

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 June 2, 2015.

Permit Number: **R30-03300015-2015**
Application Received: **February 2, 2016**
Plant Identification Number: **03300015**
Permittee: **Monongahela Power Company**
Facility Name: **Harrison Power Station**
Mailing Address: **800 Cabin Hill Drive, Greensburg, PA 15601**

Permit Action Number: *MM01* Revised: *September 27, 2016*

Physical Location: Haywood, Harrison County, West Virginia
UTM Coordinates: 557.392 km Easting • 4,359.489 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 (U1) and two 661MW (U2 & U3) 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) 1000 KW and one (1) 350 KW diesel-fired emergency generators, one (1) 108.2 KW propane fired emergency generator, 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.

This modification incorporates the changes approved under R13-2988A and R13-2988B to install a Refined Coal System for the application of sorbent chemicals to coal for NO_x and possible Hg, and SO₂ reduction/control. Also seasonal (Oct - April; May - Sept) NO_x emission rates (lb/mmBtu) were added to the permit for Units 1, 2 and 3 boilers based on a 30 day rolling average.

Emissions Summary

The change in potential emissions associated with the minor modification (MM01) is as follows:

| Pollutants | Change in Potential Emissions, TPY |
|-------------------|------------------------------------|
| PM | +0.43 |
| PM ₁₀ | +0.09 |
| PM _{2.5} | +0.02 |

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 SO₂, 42,068.10 tons per year of NO_x, 4,167.09 tons per year PM₁₀, 1,885.40 tons per year CO, 249.10 tons per year of VOC, over 88 tons per year of Hydrochloric Acid, over 30 tons per year of Hydrogen Fluoride and over 167.22 tons per year of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, 10 tons per year of an individual HAP, and over 25 tons per year of total 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.

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

| | | |
|--------------------|---------|---|
| Federal and State: | 45CSR2 | Control of Particulate matter emissions from indirect heat exchangers |
| | 45CSR13 | Permits for construction, modification |
| | 45CSR30 | Operating permit requirement. |
| State Only: | None | |

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>) |
|--------------------------------|------------------|--|
| R13-2988B | August 10, 2016 | |

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

Changes from R13-2988A and R13-2988B have been incorporated in the Title V permit. These changes include the following:

- * Emission Unit Table 1 was updated to include the new equipment.
- * Conditions 8.1.10 through 8.1.14 were added to include the new requirements.
- * Conditions 8.3.3 through 8.3.6 were added to include the monitoring and recordkeeping requirements.

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: N/A

Ending Date: N/A

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.J.Modi@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)

- Based on a comment received via e-mail dated 8/15/16, from James Lefik of Monongahela Power Company, the installation dates for Emission Point IDs EP-1 through EP-7 were changed back to “to be installed” in the Emission Units Table since this equipment hasn’t been installed yet.
- R13-2988B, Class I Administrative update which was issued on August 10, 2016 made some minor changes. James Lefik of Monongahela Power Company requested to include the changes in this permit. The changes are as follows:
 - **Page 49, Condition 8.1.14:** Changed the word “either” to “any” since there are three main boilers at Harrison.

- **Page 49, Condition 8.1.14, and 8.1.14.c:** Changed the word “urea” to “ammonia” (3 separate places). Harrison does not use urea in its catalysts.
- **Page 51, Conditions 8.3.3, 8.3.4, 8.3.5, and 8.3.6:** Changed the R13-2988B condition numbers in the citations from 4.2.2 through 4.2.5 to 4.2.3 through 4.2.6.
- **Page 52, Condition 8.4.3:** Added the phrase “Rapid Discharge Rail Unloading” prior to the word “facility” to clarify that the 5,000,000 tons per year limit applies only to the amount of coal to be unloaded by the RDRU.