the units. Thus, the Primary Boilers are still subject to 40 CFR 60 Subpart Da. (see 40 CFR §§60.14(e)(4) and (h)). Since they are only natural gas-fired, they are no longer subject to the opacity or PM requirements per 40 CFR §60.42Da(b)(2) and (f)(1). The boilers are now subject to the NO_x requirements whereas they were not previously subject when they consumed solid fuel with more than 25% coal refuse by weight. Compliance will be demonstrated through a NO_x CEMs and using a weighted average actual heat input of all six boilers (see condition 5.4.2.). The boilers are subject to the SO₂ requirements of §60.43Da(b)(2) but are exempt from the requirements to use CEMS per §60.49Da(b) since the emission rate is less than 0.060lb/MMBtu. The R14-0007 SO₂ emission limit is 0.005 lb/MMBTU and therefore the Subpart Da SO₂ limit will be streamlined with the R14 permit limit. Compliance with the SO₂

limit will be demonstrated through fuel records (condition 4.4.1.), heat input limit and the natural gas requirements of conditions 4.1.10.

- **40CSR2 (Rule 2)** - The Primary Boilers are subject to the Rule 2 visible emission limit of 10% and the PM emission limit of 0.05 lb/MMBtu. The R14-0007 PM emission limit is 0.002 lb/MMBTU and therefore the Rule 2 PM emission limit will be streamlined with the R14 limit. Since the boilers combust only natural gas, they are exempt from the Rule 2 testing and monitoring per 45CSR§2-8.4.b.
- **40CSR10 (Rule 10)** - The Primary Boilers are considered type “a” fuel burning units for the purposes of Rule 10. However, Rule 10 specifies by name the individual type “a” fuel burning units and the standards applicable to those units. Rule 10 does not establish an SO₂ standard for type “a” units that are not specifically identified in the rule. Since the MEA units are not specifically identified in the rule, the Primary Boilers are not subject to Rule 10.
- **40 CFR Part 64 (CAM)** - The CFB boilers prior to the 2020 shut-down, utilizing solid fuel, were subject to the CAM rule (40 CFR Part 64) for PM. After the re-start of the boilers which are authorized to burn only natural gas and pursuant to the application submitted for MM03 to operate the boilers on natural gas only, the pre-control device PM potential emissions are well below the “100 percent of the amount, in tons per year, required for a source to be classified as a major source” and subject to the CAM rule (see 40 CFR §64.2(a)(3)). The maximum uncontrolled filterable PM emissions listed in the application are 1.06 tons/year. Therefore, the CFB boilers are not subject to the CAM rule and the CAM requirements have been removed from the permit.
- **40 CFR 63 Subpart JJJJJJ** - The primary boilers are not subject to this subpart pursuant to 40 CFR §63.11195(a) which states: “Any boiler specifically listed as, or included in the definition of, an affected source in another standard(s) under this part.” The boilers meet this exemption under 40 CFR 63 Subpart UUUUU.
- **Acid Rain** - Prior to the shutdown of the CFB boilers, MEA was exempt from the Acid Rain requirements under 40 CFR §72.6(b)(5). Since the facility no longer produces electricity but the generator is still in place at the facility, the facility must demonstrate that the Primary Boilers are not affected Acid Rain units under 40 CFR §72.6(b) or apply for an Acid Rain permit within the applicable deadline under 40 CFR §72.30(b)(2) if they plan to produce electricity in the future.

11) Section 5.0.

Section 5.0 has been revised to contain the requirements for the Auxiliary Boilers (S009L and S009M) and the backup steam generator Boilers #1 and #2 (S009N and S009O). This section of the permit contained the requirements for the limestone and ash handling facilities which have been shut down and therefore removed from the permit. The Title for Section 5 has been revised to reflect the changes. The Section 5 requirements of R14-0007I have been incorporated in Section 5 of the title V permit

Under MM02 and the R14-0007F modification, the facility shifted from generating electricity to solely generating steam to meet the requirements of West Virginia University by shutting down the CFB boilers (*Note: the CFB boilers were permitted to operate with only natural gas under MM03 and R14-0007G*), modifying the two auxiliary boilers and installing two dual fuel rental boilers. The auxiliary boilers were modified which included increasing their design heat input from 132 mmBtu/hr to 160 mmBtu/hr burning natural gas as the primary fuel and by adding the ability to burn ultra-low sulfur diesel (ULSD) at 146.5 mmBtu/hr as a back-up fuel on a limited basis (see condition 5.1.1.g.). The two new boilers have a design capacity of 100 mmBtu/hr burning natural gas as the primary fuel and will be capable of using ULSD fuel with a heat input of 95.79 mmBtu/hr as a back-up fuel on a limited basis (see condition 5.1.2.g.).

- **40 CFR 63 Subpart JJJJJJ** - Since the primary CFB boilers no longer burn solid fuel and are only allowed to burn natural gas, the facility is no longer a major source of HAP emissions. Now that the facility is an area source of HAP emissions, 40 CFR 63 Subpart DDDDD is no longer applicable to the auxiliary boilers and therefore the requirements (previously in Section 4) have been removed from the permit. As an area source of HAP emissions, the auxiliary boilers and the new boilers are subject to 40 CFR 63 Subpart JJJJJJ. The auxiliary boilers are considered existing units under Subpart JJJJJJ and are equipped with an oxygen trim system and therefore are only subject to the tune-up requirements once every 5 years. The new boilers are considered new units under Subpart JJJJJJ and are subject to the work practice standards of minimizing startup and shutdowns durations and are subject to the tune-up requirements once every two years (biennially). In addition to the tune-up requirements, the applicable recordkeeping, and reporting requirements have been added to the permit. In accordance with 40 CFR §63.9(j) “Change in information already provided,” MEA submitted a notification of reclassification from a major source (subject to Subpart DDDDD) to an area source (subject to Subpart JJJJJJ) of HAP emissions.
- **40 CFR 60 Subpart Db** - The auxiliary boilers are subject to 40 CFR 60 Subpart Db as units modified after 2005. Since the auxiliary boilers burn natural gas and/or ULSD they are exempt from the 40 CFR §60.42b(k)(1) SO₂ emissions limit pursuant to §60.42b(k)(2). Per 40 CFR §§60.43b(f) and (g), visible emissions are limited to 20 percent opacity when burning ULSD which applies at all times, except periods of startup, shutdown and malfunction. This limit will be streamlined with the more stringent limit of 10 percent opacity of Rule 2. Compliance will be demonstrated through the use of COMS or by using a site-specific monitoring plan approved by the director as outlined in condition 5.2.2.d. Pursuant to §60.43b(h)(5), since the boilers burn ULSD which contains less than 0.30 weight percent sulfur, they are not subject to the PM limit of §60.43b(h)(1). Both boilers are subject to the 0.20 lb/MMBtu NO_x limit of §60.44b(a)(1)(ii). This limit will be streamlined with the more stringent R14-0007I limits of 0.11 lb/MMBtu and 0.18 lb/MMBtu while burning natural gas or ULSD, respectively. Compliance will be demonstrated through a NO_x CEMS.
- **40 CFR 60 Subpart Dc** - The new boilers are subject to 40 CFR 60 Subpart Dc. The boilers combust natural gas and ULSD fuel. The ULSD meets the alternative requirement in §60.42c(d) of combusting oil that contains a weight percent sulfur of 0.5 or less and therefore will not be subject to the SO₂ limit in §60.42c(d). The boilers meet the requirements of §60.43c(e)(4) by combusting ULSD and therefore are not subject to the PM limits under §60.43c(e)(1) or (2). There are no applicable requirements in this rule for combusting natural gas. Since the boilers combust ULSD, the units are only subject to the visible emission standard of Subpart Dc.
- **45CSR2 (Rule 2)** - The auxiliary boilers (S009L and S009M) and the new boilers (S009N and S009O) are subject to the Rule 2 visible emission limit of 10% and the PM emission limit of 0.09 lb/MMBtu. The R14-0007 PM emission limits are 0.03 lb/MMBtu and 0.023 lb/MMBtu for the auxiliary boilers and the new boilers respectively, when burning ULSD which are more stringent than the Rule 2 limit of 0.09 lb/MMBtu. Therefore, the Rule 2 PM emission limits will be streamlined with the R14 limits. Since all six boilers exhaust through a common stack, demonstration with the opacity limit will be demonstrated using COMS as outlined in condition 5.2.2.d. Compliance with the PM limits will be demonstrated through fuel records and stack testing. Since the potential PM emissions (4.4 lb/hr) are well below 50% of the Rule 2 limits (14.4 lb/hr NG and 13.2 lb/hr ULSD) for the auxiliary boilers and the potential PM emissions (2.2 lb/hr) are well below 50% of the Rule 2 limits (9.0 lb/hr NG and 8.6 lb/hr ULSD) for the new boilers, the retesting frequency included in the permit is once every three years. This frequency reflects the testing frequency in 45CFR§2A-5.2. for weight emission test results of ≤ 50% of the emission standard. Per 45CSR§2-8.2.a.1., the requirements for a monitoring plan is satisfied through the direct measurement with a COMS.
- **45CSR10 (Rule 10)** - The auxiliary boilers and the new boilers are subject to the Rule 10 emission limits of 45CSR§10-3.3.f. The boilers are exempt from the testing, monitoring,

recordkeeping and reporting requirements of §10-8 pursuant to §10.3 since they combust natural gas and ULSD.

- **Condition 5.4.2.** – R14-0007I contained several typographical errors that have been corrected in the Title V permit.

12) Appendix A

Revised monitoring parameters in the “CSAPR MONITORING REQUIREMENTS TABLE” for SO₂ and heat input for both units per the CEMS Part 75 Monitoring Plan Received on January 12, 2023. Updated CSAPR NO_x Ozone Season Group 2 Trading Program Requirements to Group 3 (40 CFR 97 Subpart EEEEE to Subpart GGGGG) and revised the rule citations where appropriate.

Non-Applicability Determinations

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

- 1) **40 CFR 63 Subpart UUUUU - *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units.*** Since the CFB boilers are designated as “gas-fired” units, pursuant to 40 CFR §63.9983(b), they are no longer subject to the requirements of 40 CFR 63 Subpart UUUUU (MAT Rule) which is applicable to coal- and oil-fired electric utility steam generating units.
- 2) **40 CFR 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.*** The facility is an area source of HAP emissions. Therefore 40 CFR 63 Subpart DDDDD is not applicable to the facility.
- 3) **40 CFR Part 64 - *Compliance Assurance Monitoring.*** There are no pollutant-specific emissions units that meet all three applicability requirements of §64.2(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
304/414-1910
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.