

# Fact Sheet



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

Permit Number: **R30-03300015-2025**

Application Received: **May 1, 2025**

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**

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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

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2024 Actual Emissions
Carbon Monoxide (CO)	1,885	1,074
Nitrogen Oxides (NO <sub>x</sub> )	42,068	5,527
Particulate Matter (PM <sub>2.5</sub> )	2,775	376
Particulate Matter (PM <sub>10</sub> )	4,164	597
Total Particulate Matter (TSP)	7,510	2,096
Sulfur Dioxide (SO <sub>2</sub> )	426,609	14,224
Volatile Organic Compounds (VOC)	249	129
<i>PM<sub>10</sub> is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2024 Actual Emissions
Hydrochloric Acid (HCl)	88	3
Hydrogen Fluoride (HF)	30	10
Formaldehyde	14	1
Total of non-major miscellaneous HAPs (i.e., each HAP < 10 tpy PTE)	35	19
Total HAPs	167	33

*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>, 4,164 tons per year of PM<sub>10</sub>, 1,885 tons per year of CO, 249 tons per year of VOC, 88 tons per year of Hydrochloric Acid, 30 tons per year of Hydrogen Fluoride, 14 tons per year of Formaldehyde and 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.

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

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
45CSR43	Cross-State Air Pollution Rule To Control Annual Nitrogen Oxides Emissions, Annual Sulfur Dioxide Emissions, And Ozone Season Nitrogen Oxides Emissions
40 CFR Part 60, Subpart Y	Standards of Performance for Coal Preparation Plants
40 CFR Part 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 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 Part 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 CFR Part 97, Subpart AAAAA	CSAPR NO <sub>x</sub> Annual Trading Program
40 CFR Part 97, Subpart CCCCC	CSAPR SO <sub>2</sub> Group 1 Trading Program
40 C.R Part 97, Subpart EEEEE	CSAPR NO <sub>x</sub> Ozone Season Group 2 Trading Program
WV Code § 22-5-4 (a) (15)	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
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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> )
R13-1477C	November 4, 2021	
R13-2988B	August 10, 2016	
G60-D049B	November 25, 2019	

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 November 17, 2020, and modified on March 14, 2022. Substantial changes to the most recent version of the current Title V Permit (R30-03300015-2020 (MM01)) consist of the following:

*Note: COA means citation of authority in the following discussion. The condition numbers in the following discussion reflect the renewal permit numbers unless designated with "CP" which means current permit R30-03300015-2020 (MM01).*

#### 1) 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 3.1.6.** – Revised the COA to the current version of the WV Code.
- **Condition 3.3.1.b.** – Added “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable.”
- **Condition 3.3.1.** – Revised the COA to the current version of the WV Code.
- **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.

## 2) Section 4.0

- Where applicable in several permit conditions, updated the COA for 45CSR2 (Rule 2) and 45CSR10 (Rule 10) section citations to match the revised Rule 2 and Rule 10 numbering.
- Condition 4.0.1. (CP) – The requirements of 45CSR§2-10.1 have been deleted from Rule 2 and therefore deleted in the renewal permit.
- Conditions 4.1.3.b., 4.1.20.a. (4.1.21.a. CP), 4.2.11. (4.2.12. CP), 4.3.11., 4.3.13. - Updated the language in these conditions to reflect the revised requirements in the current version of 40 CFR 63 Subpart UUUUU.
- Condition 4.1.11 (CP) – The requirement from 45CSR§2-9.1. in this condition of the current permit has been deleted from Rule 2. Therefore, the requirement has been deleted in the renewal permit. The subsequent conditions in the renewal permit have been renumbered.
- Condition 4.1.11. (4.1.12. CP) –“45CSR16” has been removed from the COA.
- Condition 4.1.19.i. (4.1.20.i. CP) Pursuant to 40 CFR §63.10021(e)(9), after January 1, 2024, reports regarding the tune-ups are required to be submitted electronically in the quarterly compliance report. Therefore, the language for the report requirements prior to January 1, 2024, has been removed since the requirement is no longer applicable.
- Condition 4.2.5. (CP) – This condition was a duplicate of condition 4.1.15. (4.1.16. CP) and therefore has been deleted from the renewal permit. The subsequent conditions have been renumbered.
- Condition 4.3.1. – Updated the language to include the date of the most recent Rule 2 PM compliance testing.
- Condition 4.3.4. – Streamlined the language and added the specific rule citations from 40 CFR §63.10006(f) in the COA.
- Condition 4.4.6. – Since the facility was not using PM CEMS, “and/or PM” was not previously included in this condition. The 2024 revisions to 40 CFR 63 Subpart UUUUU will require the use of PM CEMS or HAP metals CMS after July 6, 2027. Therefore, “and/or PM” was added to this requirement.
- Condition 4.5.3.b. – Revised as revised in Rule 2 to delete “telefax” from the requirement language.
- Conditions 4.5.8. and 4.5.9. Pursuant to 40 CFR §63.10031(b)(6), the final semiannual compliance report shall cover the reporting period from July 1, 2023, through December 31, 2023. Thereafter, quarterly compliance reports in accordance with 40 CFR §63.10031(g) are to be submitted starting with the first calendar quarter of 2024. Therefore, the semi-annual reporting requirements have been removed. The COAs have been revised to remove the rule citations of the deleted requirements.

## 3) Section 7.0

- Conditions 7.1.1., 7.1.2., 7.1.10., 7.1.11., 7.1.15., 7.1.16., 7.2.3., 7.4.1.b. and h., 7.4.6.c. 7.5.1.c., 7.5.7. – 7.5.10. - Updated the language in these conditions to reflect the revised requirements in the current versions of 40 CFR 60 Subpart IIII, Subpart JJJJ and 40 CFR 63 Subpart ZZZZ.
- Conditions 7.1.2. and 7.1.3 – Added the applicable table item number in the COAs.
- Condition 7.1.10. – The table included the standards for NO<sub>x</sub> in the first column. This should have NMHC + NO<sub>x</sub> but the NMHC was previously omitted. Therefore, this oversight has been corrected. Also, the revisions to 40 CFR 60 Subpart IIII added emission standards for CO. Therefore, the table has been revised to add the CO emission standard.

- Condition 7.4.1.g. – Deleted the “if you own or operate any of the following stationary RICE.”
- Condition 7.4.1.h. – Since the revised version of 40 CFR63 Subpart ZZZZ removed §63.6640(f)(2)(ii) or (iii) from §63.6655(f), and §63.6610(f)(4)(ii) is applicable to RICE engines located at area sources of HAP, and since the facility is a major source of HAP, the last sentence of this requirement has been deleted.
- Condition 7.5.1.b. – Since the requirement for the first annual report has been satisfied, the language regarding the first annual report has been deleted and revised for annual reports.
- Condition 7.5.1.c. – The revised requirement in 40 CFR§60.4214(d)(3) and §60.4245(e)(3) requires that the annual report must be submitted electronically according to §60.214(g) and §60.4245(g) beginning on February 26, 2025. Therefore, since February 26, 2025, has already passed, this requirement has been revised to only include the submittal requirement after February 26, 2025.
- Condition 7.5.1. – Added “(EG-1, EG-2, FP-01)” at the end of the COA.

#### 4) Appendix C

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

#### Non-Applicability Determinations

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

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.
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 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.
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 64	There have been no changes to the facility that affected CAM applicability.

### **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 1, 2025

Ending Date: October 31, 2025

### **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  
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.