

Fact Sheet



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

Permit Number: **R30-07300005-2024**
Application Received: **October 6, 2023**
Plant Identification Number: **03-54-073-00005**
Permittee: **Omnis Pleasants, LLC**
Facility Name: **Pleasants Power Station**
Mailing Address: **#1 Power Station Boulevard, Belmont, WV 26134**

Physical Location: Willow Island, Pleasants County, West Virginia
UTM Coordinates: 474.49 km Easting • 4357.40 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.

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.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|--|----------------------------|------------------------------|
| Regulated Pollutants | Potential Emissions | 2023 Actual Emissions |
| Carbon Monoxide (CO) | 1,373 | 505 |
| Nitrogen Oxides (NO _x) | 14,334 | 4,568 |
| Particulate Matter (PM _{2.5}) | 1,476 | 1,162 |
| Particulate Matter (PM ₁₀) | 2,394 | 1,757 |
| Total Particulate Matter (TSP) | 4,798 | 3,109 |
| Sulfur Dioxide (SO ₂) | 66,239 | 6,988 |
| Volatile Organic Compounds (VOC) | 151 | 60 |

PM₁₀ is a component of TSP.

| Hazardous Air Pollutants | Potential Emissions | 2023 Actual Emissions |
|---------------------------------|----------------------------|------------------------------|
| Hydrochloric Acid (HCl) | 321 | 4 |
| Hydrogen Fluoride (HF) | 342 | 4 |
| Total Other HAPS <10tpy each | 32 | 10 |
| Total HAPS | 695 | 18 |

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

Title V Program Applicability Basis

This facility has the potential to emit 66,239 tons per year of SO₂, 14,334 tons per year of NO_x, 2,394 tons per year of PM₁₀, 1,373 tons per year of CO, 151 tons per year of VOC, 321 tons per year of HCl, 342 tons per year of HF and 695 tons per year of total 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, Omnis Pleasants, LLC's Pleasants 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:

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| 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 |

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|----------------------------------|--|
| 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 |
| 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 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 64 | Compliance Assurance Monitoring |
| 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 |
| 40 C.F.R. Part 97, Subpart AAAAA | CSAPR NO _x Annual Trading Program |
| 40 C.F.R. Part 97, Subpart EEEEE | CSAPR NO _x Ozone Season Trading Program |
| 40 C.F.R. Part 97, Subpart CCCCC | CSAPR SO ₂ Group 2 Trading Program |
| WV Code § 22-5-4 (a) (14) | The Secretary can request any pertinent information such as annual emission inventory reporting. |

State Only:

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| 45CSR4 | To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors |
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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 <i>(if any)</i> |
|---|-------------------------------|---|
| R13-0071 | May 17, 1974 | |
| R13-0335 | September 26, 1977 | |
| R13-1559 | February 18, 1993 | |
| R13-2319A | November 8, 2007 | |
| R13-3082B | June 10, 2016 | |
| CO-SIP-C-2008-6 (Operation of SCRs) | April 9, 2008 (Order) | |
| Letter from David Cannon to John Benedict (Clarification of SCR Operation under Consent Order) | December 22, 2008 (Letter) | |
| R33-6004-2027-6 (Acid Rain Permit) | December 13, 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

This is a renewal of the Title V permit which was issued on April 9, 2019 and modified on October 31, 2019. Substantial changes to the most recent version of the current Title V Permit (R30-07300005-2019 (AA01)) consist of the following:

Note: COA means citation of authority in the following discussion.

- 1) Updated the Owner/Operator information on the cover page, Page 1 and in the header.
- 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 3.0

- Conditions 3.1.9., 3.1.10. and 3.1.11. – 45CSR43 adopts by reference, 40 CFR 97 Subpart AAAAA, Subpart EEEEE and Subpart CCCCC. Therefore, 45CSR43 has been added to the COA in these conditions.

4) Section 4.0

- Conditions 4.1.2.b., 4.1.22.i., 4.1.27., 4.1.28.(2), 4.1.38., 4.2.15., 4.2.17., 4.3.12., 4.3.14., 4.4.9., 4.5.7., 4.5.10., 4.5.11., 4.5.12., 4.5.13., 4.5.14. and 4.5.15. - Updated the language in these conditions to the revised language in the current version of 40 CFR 63 Subpart UUUUU:
 - Condition 4.5.10. - In the current version of Subpart UUUUU, the requirements in 40 CFR §63.10021(i) have been revised to apply only to facilities relying on paragraph 2 of the definition of startup in 40 CFR §63.10042. The facility is relying on paragraph 1 of the definition of startup and therefore is no longer subject to the requirements of §63.10021(i). Consequently, 40 CFR §63.10021(i) has been deleted from the COA.
 - Condition 4.5.15 of the current permit - The requirements in 40 CFR §63.10031(f)(3) have been deleted and marked as “Reserved” in the current version of Subpart UUUUU. Therefore condition 4.5.15. of the current permit has been deleted from the renewal permit and the subsequent conditions renumbered.
 - Condition 4.5.17. - The requirements in 40 CFR §63.10031(f)(6) were previously omitted from the Title V Permit and have been added in the renewal permit in this condition.
 - Conditions 4.5.13., 4.5.14. and 4.5.15. - Table 8 of Subpart UUUUU has been revised. Therefore, the COAs have been revised to add the appropriate item number from Table 8 to the corresponding requirements in each of these conditions.
 - Conditions 4.1.38., 4.5.10. and 4.5.11. – Revised the COA in these conditions to correspond with the updated Subpart UUUUU sections and/or to clarify in more detail from which subsection of Subpart UUUUU the permit requirements were taken.
 - Conditions 4.1.2.b., 4.3.12., and 4.3.14. – The latest amendments to 40 CFR 63 Subpart UUUUU applicable to the Pleasants Power Station became effective on July 8, 2024 and have been included in these permit conditions. However, twenty-three (23) states have petitioned the US Court of Appeals for the District of Columbia Circuit for review of the USEPA final action on this rule. (see USCA Case #24-1119) Therefore, the following note has been added to these permit conditions:

“Note: In the event any provisions of 40 CFR 63 Subpart UUUUU of this permit condition is withdrawn by the U.S. EPA, is invalidated by a court of competent jurisdiction, and/or is invalidated by an act of the United States Congress, those provisions are no longer applicable to the facility.”
- Condition 4.1.40. - Updated the language to the revised language in the current version of 40 CFR 63 Subpart ZZZZ. Also updated the COA.
- Conditions 4.1.45., 4.1.46. and 4.1.47. - Updated the language to the revised language in the current version of 40 CFR 60 Subpart IIII.
- Condition 4.3.1. – Updated the test dates to reflect the most recent tests.

5) Appendix B

- Updated the “Facility Contact” information and replaced “Supervisor Air Permitting” with “Environmental Manager” and updated the corresponding contact information.

6) Appendix D

- Replaced the expired Acid Rain Permit with the current active Acid Rain Permit.

Non-Applicability Determinations

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

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|--------------------------------|--|
| 45CSR10 | Pleasants Power Station does not have an SO ₂ weight emission standard under State Rule 10. |
| 45CSR§10-8 | The auxiliary boilers for the Pleasants Station 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 60 Subpart K | Pleasants station does 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 station does 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 station does not have any tanks that were constructed after July 23, 1984 that (a) exceed 75m ³ (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 ³ (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 CFR Part 60, Subpart OOO | Limestone equipment was in operation prior to August 31, 1983. |

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: July 17, 2024

Ending Date: August 16, 2024

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.