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 November 17, 2020.

Permit Number: R30-03300015-2020 (MM01)
Application Received: September 28, 2021
Plant Identification Number: 03-54-033-00015
Permittee: Monongahela Power Company
Facility Name: Harrison Power Station
Mailing Address: 800 Cabin Hill Drive, Greensburg, PA 15601-1650

Permit Action Number: MM01   Revised: March 14, 2022

Physical Location: Haywood, Harrison County, West Virginia
UTM Coordinates:   557.392 km Easting • 4359.489 km Northing • Zone 17
Directions: From the junction of State Route 20 and US Route 19 near Haywood, take Route 20 approximately one mile west to the facility.

Facility Description
The Harrison Power Station is a fossil fuel fired electric generation facility with one 662 MW “nominal” (Unit B1) and two 661MW “nominal” (Unit B2 & Unit B3) units and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of three (3) 6325 mmBtu/hr coal-fired boilers, two (2) 202 mmBtu/hr natural gas auxiliary boilers, two (2) 1341 HP and one (1) 470 HP diesel-fired emergency generators, one (1) 605 HP propane fired emergency generator, one (1) 145 HP propane fired emergency generator, one (1) 510 HP diesel fired fire pump, one (1) 335 HP diesel fired fire pump, boiler related lime handling and sludge system, a Rapid Discharge Rail Unloading system and various supporting operations such as coal handling, ash handling and 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
This modification results in a decrease in PM/PM$_{10}$ emissions of 0.57 lb/hr and 2.49 tons per year.

Title V Program Applicability Basis
With the proposed changes associated with this modification, this facility maintains the potential to emit 426,609 tons per year of SO$_2$, 42,068 tons per year of NO$_X$, 4,164 tons per year PM$_{10}$, 1,885 tons per year CO, 249 tons per year of VOC, over 88 tons per year of Hydrochloric Acid, over 30 tons per year of Hydrogen Fluoride and over 167 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, Monongahela Power Company’s Harrison 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR7  To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
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:

<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>R13-1477C</td>
<td>November 4, 2021</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 Title V minor modification (MM01) incorporates changes associated with permit R13-1477C to replace the emergency lime handling system with a dry sorbent injection system.

Substantial changes to R30-03300015-2020 consist of the following:

1) Section 1.1. Emission Units:
   - Revised the Emission Unit IDs, Emission Point IDs and Description for the lime pneumatic delivery conveyors. Also updated the design capacities and year installed.
   - Revised the description for the lime storage silos and updated the control device to reflect the replacement of the baghouses with new bin vent filters.
   - Added the third lime storage silo “37A” to the equipment table. This silo as described in the permit evaluation for R13-1477C, is identical to the other two and present on site but was not previously shown in the permit.
   - Revised the “Control Devices” section to reflect the replacement of the baghouses with the new bin vent collectors.

2) Section 1.2. Active R13, R14, and R19 Permits: The table has been updated to the latest version of R13-1477.

3) Conditions 5.1.1., 5.1.2, and 5.1.3. – These conditions have been revised to include the revised requirements of conditions A.1., A.2. and A.3. in R13-1477C.

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.