

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
South Central Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Dominion
5000 Dominion Boulevard, Glen Allen, Virginia
Permit No. SCRO30861

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Dominion has applied for a renewal to the Title V renewal Operating Permit for its Mecklenburg facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: 12/27/06

Air Permit Manager: _____ Date: 12/27/06

Regional Director: _____ Date: 12/27/06

FACILITY INFORMATION

Permittee

Dominion
5000 Dominion Boulevard
Glen Allen, VA 23060

Facility

Virginia Electric & Power Co. – Mecklenburg Power Station
204 Co-Gen Drive
Clarksville, VA 23060
County-Plant Identification Number: 51-117-00051

SOURCE DESCRIPTION

NAICS Code - 221112 Dominion-Mecklenburg Power Station (Mecklenburg) manufactures electricity for sale. The power station operates two, 834.5 MM Btu/hr pulverized coal fired boilers with associated coal, limestone, lime, ash, and fuel storage handling systems. Mecklenburg is a major source of PM10, SO₂, NO_x, CO, and HCl emissions. The facility became subject to the federal NO_x Budget Trading Program on May 31, 2004. Mecklenburg is located in an attainment area for all pollutants, and is a PSD major source for SO₂, NO_x, and CO.

COMPLIANCE STATUS

Mecklenburg is inspected every other year. The last inspection was conducted on August 4, 2006 and the facility was not found to be in violation of any state or federal applicable requirements during that time.

CHANGES TO THE TITLE V PERMIT

The following changes are made to the Title V permit since its amendment dated April 30, 2004,

- Change the permittee name and address (Section I)
- Update individuals listed as the responsible official and contact person (Section I)
- The annual coal consumption was deleted in Condition V.A.2 since this recordkeeping requirement was previously listed in Condition III.F.1.
- Conditions V.C.1 and V.C.1.b of the renewed Title V were revised to identify alternate locations for visible emission observations since emission points C2, C5, C6a and C6b are located inside the building. As an alternate, the building vents from the Coal Crusher, Coal Bunker Room, and Boiler/Turbine are listed as alternate locations for emission points C2, C5, C6a and C6b, respectively.

- The recordkeeping requirement for lime throughput in Condition VI.D.1 was deleted from the renewed Title V permit. No underlying applicable requirement exists for this condition.
- Update to general conditions to reflect current boilerplate language (Section XII)
- Inclusion of Title IV Acid Rain citations and attached permit (Section XIII)
- Inclusion of CAM plan for primary boilers (Attachment A)

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility are listed in the following tables:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
U-1	1/2/A	Foster-Wheeler coal/distillate oil fired dry bottom boiler, 1991	834.5MMBtu/hr (@ 114% of max. continuous rating)	ABB Flakt Model # HP-266-15 fabric filter, 10 zone, 3.4:1 air/cloth ratio, 213078 acfm,1991	U1FF	PM/PM10	March 24, 2003
				ABB Flakt Project #718, 63.1 gal/min of lime/ash slurry, 92% efficiency flue gas desulfur., 1991	U1FGD	SO ₂ , H ₂ SO ₄ , fluoride	
				Foster Wheeler, low NO _x and advance over-fire air burner, design emission rating of 0.33 lb/10 ⁶ Btu, 1991	U1 LNBOF A	NO _x	
U-2	1/2/A	Foster-Wheeler coal/distillate oil fired dry bottom boiler, 1991	834.5MMBtu/hr (@ 114% of max. continuous rating)	ABB Flakt Model # HP-266-15 fabric filter, 10 zone, 3.4:1 air/cloth ratio, 213078 acfm,1991	U2FF	PM/PM10	March 24, 2003
				ABB Flakt Project #718, 63.1 gal/min of lime/ash slurry, 92% efficiency flue gas desulfur., 1991	U2FGD	SO ₂ , H ₂ SO ₄ , fluoride	
				Foster Wheeler, low NO _x and advance over-fire air burner, design emission rating of 0.33 lb/10 ⁶ Btu, 1991	U2 LNBOF A	NO _x	
A	1/2/A	Zurn Industries distillate oil-fired auxiliary boiler, 1991	94.86 x 10 ⁶ Btu/hr (heat input)	none	none	none	March 24, 2003

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Coal Handling and Storage							
C-1	fugitive	Active / inactive coal storage piles	active-23,000 tons; inactive-55,000 tons	Wet suppression	none	PM,PM10	March 24, 2003
C-2	C2BH	Pennsylvania Crusher, coal crusher (1991)	450 ton/hr	DCE Model #DLMV30/15F6 fabric filter, 1991	C2BH	PM,PM10	March 24, 2003
C-3	fugitive	Detroit Stoker railcar unloading building, (1991)	450 ton/hr	Wet suppression	none	PM,PM10	March 24, 2003
C-4	fugitive	Detroit Stoker belt conveyors railcar unloading to crusher and crusher to coal stockpile (1991)	450 ton/hr	Wet suppression	none	PM,PM10	March 24, 2003
C-5	fugitive	Detroit Stoker belt conveyors coal stockpile to coal bunker (1991)	2 @250 ton/hr	Wet suppression	none	PM,PM10	March 24, 2003
C-6a	C6BH	6 – Detroit Stoker coal bunkers, (1991)	235 ton/hr	6-DCE Model #DLMV9/15F1 fabric filters (1991)	C6BH	PM,PM10	March 24, 2003
C-6b	fugitive	6 – Williams Crusher coal pulverizers	16 ton/hr, each	Enclosure	none	PM,PM10	March 24, 2003

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Lime Handling System							
LS-1	LS-1	Chemco lime storage silo (1991)	178-ton	DCE Model #DLMV9/15K3 fabric filter (1994)	LS1BH	PM, PM10	March 24, 2003
LS-2	LS-2	Chemco lime storage silo (1991)	178-ton	DCE Model #DLMV9/15K3 fabric filter (1994)	LS2BH	PM, PM10	March 24, 2003
Ash Handling System							
A-1	A-1	Detroit Stoker boiler ash silo, (1991)	1,000-ton	Beckert & Hiester Model 1-160-16-845-2G fabric filter, (1991)	A1BH	PM, PM10	March 24, 2003
A-6a	A-6a	Detroit Stoker recycle ash silo (1991)	49-ton	Flex Clean Model #58-BVBS-16 fabric filter bin vent (1991)	A6aBH	PM, PM10	March 24, 2003
A-7a	fugitive	Detroit Stoker ash truck loading (1991)	120 ton/hr	Wet suppression and/or total enclosure w/ closed loop air system	none	PM, PM10	March 24, 2003
A-8	fugitive	Ash Tech bottom ash conveying, storage, and truck loading (1991)	20 ton/hr	Wet suppression and/or total enclosure w/ closed loop air system	none	PM, PM10	March 24, 2003
Distillate Oil Storage Tank							
FOST	Fugitive	Unknown (1991)	90,000-gal	none	none	VOC	March 24, 2003

EMISSIONS INVENTORY

The 2005 emissions are detailed below.

Criteria Pollutant Emission (ton/yr)						
Emission Unit	VOC	CO	SO₂	PM/PM10	NO_x	Pb
U-1	5.95	49.99	356.80	49.65/14.99	700.50	0.04
U-2	5.54	46.45	299.70	46.20/12.75	673.50	0.01
A	0.00	0.00	0.00	0.00/0.00	0.00	0.00
Total	11.49	96.44	656.50	95.85/27.74	1,374.00	0.05

Hazardous Air Pollutant Emission	
Pollutant	Emissions (ton/yr)
Hydrochloric acid	18.98
Hydrofluoric acid	2.29
Total	21.27

EMISSION UNIT APPLICABLE REQUIREMENTS

The following limitations derived from the PSD permit issued on March 24, 2003 have been retained in the renewal Article 3 (Title V) permit:

I. Fuel Burning Equipment

A. Foster Wheeler Boilers (Ref. U1 & U2)

Limitations

Conditions III.A.1, III.A.2, and III.B. 1-10 and 13 are the state Standards and Conditions for Granting Permits requirement per Specific Conditions 4, 6, 7, 16-18, 20, 24, 25, 27, 28 and 35 of the PSD NSR Permit issued March 24, 2003.

Condition III.B.11 is the operation and maintenance training requirements in accordance with 9 VAC 5-80-110.

Condition III.B.12 incorporates the requirements of 40 CFR 60 Subpart Da and Subpart A by reference.

Testing

Conditions III.C.1 and 2 are the performance testing requirements.

Monitoring

Conditions III.D.1, 2 and 3 are the continuous monitoring requirements from Specific Condition 29 of the PSD NSR permit issued March 24, 2003.

Condition III.D.4 is the stack gas flowmeter requirement for compliance with the short-term NAAQS for SO₂ from Specific Condition 32 of the PSD NSR permit issued March 24, 2003.

Condition III.D.5 is the continuous monitoring QA requirements from Specific Condition 33 of the PSD NSR permit issued March 24, 2003.

Condition III.D.6 is the continuous monitoring requirement for the fabric filters from Specific Condition 4 of the PSD NSR permit issued March 24, 2003.

Condition III.D.7, is the compliance assurance monitoring (CAM) data submittal requirement in accordance with 40 CFR 64.4 (c).

Reporting

Conditions III.E.1 and 2 are the reporting requirements from Specific Condition 31 of the PSD NSR permit issued March 24, 2003.

Condition III.E.3 is the CAM reporting requirement according to 40 CFR 64.4 and 64.9.

Recordkeeping

Conditions III.F.1-10 are the recordkeeping requirements according to General Permit Condition 6 of the PSD NSR permit issued March 24, 2003.

Condition III.F.11 is the CAM recordkeeping requirements according to 40 CFR 64.9.

B. Zurn Industries Boiler (Ref. A)

Limitations

Conditions IV.A.1, IV.A.2, and IV.B. 1-5 are the state Standards and Conditions for Granting Permits requirement per Specific Conditions 8, 19, 20, and 26 -28 of the PSD

NSR Permit issued March 24, 2003.

Condition IV.B.6 incorporates the requirements of 40 CFR 60 Subpart Dc by reference.

Testing

Conditions IV.C.1-3 are performance testing requirements in accordance with 9 VAC 5-80-110E.

Monitoring

Conditions IV.D.1 and 2 are periodic monitoring requirements in accordance with 9 VAC 5-80-110E.

Reporting

Conditions IV.E.1 and 2 are the reporting requirements from in accordance with 9 VAC 5-80-110 and 9 VAC 5-50-410.

Recordkeeping

Conditions IV.F.1- 8 are the recordkeeping requirements according to General Permit Condition 6 of the PSD NSR permit issued March 24, 2003.

II. Coal Handling System (Ref. C1-C6)

Limitations

Conditions V.A.1-6 are the state Standards and Conditions for Granting Permits requirement per Specific Conditions 5, 9, 11,12, 14, and 21 of the PSD NSR Permit issued March 24, 2003.

Condition V.A.7 is the fugitive emission standard according to 40 CFR 60.252 (c).

Condition V.A.8 incorporates the requirements of NSPS Subpart Y by reference.

Monitoring

Condition V.B.1 is the monitoring device requirement for measuring differential pressure across the fabric filter.

Condition V.B.2 is the wet suppression spray system's operating requirements.

Periodic Monitoring

Conditions V.C.1, 2 are the periodic monitoring requirement for visible emissions including maintaining a record of weekly observations.

Recordkeeping

Conditions V.D.1, 2 are the recordkeeping requirements according to General Permit Condition 6 of the PSD NSR permit issued March 24, 2003.

III. Lime Handling System (Ref. LS1, LS2)

Limitations

Conditions VI.A.1-3 are the state Standards and Conditions for Granting Permits requirement per Specific Conditions 5, 10 and 21 of the PSD NSR Permit issued March 24, 2003.

Condition VI.A.4 is the fugitive emission standard according to 9 VAC 5-80-110.

Monitoring

Condition VI.B.1 is the monitoring device requirement for measuring differential pressure across the fabric filter.

Condition VI.B.2 is the state Standards and Conditions for Granting Permits requirement per Specific Condition 10 of the PSD NSR Permit issued March 24, 2003.

Periodic Monitoring

Conditions V.C.1, 2 are the periodic monitoring requirement for visible emissions including maintaining a record of weekly observations.

Recordkeeping

Conditions V.D.1, 2 are the recordkeeping requirements according to General Permit Condition 6 of the PSD NSR permit issued March 24, 2003.

IV. Ash Handling System (Ref. A1-A8)

Limitations

Conditions VII.A.1-3 are the state Standards and Conditions for Granting Permits requirement per Specific Conditions 5, 13 and 21 of the PSD NSR Permit issued March 24, 2003.

Condition VII.A.4 is the fugitive emission standard according to 9 VAC 5-80-110.

Monitoring

Condition VII.B. is the monitoring device requirement for measuring differential pressure across the fabric filter.

Periodic Monitoring

Conditions VII.C.1, 2 are the periodic monitoring requirement for visible emissions and recording of weekly observations.

Recordkeeping

Condition VII.D contains the recordkeeping requirements from 9 VAC 5-80-110.

V. Distillate Fuel Oil Storage Tank (Ref. FOST)

Recordkeeping

Condition VIII contains the recordkeeping requirements per NSPS Subpart Kb.

VI. Facility Wide Conditions

Limitations

Conditions IX.A.1-7 are the state “Standards and Conditions for Granting Permits” requirement per Specific Conditions 2, 15, 30 and 35, and General Permit Conditions 4, 6 and 7 of the PSD NSR Permit issued March 24, 2003.

VII. Acid Rain Permit Requirements

Section XIII includes the reference to the Title IV (Phase II Acid Rain) permit allowance requirements. The acid rain permit expires December 31, 2009.

VIII. NOx Budget Trading Permit Requirements

Section XIII contains NOx Budget emission limitations per 9 VAC 5-140-40. The facility’s NOx Budget trading permit became effective May 31, 2004.

IX. Compliance Assurance Monitoring (CAM) Assessment

According to 40 CFR 64, compliance assurance monitoring (CAM) applies to pollutant-specific emissions unit (PSEU) at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

- (1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt;
- (2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- (3) The unit has potential pre-control device emissions (i.e., potential to emit”) of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Mecklenburg Power Station employs the following emission units with control technology: primary boilers (Ref. U1, U2), auxiliary boiler (Ref. A), coal storage silos (for Ref. C1-C6), lime storage silo (for Ref. LS1, LS2), ash and flue gas desulfurization product storage silo (for Ref. A1-A8), and recycle silos. The fuel oil storage tank (Ref. FOST) has no controls.

In order to meet the definition of PSEU, each unit must satisfy all three criteria as outlined above. A review of the definition find the coal storage silo (Ref. C1-C6), lime storage silo (Ref. LS1, LS2), and ash/flue gas desulfurization product storage silos do not qualify as PSEUs, since these units do not have regulated air pollutants subject to emission limitations. The auxiliary boiler (A) is eliminated since this unit does not employ a control device to achieve compliance with its emission limitations. The primary boilers (Ref. U1 & U2) meet the requirements for compliance assurance monitoring (CAM) because:

- They have emission limits for PM, PM10, sulfur dioxide (SO₂) and nitrogen oxides (NO_x);
- They use control devices such as fabric filters and lime spray dryers, to achieve compliance with the emission limitations for PM, PM10 and SO₂; and
- Their potential-to-emit for PM, PM10 and SO₂ is equal to or greater than 100% of the major amount in tons per year.

Based on the above assessment, the primary boilers are subject to CAM for PM and PM10 emission limitations only since a “low NO_x and advance over-fire air burner” is not considered a control device (per to §64.1 definition); and SO₂ emission limitations use continuous compliance determination method established by part 71 (§64.2 (b), (vi)).

A CAM plan for particulate emissions is attached to the Title V permit.

Streamlined Requirements

None

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Section B: Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-2003”.

Section F: Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Section U: Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Section Y: Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

FUTURE APPLICABLE REQUIREMENTS

There are no future applicable requirements at this time.

INAPPLICABLE REQUIREMENTS

Industrial, Commercial and Institutional Boilers and Process Heaters MACT (40 CFR Part 63 Subpart DDDDD)

The provisions in 40 CFR Part 63 Subpart DDDDD (§ 63.7491(c)) exempts electric utility steam generating units that are a fossil fuel-fired combustion of more than 25 MW serving a generator that produces electricity for sale; a fossil fuel-fired unit that cogenerates steam and electricity, and supplies more than one-third of its potential electric output capacity, and more than 25 MW electrical output to an utility power distribution system for sale. Mecklenburg Power Station’s fossil fuel-fired boilers (66MW each) are used for electric power generation and are not subject to the provisions of the industrial, commercial and institutional boilers and process heaters MACT.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. The insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation (9 VAC-)	Pollutant Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
	Turbine oil vapor extraction line vent	5-80-720B.2	VOC	---
	Turbine oil defoaming return vent	5-80-720B.2	VOC	---
	Cooling tower sodium hypochlorite tank vent	5-80-720.A.40	---	---
	Cooling tower sodium bromide tank vent	5-80-720.A.40	---	---
	Cooling tower dispersant tank vent	5-80-720.A.40	---	---
	Cooling tower phosphate/polymer tank vent	5-80-720.A.40	---	---
	Water treatment bulk sulfuric acid vent	5-80-720.B.6	H ₂ SO ₄ < 1,000 lb	---
	Water treatment bulk caustic vent	5-80-720.B.1	PM-10	
	Water treatment ferric sulfate vent	5-80-720.B.1	PM-10	
	Distillate oil tanks 300-gallon fire pump	5-80-720.B.2	VOC	

	Distillate oil tanks 280-gallon refueling	5-80-720.B.2	VOC	
	Ash vacuum blower exhaust	5-80-720.B.1	PM-10	
	Lime storage silo pressure relief valve	5-80-720.A.13	PM-10	
	Recycle ash silo pressure relief valve	5-80-720.A.13	PM-10	
	Ash storage silo pressure relief valve	5-80-720.A.13	PM-10	
	Diesel-powered emergency fire pump	5-80-720.C.4.b	---	235 hp

¹The citation criteria for insignificant activities are as follows:
 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
 9 VAC 5-80-720 B - Insignificant due to emission levels
 9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V renewal application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit is scheduled for publishing in the *News Progress* on 10/9/06. The public comment period ends 11/8/06.

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
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STATEMENT OF LEGAL AND FACTUAL BASIS

Addendum to the December 27, 2006 Statement of Legal and Factual Basis

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Engineer/Permit Contact: _____ Date: _____

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Virginia Electric & Power Co. – Mecklenburg Power Station
204 Co-Gen Drive
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County-Plant Identification Number: 51-117-00051

SOURCE DESCRIPTION

NAICS Code - 221112 Dominion-Mecklenburg Power Station (MPS) manufactures electricity for sale. The power station operates two, 834.5 MM Btu/hr pulverized coal fired boilers with associated coal, limestone, lime, ash, and fuel storage handling systems. MPS is a Title V major source of PM₁₀, SO₂, NO_x, CO, and HCl emissions. Mecklenburg County is a PSD area for all pollutants, as designated in 9 VAC 5-20-205. MPS is a PSD major source for SO₂, NO_x, and CO.

COMPLIANCE STATUS

MPS is inspected every other year. The last full compliance evaluation was completed on August 29, 2007 and the facility was not found to be in violation of any state or federal applicable requirements during that time.

MINOR PERMIT MODIFICATION INFORMATION

MPS is subject to the Clean Air Interstate Rule (CAIR) promulgated on May 12, 2005. The rule will require 28 states (Virginia included) and the District of Columbia to achieve specified emission reductions for new and existing electric generating units (EGUs). Virginia opted to meet the state's emission budget by requiring EGUs to participate in an interstate cap-and-trade system, administered by the EPA that caps emissions in two stages. Phase I emission reductions begin in the 2009 for NO_x (Annual and Ozone Season) and 2010 for SO₂ and mercury (Hg). Phase II begins in the year 2015 for NO_x and SO₂ and 2018 for Hg. MPS has requested a minor modification to their Title V permit to incorporate the requirements of the CAIR regulations.

MPS submitted a timely and complete CAIR application for NO_x Annual and Ozone Season and SO₂ requirements. An application for Hg requirements has not been received but is due no later than 18 months prior to January 1, 2010. The applications were due by July 1, 2007 (NO_x) or July 1, 2008 (SO₂) and were received on June 27, 2007.

Based on EPA guidance, Virginia has decided to implement the CAIR permit through the Title V permitting process. The regulations (9 VAC 5-80-570 B) allow trading programs to be implemented through the minor modification procedures. This requires a 45-day review period by the EPA. The CAIR requirements will go through full public notice during the renewal process¹. MPS is required to resubmit the CAIR application for renewal with the Title V renewal application. Section XV of the Title V permit pertains to CAIR. The CAIR application, containing the applicable requirements, serves as the CAIR permit and is Attachment C to the Title V permit.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility are unchanged by the minor modification.

EMISSIONS INVENTORY

The 2006 emissions update has been reviewed for accuracy.

EMISSION UNIT APPLICABLE REQUIREMENTS

Section XV – CAIR Permit Requirements

This section contains the condition regarding the effective date, the CAIR permit as Attachment C, and the expiration date of the CAIR permit. The CAIR permit contains all applicable requirements for NO_x (Annual and Ozone) and SO₂ as defined in the CAIR rule and 9 VAC 140 Parts II, III, and IV, respectively.

GENERAL CONDITIONS

There are no changes to the General Conditions resulting from this minor modification.

FUTURE APPLICABLE REQUIREMENTS

The CAIR requirements become effective on the following applicable compliance dates:

Phase I NO_x – January 1, 2009 with all requirements contained in the CAIR permit

Phase I SO₂ – January 1, 2010 with all requirements contained in the CAIR permit

Phase I Hg – January 1, 2010 with no application received

Phase II NO_x – January 1, 2015 with all requirements contained in the CAIR permit

Phase II SO₂ – January 1, 2015 with all requirements contained in the CAIR permit

Phase II Hg – January 1, 2018 with no application received

INAPPLICABLE REQUIREMENTS

¹ Note that the Title V regulations would not require incorporation of the requirements until renewal for MPS; however, the CAIR requires submittal of an application 18 months prior to the compliance date. According to the regulations and in the interest of efficiency, this action is being completed through the minor modification process. The public participation process would occur at the same time, regardless of the two possible approaches.

There is no change in the inapplicable requirements due to this minor modification.

INSIGNIFICANT EMISSION UNITS

There is no change to the insignificant units due to this minor modification.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

This minor modification is subject to a 45-day EPA review period. No other public notice is required.

In SCRO's letters dated September 5, 2007, the North Carolina Division of Air Quality and EPA Region III were notified of receipt of the permit application (minor modification application received September 4, 2007).