Fact Sheet

For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-06100134-2023
Application Received: November 29, 2022
Plant Identification Number: 03-54-061-00134
Permittee: Longview Power, LLC
Facility Name: Longview Power Plant
Mailing Address: 1375 Fort Martin Road, Maidsville, WV 26541

Physical Location: Maidsville, 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.

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

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2022 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>2954</td>
<td>693.10</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO\textsubscript{X})</td>
<td>1755</td>
<td>1309.24</td>
</tr>
<tr>
<td>Particulate Matter (PM\textsubscript{2.5})</td>
<td>207</td>
<td>7.64</td>
</tr>
<tr>
<td>Particulate Matter (PM\textsubscript{10})</td>
<td>422</td>
<td>16.99</td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>445</td>
<td>93.50</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO\textsubscript{2})</td>
<td>2418</td>
<td>1694.45</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>97</td>
<td>16.61</td>
</tr>
</tbody>
</table>

*PM\textsubscript{10} is a component of TSP.*

<table>
<thead>
<tr>
<th>Hazardous Air Pollutants</th>
<th>Potential Emissions</th>
<th>2022 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total HAPs (all individual HAPs are &lt;10 TPY)</td>
<td>16.00</td>
<td>8.91</td>
</tr>
</tbody>
</table>

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

**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\textsubscript{2}, 1,755 tons per year of NO\textsubscript{X}, and 422 tons per year of PM\textsubscript{10}. 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 ZZZZZ  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  CSAPR NOX Annual Trading Program
40 C.F.R. Part 97, Subpart CCCCC  CSAPR SO2 Group 1 Trading Program
40 C.F.R. Part 97, Subpart GGGGG  CSAPR NOX Ozone Season Group 3 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

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

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R14-0024G</td>
<td>October 12, 2018</td>
<td></td>
</tr>
<tr>
<td>R33-56671-2023-3</td>
<td>December 18, 2018</td>
<td></td>
</tr>
</tbody>
</table>

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 June 12, 2018 and modified on January 15, 2019. Significant changes to the most recent version of the Title V Permit consist of the following:

Note: COA in the following discussions means citation of authority and current permit means R30-06100134-2018 MM01.

1) Table of Contents – Revised the “APPENDIX A” description from “(Transport Rule Requirements)” to “(Cross-State Air Pollution Rule Requirements).”

2) Title V Boilerplate changes:

    ➢ Condition 2.1.3. – Revised resulting from Rule 30 (45CSR30) revisions.
    ➢ Condition 2.11.4. – The COA has been corrected.
    ➢ Condition 2.17. – Deleted and marked as reserved resulting from Rule 30 revisions.
    ➢ 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 Rule 30 revisions.
    ➢ Condition 3.5.8.a.1. – Deleted and marked as reserved resulting from Rule 30 revisions.
    ➢ Condition 3.5.8.a.2. – Revised as revised in Rule 30.

3) Section 2.0 changes:

    ➢ The permittee intends to demonstrate compliance with 40 C.F.R. 63 Subpart UUUUU using low emitting EGU status for mercury (Hg) if it qualifies after sufficient performance testing, consequently, the acronym “LEE” has been used in multiple places in Section 5.0 of the permit. Therefore, the acronym has been added to permit section 2.2.

4) Section 3.0 changes (other than boilerplate changes):

    ➢ Condition 3.1.9. – The Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. Specifically, “TR” has been replaced with “CSAPR”
and “Transport” has been replaced with “Cross-State Air Pollution.” Also, 45CSR43 has been added to the COA. The actual requirements have not changed.

- **Condition 3.1.10.** – The Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. Specifically, “TR” has been replaced with “CSAPR” and “Transport” has been replaced with “Cross-State Air Pollution.” The requirements in this condition have been revised from 40 CFR §97.806 (Subpart EEEE - CSAPR NOx Ozone Season Group 2 Trading Program) to 40 CFR §97.1006 (Subpart GGGGG - CSAPR NOx Ozone Season Group 3 Trading Program) in accordance with 40 CFR §52.2540(b). The citation of Authority has been revised to replace 40 CFR §97.806 with 40 CFR §97.1006. Since 40 CFR 97 Subpart GGGGG has not yet been incorporated into 45CSR43, 45CSR43 has not been added to the COA.

- **Condition 3.1.11.** – The Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. Specifically, “TR” has been replaced with “CSAPR” and “Transport” has been replaced with “Cross-State Air Pollution.” Also, 45CSR43 has been added to the COA. The actual requirements have not changed.

5) **Section 5.0 changes:**

- The MATS Rule 40 CFR 63 Subpart UUUUU has been revised. Therefore, the permit has been updated to include the revised MATS language. Also, minor modification R30-06100134-2018 MM01 issued on January 15, 2019 incorporated the requirements of permit R14-0024G which allows for the use of other approved monitoring methods and/or procedures under 40 CFR 63 Subpart UUUUU (MATS Rule) for the continuous monitoring of mercury (Hg) emissions discharged from the PC Boiler. In the minor modification application, Longview indicated that they intended to pursue “Low Emitting EGU” (LEE) testing. Longview has performed LEE testing and qualifies for Hg LEE status. The applicable LEE requirements which were omitted in the minor modification permit have been added to the renewal permit.

  - The renewal permit conditions affected by the revised MATS language are: 5.1.10., 5.1.17.(9), 5.1.20., 5.2.1.a., 5.2.15., 5.2.16., 5.2.18., 5.4.9., 5.5.9., 5.5.12., 5.5.13., 5.5.14., 5.5.16. (5.5.15*), 5.5.17. (5.5.16*), 5.5.18., 5.5.20., 5.5.21. Condition 5.1.17. and 5.1.20.(3) of the current permit have been deleted since the old requirements of 40 CFR §63.10031(f)(3) and §63.10021(h)(3) have been replaced with “Reserved” in the revised MATS rule. *Current Permit conditions.*

  - The following permit conditions in the renewal permit have been revised and/or added to include the applicable LEE requirements: 5.1.9., 5.3.6 through 5.3.16., 5.4.12., 5.5.12.b.5. and 5.5.15.

  - **Condition 5.1.10.** – 40 CFR §63.10010(i)(4) was removed from the COA resulting from the MATS rule revisions.

  - **Condition 5.1.20.** – Added “(1) and (2)” to the COA to clarify that 40 CFR §63.10021(h)(4) is not applicable. 40 CFR §63.10021(h)(3) has been marked as “reserved” in the revised MATS rule.

  - **Condition 5.2.1.a.** – Expanded 40 CFR §60.49Da(v) to §60.49Da(v)(1), (2) and (3) in the COA since the requirements of §60.49Da(v)(4) are contained in condition 5.5.1. and not in this permit condition.

6) **Section 8.0 changes:**

- 40 CFR 60 Subpart III for compression ignition internal combustion engines has been revised. Therefore, the permit has been updated to include the revised subpart III language. The revised renewal permit conditions affected by revised Subpart III are: 8.1.3., 8.1.6., 8.1.7. and 8.1.8. The reporting requirements of 40 CFR §60.4214(d) which were previously omitted from the permit have been added in 8.5.1.

7) **APPENDIX A** – As discussed under Item 4) “Section 3.0 changes” above, the Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. The Appendix has also been updated to the current DAQ Title V boilerplate for the CSAPR requirements which includes the replacement of 40 CFR §97.806 (Subpart EEEEEE - CSAPR NOx Ozone Season Group 2 Trading Program) with 40 CFR §97.1006 (Subpart GGGGG - CSAPR NOx Ozone Season Group 3 Trading Program).
8) **APPENDIX C** – The expired Acid Rain Permit has been replaced with the current Acid Rain Permit.

9) **Permit R14-0038** - A PSD construction permit (i.e., R14-0038) was issued to Mountain State Clean Energy, LLC (MSCE) on January 5, 2022. When completed, MSCE will be a contiguous facility with the Longview Power Station. Pursuant to 45CSR§30-4.1.a.2, MSCE shall file a complete application to obtain the Title V operating permit or permit revision within twelve (12) months after commencing operation. Since this facility has not commenced operation and has not submitted an application to obtain a Title V operating permit or permit revision, R14-0038 has not been included in this renewal 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 CFR 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 JJJJJJ** The auxiliary boiler is a gas-fired boiler and therefore not subject to this subpart pursuant to §63.11195(e).

- **40 CFR 64** There have been no changes to the facility that triggered a revision to CAM applicability or the existing CAM plan.

**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 2, 2023
Ending Date: September 1, 2023

**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.