



west virginia department of environmental protection

Division of Air Quality
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
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June 28, 2016

Mr. Shawn M. Garvin
Regional Administrator
U.S. EPA, Region III (3RA00)
1650 Arch Street
Philadelphia, PA 19103-2029

Re: *Characterization methods for peak 1-hour concentration for sources emitting more than 2,000 tpy of SO₂ pursuant to 40 CFR §51.1203(b)*

Dear Administrator Garvin:

In accordance with 40 CFR 51, Subpart BB – *Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS* (DRR), the West Virginia Department of Environmental Protection, Division of Air Quality (DAQ), on behalf of the State of West Virginia, respectfully submits the required information relating to the list of stationary sources identified as emitting 2,000 tons per year (tpy) or more of SO₂. The DAQ submitted the list of applicable sources, as required by 40 CFR §51.1203(a), to you in a letter dated January 5, 2016.

Under the DRR, each air agency is required to notify the EPA how peak 1-hour SO₂ concentrations will be characterized for each area subject to requirements for air quality characterization. 40 CFR §51.1203(b) requires the state air agency to notify the EPA whether it has chosen to characterize peak 1-hour SO₂ concentrations in such area through ambient air quality monitoring; characterize peak 1-hour SO₂ concentrations in such area through air quality modeling techniques; or provide federally enforceable emission limitations by January 13, 2017 that limit emissions of applicable sources to less than 2,000 tpy, or provide documentation that the applicable source has permanently shut down. The DAQ has consulted with all applicable SO₂ sources, and has chosen to characterize peak 1-hour SO₂ concentrations as detailed in Tables 1 - 3 below.

Table 1: DRR Sources Permanently Shut Down

Facility Name	Facility ID	Shutdown Notification
Appalachian Power Co. – Kanawha River	54-039-00006	Shutdown in 2015
Appalachian Power Co. – Philip Sporn	54-053-00001	Shutdown in 2015

Table 2: DRR Sources to Characterize 1-hr SO₂ peak Concentrations through Modeling

Facility Name	Facility ID	Initial Modeling Protocol Received	Initial Modeling Protocol Transmitted to EPA	EPA Comments on Modeling Protocol Received	Revised Modeling Protocol Received
Monongahela Power Co. – Harrison	54-033-00015	3/31/2016	4/11/2016	4/29/2016	6/27/2016
Allegheny Energy – Pleasants	54-073-00005	3/31/2016	4/11/2016	4/29/2016	6/27/2016
Appalachian Power Co. – John E. Amos	54-079-00006	5/16/2016	5/25/2016	6/17/2016	---
Monongahela Power Co. – Fort Martin	54-061-00001	3/31/2016	4/11/2016	4/29/2016	6/27/2016
Appalachian Power Co. – Mountaineer	54-053-00009	6/10/2016	6/10/2016	6/17/2016	---
Dominion Resources, Inc. – Mount Storm	54-023-00003	1/28/2016	4/11/2016	4/29/2016	5/9/2016
Chemours	54-107-00001	3/31/2016	4/11/2016	4/29/2016	6/15/2016

Table 3: DRR Source to accept Federally Enforceable Limit for SO₂ less than 2,000 tpy

Facility Name	Facility ID	Permit Number	Application Received
American Bituminous – Grant Town	54-049-00026	R14-0005F	5/17/2016

The enclosed compact disc contains:

- An air quality modeling protocol for each applicable source that will be characterized through air quality modeling.
- A permit application for each applicable source that will accept a federally enforceable permit limiting SO₂ emission to less than 2,000 tpy.
- Documentation of permanent shutdowns for sources that have shutdown.

If you have any questions regarding this submittal or require additional information, please contact me at (304) 926-0462 or Laura Crowder, Assistant Director of Planning at (304) 926-0499 extension 1247.

Sincerely,

William F. Durham
 Director

WFD/lmc
 Enclosure

cc: Nikos Singelis, Acting Air Division Director, EPA Region 3 (3AP00)
 Laura M. Crowder, Assistant Director of Planning, WVDEP