

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-06100134-2023**
Application Received: **November 29, 2022**
Plant Identification Number: **03-54-061-00134**
Permittee: **Longview Power, LLC**
Facility Name: **Longview Power Plant**
Mailing Address: **1375 Fort Martin Road, Madsville, WV 26541**

Physical Location: Madsville, Monongalia County, West Virginia
UTM Coordinates: 589.2 km Easting • 4395.7 km Northing • Zone 17
Directions: From Morgantown, take WV Route 19 West to Route 100 North to Route 53 (Fort Martin Road). Proceed 5.4 miles. Turn left into Gate 2. Proceed to security.

Facility Description

Longview is an electric generating unit and operates under Standard Industrial Classification (SIC) code 4911. The facility consists of a 6,114 MMBtu/hr pulverized coal fired boiler, steam turbine generator, and a natural gas fired auxiliary boiler, with associated equipment including coal, limestone, and ash handling, a cooling tower, an emergency generator, and a fire pump. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2022 Actual Emissions
Carbon Monoxide (CO)	2954	693.10
Nitrogen Oxides (NO _x)	1755	1309.24
Particulate Matter (PM _{2.5})	207	7.64
Particulate Matter (PM ₁₀)	422	16.99
Total Particulate Matter (TSP)	445	93.50
Sulfur Dioxide (SO ₂)	2418	1694.45
Volatile Organic Compounds (VOC)	97	16.61

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2022 Actual Emissions
Total HAPs (<i>all individual HAPs are <10 TPY</i>)	16.00	8.91

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

Title V Program Applicability Basis

This facility has the potential to emit 2,954 tons per year of CO, 2,418 tons per year of SO₂, 1,755 tons per year of NO_x, and 422 tons per year of PM₁₀. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Longview Power, LLC's Longview Power Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Control Of Air Pollution From Combustion Of Refuse
45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers.
45CSR11	Prevention Of Air Pollution Emergency Episodes
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR14	Permits For Construction And Major Modification Of Major Stationary Sources Of Air Pollution For The Prevention Of Significant Deterioration

45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60
45CSR30	Requirements For Operating Permits
45CSR33	Acid Rain Provisions And Permits
45CSR34	Emission Standards For Hazardous Air Pollutants
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
40 C.F.R. 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units
40 C.F.R. 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 C.F.R. 60, Subpart Y	Standards of Performance for Coal Preparation Plants
40 C.F.R. 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants
40 C.F.R. 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. Part 61, Subpart M	National Emission Standard For Asbestos
40 C.F.R. 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units
40 C.F.R. Part 64	Compliance Assurance Monitoring
40 C.F.R. Part 72	Permits Regulation
40 C.F.R. Part 73	Sulfur Dioxide Allowance System
40 C.F.R. Part 74	Sulfur Dioxide Opt-ins
40 C.F.R. Part 75	Continuous Emissions Monitoring
40 C.F.R. Part 76	Acid Rain Nitrogen Oxides Emission Reduction Program
40 C.F.R. Part 77	Excess Emissions
40 C.F.R. Part 78	Appeals Procedure (for Acid Rain Program)
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
40 C.F.R. Part 97, Subpart AAAAA	CSAPR NO _x Annual Trading Program
40 C.F.R. Part 97, Subpart CCCCC	CSAPR SO ₂ Group 1 Trading Program
40 C.F.R. Part 97, Subpart GGGGG	CSAPR NO _x Ozone Season Group 3 Trading Program

State Only:

45CSR4	To Prevent And Control The Discharge Of Air Pollutants Into The Open Air Which Causes Or Contributes To An Objectionable Odor Or Odors
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Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R14-0024G	October 12, 2018	
R33-56671-2023-3	December 18, 2018	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit which was issued on June 12, 2018 and modified on January 15, 2019. Significant changes to the most recent version of the Title V Permit consist of the following:

Note: COA in the following discussions means citation of authority and current permit means R30-06100134-2018 MM01.

- 1) **Table of Contents** – Revised the “APPENDIX A” description from “(Transport Rule Requirements)” to “(Cross-State Air Pollution Rule Requirements).”
- 2) **Title V Boilerplate changes:**
 - **Condition 2.1.3.** – Revised resulting from Rule 30 (45CSR30) revisions.
 - **Condition 2.11.4.** – The COA has been corrected.
 - **Condition 2.17.** – Deleted and marked as reserved resulting from Rule 30 revisions.
 - **Condition 2.22.1.** – The COA has been updated to remove 45CSR38 which has been repealed.
 - **Condition 3.5.3.** – This condition was revised to update the US EPA mailing address.
 - **Condition 3.5.4.** – Revised as revised in Rule 30.
 - **Condition 3.5.7.** – Deleted and marked as reserved resulting from Rule 30 revisions.
 - **Condition 3.5.8.a.1.** – Deleted and marked as reserved resulting from Rule 30 revisions.
 - **Condition 3.5.8.a.2.** – Revised as revised in Rule 30.
- 3) **Section 2.0 changes:**
 - The permittee intends to demonstrate compliance with 40 C.F.R. 63 Subpart UUUUU using low emitting EGU status for mercury (Hg) if it qualifies after sufficient performance testing, consequently, the acronym “LEE” has been used in multiple places in Section 5.0 of the permit. Therefore, the acronym has been added to permit section 2.2.
- 4) **Section 3.0 changes (other than boilerplate changes):**
 - Condition 3.1.9. – The Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. Specifically, “TR” has been replaced with “CSAPR”

and “Transport” has been replaced with “Cross-State Air Pollution.” Also, 45CSR43 has been added to the COA. The actual requirements have not changed.

- Condition 3.1.10. – The Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. Specifically, “TR” has been replaced with “CSAPR” and “Transport” has been replaced with “Cross-State Air Pollution.” The requirements in this condition have been revised from 40 CFR §97.806 (Subpart EEEEE - *CSAPR NO_x Ozone Season Group 2 Trading Program*) to 40 CFR §97.1006 (Subpart GGGGG - *CSAPR NO_x Ozone Season Group 3 Trading Program*) in accordance with 40 CFR §52.2540(b). The citation of Authority has been revised to replace 40 CFR §97.806 with 40 CFR §97.1006. Since 40 CFR 97 Subpart GGGGG has not yet been incorporated into 45CSR43, 45CSR43 has not been added to the COA.
- Condition 3.1.11. – The Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. Specifically, “TR” has been replaced with “CSAPR” and “Transport” has been replaced with “Cross-State Air Pollution.” Also, 45CSR43 has been added to the COA. The actual requirements have not changed.

5) Section 5.0 changes:

- The MATS Rule 40 CFR 63 Subpart UUUUU has been revised. Therefore, the permit has been updated to include the revised MATS language. Also, minor modification R30-06100134-2018 MM01 issued on January 15, 2019 incorporated the requirements of permit R14-0024G which allows for the use of other approved monitoring methods and/or procedures under 40 CFR 63 Subpart UUUUU (MATS Rule) for the continuous monitoring of mercury (Hg) emissions discharged from the PC Boiler. In the minor modification application, Longview indicated that they intended to pursue “Low Emitting EGU” (LEE) testing. Longview has performed LEE testing and qualifies for Hg LEE status. The applicable LEE requirements which were omitted in the minor modification permit have been added to the renewal permit.
 - The renewal permit conditions affected by the revised MATS language are: 5.1.10., 5.1.17.(9), 5.1.20., 5.2.1.a.4., 5.2.15., 5.2.16., 5.2.18., 5.4.9., 5.5.9., 5.5.12., 5.5.13., 5.5.14., 5.5.16. (5.5.15*), 5.5.17. (5.5.16.*), 5.5.18., 5.5.20., 5.5.21. Condition 5.1.17. and 5.1.20.(3) of the current permit have been deleted since the old requirements of 40 CFR §63.10031(f)(3) and §63.10021(h)(3) have been replaced with “Reserved” in the revised MATs rule. **Current Permit conditions.*
 - The following permit conditions in the renewal permit have been revised and/or added to include the applicable LEE requirements: 5.1.9., 5.3.6 through 5.3.16., 5.4.12., 5.5.12.b.5. and 5.5.15.
 - Condition 5.1.10. – 40 CFR §63.10010(i)(4) was removed from the COA resulting from the MATS rule revisions.
 - Condition 5.1.20. – Added “(1) and (2)” to the COA to clarify that 40 CFR §63.10021(h)(4) is not applicable. 40 CFR §63.10021(h)(3) has been marked as “reserved” in the revised MATS rule.
 - Condition 5.2.1.a. – Expanded 40 CFR §60.49Da(v) to §60.49Da(v)(1), (2) and (3) in the COA since the requirements of §60.49Da(v)(4) are contained in condition 5.5.1. and not in this permit condition.

6) Section 8.0 changes:

- 40 CFR 60 Subpart IIII for compression ignition internal combustion engines has been revised. Therefore, the permit has been updated to include the revised subpart IIII language. The revised renewal permit conditions affected by revised Subpart IIII are: 8.1.3., 8.1.6., 8.1.7. and 8.1.8. The reporting requirements of 40 CFR §60.4214(d) which were previously omitted from the permit have been added in 8.5.1.

- 7) **APPENDIX A** – As discussed under Item 4) “Section 3.0 changes” above, the Transport Rule (TR) Trading Program nomenclature has been replaced with Cross-State Air Pollution Rule (CSAPR) Trading Program. The Appendix has also been updated to the current DAQ Title V boilerplate for the CSAPR requirements which includes the replacement of 40 CFR §97.806 (Subpart EEEEE - *CSAPR NO_x Ozone Season Group 2 Trading Program*) with 40 CFR §97.1006 (Subpart GGGGG - *CSAPR NO_x Ozone Season Group 3 Trading Program*).

- 8) **APPENDIX C** – The expired Acid Rain Permit has been replaced with the current Acid Rain Permit.
- 9) **Permit R14-0038** - A PSD construction permit (i.e., R14-0038) was issued to Mountain State Clean Energy, LLC (MSCE) on January 5, 2022. When completed, MSCE will be a contiguous facility with the Longview Power Station. Pursuant to 45CSR§30-4.1.a.2, MSCE shall file a complete application to obtain the Title V operating permit or permit revision within twelve (12) months after commencing operation. Since this facility has not commenced operation and has not submitted an application to obtain a Title V operating permit or permit revision, R14-0038 has not been included in this renewal permit.

Non-Applicability Determinations

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

45CSR5	Pursuant to 45CSR5, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR5. 45CSR2 is applicable to the facility.
45CSR17	Pursuant to 45CSR17, if 45CSR2 is applicable to the facility, then the facility is exempt from 45CSR17. 45CSR2 is applicable to the facility.
40 CFR 60 Subpart Kb	The facility does not include storage vessels greater than or equal to 75 cubic meters that are used to store volatile organic liquids for which construction, reconstruction or modification commenced after July 23, 1984.
40 CFR 63 Subpart JJJJJ	The auxiliary boiler is a gas-fired boiler and therefore not subject to this subpart pursuant to §63.11195(e).
40 CFR 64	There have been no changes to the facility that triggered a revision to CAM applicability or the existing CAM plan.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: August 2, 2023

Ending Date: September 1, 2023

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/414-1910
frederick.tipane@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.