

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: **October 28, 2019**
Plant Identification Number: **03-54-061-00027**
Permittee: **Morgantown Energy Associates**
Mailing Address: **555 Beechurst Avenue, Morgantown, WV 26505**

Permit Action Number: *MM01* Revised: *July 20, 2021*

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 Facility 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.

Emissions Summary

There are no emission changes associated with this modification.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 558.5 tpy of CO; 1,314 tpy of NO_x; 1,248 tpy of SO₂; and 25.0 tpy of HCl. 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, 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:

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

45CSR30

Requirements For Operating Permits

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>)
R14-0007E	January 2, 2020	

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 minor modification incorporates the changes associated with permit R14-0007E for an alternate NO_x monitoring plan using the common stack and existing CEMS to prove compliance with the existing NO_x limitations.

Due to the timing of the issuance of R14-0007E and a submittal for another minor modification associated with R14-0007F to install two rental boilers to produce steam and to shut down the CFB boilers, a decision was made to process both minor modifications together as opposed to processing them back-to-back. Prior to completing the processing of MM01 and MM02 the applications were put on hold while Morgantown Energy Associates (MEA) investigated the feasibility of producing steam alone in a non-CFB operation of the CFB units burning natural gas. If the testing proved to be successful and yielded the desired results, MEA would opt to operate the CFB boilers and remove the two rental units. Since the testing did in fact produce satisfactory results, MEA plans to submit applications to modify permit R14-0007F and the Title V permit in order to operate the CFB boilers with natural gas as the primary fuel and fuel oil as a backup fuel. The applications will also include the removal of the rental boilers. Therefore, since MM02 will eventually not be required and R14-0007F will be modified, the DAQ made the decision to proceed with processing Minor Modification MM01 and continue to keep MM02 on hold.

Substantial changes to R30-06100027-2019 in association with this modification consists of the following:

- 1) **Section 1.1. Emission Units Table** - Revised and corrected the information for emission unit S012F to match that of Permit R14-0007E.
- 2) **Section 1.2. Active R13, R14, and R19 Permits** - The table has been updated to Permit R14-0007E issued on January 2, 2020.
- 3) **Condition 3.1.10.** – The requirements of this condition were removed from R14-0007E and therefore have been removed and replaced with “Reserved” in this condition. Although 45CSR§2-5.1. was shown in the citation of authority, the requirements of 45CSR§2-5.1. are also included in Condition 3.1.9.
- 4) **Condition 4.2.1.** – Added language for “*Fuel Flow Monitor*” and added “4.2.1.f” (*R14-0007E condition*) to the citation of authority.
- 5) **Conditions 4.2.18. and 4.2.19.** – Updated the citation of authority due to the change in R14-0007E.
- 6) **Condition 4.3.13.** – Updated the citation of authority due to the change in R14-0007E.
- 7) **Condition 4.4.15.** – Updated the citation of authority due to the change in R14-0007E.
- 8) **Condition 4.4.17.** – Added a new requirement from R14-0007E.
- 9) **Condition 5.1.4.** – Removed the “Dry Ash Loadout” from the table which was removed in R14-0007E.
- 10) **Conditions 5.1.5. and 5.1.6.** - The requirements of these conditions were removed from R14-0007E and therefore have been deleted. Although 45CSR§§2-5.1.a. and 5.1.b. were shown in the citation of authority for the respective conditions, the requirements of 45CSR§§2-5.1.a. and 5.1.b. are also included in Condition 3.1.9.

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.

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
304/926-0499 ext. 41910
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.