

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 August 22, 2019.

Permit Number: **R30-09900080-2019**
Application Received: **January 13, 2023**
Plant Identification Number: **03-54-099-00080**
Permittee: **Big Sandy Peaker Plant, LLC**
Mailing Address: **P.O. Box 415, Kenova, WV 25530**

Permit Action Number: MM01 Revised: *May 23, 2023*

Physical Location:	Kenova, Wayne County, West Virginia
UTM Coordinates:	360.9 km Easting • 4245.0 km Northing • Zone 17
Directions:	Site is located between the Big Sandy River and State Route 52 and borders the Kenova Water Authority Treatment Plant on the south and Sunoco Chemical Plant on the North.

Facility Description

The Big Sandy Peaker Plant, LLC operates a 330 Megawatt (MW) natural gas-fired electric generating peaking station. The Big Sandy Peaker Plant is covered by SIC Code of 4911 and NAICS Code of 221112. The facility consists of twelve (12) Pratt & Whitney FT8 Twin Pac jet turbine engines arranged so that there is one engine on each end of 6 gas turbine generators. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week and fifty-two (52) weeks per years.

Emissions Summary

This modification results in no change to the potential emissions of the facility.

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 157.18 tpy of CO and 247.60 tpy of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Big Sandy Peaker Plant, LLC 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	Construction permit requirement.
	45CSR30	Operating permit requirement.
	45CSR16	Standards of Performance for New Stationary Sources.
	40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines.
	40 C.F.R. 97 Subpart GGGGG	CSAPR NO _x Ozone Season Group 3 Trading Program
State Only:	45CSR43	Cross-State Air Pollution Rule

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>)
R13-2383D	02/21/2023	

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 is based on changes approved under R13-2383D for the installation of continuous emission monitoring systems (CEMS) on the natural gas turbines.

The following changes were made to the Title V permit under this minor modification:

- Section 1.0
 - Table 1.2 was updated because R13-2383D supersedes and replaces R13-2383C.
- Section 3.0
 - The Title V boilerplate was updated for conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.
 - The CSAPR NO_x Ozone Season Group 3 Trading Program requirements are now applicable to the Big Sandy Peaker Plant instead of the Group 2 requirements; therefore, the requirements were updated in condition 3.1.10.
- Section 4.0
 - Conditions 4.1.5, 4.2.1, and 4.2.2 were updated to reflect changes made in permit R13-2383D for the installation of NO_x CEMS as an alternative to monitoring the water injection system to demonstrate NO_x emissions control.
 - Conditions 4.1.22, 4.2.11, and 4.2.12 were added to reflect changes made in permit R13-2383D and to include conditions from 40 C.F.R. 60 Subpart GG for NO_x CEMS.
 - Changes were made to conditions 4.1.18 and 4.4.6 to reflect recent revisions to 40 C.F.R. 60 Subpart IIII.
 - Condition 4.5.2 was removed. 40 C.F.R. §60.334(j)(1)(i) no longer applies and §60.334(j)(2) is included in condition 4.2.11.
- Appendix B
 - The CSAPR NO_x Ozone Season Group 3 Trading Program requirements are now applicable to the Big Sandy Peaker Plant instead of the Group 2 requirements; therefore, these requirements were updated in Appendix B.

Non-Applicability Determinations

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

N/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: N/A for minor mods
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Nikki B. Moats
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41282
Nikki.b.moats@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.