Roberts, Daniel P <daniel.p.roberts@wv.gov>

Notification for a Title V Minor Modification MM04 - Wheeling Power Company - Mitchell Plant - Current Permit R30-05100005-2019

1 message

Roberts, Daniel P <daniel.p.roberts@wv.gov> Wed, Jul 3, 2024 at 5:30 PM
To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>, whapham.joseph@epa.gov, jennifer.vanvlerah@epa.ohio.gov, RA-EPAIRPERMITNOTIFI@pa.gov
Cc: "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

This email serves as notification that on June 20, 2024, the WV DAQ received an application for a Title V minor modification (MM04) for Wheeling Power Company's Mitchell Plant located near Cresap/Moundsville, Marshall County, WV. The proposed change is to replace a 1971 diesel driven 230 bhp emergency fire pump and 275 gallon diesel fuel tank associated with Unit 1 with a 2023 Tier 3 diesel driven 249 bhp emergency fire pump and 300 gallon diesel fuel tank. As a result of this modification, the facility's PTE will increase 0.33 TPY for NO_X, 0.21 TPY for CO, 0.14 TPY for SO_2. and 0.02 TPY for particulate matter If you have any questions or comments about this Title V permit revision application, please contact me at your earliest convenience.

Sincerely,

Dan Roberts

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

304-926-0499 ext. 41902

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Fwd: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

1 message

McCumbers, Carrie <carrie.mccumbers@wv.gov> Wed, Jul 3, 2024 at 5:02 PM
To: Daniel P Roberts <daniel.p.roberts@wv.gov>

---------- Forwarded message ---------
From: **McCumbers, Carrie** <Carrie.McCumbers@wv.gov>
Date: Thu, Apr 9, 2020 at 1:42 PM
Subject: RE: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change
To: Carducci, Alfred A <Alfred.A.Carducci@wv.gov>

Do you mean if no NSR permit is required? If this is the case, then the only requirements that would be put into the Title V permit would be the NSPS IIII requirements.

From: Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Sent: Thursday, April 9, 2020 1:40 PM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Subject: Re: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

If no permit is required, are they held to follow iiii requirements even if not spelled out in a permit?

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From: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Sent: Thursday, April 9, 2020 1:38:35 PM
To: Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Subject: RE: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

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From: Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Sent: Thursday, April 9, 2020 1:36 PM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Subject: Re: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

If the requirements are not in an R13 or title v permit how can you be held to follow them?

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Sent: Thursday, April 9, 2020 1:35:20 PM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Subject: Re: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

I would assume that if it falls into NSPS iiii and has to follow the requirements in iiii it would need to be permitted .

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Subject: RE: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

According to the letter they sent, the engine is a new diesel engine subject to NSPS IIII and is certified.

From: Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Sent: Thursday, April 9, 2020 1:31 PM
To: Gregory J Wooten <gjwooten@aep.com>; McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; Scott Weaver <saweaver@aep.com>; G M Palmer <gmpalmer@aep.com>
Subject: Re: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

Hi Greg! Does this emergency generator fall into ZZZZ?

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From: Gregory J Wooten <gjwooten@aep.com>
Sent: Thursday, April 9, 2020 1:22:38 PM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; Carducci, Alfred A <Alfred.A.Carducci@wv.gov>; Scott Weaver <saweaver@aep.com>; G M Palmer <gmpalmer@aep.com>
Subject: RE: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

Carrie,

I don’t mean to be a pain, but I have a few follow up questions just so we can make sure we are on the same page. We can certainly put together a Title V application to add this emergency engine.

I just want to confirm that we can do this without an underlying Reg. 13 permit? As I mentioned, a reg. 13 was not necessary for installation of this emergency engine.

Also, because we felt that this engine could be added to our facility under an off-permit change, the notification was not required until the source was installed. I should be able to pull together the applicable Title V forms and get them submitted next week. However, a minor modification requires submittal of the application 7 days prior to the installation. This source is already installed. Do we need to ask the plant staff not to operate this emergency engine until the application is submitted and does this now require that we note this as a deviation in Title V reporting?

Is it acceptable to submit only the new Title V forms and applicable responsible official certifications? No need to submit the entire Title V application for the facility?

Just to make sure we understand, is it correct to assume that a tank can be replaced or added under the off permit provisions (assuming a new NSPS for the permit is not triggered) even though it would result in a new or revised emission unit listed in table 1.1 of the Title V permit? Again, assuming that a reg 13 was not required for the tank.

AMERICAN ELECTRIC POWER
BOUNDLESS ENERGY™

GREGORY J WOOTEN | **ENVIRONMENTAL ENGINEER PRIN**
GJWOOTEN@AEP.COM | D:614.716.1262
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

From: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Sent: Thursday, April 9, 2020 11:47 AM
To: Gregory J Wooten <gjwooten@aep.com>
Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Subject: RE: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

Greg,

When I think of an off-permit change, I think of the addition of a small tank which would not trigger NSPS Subpart Kb and would not require an NSR permit, so it doesn't have any applicable requirements that need to be added to the permit. When the permit is renewed, we would simply add it to the list of equipment. One of the previous off-permit changes for Mitchell was an increase in the capacity for a storage pile at the site. For this change, the storage pile didn't have any existing NSR limits, didn't trigger an NSR permit, and would be subject to the general fugitive particulate matter emission requirements already included in the Title V permit. When I requested that you submit a modification to the Title V permit for the new engine, I did so because the permit does not already have the limits for the new engine and the Title V renewal was just issued at the end of last year. If you just wait for the next renewal, it could be five years before this engine's applicable requirements are included in the permit. Looking back at the history of the Mitchell plant's Title V permits, it seems like the permits are not modified very frequently. For the last renewal in 2014, there were two off-permit changes submitted and one significant modification which was to add 40 C.F.R. 63 Subpart UUUUU requirements. The off-permit changes submitted to the 2014 renewal were not included in the significant modification and were only reflected in the 2019 Title V renewal. I have concerns that if this change is processed as an off-permit change, then the requirements for the engine will not be included until the next renewal in 2024 or 2025. Since it wouldn't be in the permit, then you would also not be certifying compliance in the Annual Compliance Certifications.

The application forms for only a Title V change are located on our website at: https://dep.wv.gov/daq/permitting/Pages/TitleVGuidanceandForms.aspx. Please review our new procedures on the website for electronic submittal of permit applications.

Thanks,

Carrie

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Cc: G M Palmer <gmpalmer@aep.com>
Subject: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

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Carrie,

I'm a little confused about this response.

The emissions from this engine are not significant enough to trigger the need for a Reg 13 permit and the reg 13 permitting folks have indicated that NSPS requirements for an engine are not significant requirements that alone, prompt the need for a Reg 13 permit. This doesn't change our compliance responsibility – we are still required to meet all applicable NSPS requirements for these engines.

So then, that leads to the question, how do we get this engine reflected in the Title V permit? You indicated that "In order to make changes to the Emission Units Table 1.1 of the permit, a minor or significant modification to the Title V permit will need to be submitted." It is not uncommon for tanks etc. to be replaced, installed, etc. at all of our facilities throughout the period of the permit. These projects do not require a Reg 13 permit and the off-permit change has historically provided us with a way to document the change for future revisions to the Title V permit. If we must submit a minor modification to the Title V permit each time we do this type of work, we are going to continually be requesting minor modifications to the Title V permit. Historically, we have simply used the permit renewal or a minor modification driven by a reg 13 modification to "clean up" the Title V permit, making corrections or updates to Table 1.1 and reflecting any updates that are need due to off-permit changes that have occurred during the permit period.

What are your thoughts? I'm just not certain how to process a minor modification to the Title V when a Reg 13 permit is not required for one of these small equipment changes.

In advance, thanks for your help. Stay well.

Greg

GREGORY J WOOTEN | **ENVIRONMENTAL ENGINEER PRIN**
GJWOOTEN@AEP.COM | D:614.716.1262
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

From: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Sent: Tuesday, April 7, 2020 4:41 PM
To: G M Palmer <gmpalmer@aep.com>
Subject: [EXTERNAL] Re: Kentucky Power Mitchell Plant Title V Off-Permit Change

Mr. Palmer,

I have reviewed the attached letter requesting an off-permit change for the Mitchell Plant to install a new diesel driven emergency generator and to relocate a previously permitted LP emergency generator. In order to make changes to the Emission Units Table 1.1 of the permit, a minor or significant modification to the Title V permit will need to be submitted. An off-permit change is an acknowledgement that a change has taken place and that change does not require a change to the Title V permit. Also, I cannot see where there are 40 C.F.R. 60 Subpart IIII requirements already in the permit for the new 464 BHP diesel engine. The requirements currently in the permit are for the older diesel engines subject to 40 C.F.R. 63 Subpart ZZZZ and for the new diesel engines EG-1 and EG-2 which are greater than 3,000 horsepower and have different 40 C.F.R. 60 Subpart IIII requirements. Since the Title V permit renewal for Mitchell was just issued on November 26, 2019 and the renewal application is not due until May 26, 2024, this permit should be modified to include the requirements for the new diesel engine.

If you have any questions, please contact me.

Thanks,

Carrie McCumbers

Title V Program Manager

WVDEP Division of Air Quality

(304) 926-0499 ext. 41278

Carrie.McCumbers@wv.gov

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Sent: Tuesday, April 7, 2020 1:16 PM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Cc: Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Subject: FW: [External] Kentucky Power Mitchell Plant Title V Off-Permit Change

Carrie;

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Thank you for your assistance in this matter.

Wanda

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The attached letter is being submitted in accordance with Title V off-permit change requirements to provide notice of the installation and subsequent operation of a new diesel engine driven emergency generator and relocation of a previously permitted LP gas engine driven emergency generator.

If you have any questions, please respond to this email.

KENTUCKY POWER
An AEP Company

G M PALMER | PLANT ENVIRONMENTAL COORD PRIN
GMPALMER@AEP.COM | D:304.843.6048
8999 ENERGY ROAD, MOUNDSVILLE, WV 26041

Roberts, Daniel P <daniel.p.roberts@wv.gov>

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Carrie McCumbers

Title V Program Manager

WVDEP Division of Air Quality

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Cc: 'R3_APD_Permits@epa.gov' <R3_APD_Permits@epa.gov>; Gregory J Wooten <gjwooten@aep.com>; Scott Weaver <saweaver@aep.com>; Janet J Henry <jjhenry@aep.com>; Douglas J Rosenberger <djrosenberger@aep.com>
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KENTUCKY POWER
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G M PALMER | **PLANT ENVIRONMENTAL COORD PRIN**
GMPALMER@AEP.COM | D:304.843.6048
8999 ENERGY ROAD, MOUNDSVILLE, WV 26041

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Fwd: FW: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

1 message

McCumbers, Carrie <carrie.mccumbers@wv.gov> Wed, Jul 3, 2024 at 4:56 PM
To: Daniel P Roberts <daniel.p.roberts@wv.gov>

---------- Forwarded message ---------
From: **McCumbers, Carrie** <Carrie.McCumbers@wv.gov>
Date: Mon, Jul 13, 2020 at 2:20 PM
Subject: FW: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change
To: Chertkovsky, Natalya V <Natalya.V.Chertkovsky@wv.gov>

From: McCumbers, Carrie
Sent: Thursday, April 9, 2020 3:26 PM
To: Gregory J Wooten <gjwooten@aep.com>
Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; Carducci, Alfred A <Alfred.A.Carducci@wv.gov>; Scott Weaver <saweaver@aep.com>; G M Palmer <gmpalmer@aep.com>; Adkins, Jesse D <Jesse.D.Adkins@wv.gov>; McKeone, Beverly D <Beverly.D.Mckeone@wv.gov>
Subject: RE: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

Greg,

You can make a Title V modification without an underlying R13 permit. Your applicable requirements will be the NSPS Subpart IIII. If you have determined that an R13 permit is not needed to install the emergency generator, you just need to fill out the Title V modification form I provided a link to in my earlier e-mail. It is a 7 page form located on the second row of the second table. You would fill out that general application and add the ATTACHMENTS for just the new engine. You do not have to submit the entire Title V application for the facility.

I spoke with Jesse Adkins and he thinks that you should not operate the new engine until 7 days after submittal of the Title V minor modification. This will be a little quicker now because we are accepting the applications through our new e-mail account DEPAirQualityPermitting@wv.gov. You should also document this as a deviation in your Title V reports.

In the example I gave for a small tank not subject to 45CSR13 and not subject to NSPS or any other regulations, you could submit this as an off-permit change and then just add it to the emission units table at renewal. The reason is that it doesn't have any applicable requirements that need to be added to the Title V permit.

Thanks,

Carrie

From: Gregory J Wooten <gjwooten@aep.com>
Sent: Thursday, April 9, 2020 1:23 PM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
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Carrie,

I don't mean to be a pain, but I have a few follow up questions just so we can make sure we are on the same page. We can certainly put together a Title V application to add this emergency engine.

I just want to confirm that we can do this without an underlying Reg. 13 permit? As I mentioned, a reg. 13 was not necessary for installation of this emergency engine.

Also, because we felt that this engine could be added to our facility under an off-permit change, the notification was not required until the source was installed. I should be able to pull together the applicable Title V forms and get them submitted next week. However, a minor modification requires submittal of the application 7 days prior to the installation. This source is already installed. Do we need to ask the plant staff not to operate this emergency engine until the application is submitted and does this now require that we note this as a deviation in Title V reporting?

Is it acceptable to submit only the new Title V forms and applicable responsible official certifications? No need to submit the entire Title V application for the facility?

Just to make sure we understand, is it correct to assume that a tank can be replaced or added under the off permit provisions (assuming a new NSPS for the permit is not triggered) even though it would result in a new or revised emission unit listed in table 1.1 of the Title V permit? Again, assuming that a reg 13 was not required for the tank.

AMERICAN ELECTRIC POWER
BOUNDLESS ENERGY

GREGORY J WOOTEN | ENVIRONMENTAL ENGINEER PRIN
GJWOOTEN@AEP.COM | D:614.716.1262
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

From: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Sent: Thursday, April 9, 2020 11:47 AM
To: Gregory J Wooten <gjwooten@aep.com>
Cc: Crowder, Laura M <Laura.M.Crowder@wv.gov>; Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Subject: RE: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

Greg,

When I think of an off-permit change, I think of the addition of a small tank which would not trigger NSPS Subpart Kb and would not require an NSR permit, so it doesn't have any applicable requirements that need to be added to the permit. When the permit is renewed, we would simply add it to the list of equipment. One of the previous off-permit changes for Mitchell was an increase in the capacity for a storage pile at the site. For this change, the storage pile didn't have any existing NSR limits, didn't trigger an NSR permit, and would be subject to the general fugitive particulate matter emission requirements already included in the Title V permit. When I requested that you submit a modification to the Title V permit for the new engine, I did so because the permit does not already have the limits for the new engine and the Title V renewal was just issued at the end of last year. If you just wait for the next renewal, it could be five years before this engine's applicable requirements are included in the permit. Looking back at the history of the Mitchell plant's Title V permits, it seems like the permits are not modified very frequently. For the last renewal in 2014, there were two off-permit changes submitted and one significant modification which was to add 40 C.F.R. 63 Subpart UUUUU requirements. The off-permit changes submitted to the 2014 renewal were not included in the significant modification and were only reflected in the 2019 Title V renewal. I have concerns that if this change is processed as an off-permit change, then the requirements for the engine will not be included until the next renewal in 2024 or 2025. Since it wouldn't be in the permit, then you would also not be certifying compliance in the Annual Compliance Certifications.

The application forms for only a Title V change are located on our website at: https://dep.wv.gov/daq/permitting/Pages/TitleVGuidanceandForms.aspx. Please review our new procedures on the website for electronic submittal of permit applications.

Thanks,

Carrie

From: Gregory J Wooten <gjwooten@aep.com>
Sent: Thursday, April 9, 2020 9:27 AM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Cc: G M Palmer <gmpalmer@aep.com>
Subject: [External] FW: Kentucky Power Mitchell Plant Title V Off-Permit Change

CAUTION: External email. Do not click links or open attachments unless you verify sender.

Carrie,

I'm a little confused about this response.

The emissions from this engine are not significant enough to trigger the need for a Reg 13 permit and the reg 13 permitting folks have indicated that NSPS requirements for an engine are not significant requirements that alone, prompt the need for a Reg 13 permit. This doesn't change our compliance responsibility – we are still required to meet all applicable NSPS requirements for these engines.

So then, that leads to the question, how do we get this engine reflected in the Title V permit? You indicated that "In order to make changes to the Emission Units Table 1.1 of the permit, a minor or significant modification to the Title V permit will

need to be submitted." It is not uncommon for tanks etc. to be replaced, installed, etc. at all of our facilities throughout the period of the permit. These projects do not require a Reg 13 permit and the off-permit change has historically provided us with a way to document the change for future revisions to the Title V permit. If we must submit a minor modification to the Title V permit each time we do this type of work, we are going to continually be requesting minor modifications to the Title V permit. Historically, we have simply used the permit renewal or a minor modification driven by a reg 13 modification to "clean up" the Title V permit, making corrections or updates to Table 1.1 and reflecting any updates that are need due to off-permit changes that have occurred during the permit period.

What are your thoughts? I'm just not certain how to process a minor modification to the Title V when a Reg 13 permit is not required for one of these small equipment changes.

In advance, thanks for your help. Stay well.

Greg

AMERICAN ELECTRIC POWER
BOUNDLESS ENERGY™

GREGORY J WOOTEN | **ENVIRONMENTAL ENGINEER PRIN**
GJWOOTEN@AEP.COM | D:614.716.1262
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

From: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Sent: Tuesday, April 7, 2020 4:41 PM
To: G M Palmer <gmpalmer@aep.com>
Subject: [EXTERNAL] Re: Kentucky Power Mitchell Plant Title V Off-Permit Change

Mr. Palmer,

I have reviewed the attached letter requesting an off-permit change for the Mitchell Plant to install a new diesel driven emergency generator and to relocate a previously permitted LP emergency generator. In order to make changes to the Emission Units Table 1.1 of the permit, a minor or significant modification to the Title V permit will need to be submitted. An off-permit change is an acknowledgement that a change has taken place and that change does not require a change to the Title V permit. Also, I cannot see where there are 40 C.F.R. 60 Subpart IIII requirements already in the permit for the new 464 BHP diesel engine. The requirements currently in the permit are for the older diesel engines subject to 40 C.F.R. 63 Subpart ZZZZ and for the new diesel engines EG-1 and EG-2 which are greater than 3,000 horsepower and have different 40 C.F.R. 60 Subpart IIII requirements. Since the Title V permit renewal for Mitchell was just issued on November 26, 2019 and the renewal application is not due until May 26, 2024, this permit should be modified to include the requirements for the new diesel engine.

If you have any questions, please contact me.

Thanks,

Carrie McCumbers

Title V Program Manager

WVDEP Division of Air Quality

(304) 926-0499 ext. 41278

Carrie.McCumbers@wv.gov

From: DEP Air Quality Reports <DEPAirQualityReports@wv.gov>
Sent: Tuesday, April 7, 2020 1:16 PM
To: McCumbers, Carrie <Carrie.McCumbers@wv.gov>
Cc: Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Subject: FW: [External] Kentucky Power Mitchell Plant Title V Off-Permit Change

Carrie;

I am forwarding you the below email/attachment as per our phone conversation. You will process and see that document is uploaded to AX.

Thank you for your assistance in this matter.

Wanda

From: G M Palmer <gmpalmer@aep.com>
Sent: Monday, April 6, 2020 3:47 PM
To: DEP Air Quality Reports <DEPAirQualityReports@wv.gov>; Carducci, Alfred A <Alfred.A.Carducci@wv.gov>
Cc: 'R3_APD_Permits@epa.gov' <R3_APD_Permits@epa.gov>; Gregory J Wooten <gjwooten@aep.com>; Scott Weaver <saweaver@aep.com>; Janet J Henry <jjhenry@aep.com>; Douglas J Rosenberger <djrosenberger@aep.com>
Subject: [External] Kentucky Power Mitchell Plant Title V Off-Permit Change

CAUTION: External email. Do not click links or open attachments unless you verify sender.

The attached letter is being submitted in accordance with Title V off-permit change requirements to provide notice of the installation and subsequent operation of a new diesel engine driven emergency generator and relocation of a previously permitted LP gas engine driven emergency generator.

If you have any questions, please respond to this email.

G M PALMER | **PLANT ENVIRONMENTAL COORD PRIN**
GMPALMER@AEP.COM | D:304.843.6048
8999 ENERGY ROAD, MOUNDSVILLE, WV 26041

Roberts, Daniel P <daniel.p.roberts@wv.gov>

WV DAQ Title V Permit Application Status for Wheeling Power Company; Mitchell Plant

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Mon, Jun 24, 2024 at 10:29 AM
To: jdsnodgrass@aep.com, gmpalmer@aep.com, btbelcher@aep.com
Cc: Carrie McCumbers <carrie.mccumbers@wv.gov>, Daniel P Roberts <daniel.p.roberts@wv.gov>

RE: Application Status

Wheeling Power Company

Mitchell Plant

Facility ID No. 051-00005

Application No. R30-05100005-2019 (MM04)

Dear Mr. Snodgrass,

Your application for a Title V Minor Modification Permit for Wheeling Power Company's Mitchell Plant was received by this Division on June 20, 2024, and was assigned to Dan Roberts.

Should you have any questions, please contact the assigned permit writer, Dan Roberts, at 304-926-0499, extension 41902, or Daniel.P.Roberts@wv.gov .

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V & NSR Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Mithcell Plant MM04

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Mon, Jun 24, 2024 at 10:28 AM
To: Daniel P Roberts <daniel.p.roberts@wv.gov>

Here's a dated copy of the application; I'm getting ready to send the confirmation email now.

Have a great day!

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V & NSR Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

R30-05100005-2019 (MM04) Mitchell Minor Mod - Dan.pdf
2628K

Received
June 20, 2024
WV DEP/Div of Air Quality

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Wheeling Power Company; Mitchell Plant
[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 03-054-05100005
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R30-05100005-2019 (MM01)

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
  - ☐ Title V Initial
  - ☐ Title V Renewal
  - ☐ Administrative Amendment**
  - ☑ Minor Modification**
  - ☐ Significant Modification**
  - ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:
  - ☐ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☑ Check (Make checks payable to: WVDEP – Division of Air Quality)
    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☐ Responsible Official/Authorized Representative
    - Name: Joshua D. Snodgrass
    - Email: jdsnodgrass@aep.com
    - Phone Number: 304-843-6005
  - ☑ Company Contact
    - Name: G. M.(Matt) Palmer
    - Email: gmpalmer@aep.com
    - Phone Number: 304-843-6048
  - ☑ Consultant
    - Name: Brandon T. Belcher
    - Email: btbelcher@aep.com
    - Phone Number: 304-541-7437

American Electric Power
Mitchell Plant
8999 Energy Road
P. O. Box K
Moundsville, WV 26041
(304) 843-6000
FAX (304) 843-6080
aep.com

June 19, 2024

Ms. Laura M. Crowder, Director (electronically via DEPAirQualityPermitting@wv.gov)
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Mitchell Plant Title V Minor Modification Request
Plant ID# 051-00005

Dear Ms. Crowder:

In accordance with Condition 2.7.1 for the subject permit, attached is an electronic copy (via email) of a signed application and request for a minor modification of the Title V permit for Wheeling Power Company's Mitchell Plant. The subject application is for the Steam Electric Generating Facility located near Moundsville, WV in Marshall County. The existing permit expires on November 26, 2024.

Wheeling Power is submitting a request for a minor modification to the Mitchell Plant Title V Permit (R30-05100005-2019 (MM01)). This change involves replacement of the existing diesel driven emergency fire pump drive engine associated with Unit 2. A minor modification for this replacement was included in Attachment S of the recent Title V Renewal Application, submitted on May 9, 2024, but it has since been determined that this diesel engine will not meet the HP requirement for Unit 2's emergency fire pump. The new diesel driven emergency fire pump drive engine is a 2024 model year Cummins CFP9E-F10 (Cummins QSL9 Series engine, 275 BHP), meeting 2024 EPA Tier 3 requirements (Certificate No. RCEXL0540AAB-009).

Should you have any further questions, please contact Brandon Belcher at (304) 541-7437 or via email at btbelcher@aep.com.

Sincerely,

Joshua D. Snodgrass
Plant Manager, Mitchell Plant

RE: Mitchell Plant Title V Minor Modification Request

cc: G.M. Palmer / D.R. Roski – Mitchell Plant
T.W. Lohner / J.N. Lukehart / B.T. Belcher – Environmental Services

Enclosure: Mitchell Plant Title V Minor Modification Application Package

WEST VIRGINIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

TITLE V PERMIT REVISION APPLICATION

PLEASE CHECK TYPE OF TITLE V PERMIT REVISION:

- ☐ **ADMINISTRATIVE AMENDMENT**
- ☑ **MINOR MODIFICATION**
- ☐ **SIGNIFICANT MODIFICATION**
- ☐ **OFF-PERMIT CHANGE**
- ☐ **OPERATIONAL FLEXIBILITY [502(B)(10) CHANGES]**
- ☐ **REOPENING**

TITLE V PERMIT NUMBER:
R30- 05100005-2019 (MM01)

WHEN DID OR WHEN WILL THE CHANGES OCCUR?
MM/DD/YYYY : 06/2024

SIC CODES: PRIMARY: 4911 **SECONDARY:**

Refer to "Title V Revision Guidance" (Appendix A, "Title V Permit Revision Flowchart"), for type of revision, and to Section 7 of this Application for Application Completeness and Ability to Operate information

Section 1: General Information

a. Name of Applicant ***(As registered with the WV Secretary of State's Office)*****:**	**b. Facility Name or Location:**
Wheeling Power Company	Mitchell Plant

b. Contact Information

Responsible Official: Joshua D. Snodgrass		Title: Plant Manager
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip:
Telephone Number: (304) 843 - 6005	Fax Number: (304) 843 - 6080	E-mail: jdsnodgrass@aep.com
Environmental Contact: G. M. (Matt) Palmer		Title: Plant Environmental Coordinator
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041
Telephone Number: (304) 843 - 6048	Fax Number: (304) 843 - 6080	E-mail: gmpalmer@aep.com
Application Preparer: Brandon T. Belcher		Title: Environmental Specialist
Company: AEP Service Corp.		
Street or P.O. Box: 1 Riverside Plaza, 21st Floor		
City: Columbus	State: OH	Zip: 43215
Telephone Number: (304) 541 - 7437	Fax Number: ( ) -	E-mail: btbelcher@aep.com

Person to contact if we have questions regarding this Application: Brandon T. Belcher

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 2: Revision Information

a. Description of Changes Associated with this Permit Revision

Provide a general description of changes to the facility.

This change involves the replacement of an emergency diesel driven fire pump and fuel tank associated with Unit 2 at the Mitchell Plant. The diesel engine included in Attachment S of the Title V Renewal application, submitted on 5/9/2024, was determined to be undersized for the fire pump requirements.

b. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☑ No

If Yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's ***"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"*** guidance as **ATTACHMENT A.**

c. Provide a **Plot Plan(s**) if new emission points were added since latest revision, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the new/modified stationary source(s) is located as **ATTACHMENT B.** For instructions, refer to "***Plot Plan - Guidelines***"**.**

d. Provide a detailed **Process Flow Diagram(s)** if new emission points were added since latest revision, showing each new/modified process or emissions unit as **ATTACHMENT C.** Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

e. Emission Units Table

Fill out the **Emission Units Table** for new and/or modified equipment and provide it as **ATTACHMENT D**.

f. Emission Units Form(s)

For each new and/or modified emission unit(s) with applicable requirement(s) listed in the **Emission Units Table**, fill out and provide an **Emission Unit Form(s)** as **ATTACHMENT E**.

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

For each new and/or modified emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

g. Control Devices

For each new and/or modified control device listed in the **Emission Units Table**, fill out and provide an **Air Pollution Control Device Form(s)** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Part 70 Major Source Threshold level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. If applicable, please check appropriate box in Section 3(a) below, fill out and provide these forms for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 3: New Applicable Requirements

a. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☑ Section 111 NSPS (Subpart(s) IIII)	☑ Section 112(d) MACT standards (Subpart(s) ZZZZ)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR26)
☐ CAIR SO_2 Trading Program (45CSR41)	

b. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

N/A

☐ **Permit Shield Requested** *(not applicable to Minor Modifications, Off-Permit Changes, or for Operational Flexibility)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

c. Suggested Title V Draft Permit Language

Provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit as **ATTACHMENT I**. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e. g. 45CSR§7-4.1)) for those requirements being added / revised.

See Attachment I

d. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number
Installation did not trigger Reg 13 modification thresholds		

e. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number

Section 4: Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY	For Off-Permit Changes: Provide Total Aggregated Emissions Increase Since Last Permit/Modification
NOx	0.33	Note: The estimated emissions
CO	0.21	listed do not take into account the
NMHC	0.019	reduction in emissions related to
SO2	0.141	the replacement of the original fire
Particulate Matter	0.018	pump engine.

Provide **Supporting Emission Calculations/Estimations** as **ATTACHMENT J**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 5: Certification of Information

a. Certification For Use Of Minor Modification Procedures ***(Required Only for Minor Modification Requests)***

Note:	*This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

i. Proposed changes do not violate any applicable requirement;

ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;

iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;

v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;

vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed): _____ *(Please use blue ink)* Date: 6 / 19 / 24 *(Please use blue ink)*

Named (typed): Joshua D. Snodgrass Title: Plant Manager

b. Certification of Truth, Accuracy and Completeness and Certification of Compliance
(Required For All Revision Requests)

Note:	*This Certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.*

Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Joshua D. Snodgrass	Title: Plant Manager

Responsible official's signature:

Signature: _____ Signature Date: 6/19/24

(Please use blue ink) *(Please use blue ink)*

Section 6: Attachments

Note: Please check all applicable attachments included with this permit application:	
☐	ATTACHMENT A: Business Confidentiality Claims
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Emission Units Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☐	ATTACHMENT G: Air Pollution Control Device Form(s)
☐	ATTACHMENT H: Compliance Assurance Monitoring Form(s)
☑	ATTACHMENT I: Suggested Title V Draft Permit Language
☑	ATTACHMENT J: Supporting Emission Calculations/Estimations

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

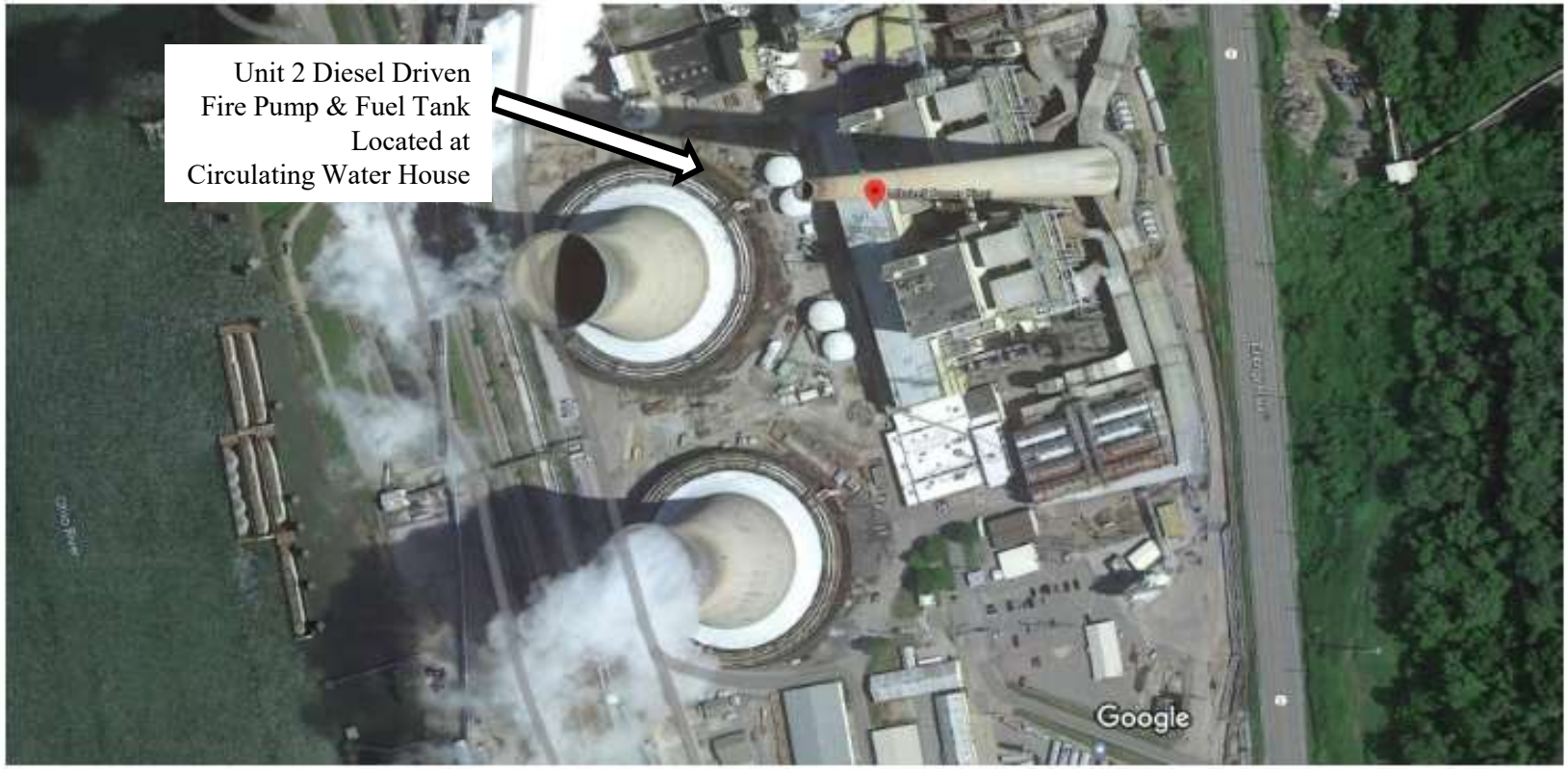
Section 7: Application Completeness and Ability to Operate information for different types of Title V Permit revisions

(Refer to "Title V Revision Guidance" for more information)

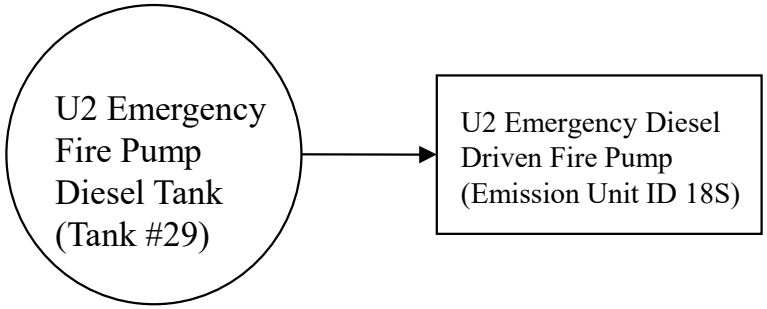
Type of Revision	Application/Notification Requirements	Ability to Operate
Administrative Amendment	☐ Description of change ☐ Supplemental information (rationale) ☐ Certification of application and compliance (Section 5(b))	Upon submittal of the application
Minor Modification	☑ Description of change ☑ Associated change in emissions ☑ Sample Calculations/estimations for determining emissions ☑ List of new applicable requirements associated with changes ☑ List of R13/R14 permits associated with the changes ☑ Suggested draft permit language ☑ Certification for use of Minor Modification (Section 5(a)) ☑ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application, or upon issuance of the R13/R14 permit (if any), whichever is later
Significant Modification	☐ Description of change ☐ Associated change in emissions ☐ Sample Calculations/estimations for determining emissions ☐ List of R13/R14 permits associated with the changes ☐ List of new applicable requirements associated with changes ☐ Request for permit shield ☐ Updated drawings, plot plans, process flow diagrams, etc. ☐ Certification of application and compliance (Section 5(b))	Upon issuance of the modified Title V permit (if changes either conflict with, or are prohibited by existing Title V Permit terms/ conditions), OR upon obtaining of proper R13/ R14 Permit for first 12 months (if changes neither conflict with, nor are prohibited by existing Title V Permit terms/conditions)
Off-Permit Changes	☐ Notification/application to DAQ and U.S.E.P.A. within 2 business days of the change ☐ Description of the change ☐ The date on which the change will occur or has occurred ☐ Pollutants and amounts emitted ☐ Sample Calculations/estimations for determining emissions ☐ Any new applicable requirements that will apply to changes ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After two (2) days from the submittal of the application
Operational Flexibility	☐ Notification/application submitted to DAQ and U.S.E.P.A. in advance (7 days prior to making changes) ☐ Description of the change ☐ The date on which the change is to occur ☐ Permit terms and conditions affected by the change ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application/notification to DAQ and EPA
Reopening	☐ Description of change ☐ List of new applicable requirements associated with changes ☐ Suggested draft permit language ☐ Certification of application and compliance (Section 5(b))	Ability to operate is not reflected by the changes

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Attachment B: Mitchell Plant



Attachment C:
Mitchell Plant Unit 2 Emergency Diesel Driven Fire Pump



ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
18S	18E	Unit 2 Emergency Diesel Driven Fire Pump	2024	275 BHP	
Tank #29	Tank #29	Diesel Fire Pump Fuel Tank - U2	2024	300 gal	

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
18S	Unit 2 Emergency Diesel Driven Fire Pump	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Emergency diesel driven fire pump that will replace existing unit associated with Unit 2 at the plant. 275 BHP diesel engine.

Manufacturer:	**Model number:**	**Serial number:**
Cummins	CFP9E-F10 Fire Pump / QSL9 Series Engine	

Construction date: MM/DD/YYYY	**Installation date:** MM/DD/YYYY	**Modification date(s):** MM/DD/YYYY
06/2024	06/2024	06/2024

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

Approx. 14.3 gal/hr, 275 BHP

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
Approx. 14.3 gal/hr	7,150 gal/yr	Assumed 500 hr/yr, but not limited during emergency

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ☑ Yes ☐ No	**If yes, is it?** ☐ Indirect Fired ☑ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 275 BHP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Diesel Fuel, less than 15 ppm sulfur.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Diesel Fuel	15 ppm		Approx. 137,030 btu/gal

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.86	0.21
Nitrogen Oxides (NO_X)	1.33	0.33
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	0.07	0.018
Particulate Matter (PM_{10})	0.07	0.018
Total Particulate Matter (TSP)	0.07	0.018
Sulfur Dioxide (SO_2)	0.56	0.141
Volatile Organic Compounds (VOC)	0.69	0.17
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO2	316.25	79.06

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Manufacturer's Data used for NOx, NMHC, PM, and CO. AP-42 used for SO2, CO2, and VOC.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

This emergency diesel fire pump engine is subject to the requirements in 40 CFR 63 Subpart IIII. The previous diesel fire pump engine was subject to the requirements in 40 CFR 63 Subpart ZZZZ and suggested language revisions have been included in Attachment L.

Requirements currently captured in Title V permit:
R30-05100005-2019 (MM01) Section 7.1.

☐ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

This emergency diesel fire pump engine is subject to the requirements in 40 CFR 63 Subpart IIII. The previous diesel fire pump engine was subject to the requirements in 40 CFR 63 Subpart ZZZZ and suggested language revisions have been included in Attachment L.

Requirements currently captured in Title V permit:
R30-05100005-2019 (MM01) Sections 7.2 through 7.5.

Are you in compliance with all applicable requirements for this emission unit? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

Attachment I

Summary of Requirements[1]

40 CFR part 60, subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

For fire pump engines with a displacement of less than 30 liters/cyl, manufactured during or after the model year that applies to your fire pump engine power rating in Table 3 of 40 CFR part 60, subpart IIII.

NOTE: To refer directly to the regulatory text, please go to Subpart IIII (scroll down to almost the end of the page).

Temporary Engines:

Per 60.4200(e) Owners and operators of facilities with CI ICE that are acting as temporary replacement units and that are located at a stationary source for less than 1 year and that have been properly certified as meeting the standards that would be applicable to such engine under the appropriate nonroad engine provisions, are not required to meet any other provisions under this subpart with regard to such engines.

Emission Standards: 60.4205(c), Table 4

60.4205(c) Owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants.

Per 60.4215(a) Stationary CI ICE with a displacement of less than 30 liters per cylinder that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are required to meet the applicable emission standards in §§60.4202 and 60.4205. Stationary CI ICE with a displacement of greater than or equal to 30 liters per cylinder that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are required to meet the emission standards in 60.4215(c).

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

[1]Disclaimer: The content provided in this software tool is intended solely as assistance for potential reporters to aid in assessing requirements for compliance under the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60 Subpart IIII. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by EPA of the applicability of the rule to any particular facility. In any particular case, EPA will make its assessment by applying the law and regulations to the specific facts of the case.

Fuel Requirements: 60.4207(a), (b), (e)

60.4207(a) Beginning October 1, 2007, owners and operators of stationary CI ICE subject to this subpart that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must purchase diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

(e) Stationary CI ICE that have a national security exemption under §60.4200(d) are also exempt from the fuel requirements in this section.

Per 60.4215(b) stationary CI ICE that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are not required to meet the fuel requirements in 40 CFR 60.4207.

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

Per 60.4217 Owners and operators of stationary CI ICE that do not use diesel fuel may petition the Administrator for approval of alternative emission standards, if they can demonstrate that they use a fuel that is not the fuel on which the manufacturer of the engine certified the engine and that the engine cannot meet the applicable standards required in §60.4204 or §60.4205 using such fuels and that use of such fuel is appropriate and reasonably necessary, considering cost, energy, technical feasibility, human health and environmental, and other factors, for the operation of the engine.

Importing/Installing Requirements: 60.4208(h), (i)

60.4208(h) In addition to the requirements specified in §§60.4201, 60.4202, 60.4204, and 60.4205, it is prohibited to import stationary CI ICE with a displacement of less than 30 liters per cylinder that do not meet the applicable requirements specified in paragraphs (a) through (g) of this section after the dates specified in paragraphs (a) through (g) of this section.

(i) The requirements of this section do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location.

Monitoring Requirements: 60.4209(a); If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209 (b) If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

Compliance Requirements: 60.4206, 60.4211(a), (c), (f), (g)

60.4206 Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.

60.4211(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(f) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(1) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(3) If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

Testing Requirements: 60.4212

60.4212 Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

(a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder.

(b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.

(c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \qquad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in §60.4213 of this subpart, as appropriate.

(d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4204(a), §60.4205(a), or §60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in §60.4204(a), §60.4205(a), or §60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate.

(e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

Notification, Reports, and Records Requirements: 60.4214(b); If equipped with DPF: 60.4214(c); If >100 HP and > 15 hrs/yr for emergency DR: 60.4214(d)

60.4214(b) If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in Table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

If your engine is equipped with a diesel particulate filter: 60.4214(c)

60.4214(c) If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.

If your engine is greater than 100 HP and used more than 15 hours a year for emergency demand response:

(d) If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in § 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.

General Provisions (40 CFR part 60): Table 8

Attachment J:

Cummins QSL9 Series Emergency Diesel Driven Fire Pump Emission Calculations

Max Power	275	BHP	
Fuel Use:	14.3	gal/hr	1.96 MMBtu/hr
	7,150	gal/yr assuming 500 hours operation.	979.76 MMBtu/yr
	137,030	Btu/gal (diesel heat content)	

Hourly Emissions:

	Emission Factor*	Emissions	Emissions	Note:
	Grams/kWh	lb/hr	lb/24hr	
NOx	2.200 Grams/bhp-hr	1.33	32.01	
CO	1.417 Grams/bhp-hr	0.86	20.62	
NMHC	0.123 Grams/bhp-hr	0.07	1.79	* NOx, CO, and NMHC EF's based on Cummins QSL9 Spec Sheet.
SO2	0.00205 lb/HP-hr	0.56	13.53	* SO2 estimated using Chapter 3.3 of AP-42 for diesel industrial engines.
PM=PM10=PM2.5	0.118 Grams/bhp-hr	0.07	1.72	* PM based on Cummins QSL9 Spec Sheet.
CO2	1.15 lb/HP-hr	316.25	7590.00	* CO2 estimated using AP-42 CO2 EF for diesel industrial engines.
VOC (used TOC)	0.0025141 lb/HP-hr	0.69	16.59	*TOC estimated using AP-42 TOC EF's for exhaust and crankcase emissions for diesel industrial engines.
Formaldehyde	0.00118 lb/MMBtu	0.00231	0.0555	* Formaldehyde estimated using AP-42 Formaldehyde EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Benzene	0.000933 lb/MMBtu	0.0018	0.044	* Benzene estimated using AP-42 Benzene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Propylene	0.00258 lb/MMBtu	0.005	0.12	* Propylene estimated using AP-42 1,3 Butadiene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Toluene	0.000409 lb/MMBtu	0.0008	0.019	* Toluene estimated using AP-42 Toluene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Xylenes	0.000285 lb/MMBtu	0.00056	0.013	* Xylenes estimated using AP-42 Xylenes EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).

Acetaldehyde	0.000767 lb/MMBtu	0.00150	0.0361	*Acetaldehyde estimated using AP-42 Acetaldehyde EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Acrolein	0.0000925 lb/MMBtu	0.000181	0.00435	*Acrolein estimated using AP-42 Acrolein EF for diesel industrial engines. Assuming 1.4gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Napthalene	0.0000848lb/MMBtu	0.00017	0.004	*Naphthalene estimated using AP-42 Naphthalene EF for diesel industrial engines. Assuming 1.9 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Total HAPS		0.007	0.18	

Typical Annual Emissions - **(Assume 500 hrs/yr)**

	Emissions
	tons/yr
NOx	0.33
CO	0.21
HC	0.019
SO2	0.1409
PM	0.018
CO2	79.06
VOC	0.17
Formaldehyde	0.000578
Benzene	0.00046
Propylene	0.0013
Toluene	0.00020
Xylenes	0.00014
Acetaldehyde	0.000376
Acrolein	0.0000453
Napthalene	0.00004
Total HAPS	0.0029

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Re: Kentucky Power Mitchell

1 message

Roberts, Daniel P <daniel.p.roberts@wv.gov> Mon, Jun 24, 2024 at 9:30 AM
To: "McCumbers, Carrie" <carrie.mccumbers@wv.gov>

Carrie,

Good morning. Thanks for the info. I am going through emails and trying to catch up from being off on vacation. I'll look into this as soon as I can and get back to you.

Dan

On Mon, Jun 24, 2024 at 9:13 AM McCumbers, Carrie <carrie.mccumbers@wv.gov> wrote:

> Dan,
>
> I just assigned MM04 to you for Kentucky Power Mitchell's replacement of an emergency diesel fire pump engine. As I was looking at the application, I noticed that it didn't have an NSR permit application associated with it. I went back and looked at the applications for MM03 and MM02 and these also do not have NSR applications associated with the replacement/installation of generators. They have an NSR general permit registration for other generators at the facility, but have not requested any NSR permits or changes to the general permit registration for these engines. Should they have?
>
> Thanks,
> Carrie

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Wheeling Power Company; Mitchell Plant

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 03-054-05100005
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R30-05100005-2019 (MM01)

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
  - ☐ Title V Initial
  - ☐ Title V Renewal
  - ☐ Administrative Amendment**
  - ☑ Minor Modification**
  - ☐ Significant Modification**
  - ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:
  - ☐ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☑ Check (Make checks payable to: WVDEP – Division of Air Quality)

    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☐ Responsible Official/Authorized Representative
    - Name: Joshua D. Snodgrass
    - Email: jdsnodgrass@aep.com
    - Phone Number: 304-843-6005
  - ☑ Company Contact
    - Name: G. M.(Matt) Palmer
    - Email: gmpalmer@aep.com
    - Phone Number: 304-843-6048
  - ☑ Consultant
    - Name: Brandon T. Belcher
    - Email: btbelcher@aep.com
    - Phone Number: 304-541-7437

American Electric Power
Mitchell Plant
8999 Energy Road
P. O. Box K
Moundsville, WV 26041
(304) 843-6000
FAX (304) 843-6080
aep.com

June 19, 2024

Ms. Laura M. Crowder, Director (electronically via DEPAirQualityPermitting@wv.gov)
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Mitchell Plant Title V Minor Modification Request
Plant ID# 051-00005

Dear Ms. Crowder:

In accordance with Condition 2.7.1 for the subject permit, attached is an electronic copy (via email) of a signed application and request for a minor modification of the Title V permit for Wheeling Power Company's Mitchell Plant. The subject application is for the Steam Electric Generating Facility located near Moundsville, WV in Marshall County. The existing permit expires on November 26, 2024.

Wheeling Power is submitting a request for a minor modification to the Mitchell Plant Title V Permit (R30-05100005-2019 (MM01)). This change involves replacement of the existing diesel driven emergency fire pump drive engine associated with Unit 2. A minor modification for this replacement was included in Attachment S of the recent Title V Renewal Application, submitted on May 9, 2024, but it has since been determined that this diesel engine will not meet the HP requirement for Unit 2's emergency fire pump. The new diesel driven emergency fire pump drive engine is a 2024 model year Cummins CFP9E-F10 (Cummins QSL9 Series engine, 275 BHP), meeting 2024 EPA Tier 3 requirements (Certificate No. RCEXL0540AAB-009).

Should you have any further questions, please contact Brandon Belcher at (304) 541-7437 or via email at btbelcher@aep.com.

Sincerely,

Joshua D. Snodgrass
Plant Manager, Mitchell Plant

RE: Mitchell Plant Title V Minor Modification Request

cc: G.M. Palmer / D.R. Roski – Mitchell Plant
T.W. Lohner / J.N. Lukehart / B.T. Belcher – Environmental Services

Enclosure: Mitchell Plant Title V Minor Modification Application Package

WEST VIRGINIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

TITLE V PERMIT REVISION APPLICATION

PLEASE CHECK TYPE OF TITLE V PERMIT REVISION:

- ☐ **ADMINISTRATIVE AMENDMENT**
- ☑ **MINOR MODIFICATION**
- ☐ **SIGNIFICANT MODIFICATION**
- ☐ **OFF-PERMIT CHANGE**
- ☐ **OPERATIONAL FLEXIBILITY [502(B)(10) CHANGES]**
- ☐ **REOPENING**

TITLE V PERMIT NUMBER:
R30- 05100005-2019 (MM01)

WHEN DID OR WHEN WILL THE CHANGES OCCUR?
MM/DD/YYYY : 06/2024

SIC CODES: PRIMARY: 4911 **SECONDARY:**

Refer to "Title V Revision Guidance" (Appendix A, "Title V Permit Revision Flowchart"), for type of revision, and to Section 7 of this Application for Application Completeness and Ability to Operate information

Section 1: General Information

a. Name of Applicant ***(As registered with the WV Secretary of State's Office)*****:**	**b. Facility Name or Location:**
Wheeling Power Company	Mitchell Plant

b. Contact Information

Responsible Official: Joshua D. Snodgrass		Title: Plant Manager
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip:
Telephone Number: (304) 843 - 6005	Fax Number: (304) 843 - 6080	E-mail: jdsnodgrass@aep.com
Environmental Contact: G. M. (Matt) Palmer		Title: Plant Environmental Coordinator
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041
Telephone Number: (304) 843 - 6048	Fax Number: (304) 843 - 6080	E-mail: gmpalmer@aep.com
Application Preparer: Brandon T. Belcher		Title: Environmental Specialist
Company: AEP Service Corp.		
Street or P.O. Box: 1 Riverside Plaza, 21st Floor		
City: Columbus	State: OH	Zip: 43215
Telephone Number: (304) 541 - 7437	Fax Number: ( ) -	E-mail: btbelcher@aep.com

Person to contact if we have questions regarding this Application: Brandon T. Belcher

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 2: Revision Information

a. Description of Changes Associated with this Permit Revision

Provide a general description of changes to the facility.

This change involves the replacement of an emergency diesel driven fire pump and fuel tank associated with Unit 2 at the Mitchell Plant. The diesel engine included in Attachment S of the Title V Renewal application, submitted on 5/9/2024, was determined to be undersized for the fire pump requirements.

b. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☑ No

If Yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's ***"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"*** guidance as **ATTACHMENT A.**

c. Provide a **Plot Plan(s**) if new emission points were added since latest revision, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the new/modified stationary source(s) is located as **ATTACHMENT B.** For instructions, refer to "***Plot Plan - Guidelines***"**.**

d. Provide a detailed **Process Flow Diagram(s)** if new emission points were added since latest revision, showing each new/modified process or emissions unit as **ATTACHMENT C.** Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

e. Emission Units Table

Fill out the **Emission Units Table** for new and/or modified equipment and provide it as **ATTACHMENT D**.

f. Emission Units Form(s)

For each new and/or modified emission unit(s) with applicable requirement(s) listed in the **Emission Units Table**, fill out and provide an **Emission Unit Form(s)** as **ATTACHMENT E**.

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

For each new and/or modified emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

g. Control Devices

For each new and/or modified control device listed in the **Emission Units Table**, fill out and provide an **Air Pollution Control Device Form(s)** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Part 70 Major Source Threshold level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. If applicable, please check appropriate box in Section 3(a) below, fill out and provide these forms for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 3: New Applicable Requirements

a. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☑ Section 111 NSPS (Subpart(s) IIII)	☑ Section 112(d) MACT standards (Subpart(s) ZZZZ)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR26)
☐ CAIR SO_2 Trading Program (45CSR41)	

b. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

N/A

☐ **Permit Shield Requested** *(not applicable to Minor Modifications, Off-Permit Changes, or for Operational Flexibility)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

c. Suggested Title V Draft Permit Language

Provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit as **ATTACHMENT I**. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e. g. 45CSR§7-4.1)) for those requirements being added / revised.

See Attachment I

d. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number
Installation did not trigger Reg 13 modification thresholds		

e. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number

Section 4: Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY	For Off-Permit Changes: Provide Total Aggregated Emissions Increase Since Last Permit/Modification
NOx	0.33	Note: The estimated emissions
CO	0.21	listed do not take into account the
NMHC	0.019	reduction in emissions related to
SO2	0.141	the replacement of the original fire
Particulate Matter	0.018	pump engine.

Provide **Supporting Emission Calculations/Estimations** as **ATTACHMENT J**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 5: Certification of Information

a. **Certification For Use Of Minor Modification Procedures** ***(Required Only for Minor Modification Requests)***

Note: *This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

i. Proposed changes do not violate any applicable requirement;
ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed): [signature] *(Please use blue ink)* Date: 6 / 19 / 24 *(Please use blue ink)*

Named (typed): Joshua D. Snodgrass Title: Plant Manager

b. Certification of Truth, Accuracy and Completeness and Certification of Compliance
(Required For All Revision Requests)

Note:	*This Certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.*

Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Joshua D. Snodgrass	Title: Plant Manager

Responsible official's signature:

Signature: _____ Signature Date: 6/19/24

(Please use blue ink) *(Please use blue ink)*

Section 6: Attachments

Note: Please check all applicable attachments included with this permit application:	
☐	ATTACHMENT A: Business Confidentiality Claims
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Emission Units Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☐	ATTACHMENT G: Air Pollution Control Device Form(s)
☐	ATTACHMENT H: Compliance Assurance Monitoring Form(s)
☑	ATTACHMENT I: Suggested Title V Draft Permit Language
☑	ATTACHMENT J: Supporting Emission Calculations/Estimations

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

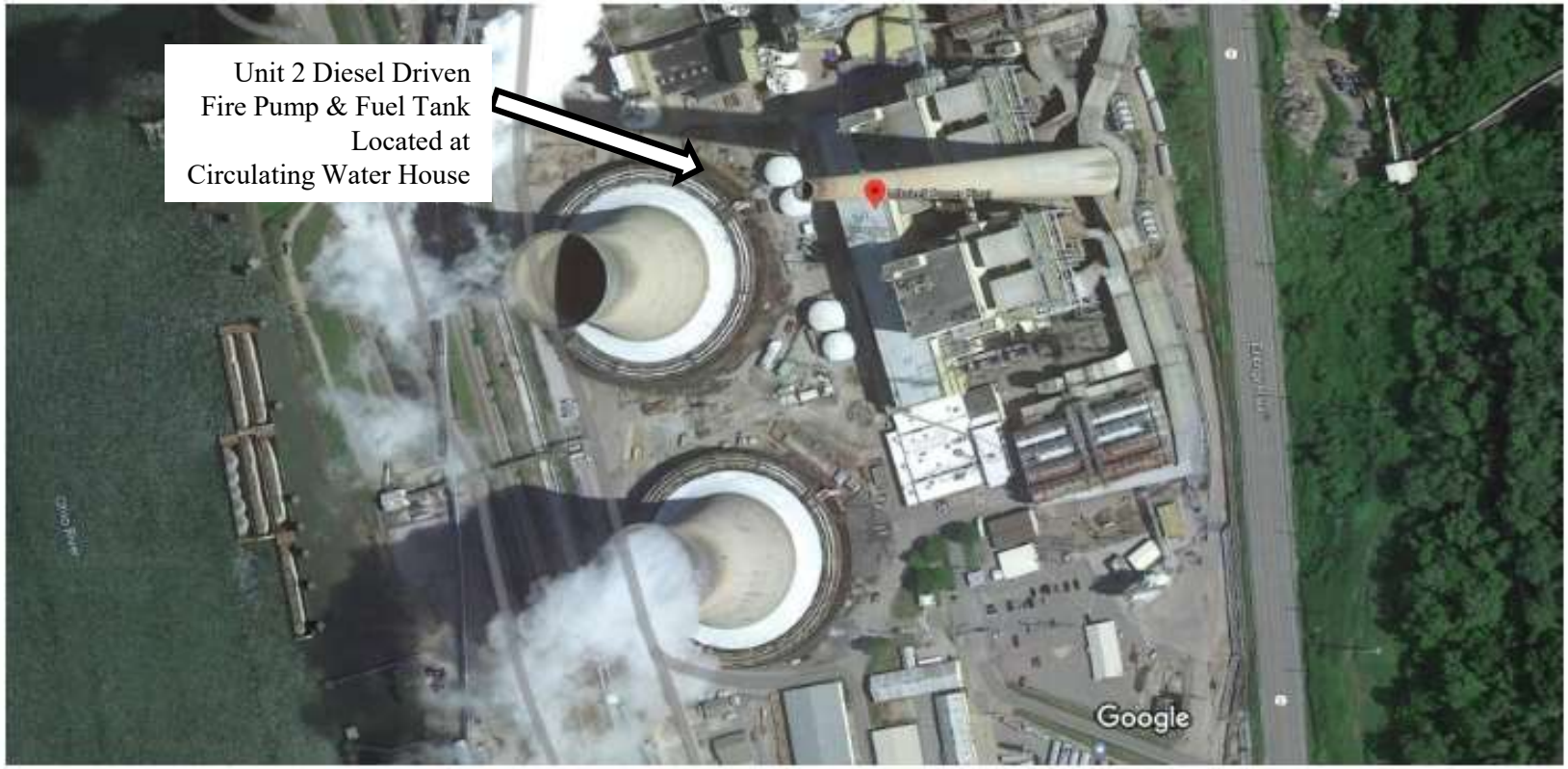
Section 7: Application Completeness and Ability to Operate information for different types of Title V Permit revisions

(Refer to "Title V Revision Guidance" for more information)

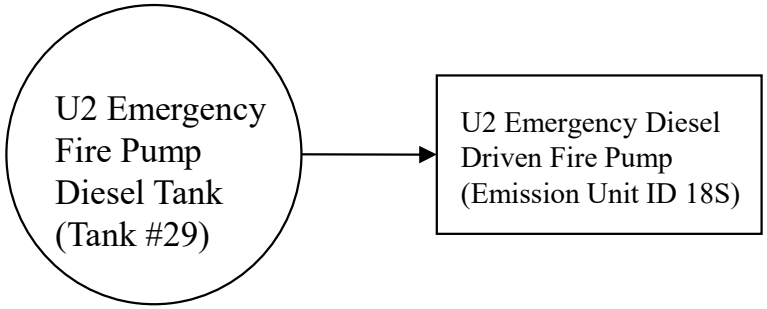
Type of Revision	Application/Notification Requirements	Ability to Operate
Administrative Amendment	☐ Description of change ☐ Supplemental information (rationale) ☐ Certification of application and compliance (Section 5(b))	Upon submittal of the application
Minor Modification	☑ Description of change ☑ Associated change in emissions ☑ Sample Calculations/estimations for determining emissions ☑ List of new applicable requirements associated with changes ☑ List of R13/R14 permits associated with the changes ☑ Suggested draft permit language ☑ Certification for use of Minor Modification (Section 5(a)) ☑ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application, or upon issuance of the R13/R14 permit (if any), whichever is later
Significant Modification	☐ Description of change ☐ Associated change in emissions ☐ Sample Calculations/estimations for determining emissions ☐ List of R13/R14 permits associated with the changes ☐ List of new applicable requirements associated with changes ☐ Request for permit shield ☐ Updated drawings, plot plans, process flow diagrams, etc. ☐ Certification of application and compliance (Section 5(b))	Upon issuance of the modified Title V permit (if changes either conflict with, or are prohibited by existing Title V Permit terms/ conditions), OR upon obtaining of proper R13/ R14 Permit for first 12 months (if changes neither conflict with, nor are prohibited by existing Title V Permit terms/conditions)
Off-Permit Changes	☐ Notification/application to DAQ and U.S.E.P.A. within 2 business days of the change ☐ Description of the change ☐ The date on which the change will occur or has occurred ☐ Pollutants and amounts emitted ☐ Sample Calculations/estimations for determining emissions ☐ Any new applicable requirements that will apply to changes ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After two (2) days from the submittal of the application
Operational Flexibility	☐ Notification/application submitted to DAQ and U.S.E.P.A. in advance (7 days prior to making changes) ☐ Description of the change ☐ The date on which the change is to occur ☐ Permit terms and conditions affected by the change ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application/notification to DAQ and EPA
Reopening	☐ Description of change ☐ List of new applicable requirements associated with changes ☐ Suggested draft permit language ☐ Certification of application and compliance (Section 5(b))	Ability to operate is not reflected by the changes

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Attachment B: Mitchell Plant



Attachment C:
Mitchell Plant Unit 2 Emergency Diesel Driven Fire Pump



ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
18S	18E	Unit 2 Emergency Diesel Driven Fire Pump	2024	275 BHP	
Tank #29	Tank #29	Diesel Fire Pump Fuel Tank - U2	2024	300 gal	

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
18S	Unit 2 Emergency Diesel Driven Fire Pump	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Emergency diesel driven fire pump that will replace existing unit associated with Unit 2 at the plant. 275 BHP diesel engine.

Manufacturer:	**Model number:**	**Serial number:**
Cummins	CFP9E-F10 Fire Pump / QSL9 Series Engine	

Construction date: MM/DD/YYYY	**Installation date:** MM/DD/YYYY	**Modification date(s):** MM/DD/YYYY
06/2024	06/2024	06/2024

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

Approx. 14.3 gal/hr, 275 BHP

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
Approx. 14.3 gal/hr	7,150 gal/yr	Assumed 500 hr/yr, but not limited during emergency

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ☑ Yes ☐ No	**If yes, is it?** ☐ Indirect Fired ☑ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 275 BHP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Diesel Fuel, less than 15 ppm sulfur.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Diesel Fuel	15 ppm		Approx. 137,030 btu/gal

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.86	0.21
Nitrogen Oxides (NO_X)	1.33	0.33
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	0.07	0.018
Particulate Matter (PM_{10})	0.07	0.018
Total Particulate Matter (TSP)	0.07	0.018
Sulfur Dioxide (SO_2)	0.56	0.141
Volatile Organic Compounds (VOC)	0.69	0.17
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
CO2	316.25	79.06

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Manufacturer's Data used for NOx, NMHC, PM, and CO. AP-42 used for SO2, CO2, and VOC.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

This emergency diesel fire pump engine is subject to the requirements in 40 CFR 63 Subpart IIII. The previous diesel fire pump engine was subject to the requirements in 40 CFR 63 Subpart ZZZZ and suggested language revisions have been included in Attachment L.

Requirements currently captured in Title V permit:
R30-05100005-2019 (MM01) Section 7.1.

☐ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

This emergency diesel fire pump engine is subject to the requirements in 40 CFR 63 Subpart IIII. The previous diesel fire pump engine was subject to the requirements in 40 CFR 63 Subpart ZZZZ and suggested language revisions have been included in Attachment L.

Requirements currently captured in Title V permit:
R30-05100005-2019 (MM01) Sections 7.2 through 7.5.

Are you in compliance with all applicable requirements for this emission unit? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

Attachment I

Summary of Requirements[1]

40 CFR part 60, subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

For fire pump engines with a displacement of less than 30 liters/cyl, manufactured during or after the model year that applies to your fire pump engine power rating in Table 3 of 40 CFR part 60, subpart IIII.

NOTE: To refer directly to the regulatory text, please go to Subpart IIII (scroll down to almost the end of the page).

Temporary Engines:

Per 60.4200(e) Owners and operators of facilities with CI ICE that are acting as temporary replacement units and that are located at a stationary source for less than 1 year and that have been properly certified as meeting the standards that would be applicable to such engine under the appropriate nonroad engine provisions, are not required to meet any other provisions under this subpart with regard to such engines.

Emission Standards: 60.4205(c), Table 4

60.4205(c) Owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants.

Per 60.4215(a) Stationary CI ICE with a displacement of less than 30 liters per cylinder that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are required to meet the applicable emission standards in §§60.4202 and 60.4205. Stationary CI ICE with a displacement of greater than or equal to 30 liters per cylinder that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are required to meet the emission standards in 60.4215(c).

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

[1]Disclaimer: The content provided in this software tool is intended solely as assistance for potential reporters to aid in assessing requirements for compliance under the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60 Subpart IIII. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by EPA of the applicability of the rule to any particular facility. In any particular case, EPA will make its assessment by applying the law and regulations to the specific facts of the case.

Fuel Requirements: 60.4207(a), (b), (e)

60.4207(a) Beginning October 1, 2007, owners and operators of stationary CI ICE subject to this subpart that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must purchase diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

(e) Stationary CI ICE that have a national security exemption under §60.4200(d) are also exempt from the fuel requirements in this section.

Per 60.4215(b) stationary CI ICE that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are not required to meet the fuel requirements in 40 CFR 60.4207.

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

Per 60.4217 Owners and operators of stationary CI ICE that do not use diesel fuel may petition the Administrator for approval of alternative emission standards, if they can demonstrate that they use a fuel that is not the fuel on which the manufacturer of the engine certified the engine and that the engine cannot meet the applicable standards required in §60.4204 or §60.4205 using such fuels and that use of such fuel is appropriate and reasonably necessary, considering cost, energy, technical feasibility, human health and environmental, and other factors, for the operation of the engine.

Importing/Installing Requirements: 60.4208(h), (i)

60.4208(h) In addition to the requirements specified in §§60.4201, 60.4202, 60.4204, and 60.4205, it is prohibited to import stationary CI ICE with a displacement of less than 30 liters per cylinder that do not meet the applicable requirements specified in paragraphs (a) through (g) of this section after the dates specified in paragraphs (a) through (g) of this section.

(i) The requirements of this section do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location.

Monitoring Requirements: 60.4209(a); If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209 (b) If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

Compliance Requirements: 60.4206, 60.4211(a), (c), (f), (g)

60.4206 Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.

60.4211(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(f) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(1) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(3) If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

Testing Requirements: 60.4212

60.4212 Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

(a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder.

(b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.

(c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \qquad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in §60.4213 of this subpart, as appropriate.

(d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4204(a), §60.4205(a), or §60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in §60.4204(a), §60.4205(a), or §60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate.

(e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

Notification, Reports, and Records Requirements: 60.4214(b); If equipped with DPF: 60.4214(c); If >100 HP and > 15 hrs/yr for emergency DR: 60.4214(d)

60.4214(b) If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in Table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

If your engine is equipped with a diesel particulate filter: 60.4214(c)

60.4214(c) If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.

If your engine is greater than 100 HP and used more than 15 hours a year for emergency demand response:

(d) If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in § 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.

General Provisions (40 CFR part 60): Table 8

Attachment J:

Cummins QSL9 Series Emergency Diesel Driven Fire Pump Emission Calculations

Max Power	275	BHP	
Fuel Use:	14.3	gal/hr	1.96 MMBtu/hr
	7,150	gal/yr assuming 500 hours operation.	979.76 MMBtu/yr
	137,030	Btu/gal (diesel heat content)	

Hourly Emissions:

	Emission Factor*	Emissions	Emissions	Note:
	Grams/kWh	lb/hr	lb/24hr	
NOx	2.200 Grams/bhp-hr	1.33	32.01	
CO	1.417 Grams/bhp-hr	0.86	20.62	
NMHC	0.123 Grams/bhp-hr	0.07	1.79	* NOx, CO, and NMHC EF's based on Cummins QSL9 Spec Sheet.
SO2	0.00205 lb/HP-hr	0.56	13.53	* SO2 estimated using Chapter 3.3 of AP-42 for diesel industrial engines.
PM=PM10=PM2.5	0.118 Grams/bhp-hr	0.07	1.72	* PM based on Cummins QSL9 Spec Sheet.
CO2	1.15 lb/HP-hr	316.25	7590.00	* CO2 estimated using AP-42 CO2 EF for diesel industrial engines.
VOC (used TOC)	0.0025141 lb/HP-hr	0.69	16.59	*TOC estimated using AP-42 TOC EF's for exhaust and crankcase emissions for diesel industrial engines.
Formaldehyde	0.00118 lb/MMBtu	0.00231	0.0555	* Formaldehyde estimated using AP-42 Formaldehyde EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Benzene	0.000933 lb/MMBtu	0.0018	0.044	* Benzene estimated using AP-42 Benzene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Propylene	0.00258 lb/MMBtu	0.005	0.12	* Propylene estimated using AP-42 1,3 Butadiene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Toluene	0.000409 lb/MMBtu	0.0008	0.019	* Toluene estimated using AP-42 Toluene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Xylenes	0.000285 lb/MMBtu	0.00056	0.013	* Xylenes estimated using AP-42 Xylenes EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).

Acetaldehyde	0.000767 lb/MMBtu	0.00150	0.0361	*Acetaldehyde estimated using AP-42 Acetaldehyde EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Acrolein	0.0000925 lb/MMBtu	0.000181	0.00435	*Acrolein estimated using AP-42 Acrolein EF for diesel industrial engines. Assuming 1.4gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Napthalene	0.0000848lb/MMBtu	0.00017	0.004	*Naphthalene estimated using AP-42 Naphthalene EF for diesel industrial engines. Assuming 1.9 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Total HAPS		0.007	0.18	

Typical Annual Emissions - **(Assume 500 hrs/yr)**

	Emissions
	tons/yr
NOx	0.33
CO	0.21
HC	0.019
SO2	0.1409
PM	0.018
CO2	79.06
VOC	0.17
Formaldehyde	0.000578
Benzene	0.00046
Propylene	0.0013
Toluene	0.00020
Xylenes	0.00014
Acetaldehyde	0.000376
Acrolein	0.0000453
Napthalene	0.00004
Total HAPS	0.0029

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Fwd: [Wheeling Power Company; Mitchell Plant] Title V Permit Minor Modification Application

1 message

Air Quality Permitting, DEP <depairqualitypermitting@wv.gov> Mon, Jun 24, 2024 at 8:07 AM
To: Stephanie R Mink <stephanie.r.mink@wv.gov>, Daniel P Roberts <daniel.p.roberts@wv.gov>

Stephanie,

Please assign this minor modification to Dan as R30-05100005-2019 (MM04).

Thanks,
Carrie

---------- Forwarded message ---------
From: **Brandon T Belcher** <btbelcher@aep.com>
Date: Thu, Jun 20, 2024 at 12:12 PM
Subject: [Wheeling Power Company; Mitchell Plant] Title V Permit Minor Modification Application
To: DEPAirQualityPermitting@wv.gov <DEPAirQualityPermitting@wv.gov>
Cc: Joshua D Snodgrass <jdsnodgrass@aep.com>, G M Palmer <gmpalmer@aep.com>, Danielle R Roski <drroski@aep.com>, Tim Lohner <twlohner@aep.com>, Jill N Lukehart <jnlukehart@aep.com>

Dear Ms. Crowder,

In accordance with Condition 2.7.1 for the subject permit, attached is an electronic copy of a signed application and request for a minor modification of the Title V permit for Wheeling Power Company's Mitchell Plant. The subject application is for the Steam Electric Generating Facility located near Moundsville, WV in Marshall County. The existing permit expires on November 26, 2024.

Wheeling Power is submitting a request for a minor modification to the Mitchell Plant Title V Permit (R30-05100005-2019 (MM01)). This change involves replacement of the existing diesel driven emergency fire pump drive engine associated with Unit 2.

A minor modification for this replacement was included in Attachment S of the recent Title V Renewal Application, submitted on May 9, 2024, but it has since been determined that this diesel engine will not meet the HP requirement for Unit 2's emergency fire pump. The new diesel driven emergency fire pump drive engine is a 2024 model year Cummins CFP9E-F10 (Cummins QSL9 Series engine, 275 BHP), meeting 2024 EPA Tier 3 requirements (Certificate No. RCEXL0540AAB-009).

Should you have any questions or concerns, please let me know.

Sincerely,

Brandon Belcher

BRANDON T BELCHER | **ENVIRONMENTAL SPECIALIST SR**
BTBELCHER@AEP.COM | A:8.200.1800 | C:304.541.7437
1 RIVERSIDE PLAZA, COLUMBUS, OH 43215

2 attachments

Email Cover Letter-ML Title V Permit Renewal_ModRev1.pdf
553K

Mitchell Minor Mod - U2 Fire Pump 2024 Rev1.pdf
2069K

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Notification for a Title V Minor Modification MM03 - Kentucky Power Company - Mitchell Plant - Current Permit R30-05100005-2019

1 message

Roberts, Daniel P <daniel.p.roberts@wv.gov> Thu, Aug 31, 2023 at 3:09 PM
To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>, Weinelt.Eva@epa.gov, jennifer.vanvlerah@epa.ohio.gov, RA-EPAIRPERMITNOTIFI@pa.gov
Cc: "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

This email serves as notification that on August 25, 2023, the WV DAQ received an application for a Title V minor modification (MM03) for Kentucky Power Company's Mitchell Plant located near Cresap/Moundsville, Marshall County, WV. The proposed change is to replace a 1971 diesel driven 230 bhp emergency fire pump and 275 gallon diesel fuel tank associated with Unit 1 with a 2023 Tier 3 diesel driven 249 bhp emergency fire pump and 300 gallon diesel fuel tank. As a result of this modification, the facility's PTE will increase 0.34 TPY for NO_X, 0.16 TPY for CO, 0.13 TPY for SO_2. and 0.02 TPY for particulate matter If you have any questions or comments about this Title V permit revision application, please contact me at your earliest convenience.

Sincerely,

Dan Roberts

WV Department of Environmental Protection

Division of Air Quality

601 57th Street, SE

Charleston, WV 25304

304-926-0499 ext. 41902

Roberts, Daniel P <daniel.p.roberts@wv.gov>

WV DAQ Title V Permit Application Status for Wheeling Power Company; Mitchell Plant

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Mon, Aug 28, 2023 at 9:12 AM
To: "damiller@aep.com" <damiller@aep.com>, gmpalmer@aep.com, btbelcher@aep.com
Cc: Carrie McCumbers <carrie.mccumbers@wv.gov>, Daniel P Roberts <daniel.p.roberts@wv.gov>

RE: Application Status

Wheeling Power Company

Mitchell Plant

Facility ID No. 051-00005

Application No. R30-05100005-2019 (MM03)

Dear Mr. Miller,

Your application for a Title V Minor Modification permit for Wheeling Power Company's Mitchell Plant was received by this Division on August 25, 2023, and was assigned to Dan Roberts.

Should you have any questions, please contact the assigned permit writer, Dan Roberts, at 304-926-0499, extension 41902, or Daniel.P.Roberts@wv.gov .

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Mitchell Plant MM03

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Mon, Aug 28, 2023 at 8:49 AM
To: Daniel P Roberts <daniel.p.roberts@wv.gov>

Hi Dan,

Here's a dated copy of the application. I'm getting it entered now and will send the email to the company shortly.

Have a good day!

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

R30-05100005-2019 (MM03) Mitchell Plant.pdf
13447K

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Wheeling Power Company; Mitchell Plant

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 03-054-05100005
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R30-05100005-2019

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
  - ☐ Title V Initial
  - ☐ Title V Renewal
  - ☐ Administrative Amendment**
  - ☑ Minor Modification**
  - ☐ Significant Modification**
  - ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:
  - ☐ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☑ Check (Make checks payable to: WVDEP – Division of Air Quality)

    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☐ Responsible Official/Authorized Representative
    - Name: David A. Miller
    - Email: damiller@aep.com
    - Phone Number: 614-716-2281
  - ☑ Company Contact
    - Name: G. M.(Matt) Palmer
    - Email: gmpalmer@aep.com
    - Phone Number: 304-843-6048
  - ☑ Consultant
    - Name: Brandon T. Belcher
    - Email: btbelcher@aep.com
    - Phone Number: 304-541-7437

American Electric Power
Mitchell Plant
8999 Energy Road
P. O. Box K
Moundsville, WV 26041
(304) 843-6000
FAX (304) 843-6080
aep.com

August 25, 2023

Ms. Laura M. Crowder, Director (electronically via DEPAirQualityPermitting@wv.gov)
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Mitchell Plant Title V Minor Modification Request

Dear Ms. Crowder:

In accordance with Condition 2.7.1 for the subject permit, attached is an electronic copy (via email) of a signed application and request for a minor modification of the Title V permit for Wheeling Power Company's Mitchell Plant. The subject application is for the Steam Electric Generating Facility located near Moundsville, WV in Marshall County. The existing permit expires on November 26, 2024.

Wheeling Power is submitting a request for a minor modification to the Mitchell Plant Title V Permit (R30-05100005-2019). This change involves replacement of the existing diesel driven emergency fire pump drive engine associated with Unit 1. The new diesel driven emergency fire pump drive engine is a 2023 model year Cummins CFP7E-F60 (Cummins QSB 6.7 Series engine, 249 BHP), meeting 2023 EPA Tier 3 requirements (Certificate No. PCEXL0409AAB-006).

Should you have any further questions, please contact Brandon Belcher via email at btbelcher@aep.com.

Sincerely,

David A. Miller

David A. Miller
Director – Environmental Permit, Programs & Reporting Services (EPPRS)

RE: Mitchell Plant Title V Minor Modification Request

cc: J.D. Snodgrass – Mitchell Plant
G.M. Palmer – Mitchell Plant
D.R. Roski – Mitchell Plant
T.W. Lohner – Environmental Permit Services

Enclosure: Mitchell Plant Title V Minor Modification Application Package

WEST VIRGINIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

TITLE V PERMIT REVISION APPLICATION

PLEASE CHECK TYPE OF TITLE V PERMIT REVISION:

- ☐ ADMINISTRATIVE AMENDMENT
- ☑ MINOR MODIFICATION
- ☐ SIGNIFICANT MODIFICATION
- ☐ OFF-PERMIT CHANGE
- ☐ OPERATIONAL FLEXIBILITY [502(B)(10) CHANGES]
- ☐ REOPENING

TITLE V PERMIT NUMBER:
R30- 05100005-2019

WHEN DID OR WHEN WILL THE CHANGES OCCUR?
MM/DD/YYYY : 09/2023

SIC CODES: PRIMARY: 4911 **SECONDARY:**

Refer to "Title V Revision Guidance" (Appendix A, "Title V Permit Revision Flowchart"), for type of revision, and to Section 7 of this Application for Application Completeness and Ability to Operate information

Section 1: General Information

a. Name of Applicant *(As registered with the WV Secretary of State's Office)*:	**b. Facility Name or Location:**
Wheeling Power Company	Mitchell Plant

b. Contact Information

Responsible Official: David A. Miller		Title: Director - EPPRS
Street or P.O. Box: 1 Riverside Plaza, 21st Floor		
City: Columbus	State: OH	Zip: 43215
Telephone Number: (614) 716 - 2281	Fax Number: (318) 673 - 3960	E-mail: damiller@aep.com
Environmental Contact: G. M. (Matt) Palmer		Title: Plant Environmental Coordinator
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041
Telephone Number: (304) 843 - 6048	Fax Number: (304) 843 - 6080	E-mail: gmpalmer@aep.com
Application Preparer: Brandon T. Belcher		Title: Environmental Specialist
Company: AEP Service Corp.		
Street or P.O. Box: 1 Riverside Plaza, 21st Floor		
City: Columbus	State: OH	Zip: 43215
Telephone Number: (304) 541 - 7437	Fax Number: ( ) -	E-mail: btbelcher@aep.com

Person to contact if we have questions regarding this Application: Brandon T. Belcher

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 2: Revision Information

a. Description of Changes Associated with this Permit Revision

Provide a general description of changes to the facility.

This change involves the replacement of an emergency diesel driven fire pump and fuel tank associated with Unit 1 at the Mitchell Plant.

b. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☑ No

If Yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's ***"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"*** guidance as **ATTACHMENT A.**

c. Provide a **Plot Plan(s**) if new emission points were added since latest revision, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the new/modified stationary source(s) is located as **ATTACHMENT B.** For instructions, refer to "***Plot Plan - Guidelines***"**.**

d. Provide a detailed **Process Flow Diagram(s)** if new emission points were added since latest revision, showing each new/modified process or emissions unit as **ATTACHMENT C.** Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

e. Emission Units Table

Fill out the **Emission Units Table** for new and/or modified equipment and provide it as **ATTACHMENT D**.

f. Emission Units Form(s)

For each new and/or modified emission unit(s) with applicable requirement(s) listed in the **Emission Units Table**, fill out and provide an **Emission Unit Form(s)** as **ATTACHMENT E**.

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

For each new and/or modified emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

g. Control Devices

For each new and/or modified control device listed in the **Emission Units Table**, fill out and provide an **Air Pollution Control Device Form(s)** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Part 70 Major Source Threshold level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. If applicable, please check appropriate box in Section 3(a) below, fill out and provide these forms for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 3: New Applicable Requirements

a. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☑ Section 111 NSPS (Subpart(s) III)	☑ Section 112(d) MACT standards (Subpart(s) zzzz)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR26)
☐ CAIR SO_2 Trading Program (45CSR41)	

b. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

N/A

☐ **Permit Shield Requested** *(not applicable to Minor Modifications, Off-Permit Changes, or for Operational Flexibility)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

c. Suggested Title V Draft Permit Language

Provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit as **ATTACHMENT I**. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e. g. 45CSR§7-4.1)) for those requirements being added / revised.

See Attachment I

d. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number
Installation did not trigger Reg 13 modification thresholds		

e. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number

Section 4: Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY	For Off-Permit Changes: Provide Total Aggregated Emissions Increase Since Last Permit/Modification
NOx	0.34	Note: The estimated emissions
CO	0.16	listed do not take into account the
NMHC	0.009	reduction in emissions related to
SO2	0.128	the replacement of the original fire
Particulate Matter	0.015	pump engine.

Provide **Supporting Emission Calculations/Estimations** as **ATTACHMENT J**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 5: Certification of Information

a. Certification For Use Of Minor Modification Procedures ***(Required Only for Minor Modification Requests)***

Note:	*This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

i. Proposed changes do not violate any applicable requirement;

ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;

iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;

v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;

vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed): David A. Miller *(Please use blue ink)* Date: 08 / 25 / 23 *(Please use blue ink)*

Named (typed): David A. Miller Title: Director - EPPRS

b. Certification of Truth, Accuracy and Completeness and Certification of Compliance
(Required For All Revision Requests)

Note:	*This Certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.*

Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: David A. Miller | Title: Director - EPPRS

Responsible official's signature:
Signature: David A. Miller *(Please use blue ink)* Signature Date: 08.25.2023 *(Please use blue ink)*

Section 6: Attachments

Note: Please check all applicable attachments included with this permit application:	
☐	ATTACHMENT A: Business Confidentiality Claims
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Emission Units Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☐	ATTACHMENT G: Air Pollution Control Device Form(s)
☐	ATTACHMENT H: Compliance Assurance Monitoring Form(s)
☑	ATTACHMENT I: Suggested Title V Draft Permit Language
☑	ATTACHMENT J: Supporting Emission Calculations/Estimations

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

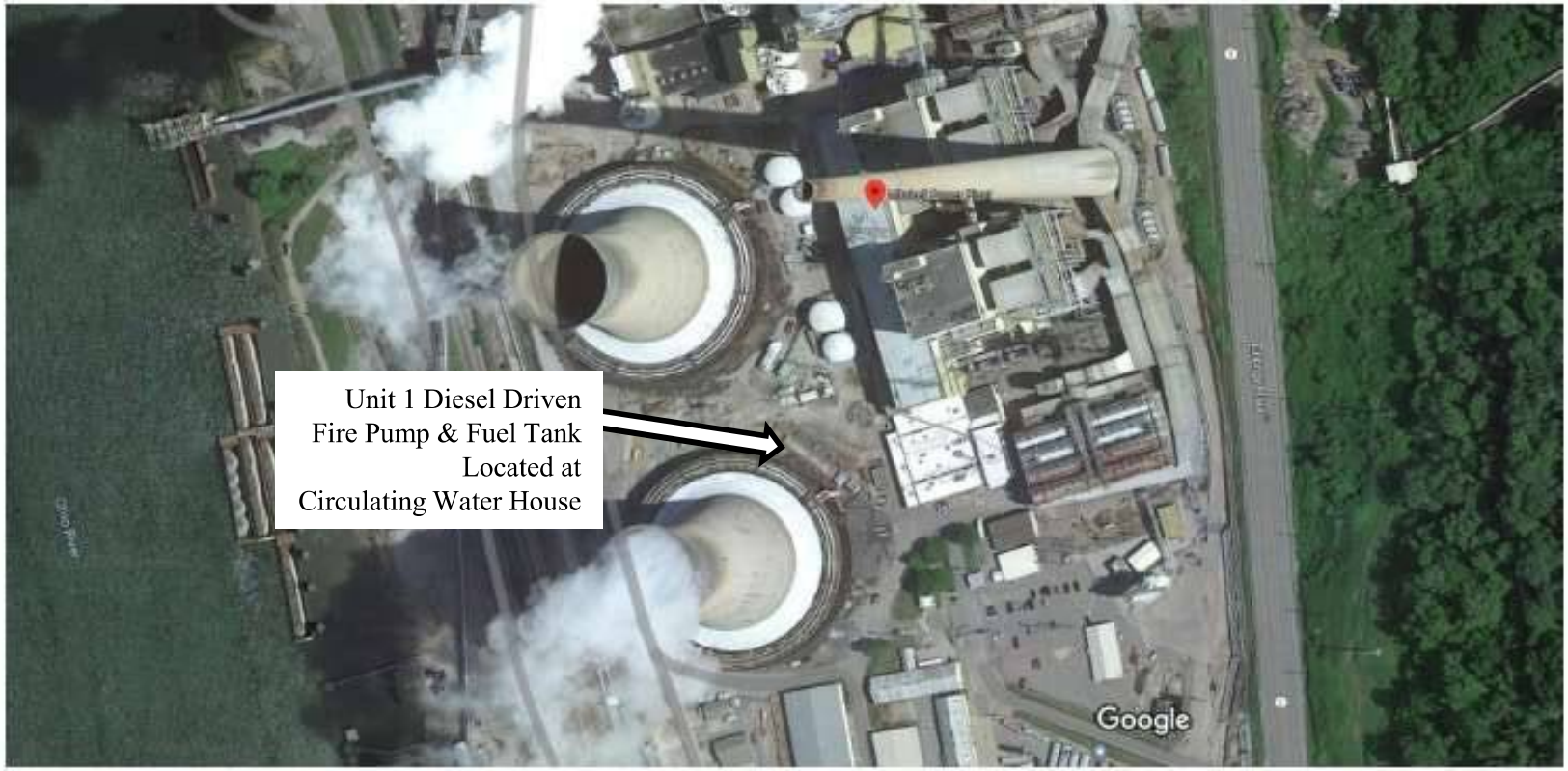
Section 7: Application Completeness and Ability to Operate information for different types of Title V Permit revisions

(Refer to "Title V Revision Guidance" for more information)

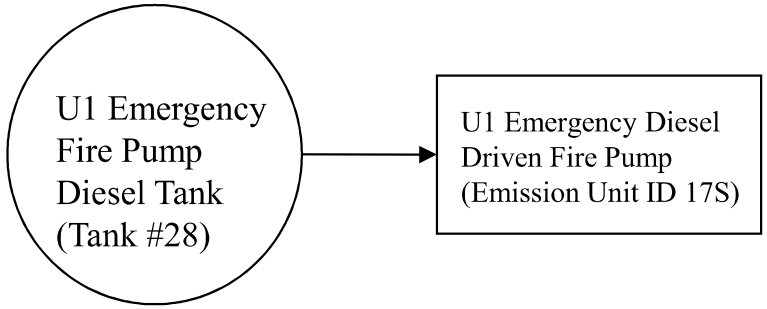
Type of Revision	Application/Notification Requirements	Ability to Operate
Administrative Amendment	☐ Description of change ☐ Supplemental information (rationale) ☐ Certification of application and compliance (Section 5(b))	Upon submittal of the application
Minor Modification	☑ Description of change ☑ Associated change in emissions ☑ Sample Calculations/estimations for determining emissions ☑ List of new applicable requirements associated with changes ☑ List of R13/R14 permits associated with the changes ☑ Suggested draft permit language ☑ Certification for use of Minor Modification (Section 5(a)) ☑ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application, or upon issuance of the R13/R14 permit (if any), whichever is later
Significant Modification	☐ Description of change ☐ Associated change in emissions ☐ Sample Calculations/estimations for determining emissions ☐ List of R13/R14 permits associated with the changes ☐ List of new applicable requirements associated with changes ☐ Request for permit shield ☐ Updated drawings, plot plans, process flow diagrams, etc. ☐ Certification of application and compliance (Section 5(b))	Upon issuance of the modified Title V permit (if changes either conflict with, or are prohibited by existing Title V Permit terms/ conditions), OR upon obtaining of proper R13/ R14 Permit for first 12 months (if changes neither conflict with, nor are prohibited by existing Title V Permit terms/conditions)
Off-Permit Changes	☐ Notification/application to DAQ and U.S.E.P.A. within 2 business days of the change ☐ Description of the change ☐ The date on which the change will occur or has occurred ☐ Pollutants and amounts emitted ☐ Sample Calculations/estimations for determining emissions ☐ Any new applicable requirements that will apply to changes ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After two (2) days from the submittal of the application
Operational Flexibility	☐ Notification/application submitted to DAQ and U.S.E.P.A. in advance (7 days prior to making changes) ☐ Description of the change ☐ The date on which the change is to occur ☐ Permit terms and conditions affected by the change ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application/notification to DAQ and EPA
Reopening	☐ Description of change ☐ List of new applicable requirements associated with changes ☐ Suggested draft permit language ☐ Certification of application and compliance (Section 5(b))	Ability to operate is not reflected by the changes

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Attachment B: Mitchell Plant



Attachment C:
Mitchell Plant Unit 1 Emergency Diesel Driven Fire Pump



ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
17S	17E	Unit 1 Emergency Diesel Driven Fire Pump	2023	249 BHP	
Tank #28	Tank #28	Diesel Fire Pump Fuel Tank - U1	2023	300 gal	

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
17S	Unit 1 Emergency Diesel Driven Fire Pump	N/A

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Emergency diesel driven fire pump to replace existing unit associated with Unit 1 at the plant. 249 BHP diesel engine.

Manufacturer:	**Model number:**	**Serial number:**
Cummins	CFP7E-F60 Fire Pump / QSB6.7 Engine	

Construction date: MM/DD/YYYY	**Installation date:** MM/DD/YYYY	**Modification date(s):** MM/DD/YYYY
09/2023	09/2023	

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

Approx. 14 gal/hr, 249 BHP

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
Approx. 14 gal/hr	7,000 gal/yr	Assumed 500 hr/yr, but not limited during emergency

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ☑ Yes ☐ No	**If yes, is it?** ☐ Indirect Fired ☑ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 249 BHP	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Diesel Fuel, less than 15 ppm sulfur.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Diesel Fuel	15 ppm		Approx. 137,030 btu/gal

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.65	0.16
Nitrogen Oxides (NO_X)	1.36	0.34
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	0.06	0.015
Particulate Matter (PM_{10})	0.06	0.015
Total Particulate Matter (TSP)	0.06	0.015
Sulfur Dioxide (SO_2)	0.51	0.128
Volatile Organic Compounds (VOC)	0.63	0.16
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See Attachment J.

Note: The estimated emissions listed do not take into account the reduction in emissions related to the replacement of the original fire pump engine.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

See Attachment I.

☐ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See Attachment I.

Are you in compliance with all applicable requirements for this emission unit? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

Attachment I

Summary of Requirements[1]

40 CFR part 60, subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

For fire pump engines with a displacement of less than 30 liters/cyl, manufactured during or after the model year that applies to your fire pump engine power rating in Table 3 of 40 CFR part 60, subpart IIII.

NOTE: To refer directly to the regulatory text, please go to Subpart IIII (scroll down to almost the end of the page).

Temporary Engines:

Per 60.4200(e) Owners and operators of facilities with CI ICE that are acting as temporary replacement units and that are located at a stationary source for less than 1 year and that have been properly certified as meeting the standards that would be applicable to such engine under the appropriate nonroad engine provisions, are not required to meet any other provisions under this subpart with regard to such engines.

Emission Standards: 60.4205(c), Table 4

60.4205(c) Owners and operators of fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in table 4 to this subpart, for all pollutants.

Per 60.4215(a) Stationary CI ICE with a displacement of less than 30 liters per cylinder that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are required to meet the applicable emission standards in §§60.4202 and 60.4205. Stationary CI ICE with a displacement of greater than or equal to 30 liters per cylinder that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are required to meet the emission standards in 60.4215(c).

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

[1]Disclaimer: The content provided in this software tool is intended solely as assistance for potential reporters to aid in assessing requirements for compliance under the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60 Subpart IIII. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by EPA of the applicability of the rule to any particular facility. In any particular case, EPA will make its assessment by applying the law and regulations to the specific facts of the case.

Fuel Requirements: 60.4207(a), (b), (e)

60.4207(a) Beginning October 1, 2007, owners and operators of stationary CI ICE subject to this subpart that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must purchase diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

(e) Stationary CI ICE that have a national security exemption under §60.4200(d) are also exempt from the fuel requirements in this section.

Per 60.4215(b) stationary CI ICE that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are not required to meet the fuel requirements in 40 CFR 60.4207.

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

Per 60.4217 Owners and operators of stationary CI ICE that do not use diesel fuel may petition the Administrator for approval of alternative emission standards, if they can demonstrate that they use a fuel that is not the fuel on which the manufacturer of the engine certified the engine and that the engine cannot meet the applicable standards required in §60.4204 or §60.4205 using such fuels and that use of such fuel is appropriate and reasonably necessary, considering cost, energy, technical feasibility, human health and environmental, and other factors, for the operation of the engine.

Importing/Installing Requirements: 60.4208(h), (i)

60.4208(h) In addition to the requirements specified in §§60.4201, 60.4202, 60.4204, and 60.4205, it is prohibited to import stationary CI ICE with a displacement of less than 30 liters per cylinder that do not meet the applicable requirements specified in paragraphs (a) through (g) of this section after the dates specified in paragraphs (a) through (g) of this section.

(i) The requirements of this section do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location.

Monitoring Requirements: 60.4209(a); If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209 (b) If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

Compliance Requirements: 60.4206, 60.4211(a), (c), (f), (g)

60.4206 Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.

60.4211(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(f) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(1) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(3) If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

Testing Requirements: 60.4212

60.4212 Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

(a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder.

(b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.

(c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \qquad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in §60.4213 of this subpart, as appropriate.

(d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4204(a), §60.4205(a), or §60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in §60.4204(a), §60.4205(a), or §60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate.

(e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

Notification, Reports, and Records Requirements: 60.4214(b); If equipped with DPF: 60.4214(c); If >100 HP and > 15 hrs/yr for emergency DR: 60.4214(d)

60.4214(b) If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in Table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

If your engine is equipped with a diesel particulate filter: 60.4214(c)

60.4214(c) If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.

If your engine is greater than 100 HP and used more than 15 hours a year for emergency demand response:

(d) If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in § 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.

General Provisions (40 CFR part 60): Table 8

Attachment J:

Cummins QSB6.7 Emergency Diesel Driven Fire Pump Emission Calculations

Max Power	249	BHP	
Fuel Use:	14	gal/hr	1.92 MMBtu/hr
	7,000	gal/yr assuming 500 hours operation.	959.21 MMBtu/yr
	137,030	Btu/gal (diesel heat content)	

Hourly Emissions:

	Emission Factor*	Emissions	Emissions	Note:
	Grams/kWh	lb/hr	lb/24hr	
NOx	2.475 Grams/bhp-hr	1.36	32.61	
CO	1.193 Grams/bhp-hr	0.65	15.72	
NMHC	0.062 Grams/bhp-hr	0.03	0.82	* NOx, CO, and NMHC EF's based on Cummins QSB6.7 Spec Sheet.
SO2	0.00205 lb/HP-hr	0.51	12.25	* SO2 estimated using Chapter 3.3 of AP-42 for diesel industrial engines.
PM=PM10=PM2.5	0.111 Grams/bhp-hr	0.06	1.46	* All PM assumed to be less than 1 um
CO2	1.15 lb/HP-hr	286.35	6872.40	* CO2 estimated using AP-42 CO2 EF for diesel industrial engines.
VOC (used TOC)	0.0025141 lb/HP-hr	0.63	15.02	*TOC estimated using AP-42 TOC EF's for exhaust and crankcase emissions for diesel industrial engines.
Formaldehyde	0.00118 lb/MMBtu	0.00226	0.0543	* Formaldehyde estimated using AP-42 Formaldehyde EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Benzene	0.000933 lb/MMBtu	0.0018	0.043	* Benzene estimated using AP-42 Benzene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Propylene	0.00258 lb/MMBtu	0.005	0.12	* Propylene estimated using AP-42 1,3 Butadiene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Toluene	0.000409 lb/MMBtu	0.0008	0.019	* Toluene estimated using AP-42 Toluene EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Xylenes	0.000285 lb/MMBtu	0.00055	0.013	* Xylenes estimated using AP-42 Xylenes EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).

Acetaldehyde	0.000767 lb/MMBtu	0.00147	0.0353	*Acetaldehyde estimated using AP-42 Acetaldehyde EF for diesel industrial engines. Assuming 14 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Acrolein	0.0000925 lb/MMBtu	0.000177	0.00426	*Acrolein estimated using AP-42 Acrolein EF for diesel industrial engines. Assuming 1.4gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Napthalene	0.0000848lb/MMBtu	0.00016	0.004	*Naphthalene estimated using AP-42 Naphthalene EF for diesel industrial engines. Assuming 1.9 gal/hr and 137,030 Btu/gal (therefore 1.92 MMBtu/hr).
Total HAPS		0.007	0.17	

Typical Annual Emissions - **(Assume 500 hrs/yr)**

	Emissions
	tons/yr
NOx	0.34
CO	0.16
HC	0.009
SO2	0.1276
PM	0.015
CO2	71.59
VOC	0.16
Formaldehyde	0.000566
Benzene	0.00045
Propylene	0.0012
Toluene	0.00020
Xylenes	0.00014
Acetaldehyde	0.000368
Acrolein	0.0000444
Napthalene	0.00004
Total HAPS	0.0028

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Fwd: Wheeling Power Company; Mitchell Plant

1 message

Air Quality Permitting, DEP <depairqualitypermitting@wv.gov> Mon, Aug 28, 2023 at 7:31 AM
To: Stephanie R Mink <stephanie.r.mink@wv.gov>, Daniel P Roberts <daniel.p.roberts@wv.gov>

Stephanie,

Please assign this minor modification to Dan as R30-05100005-2019 (MM03).

Thanks,
Carrie

---------- Forwarded message ---------
From: **Brandon T Belcher** <btbelcher@aep.com>
Date: Fri, Aug 25, 2023 at 10:17 AM
Subject: Wheeling Power Company; Mitchell Plant
To: DEPAirQualityPermitting@wv.gov <DEPAirQualityPermitting@wv.gov>
Cc: Joshua D Snodgrass <jdsnodgrass@aep.com>, Timothy W Lohner <twlohner@aep.com>, G M Palmer <gmpalmer@aep.com>, Danielle R Roski <drroski@aep.com>

2 attachments

Mitchell Plant Minor Mod Application_U1 Fire Pump Engine.pdf
13119K

Email Cover Letter-Mitchell Minor Mod_U1 Fire Pump Engine.pdf
356K

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Notification for a Title V Minor Modification MM02 - Kentucky Power Company - Mitchell Plant - Current Permit R30-05100005-2019

1 message

Roberts, Daniel P <daniel.p.roberts@wv.gov> Thu, Aug 31, 2023 at 3:05 PM
To: "Supplee, Gwendolyn" <Supplee.Gwendolyn@epa.gov>, Weinelt.Eva@epa.gov, jennifer.vanvlerah@epa.ohio.gov, RA-EPAIRPERMITNOTIFI@pa.gov
Cc: "McCumbers, Carrie" <Carrie.McCumbers@wv.gov>

This email serves as notification that on July 17, 2023, the WV DAQ received an application for a Title V minor modification (MM02) for Kentucky Power Company's Mitchell Plant located near Cresap/Moundsville, Marshall County, WV. The proposed change is to install a 2023 Tier 3 diesel driven 513 bhp (400 kW) emergency generator at the landfill leachate storage pond. As a result of this modification, the facility's PTE will increase 0.04 TPY for NOx, 0.02 TPY for CO and 0.03 TPY for SO_2. If you have any questions or comments about this Title V permit revision application, please contact me at your earliest convenience.

Sincerely,

Dan Roberts
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
304-926-0499 ext. 41902
Daniel.p.roberts@wv.gov

inor modification for American Woodmark Corporation's South Branch facility located near Moorefield, Hardy County, WV. The proposed changes include the following: changes to the rollcoat (frame), spray (door) lines and finishing paint line 3. As a result of this modification, facility PTE will not change. If you have any questions or comments about this Title V permit revision application, please contact me at your earliest convenience.

Sincerely,

Dan Roberts

WV Department of Environmental Protection

Division of Air Quality

Title V Permitting Section

601 57th Street, SE

Charleston, WV 25304

304-926-0499 ext. 41902

Daniel.p.roberts@wv.gov

D

Reply Reply all Forward

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Re: Permits Transfer Kentucky Power Company to Wheeling Power Company

1 message

Grose, Megan E <megan.e.grose@wv.gov> Tue, Aug 8, 2023 at 2:43 PM
To: "Crowder, Laura M" <laura.m.crowder@wv.gov>
Cc: Daniel P Roberts <daniel.p.roberts@wv.gov>

No. You did not sign this one. This is the one I mentioned to you last week or week before last.

Megan E. Grose

Environmental Resource Analyst

WV DEP Division of Air Quality

601 57th Street S.E.
Charleston, WV 25304
304-926-0499 ext. 43810
megan.e.grose@wv.gov

On Tue, Aug 8, 2023 at 2:39 PM Crowder, Laura M <laura.m.crowder@wv.gov> wrote:

> Megan,
>
> Was this ever finalized?
>
> Laura
>
> ---------- Forwarded message ---------
> From: **Grose, Megan E** <megan.e.grose@wv.gov>
> Date: Mon, Aug 29, 2022 at 11:00 AM
> Subject: Permits Transfer Kentucky Power Company to Wheeling Power Company
> To: Laura M Crowder <laura.m.crowder@wv.gov>
>
> Laura
>
> Attached is the supporting documentation and two letters to be signed for permit transfers from Kentucky Power Company to Wheeling Power Company for the Mitchell Plant. The fee was paid January 28 but the transfer was held awaiting a PSC approval. If you have any questions or see anything that needs to be corrected please let me know.
>
> Megan E. Grose
>
> Environmental Resource Analyst
>
> WV DEP Division of Air Quality
>
> 601 57th Street S.E.
> Charleston, WV 25304
> 304-926-0499 ext. 43810
> megan.e.grose@wv.gov

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Re: Change of Ownership from Kentucky Power Company to Wheeling Power Company (Facility ID No. 051-00005)

1 message

Roberts, Daniel P <daniel.p.roberts@wv.gov> Fri, Jul 28, 2023 at 9:20 AM
To: "Mink, Stephanie R" <stephanie.r.mink@wv.gov>

No worries. I am just trying to gather as much info as I can and go from there. I'll keep you posted.

Thanks again!
Dan

On Fri, Jul 28, 2023 at 9:14 AM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:

> I agree with Carrie, there should have been something done either way. Laura Crowder may also shed some light on this, she's the one who said she'd talk to them before they finalized anything but maybe Greg has some documentation to share from whenever it would have been denied. Maybe it just didn't get indexed at the time, that was probably one of the first big transfers that went to Megan and it could have been missed. Wish I could be more help.
>
> Steph
>
> On Fri, Jul 28, 2023 at 9:09 AM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:
>
> > Stephanie,
> >
> > Hey. Thanks for the additional info. I chatted with Carrie yesterday and I have copied the string and pasted it below so you can read it. Let me know what you think after you read it.
> >
> > "Daniel P Roberts, Yesterday 3:48 PM
> > I need some guidance with Wheeling Power Company's Mitchell Plant minor modification R30-05100005-2019 (MM02). This minor modification was submitted under the name of Wheeling Power Company, but AirTrax and AX still list the company name as Kentucky Power Company. Apparently they tried to change the name in 2022, but Megan Grose told me "LMJ had concerns so we did not transfer the permits." So, should I accept, send out the notice, request name change paperwork continue to work on the minor modification under the name of Wheeling Power Company? Or should they have the name changed first?
> >
> > Carrie McCumbers, Yesterday 3:53 PM
> > When did I assign this one to you? I don’t have it written down.
> >
> > Daniel P Roberts, Yesterday 4:00 PM
> > It was last Monday July 17. I'll forward the email.
> >
> > Carrie McCumbers, Yesterday 4:00 PM
> > I forgot to write it down. I was on vacation.
> > Did we deny the transfer through a letter?
> >
> > Daniel P Roberts, Yesterday 4:02 PM
> > I don't have any more information. That was all I got from Megan. But, I couldn't find any related information in AX.... but there were a lot of documents to wade through.
> >
> > Carrie McCumbers, Yesterday 4:14 PM
> > We should either transfer the permits or deny the transfer and tell them why. If you ask them for name change paperwork, it won't help if we either denied it before or don't want to act. I would talk to Megan and Laura J. to see what we need to transfer or do a name change or if this is something we can't do for some reason. For now, I would work on it under the name of Kentucky Power because we have never changed the name or transferred the permit in Airtrax. If a name change or transfer occurs after you start working on the modification, we can just change it then. If it occurs after, they can always ask for an administrative amendment to change the name or they can continue to operate without the name being changed on the permit. If they ask why we are using Kentucky Power, you can just tell them it has never been changed in our database.

Daniel P Roberts, Yesterday 4:25 PM
Ok. Thanks for the guidance. I'm going to see if I can get the whole story and will keep you posted.

Carrie McCumbers, Yesterday 4:26 PM
Ok, thanks!"

On Fri, Jul 28, 2023 at 7:45 AM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:

> Thanks Dan, after I handed it off I wasn't sure what the resolution was since this was a year ago. It dragged on for months because they were waiting for approval from the PSC for the actual ownership changes before they could make things official with us. Looking back at old emails they had hoped to get everything changed over on our end by 9/1/22, I had emails from the end of August where Megan was going to discuss it with Laura because the company was getting in a hurry to close it out. The whole thing was pretty confusing because they had wanted to split ownership between some of the entities and when Laura found out Greg Wooten was handling it she said great, I know him so I'll just get on the phone with him and see what's going on. After that I was just happy to be out of it because I was swamped LOL! Greg should be able to get things on track at this point.
>
> Thanks
> Stephanie
>
> On Thu, Jul 27, 2023 at 3:36 PM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:
>
> > Here's the info I got back from Megan...
> >
> > ---------- Forwarded message ---------
> > From: **Grose, Megan E** <megan.e.grose@wv.gov>
> > Date: Thu, Jul 27, 2023 at 3:03 PM
> > Subject: Re: Change of Ownership from Kentucky Power Company to Wheeling Power Company (Facility ID No. 051-00005)
> > To: Roberts, Daniel P <daniel.p.roberts@wv.gov>
> >
> > Dan,
> >
> > Some paperwork was submitted in 2022 to transfer the facility's permits from Kentucky Power to Wheeling Power Company but LMJ had concerns so we did not transfer the permits. Please have them submit all the appropriate paperwork to me to complete the transfer. Thanks,
> >
> > Megan E. Grose
> >
> > Environmental Resource Analyst
> >
> > WV DEP Division of Air Quality
> >
> > 601 57th Street S.E.
> > Charleston, WV 25304
> > 304-926-0499 ext. 43810
> > megan.e.grose@wv.gov
> >
> > On Thu, Jul 27, 2023 at 2:35 PM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:
> >
> > > Megan,
> > >
> > > Hey. I have been assigned to review a Title V minor modification for the Mitchell Power Plant in Marshall County. The application was submitted under the company name of Wheeling Power Company, but AirTrax lists the name of the company as Kentucky Power Company. Have they submitted a change of ownership? I didn't see anything in AX. I'm just trying to figure out if they have already submitted the proper documentation or if I need to request them to.
> > >
> > > Thanks,
> > > Dan

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Re: Change of Ownership from Kentucky Power Company to Wheeling Power Company (Facility ID No. 051-00005)

1 message

Roberts, Daniel P <daniel.p.roberts@wv.gov> Thu, Jul 27, 2023 at 3:33 PM
To: "Grose, Megan E" <megan.e.grose@wv.gov>

Thanks for the info!

Dan

On Thu, Jul 27, 2023 at 3:03 PM Grose, Megan E <megan.e.grose@wv.gov> wrote:

> Dan,
>
> Some paperwork was submitted in 2022 to transfer the facility's permits from Kentucky Power to Wheeling Power Company but LMJ had concerns so we did not transfer the permits. Please have them submit all the appropriate paperwork to me to complete the transfer. Thanks,
>
> Megan E. Grose
>
> Environmental Resource Analyst
>
> WV DEP Division of Air Quality
>
> 601 57th Street S.E.
> Charleston, WV 25304
> 304-926-0499 ext. 43810
> megan.e.grose@wv.gov
>
> On Thu, Jul 27, 2023 at 2:35 PM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:
>
> > Megan,
> >
> > Hey. I have been assigned to review a Title V minor modification for the Mitchell Power Plant in Marshall County. The application was submitted under the company name of Wheeling Power Company, but AirTrax lists the name of the company as Kentucky Power Company. Have they submitted a change of ownership? I didn't see anything in AX. I'm just trying to figure out if they have already submitted the proper documentation or if I need to request them to.
> >
> > Thanks,
> > Dan

Roberts, Daniel P <daniel.p.roberts@wv.gov>

WV DAQ Title V Permit Application Status for Wheeling Power Company; Mitchell Plant

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Tue, Jul 18, 2023 at 9:59 AM
To: djrosenberger@aep.com, gmpalmer@aep.com, knclark1@aep.com
Cc: Carrie McCumbers <carrie.mccumbers@wv.gov>, Daniel P Roberts <daniel.p.roberts@wv.gov>

RE: Application Status

Wheeling Power Company

Mitchell Plant

Facility ID No. 051-00005

Application No. R30-05100005-2019 (MM02)

Dear Mr. Rosenberger,

Your application for a Title V Minor Modification permit for Wheeling Power Company's Mitchell Plant was received by this Division on July 17, 2023, and was assigned to Dan Roberts.

Should you have any questions, please contact the assigned permit writer, Dan Roberts, at 304-926-0499, extension 41902, or Daniel.P.Roberts@wv.gov .

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Re:

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Tue, Jul 18, 2023 at 9:57 AM
To: "Roberts, Daniel P" <daniel.p.roberts@wv.gov>

Thanks so much!

On Tue, Jul 18, 2023 at 9:56 AM Roberts, Daniel P <daniel.p.roberts@wv.gov> wrote:

> Stephanie,
>
> Hey. Thanks for the background info. I'll keep you informed of what I find out about the name change.
>
> Thanks again!
> Dan
>
> On Tue, Jul 18, 2023 at 9:43 AM Mink, Stephanie R <stephanie.r.mink@wv.gov> wrote:
>
> > Hi Dan,
> >
> > This application is under Wheeling Power but Airtrax and AX still have it under Kentucky Power. I didn't see anything in AX for their change of ownership but I know that Megan Grose was handling some ownership changes for AEP when she was first hired. I had started the process but turned it over to her to complete when she came in because AEP had some delays and it took a while to work everything out. Please make sure it did get changed over to Wheeling Power and, if so, let me know if she will be updating Airtrax & AX to change the name or if I need to do it. I'll enter it under the original ID and the name will update whenever everything is done.
> >
> > Thanks!
> >
> > --
> >
> > Stephanie Mink
> >
> > Environmental Resources Associate
> >
> > West Virginia Department of Environmental Protection
> >
> > Division of Air Quality, Title V Permitting
> >
> > 601 57th Street SE
> >
> > Charleston, WV 25304
> >
> > Phone: 304-926-0499 x41281

Roberts, Daniel P <daniel.p.roberts@wv.gov>

(no subject)

1 message

Mink, Stephanie R <stephanie.r.mink@wv.gov> Tue, Jul 18, 2023 at 9:42 AM
To: Daniel P Roberts <daniel.p.roberts@wv.gov>

Hi Dan,

This application is under Wheeling Power but Airtrax and AX still have it under Kentucky Power. I didn't see anything in AX for their change of ownership but I know that Megan Grose was handling some ownership changes for AEP when she was first hired. I had started the process but turned it over to her to complete when she came in because AEP had some delays and it took a while to work everything out. Please make sure it did get changed over to Wheeling Power and, if so, let me know if she will be updating Airtrax & AX to change the name or if I need to do it. I'll enter it under the original ID and the name will update whenever everything is done.

Thanks!

--

Stephanie Mink

Environmental Resources Associate

West Virginia Department of Environmental Protection

Division of Air Quality, Title V Permitting

601 57th Street SE

Charleston, WV 25304

Phone: 304-926-0499 x41281

R30-05100005-2019 (MM02) Wheeling Pwr.pdf
1473K

Received
July 17, 2023
WV DEP/Div of Air Quality

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Wheeling Power Company; Mitchell Plant
[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 54-051-00005
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R30-05100005-2019

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
  - ☐ Title V Initial
  - ☐ Title V Renewal
  - ☐ Administrative Amendment**
  - ☑ Minor Modification**
  - ☐ Significant Modification**
  - ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:
  - ☐ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☑ Check (Make checks payable to: WVDEP – Division of Air Quality)
    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☐ Responsible Official/Authorized Representative
    - Name: Douglas J. Rosenberger
    - Email: djrosenberger@aep.com
    - Phone Number: 304-843-6001
  - ☑ Company Contact
    - Name: G. M.(Matt) Palmer
    - Email: gmpalmer@aep.com
    - Phone Number: 304-843-6048
  - ☑ Consultant
    - Name: Kristin N. Clark
    - Email: knclark1@aep.com
    - Phone Number: 614-716-2952

American Electric Power
Mitchell Plant
8999 Energy Road
P. O. Box K
Moundsville, WV 26041
(304) 843-6000
FAX (304) 843-6080
aep.com

July 17, 2023

Ms. Laura M. Crowder, Director (electronically via DEPAirQualityPermitting@wv.gov)
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Mitchell Plant Title V Minor Modification Request

Dear Ms. Crowder:

In accordance with Condition 2.7.1 for the subject permit, attached is an electronic copy (via email) of a signed application and request for a minor modification of the Title V permit for Wheeling Power Company's Mitchell Plant. The subject application is for the Steam Electric Generating Facility located near Moundsville, WV in Marshall County. The existing permit expires on November 26, 2024.

Wheeling Power submitted a request for a minor modification to the Mitchell Plant Title V Permit (R30-05100005-2019). The change involves the installation of a 400 kw diesel driven (513 BHP diesel engine) emergency generator at the landfill leachate storage pond to be used during times of power interruption to ensure the pond level is maintained. The new diesel driven emergency generator is a 2023 model year Cummins QSG12 portable emergency generator, meeting 2023 EPA Tier 3 requirements (Certificate No. PCEXL12.0AAA-049).

Should you have any further questions, please contact Kristin Clark via email at knclark1@aep.com.

Sincerely,

DocuSigned by:
Douglas J Rosenberger
AECB541C1E3C41C...

D.J. Rosenberger
Plant Manager, Mitchell Plant

cc: G.M. Palmer – Mitchell Plant
D.R. Roski – Mitchell Plant
T.W. Lohner – Environmental Permit Services
B.T. Belcher – Environmental Permit Services

Enclosure: Mitchell Plant Title V Minor Modification Application Package

WEST VIRGINIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

TITLE V PERMIT REVISION APPLICATION

PLEASE CHECK TYPE OF TITLE V PERMIT REVISION:

- ☐ **ADMINISTRATIVE AMENDMENT**
- ☑ **MINOR MODIFICATION**
- ☐ **SIGNIFICANT MODIFICATION**
- ☐ **OFF-PERMIT CHANGE**
- ☐ **OPERATIONAL FLEXIBILITY [502(B)(10) CHANGES]**
- ☐ **REOPENING**

TITLE V PERMIT NUMBER:
R30- 05100005-2019

WHEN DID OR WHEN WILL THE CHANGES OCCUR?
MM/DD/YYYY : 7/2023

SIC CODES: PRIMARY: 4911 **SECONDARY:**

Refer to "Title V Revision Guidance" (Appendix A, "Title V Permit Revision Flowchart"), for type of revision, and to Section 7 of this Application for Application Completeness and Ability to Operate information

Section 1: General Information

a. Name of Applicant ***(As registered with the WV Secretary of State's Office)*****:**	**b. Facility Name or Location:**
Wheeling Power Company	Mitchell Plant

b. Contact Information

Responsible Official: Douglas J. Rosenberger		Title: Plant Manager
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041
Telephone Number: (304) 843 - 6001	Fax Number: (304) 843 - 6080	E-mail: djrosenberger@aep.com
Environmental Contact: G. M. (Matt) Palmer		Title: Plant Environmental Coordinator
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041
Telephone Number: (304) 843 - 6048	Fax Number: (304) 843 - 6080	E-mail:
Application Preparer: Kristin Clark		Title: Environmental Specialist
Company: AEP Service Corp.		
Street or P.O. Box: 1 Riverside Plaza, 21st Floor		
City: Columbus	State: Ohio	Zip: 43215
Telephone Number: (614) 716 - 2952	Fax Number: ( ) -	E-mail: knclark1@aep.com

Person to contact if we have questions regarding this Application: Kristin Clark

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 2: Revision Information

a. Description of Changes Associated with this Permit Revision

Provide a general description of changes to the facility.

The change involves the addition of a 400kw diesel driven mobile emergency generator at the Mitchell Plant leachate storage pond to be used during times of power interruption to ensure pond level is maintained.

b. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☑ No

If Yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's ***"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"*** guidance as **ATTACHMENT A.**

c. Provide a **Plot Plan(s**) if new emission points were added since latest revision, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the new/modified stationary source(s) is located as **ATTACHMENT B.** For instructions, refer to "***Plot Plan - Guidelines***"**.**

d. Provide a detailed **Process Flow Diagram(s)** if new emission points were added since latest revision, showing each new/modified process or emissions unit as **ATTACHMENT C.** Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

e. Emission Units Table

Fill out the **Emission Units Table** for new and/or modified equipment and provide it as **ATTACHMENT D**.

f. Emission Units Form(s)

For each new and/or modified emission unit(s) with applicable requirement(s) listed in the **Emission Units Table**, fill out and provide an **Emission Unit Form(s)** as **ATTACHMENT E**.

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

For each new and/or modified emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

g. Control Devices

For each new and/or modified control device listed in the **Emission Units Table**, fill out and provide an **Air Pollution Control Device Form(s)** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Part 70 Major Source Threshold level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. If applicable, please check appropriate box in Section 3(a) below, fill out and provide these forms for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 3: New Applicable Requirements

a. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☑ Section 111 NSPS (Subpart(s) IIII)	☑ Section 112(d) MACT standards (Subpart(s) ZZZZ)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR26)
☐ CAIR SO_2 Trading Program (45CSR41)	

b. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

☐ **Permit Shield Requested** *(not applicable to Minor Modifications, Off-Permit Changes, or for Operational Flexibility)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

c. Suggested Title V Draft Permit Language

Provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit as **ATTACHMENT I**. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e. g. 45CSR§7-4.1)) for those requirements being added / revised.

See Attachment I

d. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number
Installation did not trigger Reg 13 modification thresholds		

e. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number

Section 4: Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY	For Off-Permit Changes: Provide Total Aggregated Emissions Increase Since Last Permit/Modification
NOx	0.04	
CO	0.02	
NMHC	0.0021	
Particulate Matter	0.002	
SO2	0.026	

Provide **Supporting Emission Calculations/Estimations** as **ATTACHMENT J**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 5: Certification of Information

a. Certification For Use Of Minor Modification Procedures ***(Required Only for Minor Modification Requests)***

Note:	*This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

i. Proposed changes do not violate any applicable requirement;

ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;

iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;

v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;

vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):	DocuSigned by: Douglas J Rosenberger AECB541C1E3C41C... *(Please use blue ink)*	Date:	7/17/2023 | 1:16 PM EDT / / *(Please use blue ink)*
Named (typed):	Douglas J. Rosenberger	Title:	Plant Manager

***b.* Certification of Truth, Accuracy and Completeness and Certification of Compliance**
(Required For All Revision Requests)

Note:	*This Certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.*

Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Douglas J. Rosenberger | Title: Plant Manager

Responsible official's signature:

Signature: DocuSigned by: Douglas J Rosenberger AE3B541C1E3C41C... *(Please use blue ink)*

Signature Date: 7/17/2023 | 1:16 PM EDT *(Please use blue ink)*

Section 6: Attachments

Note: Please check all applicable attachments included with this permit application:	
☐	ATTACHMENT A: Business Confidentiality Claims
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Emission Units Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☐	ATTACHMENT G: Air Pollution Control Device Form(s)
☐	ATTACHMENT H: Compliance Assurance Monitoring Form(s)
☑	ATTACHMENT I: Suggested Title V Draft Permit Language
☑	ATTACHMENT J: Supporting Emission Calculations/Estimations

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 7: Application Completeness and Ability to Operate information for different types of Title V Permit revisions

(Refer to "Title V Revision Guidance" for more information)

Type of Revision	Application/Notification Requirements	Ability to Operate
Administrative Amendment	☐ Description of change ☐ Supplemental information (rationale) ☐ Certification of application and compliance (Section 5(b))	Upon submittal of the application
Minor Modification	☑ Description of change ☑ Associated change in emissions ☑ Sample Calculations/estimations for determining emissions ☑ List of new applicable requirements associated with changes ☑ List of R13/R14 permits associated with the changes ☑ Suggested draft permit language ☑ Certification for use of Minor Modification (Section 5(a)) ☑ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application, or upon issuance of the R13/R14 permit (if any), whichever is later
Significant Modification	☐ Description of change ☐ Associated change in emissions ☐ Sample Calculations/estimations for determining emissions ☐ List of R13/R14 permits associated with the changes ☐ List of new applicable requirements associated with changes ☐ Request for permit shield ☐ Updated drawings, plot plans, process flow diagrams, etc. ☐ Certification of application and compliance (Section 5(b))	Upon issuance of the modified Title V permit (if changes either conflict with, or are prohibited by existing Title V Permit terms/ conditions), OR upon obtaining of proper R13/ R14 Permit for first 12 months (if changes neither conflict with, nor are prohibited by existing Title V Permit terms/conditions)
Off-Permit Changes	☐ Notification/application to DAQ and U.S.E.P.A. within 2 business days of the change ☐ Description of the change ☐ The date on which the change will occur or has occurred ☐ Pollutants and amounts emitted ☐ Sample Calculations/estimations for determining emissions ☐ Any new applicable requirements that will apply to changes ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After two (2) days from the submittal of the application
Operational Flexibility	☐ Notification/application submitted to DAQ and U.S.E.P.A. in advance (7 days prior to making changes) ☐ Description of the change ☐ The date on which the change is to occur ☐ Permit terms and conditions affected by the change ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application/notification to DAQ and EPA
Reopening	☐ Description of change ☐ List of new applicable requirements associated with changes ☐ Suggested draft permit language ☐ Certification of application and compliance (Section 5(b))	Ability to operate is not reflected by the changes

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Attachment B:

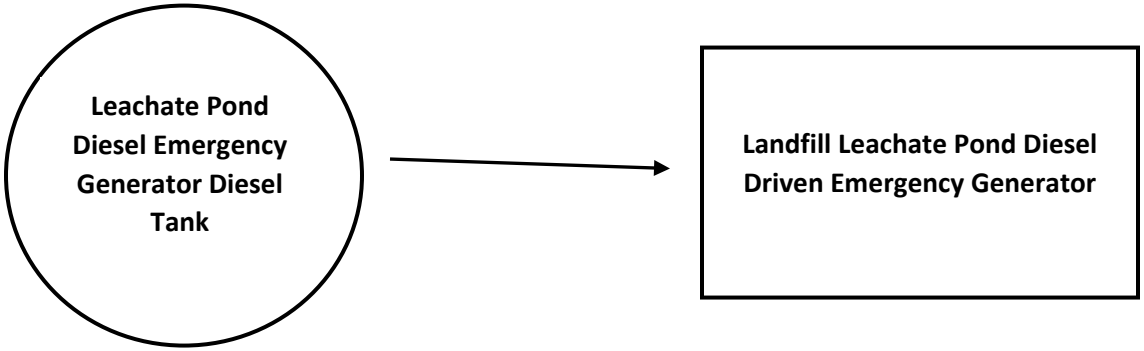
Mitchell Power Plant

*Portable generator will be at the Leachate Pond.

*Diesel Emerg. Gen is at the Leachate Sump.

Attachment C:

Mitchell Plant Diesel Driven Emergency Generator Located at Landfill Leachate Pond



ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
LF DEG	LF DEG	Landfill Leachate Collection Sump Diesel Emergency Generator	2020	464 bhp	
LF DEG2	LF DEG2	Landfill Leachate Pond Diesel Emergency Generator	2023	513 bhp	
LF DEGT	LF DEGT	Diesel fuel tank for LF DEG and LF DEG2	2020	600 Gal.	

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
LF DEG2	LF DEG2	n/a

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Diesel driven 400kw, 513 Bhp, mobile emergency generator to be used at the Landfill Leachate Storage Pond

Manufacturer:	**Model number:**	**Serial number:**
Cummins	QSG12	

Construction date: MM/DD/YYYY	**Installation date:** MM/DD/YYYY	**Modification date(s):** MM/DD/YYYY
07/2023	07/2023	

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

approx 23.2 gal/hr, 513 Bhp, 470 gallon fuel tank

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
approx 23.2 gal/hr	11,600 gal/yr	assumed 500hr/yr but not limited during emergency

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ☑ Yes ☐ No	**If yes, is it?** ☐ Indirect Fired ☐ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 513 Bhp	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Diesel Fuel, less than 15ppm S.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Diesel Fuel	15 ppm		approx 137,030 btu/gal

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.08	0.02
Nitrogen Oxides (NO_X)	0.14	0.04
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	0.01	0.002
Particulate Matter (PM_{10})	0.01	0.002
Total Particulate Matter (TSP)	0.01	0.002
Sulfur Dioxide (SO_2)	0.11	0.026
Volatile Organic Compounds (VOC)	1.29	0.322
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See attachment J.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

See attachment I.

☐ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See attachment I.

Are you in compliance with all applicable requirements for this emission unit? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

Attachment I:

Summary of Requirements[1]

40 CFR part 60, subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

For 2007 model year and later **emergency** engines with <30 l/cyl,
constructed after July 11, 2005 and manufactured after April 1, 2006

NOTE: To refer directly to the regulatory text, please go to Subpart IIII (scroll down to almost the end of the page).

Temporary Engines:

Per 60.4200(e) Owners and operators of facilities with CI ICE that are acting as temporary replacement units and that are located at a stationary source for less than 1 year and that have been properly certified as meeting the standards that would be applicable to such engine under the appropriate nonroad engine provisions, are not required to meet any other provisions under this subpart with regard to such engines.

Emission Standards: 60.4205(b), 60.4202

60.4205(b) Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.

60.4202 (a) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in paragraphs (a)(1) through (2) of this section.

(1) For engines with a maximum engine power less than 37 KW (50 HP):

(i) The certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants for model year 2007 engines, and
(ii) The certification emission standards for new nonroad CI engines in 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, 40 CFR 1039.115, and table 2 to this subpart, for 2008 model year and later engines.

[1]Disclaimer: The content provided in this software tool is intended solely as assistance for potential reporters to aid in assessing requirements for compliance under the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60 Subpart IIII. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by EPA of the applicability of the rule to any particular facility. In any particular case, EPA will make its assessment by applying the law and regulations to the specific facts of the case.

(2) For engines with a maximum engine power greater than or equal to 37 KW (50 HP), the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants beginning in model year 2007.

(b) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power greater than 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in paragraphs (b)(1) through (2) of this section.

(1) For 2007 through 2010 model years, the emission standards in table 1 to this subpart, for all pollutants, for the same maximum engine power.

(2) For 2011 model year and later, the certification emission standards for new nonroad CI engines for engines of the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.

(c) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder that are not fire pump engines to the certification emission standards for new marine CI engines in 40 CFR 94.8, as applicable, for all pollutants, for the same displacement and maximum engine power.

(d) Beginning with the model years in table 3 to this subpart, stationary CI internal combustion engine manufacturers must certify their fire pump stationary CI ICE to the emission standards in table 4 to this subpart, for all pollutants, for the same model year and NFPA nameplate power.

(e) Stationary CI internal combustion engine manufacturers must certify the following emergency stationary CI ICE that are not fire pump engines to the certification emission standards for new marine CI engines in 40 CFR 94.8, as applicable, for all pollutants, for the same displacement and maximum engine power:

(1) Their 2007 model year through 2012 emergency stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder;

(2) Their 2013 model year and later emergency stationary CI ICE with a maximum engine power greater than or equal to 3,700 KW (4,958 HP) and a displacement of greater than or equal to 10 liters per cylinder and less than 15 liters per cylinder;

(3) Their 2013 model year emergency stationary CI ICE with a displacement of greater than or equal to 15 liters per cylinder and less than 30 liters per cylinder; and

(4) Their 2014 model year and later emergency stationary CI ICE with a maximum engine power greater than or equal to 2,000 KW (2,682 HP) and a displacement of greater than or equal to 15 liters per cylinder and less than 30 liters per cylinder.

(f) Stationary CI internal combustion engine manufacturers must certify the following emergency stationary CI ICE to the certification emission standards and other requirements applicable to Tier 3 new marine CI engines in 40 CFR 1042.101, 40 CFR 1042.107, 40 CFR 1042.115, 40 CFR 1042.120, and 40 CFR 1042.145, for all pollutants, for the same displacement and maximum engine power:

(1) Their 2013 model year and later emergency stationary CI ICE with a maximum engine power less than 3,700 KW (4,958 HP) and a displacement of greater than or equal to 10 liters per cylinder and less than 15 liters per cylinder; and

(2) Their 2014 model year and later emergency stationary CI ICE with a maximum engine power less than 2,000 KW (2,682 HP) and a displacement of greater than or equal to 15 liters per cylinder and less than 30 liters per cylinder.

(g) Notwithstanding the requirements in paragraphs (a) through (d) of this section, stationary emergency CI internal combustion engines identified in paragraphs (a) and (c) may be certified to the provisions of 40 CFR part 94 or, if Table 2 to 40 CFR 1042.101 identifies Tier 3 standards as being applicable, the requirements applicable to Tier 3 engines in 40 CFR part 1042, if the engines will be used solely in either or both of the following locations:

(1) Areas of Alaska not accessible by the FAHS; and

(2) Marine offshore installations.

(h) Notwithstanding the requirements in paragraphs (a) through (f) of this section, stationary CI internal combustion engine manufacturers are not required to certify reconstructed engines; however manufacturers may elect to do so. The reconstructed engine must be certified to the emission standards specified in paragraphs (a) through (f) of this section that are applicable to the model year, maximum engine power and displacement of the reconstructed emergency stationary CI ICE.

Fuel Requirements: 60.4207(a), (b), (e)

60.4207(a) Beginning October 1, 2007, owners and operators of stationary CI ICE subject to this subpart that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must purchase diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

(e) Stationary CI ICE that have a national security exemption under §60.4200(d) are also exempt from the fuel requirements in this section.

Per 60.4215(b) stationary CI ICE that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are not required to meet the fuel requirements in 40 CFR 60.4207.

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

Per 60.4217 Owners and operators of stationary CI ICE that do not use diesel fuel may petition the Administrator for approval of alternative emission standards, if they can demonstrate that they use a fuel that is not the fuel on which the manufacturer of the engine certified the engine and that the engine cannot meet the applicable standards required in §60.4204 or §60.4205 using such fuels and that use of such fuel is appropriate and reasonably necessary, considering cost, energy, technical feasibility, human health and environmental, and other factors, for the operation of the engine.

Importing/Installing Requirements: 60.4208(a), (b), (h), (i)

60.4208(a) After December 31, 2008, owners and operators may not install stationary CI ICE (excluding fire pump engines) that do not meet the applicable requirements for 2007 model year engines.

(b) After December 31, 2009, owners and operators may not install stationary CI ICE with a maximum engine power of less than 19 KW (25 HP) (excluding fire pump engines) that do not meet the applicable requirements for 2008 model year engines.

(h) In addition to the requirements specified in §§60.4201, 60.4202, 60.4204, and 60.4205, it is prohibited to import stationary CI ICE with a displacement of less than 30 liters per cylinder that do not meet the applicable requirements specified in paragraphs (a) through (g) of this section after the dates specified in paragraphs (a) through (g) of this section.

(i) The requirements of this section do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location.

Monitoring Requirements: 60.4209(a); If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

If your engine is equipped with a diesel particulate filter: 60.4209(b) If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

Compliance Requirements: 60.4206, 60.4211(a), (c), (f), (g)

60.4206 Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.

60.4211(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the

emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(f) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

Note: On May 1, 2015, the U.S. Court of Appeals for the District of Columbia Circuit issued a decision vacating paragraphs 40 CFR 60.4211(f)(2)(ii)-(iii) below. Guidance regarding the impact of the vacatur is available here: https://www3.epa.gov/ttn/atw/icengines/docs/RICEVacaturGuidance041516.pdf.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraph (f)(3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to

generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(1) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(3) If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an

engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

Testing Requirements: 60.4212

60.4212 Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

(a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder.

(b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.

(c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \qquad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in §60.4213 of this subpart, as appropriate.

(d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4204(a), §60.4205(a), or §60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in §60.4204(a), §60.4205(a), or §60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate.

(e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

Notification, Reports, and Records Requirements: 60.4214(b); If equipped with DPF: 60.4214(c); If >100 HP and > 15 hrs/yr for emergency DR: 60.4214(d)

60.4214(b) If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

If your engine is equipped with a diesel particulate filter: 60.4214(c)

60.4214(c) If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.

If your engine is greater than 100 HP and used more than 15 hours a year for emergency demand response:

60.4214(d) If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in § 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.

(1) The report must contain the following information:

(i) Company name and address where the engine is located.
(ii) Date of the report and beginning and ending dates of the reporting period.
(iii) Engine site rating and model year.
(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
(v) Hours operated for the purposes specified in § 60.4211(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in § 60.4211(f)(2)(ii) and (iii).
(vi) Number of hours the engine is contractually obligated to be available for the purposes specified in § 60.4211(f)(2)(ii) and (iii).
(vii) Hours spent for operation for the purposes specified in § 60.4211(f)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in § 60.4211(f)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (*www.epa.gov/cdx*). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in § 60.4.

General Provisions (40 CFR part 60): Table 8

Attachment J:

Cummins QSG12 Diesel Engine Driven Backup Generator Emission Calculations

Max Power	513	Bhp	382.698	bkW
Fuel Use:	23.2	gal/hr		3.18 MMBtu/hr
	11,600	gal/yr assuming 500 hours operation.		1589.55 MMBtu/yr
Assume:	137,030	Btu/gal (diesel heat content)		

Hourly Emissions:

	Emission Factor*	Emissions	Emissions
		lb/hr	lb/24hr
NOx	0.17 Grams/kw-hr	0.14	3.44
CO	0.1 Grams/kw-hr	0.08	2.02
HC (Assume NMHC))	0.01 Grams/kw-hr	0.01	0.20
PM=PM10=PM2.5	0.01 Grams/kw-hr	0.01	0.202
SO2	2.06 x E-4 lbs/HP-hr	0.11	2.54
CO2	1458 Grams/kw-hr	1230.127834	29523.07
VOC (used TOC)	0.0025141 lb/HP-hr	1.29	30.95
Formaldehyde	0.00118 lb/MMBtu	0.00375	0.0900
Benzene	0.000933 lb/MMBtu	0.00297	0.0712
Toluene	0.000409 lb/MMBtu	0.00130	0.0312
Xylenes	0.000285 lb/MMBtu	0.000906	0.0217

Note:

*NOx, CO, HC, and PM emission factors are based on Cummins Emission Data Sheet for QSG12.
* All PM assumed to be less than 1 um

* SO2 estimated using AP-42 (Chapter 3.3) SO2 EF for Gasoline And Diesel Industrial Engines with adjustment for 15ppm oil diesel.

* CO2 estimated using EPA Annual Certifcation Data for Non-road Compression Ignition Engines

*TOC estimated using Chapter 3.3 of AP-42 TOC Efs for exhaust and crankcase emissions for diesel industrial engines.

* Formaldehyde, Benzene, Toluene, Xylenes, Acetaldehyde, Acrolein, and Napthalene estimated using Chapter 3.3 of AP-42 EFs for diesel industrial engines.

Acetaldehyde	0.000767 lb/MMBtu	0.00244	0.0585
Acrolein	0.0000925 lb/MMBtu	0.000294	0.00706
Napthalene	0.0000848lb/MMBtu	0.000270	0.00647
Total HAPS		0.0119	0.286

* Total HAP is sum of Formaldehyde, Benzene, Toluene, Xylenes, Acetaldehyde, Acrolein, and Napthalene.

Typical Annual Emissions - **(Assume 500 hrs/yr)**

	Emissions
	tons/yr
NOx	0.04
CO	0.02
HC	0.0021
PM	0.002
SO2	0.026
CO2	307.53
VOC	0.322
Formaldehyde	0.000938
Benzene	0.000742
Toluene	0.000325
Xylenes	0.000227
Acetaldehyde	0.000610
Acrolein	0.0000735
Napthalene	0.0000674
Total HAPS	0.00298

DocuSign

Certificate Of Completion

Envelope Id: 786B81A126C34BA0AC7D7C62E6028C4E
Status: Completed
Subject: Complete with DocuSign: 071423-Mitchell Minor Modification App Package.pdf
Source Envelope:
Document Pages: 27
Signatures: 3
Certificate Pages: 2
Initials: 0
AutoNav: Enabled
EnvelopeId Stamping: Disabled
Time Zone: (UTC-05:00) Eastern Time (US & Canada)

Envelope Originator:
Kristin N Clark
700 Morrison Road
Gahanna, OH 43230
knclark1@aep.com
IP Address: 167.239.221.107

Record Tracking

Status: Original
7/17/2023 1:05:51 PM
Holder: Kristin N Clark
knclark1@aep.com
Location: DocuSign

Signer Events	Signature	Timestamp
Douglas J Rosenberger djrosenberger@aep.com Plant Manager Security Level: Email, Account Authentication (None)	DocuSigned by: Douglas J Rosenberger AECB541C1E3C41C... Signature Adoption: Pre-selected Style Using IP Address: 167.239.221.106	Sent: 7/17/2023 1:11:42 PM Viewed: 7/17/2023 1:16:28 PM Signed: 7/17/2023 1:16:45 PM

Electronic Record and Signature Disclosure:
Accepted: 7/17/2023 1:16:28 PM
ID: 9d8cf333-19c4-4510-8f0a-7e466d65302c

In Person Signer Events	Signature	Timestamp

Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp

Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	7/17/2023 1:11:42 PM
Certified Delivered	Security Checked	7/17/2023 1:16:28 PM
Signing Complete	Security Checked	7/17/2023 1:16:45 PM
Completed	Security Checked	7/17/2023 1:16:45 PM

Payment Events	Status	Timestamps

Electronic Record and Signature Disclosure

ELECTRONIC RECORD AND SIGNATURE DISCLOSURE

Each party agrees that the electronic signatures, whether digital or encrypted, of the parties included in this Agreement are intended to authenticate this writing and to have the same force and effect as manual signatures. Electronic signature means any electronic sound, symbol or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record.

Please confirm your agreement by clicking the 'I agree' button at the bottom of this document.

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Wheeling Power Company; Mitchell Plant

[Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only): 54-051-00005
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only): R30-05100005-2019

- Type of NSR Application (check all that apply):
  - ☐ Construction
  - ☐ Modification
  - ☐ Class I Administrative Update
  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
  - ☐ Title V Initial
  - ☐ Title V Renewal
  - ☐ Administrative Amendment**
  - ☑ Minor Modification**
  - ☐ Significant Modification**
  - ☐ Off Permit Change

****If the box above is checked, include the Title V revision information as ATTACHMENT S to the combined NSR/Title V application.**

- Payment Type:
  - ☐ Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - ☑ Check (Make checks payable to: WVDEP – Division of Air Quality)

    Mail checks to:
    WVDEP – DAQ – Permitting
    Attn: NSR Permitting Secretary
    601 57th Street, SE
    Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - ☐ Responsible Official/Authorized Representative
    - Name: Douglas J. Rosenberger
    - Email: djrosenberger@aep.com
    - Phone Number: 304-843-6001
  - ☑ Company Contact
    - Name: G. M.(Matt) Palmer
    - Email: gmpalmer@aep.com
    - Phone Number: 304-843-6048
  - ☑ Consultant
    - Name: Kristin N. Clark
    - Email: knclark1@aep.com
    - Phone Number: 614-716-2952

Division of Air Quality Permit Application Submittal

Please find attached a permit application for : Wheeling Power Company; Mitchell Plant

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  - ☐ Class II Administrative Update
  - ☐ Relocation
  - ☐ Temporary
  - ☐ Permit Determination

- Type of 45CSR30 (TITLE V) Application:
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  - ☐ Administrative Amendment**
  - ☑ Minor Modification**
  - ☐ Significant Modification**
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  - ☐ Responsible Official/Authorized Representative
    - Name: Douglas J. Rosenberger
    - Email: djrosenberger@aep.com
    - Phone Number: 304-843-6001
  - ☑ Company Contact
    - Name: G. M.(Matt) Palmer
    - Email: gmpalmer@aep.com
    - Phone Number: 304-843-6048
  - ☑ Consultant
    - Name: Kristin N. Clark
    - Email: knclark1@aep.com
    - Phone Number: 614-716-2952

American Electric Power
Mitchell Plant
8999 Energy Road
P. O. Box K
Moundsville, WV 26041
(304) 843-6000
FAX (304) 843-6080
aep.com

July 17, 2023

Ms. Laura M. Crowder, Director (electronically via DEPAirQualityPermitting@wv.gov)
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Mitchell Plant Title V Minor Modification Request

Dear Ms. Crowder:

In accordance with Condition 2.7.1 for the subject permit, attached is an electronic copy (via email) of a signed application and request for a minor modification of the Title V permit for Wheeling Power Company's Mitchell Plant. The subject application is for the Steam Electric Generating Facility located near Moundsville, WV in Marshall County. The existing permit expires on November 26, 2024.

Wheeling Power submitted a request for a minor modification to the Mitchell Plant Title V Permit (R30-05100005-2019). The change involves the installation of a 400 kw diesel driven (513 BHP diesel engine) emergency generator at the landfill leachate storage pond to be used during times of power interruption to ensure the pond level is maintained. The new diesel driven emergency generator is a 2023 model year Cummins QSG12 portable emergency generator, meeting 2023 EPA Tier 3 requirements (Certificate No. PCEXL12.0AAA-049).

Should you have any further questions, please contact Kristin Clark via email at knclark1@aep.com.

Sincerely,

DocuSigned by:
Douglas J Rosenberger
AECB541C1E3C41C...

D.J. Rosenberger
Plant Manager, Mitchell Plant

cc: G.M. Palmer – Mitchell Plant
D.R. Roski – Mitchell Plant
T.W. Lohner – Environmental Permit Services
B.T. Belcher – Environmental Permit Services

Enclosure: Mitchell Plant Title V Minor Modification Application Package

WEST VIRGINIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

TITLE V PERMIT REVISION APPLICATION

PLEASE CHECK TYPE OF TITLE V PERMIT REVISION:

- ☐ **ADMINISTRATIVE AMENDMENT**
- ☑ **MINOR MODIFICATION**
- ☐ **SIGNIFICANT MODIFICATION**
- ☐ **OFF-PERMIT CHANGE**
- ☐ **OPERATIONAL FLEXIBILITY [502(B)(10) CHANGES]**
- ☐ **REOPENING**

TITLE V PERMIT NUMBER:
R30- 05100005-2019

WHEN DID OR WHEN WILL THE CHANGES OCCUR?
MM/DD/YYYY : 7/2023

SIC CODES: PRIMARY: 4911 **SECONDARY:**

Refer to "Title V Revision Guidance" (Appendix A, "Title V Permit Revision Flowchart"), for type of revision, and to Section 7 of this Application for Application Completeness and Ability to Operate information

Section 1: General Information

a. Name of Applicant ***(As registered with the WV Secretary of State's Office)*****:**	**b. Facility Name or Location:**
Wheeling Power Company	Mitchell Plant

b. Contact Information

Responsible Official: Douglas J. Rosenberger		Title: Plant Manager
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041
Telephone Number: (304) 843 - 6001	Fax Number: (304) 843 - 6080	E-mail: djrosenberger@aep.com
Environmental Contact: G. M. (Matt) Palmer		Title: Plant Environmental Coordinator
Street or P.O. Box: P.O. Box K		
City: Moundsville	State: WV	Zip: 26041
Telephone Number: (304) 843 - 6048	Fax Number: (304) 843 - 6080	E-mail:
Application Preparer: Kristin Clark		Title: Environmental Specialist
Company: AEP Service Corp.		
Street or P.O. Box: 1 Riverside Plaza, 21st Floor		
City: Columbus	State: Ohio	Zip: 43215
Telephone Number: (614) 716 - 2952	Fax Number: ( ) -	E-mail: knclark1@aep.com

Person to contact if we have questions regarding this Application: Kristin Clark

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 2: Revision Information

a. Description of Changes Associated with this Permit Revision

Provide a general description of changes to the facility.

The change involves the addition of a 400kw diesel driven mobile emergency generator at the Mitchell Plant leachate storage pond to be used during times of power interruption to ensure pond level is maintained.

b. Business Confidentiality Claims

Does this application include confidential information (per 45CSR31)? ☐ Yes ☑ No

If Yes, identify each segment of information on each page that is submitted as confidential, and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's ***"PRECAUTIONARY NOTICE-CLAIMS OF CONFIDENTIALITY"*** guidance as **ATTACHMENT A.**

c. Provide a **Plot Plan(s**) if new emission points were added since latest revision, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the new/modified stationary source(s) is located as **ATTACHMENT B.** For instructions, refer to "***Plot Plan - Guidelines***"**.**

d. Provide a detailed **Process Flow Diagram(s)** if new emission points were added since latest revision, showing each new/modified process or emissions unit as **ATTACHMENT C.** Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

e. Emission Units Table

Fill out the **Emission Units Table** for new and/or modified equipment and provide it as **ATTACHMENT D**.

f. Emission Units Form(s)

For each new and/or modified emission unit(s) with applicable requirement(s) listed in the **Emission Units Table**, fill out and provide an **Emission Unit Form(s)** as **ATTACHMENT E**.

Are you in compliance with all facility-wide applicable requirements? ☑ Yes ☐ No

For each new and/or modified emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

g. Control Devices

For each new and/or modified control device listed in the **Emission Units Table**, fill out and provide an **Air Pollution Control Device Form(s)** as **ATTACHMENT G**.

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Part 70 Major Source Threshold level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. If applicable, please check appropriate box in Section 3(a) below, fill out and provide these forms for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 3: New Applicable Requirements

a. New Applicable Requirements Summary	
Mark all applicable requirements associated with the changes involved with this permit revision:	
☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR34)	☐ Nonattainment NSR (45CSR19)
☑ Section 111 NSPS (Subpart(s) IIII)	☑ Section 112(d) MACT standards (Subpart(s) ZZZZ)
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR26)
☐ CAIR SO_2 Trading Program (45CSR41)	

b. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

☐ **Permit Shield Requested** *(not applicable to Minor Modifications, Off-Permit Changes, or for Operational Flexibility)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

c. Suggested Title V Draft Permit Language

Provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit as **ATTACHMENT I**. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e. g. 45CSR§7-4.1)) for those requirements being added / revised.

See Attachment I

d. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number
Installation did not trigger Reg 13 modification thresholds		

e. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit Number	Date of Issuance (MM/DD/YYYY)	Permit/Consent Order Condition Number

Section 4: Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY	For Off-Permit Changes: Provide Total Aggregated Emissions Increase Since Last Permit/Modification
NOx	0.04	
CO	0.02	
NMHC	0.0021	
Particulate Matter	0.002	
SO2	0.026	

Provide **Supporting Emission Calculations/Estimations** as **ATTACHMENT J**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 5: Certification of Information

a. Certification For Use Of Minor Modification Procedures ***(Required Only for Minor Modification Requests)***

Note:	*This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:*

i. Proposed changes do not violate any applicable requirement;

ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;

iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;

v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;

vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):	DocuSigned by: Douglas J Rosenberger AECB541C1E3C41C... *(Please use blue ink)*	Date:	7/17/2023 | 1:16 PM EDT / / *(Please use blue ink)*
Named (typed):	Douglas J. Rosenberger	Title:	Plant Manager

***b.* Certification of Truth, Accuracy and Completeness and Certification of Compliance**
(Required For All Revision Requests)

Note:	*This Certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.*

Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

Responsible official (type or print)

Name: Douglas J. Rosenberger | Title: Plant Manager

Responsible official's signature:

Signature: DocuSigned by: Douglas J Rosenberger AE3B541C1E3C41C... *(Please use blue ink)*

Signature Date: 7/17/2023 | 1:16 PM EDT *(Please use blue ink)*

Section 6: Attachments

Note: Please check all applicable attachments included with this permit application:	
☐	ATTACHMENT A: Business Confidentiality Claims
☑	ATTACHMENT B: Plot Plan(s)
☑	ATTACHMENT C: Process Flow Diagram(s)
☑	ATTACHMENT D: Emission Units Table
☑	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☐	ATTACHMENT G: Air Pollution Control Device Form(s)
☐	ATTACHMENT H: Compliance Assurance Monitoring Form(s)
☑	ATTACHMENT I: Suggested Title V Draft Permit Language
☑	ATTACHMENT J: Supporting Emission Calculations/Estimations

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Section 7: Application Completeness and Ability to Operate information for different types of Title V Permit revisions

(Refer to "Title V Revision Guidance" for more information)

Type of Revision	Application/Notification Requirements	Ability to Operate
Administrative Amendment	☐ Description of change ☐ Supplemental information (rationale) ☐ Certification of application and compliance (Section 5(b))	Upon submittal of the application
Minor Modification	☑ Description of change ☑ Associated change in emissions ☑ Sample Calculations/estimations for determining emissions ☑ List of new applicable requirements associated with changes ☑ List of R13/R14 permits associated with the changes ☑ Suggested draft permit language ☑ Certification for use of Minor Modification (Section 5(a)) ☑ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application, or upon issuance of the R13/R14 permit (if any), whichever is later
Significant Modification	☐ Description of change ☐ Associated change in emissions ☐ Sample Calculations/estimations for determining emissions ☐ List of R13/R14 permits associated with the changes ☐ List of new applicable requirements associated with changes ☐ Request for permit shield ☐ Updated drawings, plot plans, process flow diagrams, etc. ☐ Certification of application and compliance (Section 5(b))	Upon issuance of the modified Title V permit (if changes either conflict with, or are prohibited by existing Title V Permit terms/ conditions), OR upon obtaining of proper R13/ R14 Permit for first 12 months (if changes neither conflict with, nor are prohibited by existing Title V Permit terms/conditions)
Off-Permit Changes	☐ Notification/application to DAQ and U.S.E.P.A. within 2 business days of the change ☐ Description of the change ☐ The date on which the change will occur or has occurred ☐ Pollutants and amounts emitted ☐ Sample Calculations/estimations for determining emissions ☐ Any new applicable requirements that will apply to changes ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After two (2) days from the submittal of the application
Operational Flexibility	☐ Notification/application submitted to DAQ and U.S.E.P.A. in advance (7 days prior to making changes) ☐ Description of the change ☐ The date on which the change is to occur ☐ Permit terms and conditions affected by the change ☐ Certification of application and compliance (Section 5(b)) ***No Permit Shield***	After seven (7) days from the submittal of the application/notification to DAQ and EPA
Reopening	☐ Description of change ☐ List of new applicable requirements associated with changes ☐ Suggested draft permit language ☐ Certification of application and compliance (Section 5(b))	Ability to operate is not reflected by the changes

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

Attachment B:

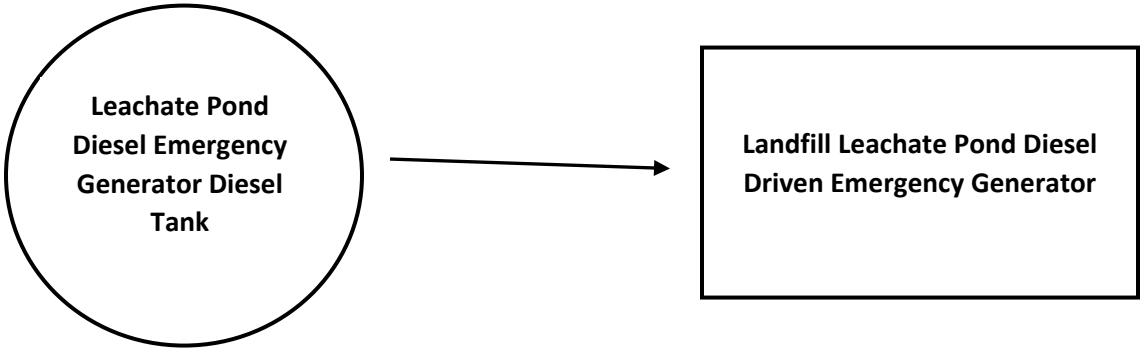
Mitchell Power Plant

*Portable generator will be at the Leachate Pond.

*Diesel Emerg. Gen is at the Leachate Sump.

Attachment C:

Mitchell Plant Diesel Driven Emergency Generator Located at Landfill Leachate Pond



ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Unit ID[1]	Emission Point ID[1]	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device[1]
LF DEG	LF DEG	Landfill Leachate Collection Sump Diesel Emergency Generator	2020	464 bhp	
LF DEG2	LF DEG2	Landfill Leachate Pond Diesel Emergency Generator	2023	513 bhp	
LF DEGT	LF DEGT	Diesel fuel tank for LF DEG and LF DEG2	2020	600 Gal.	

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
LF DEG2	LF DEG2	n/a

Provide a description of the emission unit (type, method of operation, design parameters, etc.; for engines, please indicate compression or spark ignition, lean or rich, four or two stroke, non-emergency or emergency, certified or not certified, as applicable)

Diesel driven 400kw, 513 Bhp, mobile emergency generator to be used at the Landfill Leachate Storage Pond

Manufacturer:	**Model number:**	**Serial number:**
Cummins	QSG12	

Construction date: MM/DD/YYYY	**Installation date:** MM/DD/YYYY	**Modification date(s):** MM/DD/YYYY
07/2023	07/2023	

Design Capacity (examples: furnaces - tons/hr, tanks – gallons, boilers – MMBtu/hr, engines - hp):

approx 23.2 gal/hr, 513 Bhp, 470 gallon fuel tank

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
approx 23.2 gal/hr	11,600 gal/yr	assumed 500hr/yr but not limited during emergency

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ☑ Yes ☐ No	**If yes, is it?** ☐ Indirect Fired ☐ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 513 Bhp	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Diesel Fuel, less than 15ppm S.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Diesel Fuel	15 ppm		approx 137,030 btu/gal

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0.08	0.02
Nitrogen Oxides (NO_X)	0.14	0.04
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	0.01	0.002
Particulate Matter (PM_{10})	0.01	0.002
Total Particulate Matter (TSP)	0.01	0.002
Sulfur Dioxide (SO_2)	0.11	0.026
Volatile Organic Compounds (VOC)	1.29	0.322
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See attachment J.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

See attachment I.

☐ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

See attachment I.

Are you in compliance with all applicable requirements for this emission unit? ☑ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

Attachment I:

Summary of Requirements[1]

40 CFR part 60, subpart IIII

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

For 2007 model year and later **emergency** engines with <30 l/cyl,
constructed after July 11, 2005 and manufactured after April 1, 2006

NOTE: To refer directly to the regulatory text, please go to Subpart IIII (scroll down to almost the end of the page).

Temporary Engines:

Per 60.4200(e) Owners and operators of facilities with CI ICE that are acting as temporary replacement units and that are located at a stationary source for less than 1 year and that have been properly certified as meeting the standards that would be applicable to such engine under the appropriate nonroad engine provisions, are not required to meet any other provisions under this subpart with regard to such engines.

Emission Standards: 60.4205(b), 60.4202

60.4205(b) Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.

60.4202 (a) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in paragraphs (a)(1) through (2) of this section.

(1) For engines with a maximum engine power less than 37 KW (50 HP):

(i) The certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants for model year 2007 engines, and
(ii) The certification emission standards for new nonroad CI engines in 40 CFR 1039.104, 40 CFR 1039.105, 40 CFR 1039.107, 40 CFR 1039.115, and table 2 to this subpart, for 2008 model year and later engines.

[1]Disclaimer: The content provided in this software tool is intended solely as assistance for potential reporters to aid in assessing requirements for compliance under the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 60 Subpart IIII. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by EPA of the applicability of the rule to any particular facility. In any particular case, EPA will make its assessment by applying the law and regulations to the specific facts of the case.

(2) For engines with a maximum engine power greater than or equal to 37 KW (50 HP), the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants beginning in model year 2007.

(b) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power greater than 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in paragraphs (b)(1) through (2) of this section.

(1) For 2007 through 2010 model years, the emission standards in table 1 to this subpart, for all pollutants, for the same maximum engine power.

(2) For 2011 model year and later, the certification emission standards for new nonroad CI engines for engines of the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.

(c) Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder that are not fire pump engines to the certification emission standards for new marine CI engines in 40 CFR 94.8, as applicable, for all pollutants, for the same displacement and maximum engine power.

(d) Beginning with the model years in table 3 to this subpart, stationary CI internal combustion engine manufacturers must certify their fire pump stationary CI ICE to the emission standards in table 4 to this subpart, for all pollutants, for the same model year and NFPA nameplate power.

(e) Stationary CI internal combustion engine manufacturers must certify the following emergency stationary CI ICE that are not fire pump engines to the certification emission standards for new marine CI engines in 40 CFR 94.8, as applicable, for all pollutants, for the same displacement and maximum engine power:

(1) Their 2007 model year through 2012 emergency stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder;

(2) Their 2013 model year and later emergency stationary CI ICE with a maximum engine power greater than or equal to 3,700 KW (4,958 HP) and a displacement of greater than or equal to 10 liters per cylinder and less than 15 liters per cylinder;

(3) Their 2013 model year emergency stationary CI ICE with a displacement of greater than or equal to 15 liters per cylinder and less than 30 liters per cylinder; and

(4) Their 2014 model year and later emergency stationary CI ICE with a maximum engine power greater than or equal to 2,000 KW (2,682 HP) and a displacement of greater than or equal to 15 liters per cylinder and less than 30 liters per cylinder.

(f) Stationary CI internal combustion engine manufacturers must certify the following emergency stationary CI ICE to the certification emission standards and other requirements applicable to Tier 3 new marine CI engines in 40 CFR 1042.101, 40 CFR 1042.107, 40 CFR 1042.115, 40 CFR 1042.120, and 40 CFR 1042.145, for all pollutants, for the same displacement and maximum engine power:

(1) Their 2013 model year and later emergency stationary CI ICE with a maximum engine power less than 3,700 KW (4,958 HP) and a displacement of greater than or equal to 10 liters per cylinder and less than 15 liters per cylinder; and

(2) Their 2014 model year and later emergency stationary CI ICE with a maximum engine power less than 2,000 KW (2,682 HP) and a displacement of greater than or equal to 15 liters per cylinder and less than 30 liters per cylinder.

(g) Notwithstanding the requirements in paragraphs (a) through (d) of this section, stationary emergency CI internal combustion engines identified in paragraphs (a) and (c) may be certified to the provisions of 40 CFR part 94 or, if Table 2 to 40 CFR 1042.101 identifies Tier 3 standards as being applicable, the requirements applicable to Tier 3 engines in 40 CFR part 1042, if the engines will be used solely in either or both of the following locations:

(1) Areas of Alaska not accessible by the FAHS; and

(2) Marine offshore installations.

(h) Notwithstanding the requirements in paragraphs (a) through (f) of this section, stationary CI internal combustion engine manufacturers are not required to certify reconstructed engines; however manufacturers may elect to do so. The reconstructed engine must be certified to the emission standards specified in paragraphs (a) through (f) of this section that are applicable to the model year, maximum engine power and displacement of the reconstructed emergency stationary CI ICE.

Fuel Requirements: 60.4207(a), (b), (e)

60.4207(a) Beginning October 1, 2007, owners and operators of stationary CI ICE subject to this subpart that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(a).

(b) Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must purchase diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

(e) Stationary CI ICE that have a national security exemption under §60.4200(d) are also exempt from the fuel requirements in this section.

Per 60.4215(b) stationary CI ICE that are used in Guam, American Samoa, or the Commonwealth of the Northern Mariana Islands are not required to meet the fuel requirements in 40 CFR 60.4207.

Special requirements apply to engines used in Alaska. Please refer to 60.4216 for the specific requirements and provisions that apply to engines that are located in areas of Alaska not accessible by the FAHS.

Per 60.4217 Owners and operators of stationary CI ICE that do not use diesel fuel may petition the Administrator for approval of alternative emission standards, if they can demonstrate that they use a fuel that is not the fuel on which the manufacturer of the engine certified the engine and that the engine cannot meet the applicable standards required in §60.4204 or §60.4205 using such fuels and that use of such fuel is appropriate and reasonably necessary, considering cost, energy, technical feasibility, human health and environmental, and other factors, for the operation of the engine.

Importing/Installing Requirements: 60.4208(a), (b), (h), (i)

60.4208(a) After December 31, 2008, owners and operators may not install stationary CI ICE (excluding fire pump engines) that do not meet the applicable requirements for 2007 model year engines.

(b) After December 31, 2009, owners and operators may not install stationary CI ICE with a maximum engine power of less than 19 KW (25 HP) (excluding fire pump engines) that do not meet the applicable requirements for 2008 model year engines.

(h) In addition to the requirements specified in §§60.4201, 60.4202, 60.4204, and 60.4205, it is prohibited to import stationary CI ICE with a displacement of less than 30 liters per cylinder that do not meet the applicable requirements specified in paragraphs (a) through (g) of this section after the dates specified in paragraphs (a) through (g) of this section.

(i) The requirements of this section do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed, and do not apply to engines that were removed from one existing location and reinstalled at a new location.

Monitoring Requirements: 60.4209(a); If your engine is equipped with a diesel particulate filter: 60.4209(b)

60.4209(a) If you are an owner or operator of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine.

If your engine is equipped with a diesel particulate filter: 60.4209(b) If you are an owner or operator of a stationary CI internal combustion engine equipped with a diesel particulate filter to comply with the emission standards in §60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached.

Compliance Requirements: 60.4206, 60.4211(a), (c), (f), (g)

60.4206 Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.

60.4211(a) If you are an owner or operator and must comply with the emission standards specified in this subpart, you must do all of the following, except as permitted under paragraph (g) of this section:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.

(c) If you are an owner or operator of a 2007 model year and later stationary CI internal combustion engine and must comply with the emission standards specified in §60.4204(b) or §60.4205(b), or if you are an owner or operator of a CI fire pump engine that is manufactured during or after the model year that applies to your fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), you must comply by purchasing an engine certified to the

emission standards in §60.4204(b), or §60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in paragraph (g) of this section.

(f) If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (f)(1) through (3) of this section. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (3) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (3) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary ICE in emergency situations.

(2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (f)(3) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

Note: On May 1, 2015, the U.S. Court of Appeals for the District of Columbia Circuit issued a decision vacating paragraphs 40 CFR 60.4211(f)(2)(ii)-(iii) below. Guidance regarding the impact of the vacatur is available here: https://www3.epa.gov/ttn/atw/icengines/docs/RICEVacaturGuidance041516.pdf.

(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraph (f)(3)(i) of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to

generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator;

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

(g) If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

(1) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

(2) If you are an owner or operator of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

(3) If you are an owner or operator of a stationary CI internal combustion engine greater than 500 HP, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an

engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. You must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

Testing Requirements: 60.4212

60.4212 Owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests pursuant to this subpart must do so according to paragraphs (a) through (e) of this section.

(a) The performance test must be conducted according to the in-use testing procedures in 40 CFR part 1039, subpart F, for stationary CI ICE with a displacement of less than 10 liters per cylinder, and according to 40 CFR part 1042, subpart F, for stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder.

(b) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1039 must not exceed the not-to-exceed (NTE) standards for the same model year and maximum engine power as required in 40 CFR 1039.101(e) and 40 CFR 1039.102(g)(1), except as specified in 40 CFR 1039.104(d). This requirement starts when NTE requirements take effect for nonroad diesel engines under 40 CFR part 1039.

(c) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8, as applicable, must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112 or 40 CFR 94.8, as applicable, determined from the following equation:

$$\text{NTE requirement for each pollutant} = (1.25) \times (\text{STD}) \qquad \text{(Eq. 1)}$$

Where:

STD = The standard specified for that pollutant in 40 CFR 89.112 or 40 CFR 94.8, as applicable.

Alternatively, stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR 89.112 or 40 CFR 94.8 may follow the testing procedures specified in §60.4213 of this subpart, as appropriate.

(d) Exhaust emissions from stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) must not exceed the NTE numerical requirements, rounded to the same number of decimal places as the applicable standard in §60.4204(a), §60.4205(a), or §60.4205(c), determined from the equation in paragraph (c) of this section.

Where:

STD = The standard specified for that pollutant in §60.4204(a), §60.4205(a), or §60.4205(c).

Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in §60.4204(a), §60.4205(a), or §60.4205(c) may follow the testing procedures specified in §60.4213, as appropriate.

(e) Exhaust emissions from stationary CI ICE that are complying with the emission standards for new CI engines in 40 CFR part 1042 must not exceed the NTE standards for the same model year and maximum engine power as required in 40 CFR 1042.101(c).

Notification, Reports, and Records Requirements: 60.4214(b); If equipped with DPF: 60.4214(c); If >100 HP and > 15 hrs/yr for emergency DR: 60.4214(d)

60.4214(b) If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

If your engine is equipped with a diesel particulate filter: 60.4214(c)

60.4214(c) If the stationary CI internal combustion engine is equipped with a diesel particulate filter, the owner or operator must keep records of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit of the engine is approached.

If your engine is greater than 100 HP and used more than 15 hours a year for emergency demand response:

60.4214(d) If you own or operate an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 60.4211(f)(2)(ii) and (iii) or that operates for the purposes specified in § 60.4211(f)(3)(i), you must submit an annual report according to the requirements in paragraphs (d)(1) through (3) of this section.

(1) The report must contain the following information:

(i) Company name and address where the engine is located.
(ii) Date of the report and beginning and ending dates of the reporting period.
(iii) Engine site rating and model year.
(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.
(v) Hours operated for the purposes specified in § 60.4211(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in § 60.4211(f)(2)(ii) and (iii).
(vi) Number of hours the engine is contractually obligated to be available for the purposes specified in § 60.4211(f)(2)(ii) and (iii).
(vii) Hours spent for operation for the purposes specified in § 60.4211(f)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in § 60.4211(f)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (*www.epa.gov/cdx*). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in § 60.4.

General Provisions (40 CFR part 60): Table 8

Attachment J:

Cummins QSG12 Diesel Engine Driven Backup Generator Emission Calculations

Max Power	513	Bhp	382.698	bkW
Fuel Use:	23.2	gal/hr		3.18 MMBtu/hr
	11,600	gal/yr assuming 500 hours operation.		1589.55 MMBtu/yr
Assume:	137,030	Btu/gal (diesel heat content)		

Hourly Emissions:

	Emission Factor*	Emissions	Emissions
		lb/hr	lb/24hr
NOx	0.17 Grams/kw-hr	0.14	3.44
CO	0.1 Grams/kw-hr	0.08	2.02
HC (Assume NMHC))	0.01 Grams/kw-hr	0.01	0.20
PM=PM10=PM2.5	0.01 Grams/kw-hr	0.01	0.202
SO2	2.06 x E-4 lbs/HP-hr	0.11	2.54
CO2	1458 Grams/kw-hr	1230.127834	29523.07
VOC (used TOC)	0.0025141 lb/HP-hr	1.29	30.95
Formaldehyde	0.00118 lb/MMBtu	0.00375	0.0900
Benzene	0.000933 lb/MMBtu	0.00297	0.0712
Toluene	0.000409 lb/MMBtu	0.00130	0.0312
Xylenes	0.000285 lb/MMBtu	0.000906	0.0217

Note:

*NOx, CO, HC, and PM emission factors are based on Cummins Emission Data Sheet for QSG12.
* All PM assumed to be less than 1 um

* SO2 estimated using AP-42 (Chapter 3.3) SO2 EF for Gasoline And Diesel Industrial Engines with adjustment for 15ppm oil diesel.

* CO2 estimated using EPA Annual Certifcation Data for Non-road Compression Ignition Engines

*TOC estimated using Chapter 3.3 of AP-42 TOC Efs for exhaust and crankcase emissions for diesel industrial engines.

* Formaldehyde, Benzene, Toluene, Xylenes, Acetaldehyde, Acrolein, and Napthalene estimated using Chapter 3.3 of AP-42 EFs for diesel industrial engines.

Acetaldehyde	0.000767 lb/MMBtu	0.00244	0.0585
Acrolein	0.0000925 lb/MMBtu	0.000294	0.00706
Napthalene	0.0000848lb/MMBtu	0.000270	0.00647
Total HAPS		0.0119	0.286

* Total HAP is sum of Formaldehyde, Benzene, Toluene, Xylenes, Acetaldehyde, Acrolein, and Napthalene.

Typical Annual Emissions - **(Assume 500 hrs/yr)**

	Emissions
	tons/yr
NOx	0.04
CO	0.02
HC	0.0021
PM	0.002
SO2	0.026
CO2	307.53
VOC	0.322
Formaldehyde	0.000938
Benzene	0.000742
Toluene	0.000325
Xylenes	0.000227
Acetaldehyde	0.000610
Acrolein	0.0000735
Napthalene	0.0000674
Total HAPS	0.00298

DocuSign

Certificate Of Completion

Envelope Id: 786B81A126C34BA0AC7D7C62E6028C4E
Status: Completed
Subject: Complete with DocuSign: 071423-Mitchell Minor Modification App Package.pdf
Source Envelope:
Document Pages: 27
Signatures: 3
Certificate Pages: 2
Initials: 0
AutoNav: Enabled
EnvelopeId Stamping: Disabled
Time Zone: (UTC-05:00) Eastern Time (US & Canada)

Envelope Originator:
Kristin N Clark
700 Morrison Road
Gahanna, OH 43230
knclark1@aep.com
IP Address: 167.239.221.107

Record Tracking

Status: Original
7/17/2023 1:05:51 PM
Holder: Kristin N Clark
knclark1@aep.com
Location: DocuSign

Signer Events	Signature	Timestamp
Douglas J Rosenberger djrosenberger@aep.com Plant Manager Security Level: Email, Account Authentication (None)	DocuSigned by: Douglas J Rosenberger AECB541C1E3C41C... Signature Adoption: Pre-selected Style Using IP Address: 167.239.221.106	Sent: 7/17/2023 1:11:42 PM Viewed: 7/17/2023 1:16:28 PM Signed: 7/17/2023 1:16:45 PM

Electronic Record and Signature Disclosure:
Accepted: 7/17/2023 1:16:28 PM
ID: 9d8cf333-19c4-4510-8f0a-7e466d65302c

In Person Signer Events	Signature	Timestamp

Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp

Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	7/17/2023 1:11:42 PM
Certified Delivered	Security Checked	7/17/2023 1:16:28 PM
Signing Complete	Security Checked	7/17/2023 1:16:45 PM
Completed	Security Checked	7/17/2023 1:16:45 PM

Payment Events	Status	Timestamps

Electronic Record and Signature Disclosure

ELECTRONIC RECORD AND SIGNATURE DISCLOSURE

Each party agrees that the electronic signatures, whether digital or encrypted, of the parties included in this Agreement are intended to authenticate this writing and to have the same force and effect as manual signatures. Electronic signature means any electronic sound, symbol or process attached to or logically associated with a record and executed and adopted by a party with the intent to sign such record.

Please confirm your agreement by clicking the 'I agree' button at the bottom of this document.

Roberts, Daniel P <daniel.p.roberts@wv.gov>

Fwd: Wheeling Power Company; Mitchell Plant

1 message

Air Quality Permitting, DEP <depairqualitypermitting@wv.gov> Tue, Jul 18, 2023 at 7:51 AM
To: Stephanie R Mink <stephanie.r.mink@wv.gov>
Cc: Daniel P Roberts <daniel.p.roberts@wv.gov>

Stephanie,

Please assign this minor modification to Dan as R30-05100005-2019 (MM02).

Thanks,
Carrie

---------- Forwarded message ---------
From: **Kristin N Clark** <knclark1@aep.com>
Date: Mon, Jul 17, 2023 at 1:55 PM
Subject: Wheeling Power Company; Mitchell Plant
To: DEPAirQualityPermitting@wv.gov <DEPAirQualityPermitting@wv.gov>
Cc: Brandon T Belcher <btbelcher@aep.com>, G M Palmer <gmpalmer@aep.com>, Timothy W Lohner <twlohner@aep.com>, Danielle R Roski <drroski@aep.com>

2 attachments

Email Cover Letter-Mitchell Minor Mod.pdf
571K

071723-Mitchell Minor Modification App Package.pdf
1647K