

Region III Plan Summary
West Virginia Portion of the Huntington-Ashland, WV-KY-OH 1997 Annual PM_{2.5}
Attainment Area

Title: Maintenance Plan for the West Virginia Portion of the Huntington-Ashland, West Virginia 1997 Annual PM_{2.5} Attainment Area

Federal Register Dates: November 15, 2012, 77 FR 68076 (Proposed Rule); December 28, 2012, 77 FR 76415 (Final Rule)

EPA Effective date: December 28, 2012

State Submittal Date: June 30, 2011

Affected Areas: Cabell and Wayne Counties and the Graham Tax District in Mason County

Key Features: 2008 attainment year; projections to 2015 and 2022

The Huntington plan shows maintenance of the 1997 annual PM_{2.5} NAAQS by demonstrating that current and future emissions of PM_{2.5}, NO_x and SO₂ remain at or below the attainment year 2008 emissions throughout Huntington through the year 2022.

Monitoring Network: West Virginia will continue to operate its current air quality monitors (located in Cabell County) in accordance with 40 CFR part 58.

Contingency Plan Triggers:

1. If PM_{2.5}, NO_x and SO₂ emissions exceed specified predetermined level.
2. In the event future violations of the standard occurs at the Cabell County monitor.

Contingency Measures:

Contingency measures for trigger 1:

WVDEP will evaluate existing control measures to ascertain if additional regulatory revisions are necessary to maintain the PM_{2.5} standard.

Contingency measures for trigger 2:

1. Diesel reduction emission strategies.
2. Alternative fuel and diesel retrofit programs for fleet vehicle operations.
3. Tighter PM_{2.5}, NO_x and SO₂ emissions offsets for new and modified major sources.
4. Concrete manufacturing – upgrade wet suppression.
5. Additional NO_x RACT statewide.
6. List of sources that could potentially be controlled: Industrial, commercial and institutional (ICI) boilers for SO₂ and NO_x controls, EGUs, process heaters, internal combustion engines, combustion turbines, other sources greater than 100 tons per year, fleet vehicles, and aggregate processing plants.

Schedule: Expeditious contingency measures can be implemented at the beginning of a calendar year through issuance of an emergency rule. The regular legislative rule process can produce enforceable contingency measures within a 12 to 18 month time frame.

Additional Provision: The State’s maintenance plan submission expressly documents that the Area’s emissions inventories will remain below the attainment year inventories through 2022. In addition, for the reasons set forth below, the State’s maintenance plan submission further demonstrates that the Area will continue to maintain the 1997 annual PM_{2.5} NAAQS at least through 2023:

- Significant emissions controls remain in place, and will continue to provide reductions that keep the Area in attainment. The Mountaineer Power Station was required by a permanent and enforceable consent decree to install SCR for NO_x in 2008 and to operate its FGD continuously for SO₂ in 2007. Philip Sporn Power Station installed SNCR to control NO_x in 2009, and must retire, retrofit, or repower Unit 5 by the end of 2013.
- West Virginia has committed to maintain all of the control measures that are relied on, and will submit any changes to EPA for approval as a SIP revision.
- Emissions inventory levels for SO₂ and NO_x in 2022 are well below the attainment year inventory levels (see Table 1), and it is highly improbable that sudden increases would occur that could exceed the attainment year inventory levels in 2023.
- The mobile source contribution has been determined to be insignificant, and is expected to remain insignificant in 2023 with fleet turnover in upcoming years that will result in cleaner vehicles and cleaner fuels.
- Air quality concentrations well below the standard, coupled with the emissions inventory projections through 2022 show that it would be very unlikely for a violation to occur in 2023. The 2009-2011 design value of 12.1 µg/m³ provides a sufficient margin in the event emissions increase, and continues the downward trend of monitored data in this Area for the last several years.

Table 1. Comparison of 2008, 2015, 2022 SO₂, NO_x, and Direct PM_{2.5} Emission Totals, in tpy for the Entire Huntington-Ashland Area WV-KY-OH

	2008	2015	2022	Decrease from 2008 to 2022
SO ₂ (tpy)	221,210	139,263	88,432	132,778
NO _x (tpy)	145,527	94,932	68,313	77,214
PM _{2.5} (tpy)	11,701	11,262	11,317	384

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