

# Fact Sheet



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

Permit Number: **R30-03300015-2020**  
Application Received: **November 22, 2019**  
Plant Identification Number: **033-00015**  
Permittee: **Monongahela Power Company**  
Facility Name: **Harrison Power Station**  
Mailing Address: **800 Cabin Hill Drive, Greensburg, PA 15601-1650**

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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.

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### 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

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Carbon Monoxide (CO)	1,885	1,281
Nitrogen Oxides (NO <sub>x</sub> )	42,068	5,669
Particulate Matter (PM <sub>2.5</sub> )	2778	374
Particulate Matter (PM <sub>10</sub> )	4167	601
Total Particulate Matter (TSP)	7,510	2,337
Sulfur Dioxide (SO <sub>2</sub> )	426,609	11,153
Volatile Organic Compounds (VOC)	249	154

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2019 Actual Emissions</b>
Hydrochloric Acid (HCl)	88.3	14.8
Hydrogen Fluoride (HF)	30.3	12.0
Formaldehyde	14.12	0.62
Total of non-major miscellaneous HAPs	34.5	23.6

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

### Title V Program Applicability Basis

This facility has the potential to emit 426,609 tons per year of SO<sub>2</sub>, 42,068 tons per year of NO<sub>x</sub>, 4,167 tons per year PM<sub>10</sub>, 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, 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.

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

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45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
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
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 Y	Standards of Performance for Coal Preparation Plants
40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. Part 60, Subpart JJJJ	Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines
40 CFR Part 61, Subpart M	National Emission Standard For Asbestos
40 CFR Part 64	Compliance Assurance Monitoring
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 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 <sub>x</sub> Annual Trading Program
40 C.F.R. Part 97, Subpart EEEEE	CSAPR NO <sub>x</sub> Ozone Season Trading Program
40 C.F.R. Part 97, Subpart CCCCC	CSAPR SO <sub>2</sub> 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:

45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors
45CSR43	Cross-State Air Pollution Rule To Control Annual Nitrogen Oxides Emissions, Annual Sulfur Dioxide Emissions, And Ozone Season Nitrogen Oxides Emissions

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> )
R13-1477B	June 3, 2003	
R13-2988B	August 10, 2016	
G60-D049B	November 25, 2019	
R33-3944-2022-5A	April 12, 2018	Effective January 1, 2018 to December 31, 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 June 2, 2015 and modified on September 27, 2016. Substantial changes to the most recent version of the Title V Permit consist of the following:

**1) Section 1.1. Emission Units Table:**

- – Added emergency engines EG-2, FP-01 and FP-02.
- Moved 8sg, and 8sh into a separate row from 8sa and 8sb
- Updated descriptions and/or design capacities of various equipment, including Emission Unit IDs “EDG1”, “EDG2”, “EDG3”, “EG-1”, “LRCH”, “6si & 6sj”, “13”, “14”, “24v, 25v, 26v 27v” and 24s, 25s, 26s, 27s”

**2) Title V Boilerplate changes**

- **Conditions 3.5.3., 3.5.5. and 3.5.6.** - These conditions were revised to require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.

- 3) Condition 3.1.10.** - This condition contained the requirements of 45CSR39 (CAIR NO<sub>x</sub> Annual Trading Program). Since CAIR has been replaced with the Cross-State Air Pollution Rule (CSAPR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the “Cross-State Air Pollution Rule (CSAPR) Trading Program” of 40 CFR §97.406. The requirements of CSAPR have been added in Appendix B of the permit.

- 4) **Condition 3.1.11.** - This condition contained requirements of 45CSR40 (CAIR NO<sub>x</sub> Ozone Season Trading Program). Since CAIR has been replaced with the Cross-State Air Pollution Rule (CSAPR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the “Cross-State Air Pollution Rule (CSAPR)Trading Program” of 40 CFR §97.806. The requirements of the Transport Rule have been added in Appendix B of the permit.
- 5) **Condition 3.1.12.** - This condition contained requirements of 45CSR41 (CAIR SO<sub>2</sub> Trading Program). Since CAIR has been replaced with the Cross-State Air Pollution Rule (CSAPR) trading program, the CAIR requirements have been removed from the permit. This condition now contains requirements for the “Cross-State Air Pollution Rule (CSAPR) Trading Program” of 40 CFR §97.606. The requirements of the Transport Rule have been added in Appendix B of the permit.
- 6) **Section 4.0.**
  - Condition 4.1.14. of the current permit has been deleted. The Acid Rain NO<sub>x</sub> requirements are contained in condition 4.1.17. of the renewal permit (4.1.18. of the current permit) and in the Acid Rain Permit which is attached in Appendix C of the renewal permit (Appendix D of the current permit). Therefore, this requirement is redundant and has been removed.
  - The MATS “place holder” language for 40 CFR 63 Subpart UUUUU in condition 4.1.19. of the current permit has been deleted. The requirements of 40 CFR 63 Subpart UUUUU (MATS) have been added in Section 4 of the permit in conditions 4.1.3.b., 4.1.18. through 4.1.35., 4.2.11. through 4.2.22., 4.3.2. through 4.3.15., 4.4.5. through 4.4.14., and 4.5.5. through 4.5.15. See discussion below.
  - The Boiler MACT “place holder” language for 40 CFR 63 Subpart DDDDD in condition 4.1.20. of the current permit has been deleted. The requirements of 40 CFR 63 Subpart DDDDD (Boiler MACT) have been added in Section 4 of the permit in conditions 4.1.36. 4.4.15., 4.4.16., 4.5.16. and 4.5.17. See discussion below.
  - Condition 4.3.1. – Updated to include the most recent test results and testing schedule.
- 7) **Condition 5.1.1.** – The current permit uses the verbatim language from Permit R13-1477B and references throughputs in Section 1.0. Since there may be other throughputs in the emissions units table of section 1 of the Title V permit, the table from permit R13-1477B for which this requirement references has been added to this condition in the renewal permit. The reference to “Section 1.0” has been deleted and replaced with “the following” to apply the requirements to the table in permit R13-1477B. The column “AMR” and its corresponding footnote are not pertinent to the applicable requirements and therefore have not been included in the table in this condition.
- 8) **Section 7.0.**
  - The requirements for the emergency generator EG-2 (General permit G60-D049B and 40 CFR 60 Subpart JJJJ), fire pump FP-01 (General permit G60-D049B and 40 CFR 60 Subpart IIII) and fire pump FP-02 (40 CFR 63 Subpart ZZZZ) have been added to this section of the permit.
    - Emergency generator EG-2 was installed in 2019 and is subject to 40 CFR 60 Subpart JJJJ. It is a “new” 4SRB LPG-fired certified engine greater than 500 HP. Pursuant to 40 CFR §63.6590(b)(i), it does not have to meet the requirements of 40 CFR 63 Subpart ZZZZ and of 40 CFR 63 Subpart A except for the initial notification requirements of §63.6645(f). The initial notification requirements have been met.

- Emergency fire pump FP-01 was installed in 2019 and is subject to 40 CFR 60 Subpart IIII. It is a “new” diesel-fired certified engine greater than 500 HP. Pursuant to 40 CFR §63.6590(b)(i), it does not have to meet the requirements of 40 CFR 63 Subpart ZZZZ and of 40 CFR 63 Subpart A except for the initial notification requirements of §63.6645(f). The initial notification requirements have been met.
  - Emergency fire pump FP-02 was installed in 1971 and is subject to 40 CFR 63 Subpart ZZZZ. It is an “existing” diesel-fired engine less than 500 HP. This engine was not previously included in the Title V permit and therefore is being included in this section of the renewal permit. This engine does not meet the applicability requirements of 40 CFR §60.4200 and therefore is not subject to 40 CFR 60 Subpart IIII.
- The Incorporation by reference (IBR) of the General permit requirements have been deleted and the individual requirements of Class II General Permit G60-D (hereafter referred to as Permit G60-D) and Registration G60-D049B have been incorporated into the permit. The general permit itself and the registration will not be included in the Appendix. Therefore, the General permit has been deleted from Appendix C.
- As discussed, the IBR language has been deleted and therefore the individual applicable requirements from the General permit, 40 CFR 60 Subpart IIII, 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ have been incorporated in this section of the permit. If a requirement is not applicable to all of the emergency RICE engines covered in this section, the Emission Point ID will follow the citation of authority of the requirement to indicate which engine is subject to a particular permit condition.
- 9) **Condition 8.1.9.** – This condition in the current permit has been relocated to the end of this section in order to be more consistent with Permit R13-2988B.
- 10) **Condition 8.1.13. (8.1.14 of the current permit)** – The footnote in this condition of the current permit is obsolete and therefore has not been included in the renewal permit.
- 11) **APPENDIX B** – The CAIR requirements have been replaced with the Cross-State Air Pollution Rule Requirements.
- 12) **APPENDIX C** – The Class II Emergency Generator General Permit G60-C has been deleted and replaced with the Acid Rain Permit. The G60-D requirements have been incorporated directly into Section 7.0
- 13) **APPENDIX D** – This Acid Rain Permit, has been moved to Appendix C and replaced with the 40 CFR 63 Subpart UUUUU Averaging Plan.
- ❖ **40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.**
- The Harrison Power Station is a major source of HAP because it has potential emissions in excess of 25 tpy for total HAP and/or potential emissions in excess of 10 tpy for any individual HAP. Therefore, 40 CFR Part 63, Subpart DDDDD potentially applies to Unit B1, Unit B2 and Unit B3 steam generators and the two auxiliary boilers. The Unit B1, Unit B2 and Unit B3 steam generators are not subject to the Boiler MACT regulation per 40 CFR §63.7491(a) because they are electric utility steam generating units (EGUs) covered by 40 CFR 63 Subpart UUUUU (see discussion below). The non-EGU auxiliary boilers are considered existing affected units under Subpart DDDDD because construction commenced on the units prior to June 4, 2010 and they have never been reconstructed. It should be noted that the Harrison Power Station has submitted a timely initial notification to WVDEP

in accordance with 40 C.F.R. §§63.7545(b) and 63.9(b) indicating that the auxiliary boilers are subject to 40 C.F.R. 63 Subpart DDDDD.

Each auxiliary boiler is a natural gas-fired non-EGU boiler. The boilers also have the ability to burn liquid fuel for the purposes defined in 40 CFR §63.7575. The boilers are used for heating, startup, and shutdown purposes when the main units are out of service. The nominal design heat input of each boiler is 202.2 mmBtu/hr. Since the boilers are natural gas-fired boilers with design heat inputs greater than 10 mmBtu/hr, they are required to perform annual tune-ups and a one-time energy assessment.

Since the auxiliary boilers are existing, the compliance date is January 31, 2016, according to §63.7495(b). The requirements to comply with the applicable requirements of Subpart DDDDD by January 31, 2016 (40 CFR §63.7495(b)), to complete an initial tune-up of Boiler 1A and Aux Blr PB by January 31, 2016 (40 CFR §63.7510(e)), to submit the “Notification of Compliance Status” containing results of the initial compliance demonstration (40 CFR§63.7530(f)), and to have a one-time energy assessment performed (40 CFR§63.7510(e)) have been satisfied and therefore not included in this renewal.

❖ **40 CFR 63 Subpart UUUUU – National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units**

- This regulation, also known as the “Utility Mercury and Air Toxics (MATS)” rule, applies to coal- and oil-fired EGUs as defined in §63.10042 of 40 CFR Part 63. The Utility MATS rule establishes national emission limitations and work practice standards for mercury, acid gases, and filterable particulate matter, as well as requirements to demonstrate initial and continuous compliance with the emission limitations and work practice standards. Existing affected sources must comply with the requirements of Subpart UUUUU no later than April 16, 2015 (cf. §63.9984(b)) A one-year extension was requested and granted. Therefore, the compliance date for the Harrison Station was April 16, 2016. However, in accordance with §64.9984(f), compliance demonstration by conducting the required performance tests and other activities must be completed no later than 180 days after said compliance date. The Harrison Power Station has met the initial compliance requirements.

The coal-fired Unit B1, Unit B2 and Unit B3 steam generators are existing EGUs as defined in §63.9982(d), and do not meet any of the exemption criteria in §63.9983. The three steam generators primarily combust coal with a heating value greater than 8,300 Btu/lb. The units are also capable of combusting natural gas as a secondary fuel for startup, shutdown, and for flame stabilization. All three units meet the criterion of §63.9990(a)(1) for units combusting coal with a heating value greater than 8,300 Btu/lb, and as such do not combust low rank virgin coal.

- Compliance Approach - The permittee has conducted the initial compliance demonstration and submitted the results of the performance testing to DAQ. The test results are briefly discussed below for each pollutant. Additionally, the required NOCS has been submitted. The facility has elected to demonstrate compliance by emissions averaging for HCL and PM (quarterly stack tests), and CEMS for Hg (30-day rolling average).

- *Filterable Particulate Matter (PM)*  
The permittee has elected to comply with the 0.30 lb/MWh filterable particulate matter (PM) limitation (rather than Total non-Hg HAP metals, or Individual HAP metals). The initial performance testing was concluded for Units B1, B2 and B3 on June 15, 2016 resulting in 0.115 lb/MWh. Continuous compliance will be demonstrated through quarterly performance testing and utilizing the emissions averaging procedures in 40 CFR §63.10009.
- *Hydrogen Chloride (HCL)*

The permittee has elected to comply with the 0.02 lb/MWh Hydrogen Chloride (HCL) limitation. The initial performance testing was concluded for Units B1, B2 and B3 on June 15, 2016 resulting in 0.004 lb/MWh. Continuous compliance will be demonstrated through quarterly performance testing and utilizing the emissions averaging procedures in 40 CFR §63.10009.

- *Mercury (Hg)*

The permittee has elected to comply with the 0.013 lb/GWh mercury (Hg) limitation utilizing an Hg CEMS. The initial compliance was concluded on May 15, 2016 resulting in 0.004 lb/GWh. Continuous compliance will be demonstrated using the Hg CEMS and utilizing the emissions averaging procedures in 40 CFR §63.10009.

- *Work Practice Standard for Tune-up of Burner & Combustion Controls*

The permittee will conduct a tune-up of the EGU burner and combustion controls at least each 36 calendar months as specified in 40 CFR §63.10021(e).

- *Work Practice Standard for Startup & Shutdown*

The permittee will operate all continuous monitoring systems for the units during periods of *startup* and *shutdown* as those terms are defined in 40 CFR §63.10042. (*The Harrison Power Station plans to utilize paragraph (1) of the start-up definition in §63.10042 for all three units*). During startup of a unit, clean fuel (defined in §63.10042) must be used for ignition. Once coal is fired, all of the applicable control technologies must be engaged. During shutdown of a unit, the permittee must operate all applicable control technologies while firing coal. The permittee must comply with all applicable emissions limits at all times except for periods that meet the definitions of startup and shutdown. All applicable requirements in Items #3 and #4 of Table 3 to Subpart UUUUU will be adhered to.

➤ The applicable requirements for an EGU utilizing PM and HCL quarterly performance testing and Hg CEMS have been included in Section 4 of the permit. The initial compliance demonstration has been completed and the NOCS has been submitted therefore the initial compliance requirements are not included in the permit. The permittee has indicated the use of emission averaging; therefore, the emission averaging requirements have been incorporated into the permit.

- The permittee has not indicated the desire to qualify for LEE status and therefore the LEE requirements have not been included in the permit
- A PM continuous parametric monitoring system (CPMS) is not being utilized, therefore the PM CPMS requirements have not been included in the permit.
- The permittee has elected to comply with the PM limit as opposed to total non-Hg HAP metals or Individual HAP metals, therefore requirements pertaining to non-Hg HAP metals or Individual HAP metals are not included in the 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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| 45CSR5 | Pursuant to 45CSR5, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR5. 45CSR2 is applicable to the facility. |
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45CSR17	Pursuant to 45CSR17, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR17. 45CSR2 is applicable to the facility.
45CSR27	Although this facility has emissions of Toxic Air Pollutants in excess of the thresholds listed in 45CSR27 Table A, it does not meet the definition of a Chemical Processing Unit. There is not an assembly of reactors, tanks, distillation columns, heat exchangers, vaporizers, compressors, dryers, decanters, and/or other equipment used to treat, store, manufacture, or use toxic air pollutants. Therefore the facility is not subject to the requirements of Rule 27.
40 CFR. 60 Subpart D	Harrison Power Station boilers (B1, B2, & B3) commenced construction prior to August 17, 1971.
40 CFR Part 60 Subpart Da	Harrison Power Station boilers (B1, B2, & B3) commenced construction prior to September 18, 1978.
40 CFR Part 60 Subpart Db	Harrison Power Station Auxiliary boilers (A. B) commenced construction prior to June 19, 1984.
40 CFR Part 60 Subpart K	Harrison Power Station does not have any tanks storing petroleum liquids (as defined in 40 CFR §60.111) that were constructed after June 11, 1973 and prior to May 19, 1978 and exceed 40,000 gallons in capacity.
40 CFR Part 60 Subpart Ka	Harrison Power 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	Harrison Power Station does not have any tanks that were constructed after July 23, 1984 that (a) exceed 75m <sup>3</sup> (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 <sup>3</sup> (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 63 Subpart Q	The existing Cooling Towers do not use any chromium based water treatment chemicals and therefore, are exempt from the referenced regulation.
40 CFR Part 60 Subpart OOO	The definition of limestone states that it is a sedimentary rock consisting of at least 80% calcium or magnesium carbonates. Lime is defined as calcium oxide, which can be produced by subjecting calcium carbonate to high temperature baking in kilns to drive off carbon dioxide. Therefore, lime is not equivalent to limestone and the Harrison lime handling operation is not subject to Subpart OOO.

**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: October 2, 2020  
Ending Date: November 2, 2020

### **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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 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.