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**west virginia department of environmental protection**

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Division of Air Quality  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304  
Phone: (304) 926-0475 • Fax: (304) 926-0479

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
www.dep.wv.gov

**ENGINEERING EVALUATION / FACT SHEET**

BACKGROUND INFORMATION

Application No.: R13-2359C  
Plant ID No.: 051-00012  
Applicant: Consolidation Coal Company  
Facility Name: Shoemaker Preparation Plant  
Location: Marshall County  
SIC Code: 1221 - Bituminous Coal & Lignite - Surface  
Application Type: Modification  
Received Date: June 03, 2014  
Engineer Assigned: Thornton E. Martin Jr.  
Fee Amount: \$2,000  
Date Received: June 05, 2014  
Complete Date: July 01, 2014  
Newspaper: *Moundsville Daily Echo*  
UTM's: Easting: 522.8 km      Northing: 4,430.2 km      Zone: 17  
Description: Applicant is proposing to enhance their coal storage capabilities to include new equipment to facilitate transfer between the new piles and the mines preparation plant.

BACKGROUND

On December 5, 2013, Ohio Valley Resources, Inc. (OVRI) acquired a bituminous coal mine and preparation plant located in Marshall County near Benwood, West Virginia, from CONSOL Energy. The mine is operated by Consolidation Coal Company (CCC) and is referred to as the Shoemaker Facility.

Upon acquiring the Shoemaker Facility, OVRI performed a comprehensive review of the existing operations at the mine to ensure consistency with the existing permit (R13-2359B). OVRI's review resulted in several updates made by CCC to ensure the accuracy of the equipment inventory and existing potential emissions calculations for the facility. Through these efforts OVRI has identified several pieces of equipment that have been removed or re-purposed and updated the emission calculation methodology for several sources at the mine to reflect latest guidance and emission factors from U.S. EPA as well approved methodologies employed by OVRI at its' mines across the country.

## PROJECT OVERVIEW

The proposed coal storage enhancement will be accomplished via the installation of a new clean coal storage pile and new raw coal storage pile. The new raw coal storage pile is intended to provide CCC with the capability of storing additional raw coal and balance inefficiencies between the mine and preparation plant operations.

With this project, CCC is proposing to install the following equipment:

- Raw coal storage pile (OS-A) with 300,000 ton capacity;
- Raw coal belt conveyor (BC-A) feeding the new raw coal storage pile;
- Vibratory feeders and reclaim conveyor (BC-B) under the new raw coal storage pile;
- Scalping screen (SC-A);
- Clean coal storage pile (OS-B) with 30,000 ton capacity;
- Chain feeder (CF-A) loading out the new clean coal storage pile;
- Reclaim conveyor (BC-D) receiving clean coal from the new chain feeder;
- Refuse storage pile (OS-D) with 3,000 ton capacity;
- Two (2) refuse belt conveyors (BC-E and BC-F) feeding the new refuse storage pile;
- Chain feeder (CF-B) loading out the new refuse storage pile;
- Refuse belt conveyor (BC-G) receiving refuse from the new chain feeder;

Additionally, facility haul roads (VT) will be modified as part of the proposed project.

## DESCRIPTION OF PROCESS

Operations at the Shoemaker Facility consist of procuring raw coal from an existing mine portal and conveying the raw coal to a raw coal storage pile. Raw coal is transferred from underground to the existing raw coal stockpile (OS-1, maximum storage of 350,000 tons) via the S6 slope conveyor (BC-1) and the S5 stacker feed conveyor (BC-2) at a maximum throughput of 5,000 tons per hour (tph) and 15,000,000 tons per year (tpy). The transfer points from BC-1 to BC-2 (OVTP-1) and from BC-2 to OS-1 (OVTP-2) are fully enclosed. Raw coal is fed from OS-1 to the S4 stockpile reclaim conveyor (BC-3) via a fully enclosed transfer point (OVTP-3) at a maximum throughput of 2,500 tph and 15,000,000 tpy. Additionally, CCC has the option to load out from OS-1 via trucks at a maximum rate of 400 tph and 2,764,800 tpy; the transfer of raw coal from OS-1 to truck (TTP-1) is controlled by minimizing the drop height of the material. BC-3 then feeds the S3 overland conveyor (BC-4) via a fully enclosed transfer point (OVTP-4) at a maximum rate of 2,500 tph and 15,000,000 tpy. BC-4 feeds raw coal to the S2 overland conveyor (BC-5) via a fully enclosed transfer point (OVTP-5) which in turn feeds the S1 overland conveyor (BC-6) via fully enclosed OVTP-6. The maximum throughput for both OVTP-5 and OVTP-6 is 2,500 tph and 15,000,000 tpy. BC-6 feeds raw coal to Screener #1 (SC-1, fully enclosed) via a fully enclosed transfer point (OVTP-7) at a maximum rate of 2,500 tph and 15,000,000 tpy.

As part of the proposed project, Murray will gain the capability to direct a maximum of 2,500 tph and 5,000,000 tpy of raw coal from BC-6 to a new run of mine (ROM) storage conveyor (BC-A) via a fully enclosed transfer point (OVTP-A). BC-A will feed a new ROM storage pile (OS-A, maximum storage of 300,000 tons) via a fully enclosed transfer point (OVTP-B) at a maximum rate of 2,500 tph and 5,000,000 tpy. Additionally, CCC will have the capability to load raw coal to OS-A via trucks from OS-1 at a maximum rate of 700 tph and 3,000,000 tpy via a transfer point (TTP-B)

that is controlled by minimizing the drop height of the material. Raw coal will be loaded out of OS-A via a new ROM reclaim conveyor (BC-B) at a maximum rate of 2,500 tph and 5,000,000 tpy; this transfer point (RCTP-A) will be fully enclosed. Additionally, CCC will have the option to load trucks from OS-A at a maximum rate of 300 tph and 2,000,000 tpy via a transfer point (TTP-A) that is controlled by minimizing the drop height of the material. BC-B will transfer raw coal to a new screener (SC-A, partially enclosed) via a fully enclosed transfer point (RCTP-B) at a maximum rate of 2,500 tph and 5,000,000 tpy. The oversized material from the screener will go to the refurbished crusher (CR-1, fully enclosed) via a partially enclosed transfer point (RCTP-C) which will in turn feed the #10 raw coal conveyor (BC-8) via a fully enclosed transfer point (RCTP-D); the maximum throughput for both RCTP-C and RCTP-D will be 100 tph and 200,000 tpy. The screened material from SC-A will feed directly onto BC-8 via a fully enclosed transfer point (RCTP-3) at a maximum rate of 2,400 tph 4,800,000 tpy. BC-8 will in turn feed back onto the #13 silo feed belt (BC-9) via a fully enclosed transfer point (RCTP-4) at a maximum rate of 2,500 tph and 5,000,000 tpy.

The oversized material from SC-1 will feed the #2 crusher (CR-2, fully enclosed) via fully enclosed transfer point (PRTP-1A). CR-2 will feed the 100 ton rock bin (BS-2) via fully enclosed PRTP-2A, which will in turn feed the #34 plant refuse conveyor (BC-10) via fully enclosed PRTP-6. The maximum throughput for PRTP-1A and PRTP-2A is 100 tph and 876,000 tpy. The maximum throughput for PRTP-6 is 600 tph and 876,000 tpy.

The screened material from SC-1 will drop onto BC-9 via fully enclosed RCTP-5 which will in turn feed the raw coal silo (BS-3) via fully enclosed RCTP-6. Both RCTP-5 and RCTP-6 will have a maximum throughput of 2,500 tph and 15,000,000 tpy. BS-3 will load to the #16 plant feed conveyor (BC-11) via fully enclosed RCTP-7, which will in turn feed the preparation plant via fully enclosed RCTP-8; the maximum throughput for these transfer points will be 2,200 tph and 15,000,000 tpy.

Refuse from the preparation plant will be loaded to BC-10 via a fully enclosed transfer point (PRTP-7) at a maximum rate of 600 tph and 3,000,000 tpy. BC-10 will in turn feed the underground refuse conveyor (BC-14) via the partially enclosed transfer point PRTP-6A (also at a maximum rate of 600 tph and 3,000,000 tpy). As part of the proposed project, CCC will have the option to re direct a maximum of 550 tph and 50,000 tpy of refuse from BC-10 to a new refuse conveyor (BC-E) via a fully enclosed transfer point (PRTP-A); this bypass will be utilized only when BC-14 is not operational. BC-E will feed a second new refuse conveyor (BC-F) via fully enclosed PRTP-B. BC-F will then drop to a new refuse storage pile (OS-D, maximum storage of 3,000 tons) via transfer point PRTP-C (which will be controlled by minimizing drop height of the material). Front end loaders will transfer coal from OS-D to a new refuse feeder (CF-B) via a transfer point (PTRP-D) that will be controlled by minimizing the drop height of the material. CF-B will feed a third new refuse conveyor (BC-G) via fully enclosed PRTP-E which will in turn feed back onto BC-10 via fully enclosed PRTP-F. The maximum throughput for PRTP-A, PRTP-B, and PRTP-C will be 550 tph and 50,000 tpy. The maximum throughput for PRTP-D, PRTP-E, and PRTP-F will be 200 tph and 50,000 tpy.

BC-14 will feed refuse to the refuse slope conveyor (BC-15) via fully enclosed PRTP-8. BC-15 can either load to refuse bin #1 (BS-5) via fully enclosed PRTP-9A, or drop to refuse conveyor #2 (BC-16) via fully enclosed PRTP-9. BC-16 feeds refuse bin #2 (BS-6) via partially enclosed PRTP-

11. Refuse is loaded out from BS-5 and BS-6 to trucks via PRTP-10 (controlled by minimizing the drop height of the material) and PRTP-12 (partially enclosed), respectively. Refuse trucks dump to either Brown' Run (RSP-1, maximum size of 27 acres) or Cunningham Hollow (RSP-2, maximum size of 50 acres) via PRTP-13, which is controlled by minimizing the drop height of the material. The maximum throughput for the refuse load out operations is 600 tph and 3,000,000 tpy.

Clean coal from the preparation plant is loaded to the #30 clean coal conveyor (BC-12) via a fully enclosed transfer point (CCTP-1) at a maximum rate of 2,200 tph and 15,000,000 tpy. BC-12 also receives coal from an existing belt conveyor (BC-18) via partially enclosed CCTP-7. BC-18 conveys low sulfur coal that is stored in OS-4 (maximum storage of 2,000 tons). Low sulfur coal is loaded from OS-4 to an existing hopper (CCF) via CCTP-5, which is controlled by minimizing the drop height of the material. The hopper in turn feeds BC-18 via partially enclosed CCTP-6. The addition of low sulfur coal from OS-4 will be done on an as needed basis to meet customer specifications. The low sulfur coal in OS-4 will be received via trucks at a maximum rate of 200 tph and 500,000 tpy. The dumping of low sulfur coal from truck to OS-4 is done via transfer point TTP-C, which is controlled by minimizing the drop height of the material. Finally, the maximum throughput for the addition of low sulfur coal from OS-4 (via CCTP-5 and CCTP-6) will be 300 tph and 2,000,000 tpy.

BC-12 loads clean coal to the existing clean coal storage bin (BS-4) via a fully enclosed transfer point (CCTP-2) at a maximum rate of 2,200 tph and 15,000,000 tpy. As part of the proposed project, CCC will gain the capability of re directing up to 1,500 tph and 2,000,000 tpy of clean coal to a new clean coal storage pile (OS-B; maximum storage of 30,000 tons). This will be accomplished via a new clean coal conveyor (BC-C) and two fully enclosed transfer points (CCTP-A, CCTP-B). Clean coal will be loaded from OS-B to a new clean coal feeder (CF-A) via front end loader. The transfer from front end loader to CF-A (CCTP-C) will be controlled by minimizing the drop height of the material. CF-A will feed a new clean coal reclaim conveyor (BC-D) via fully enclosed CCTP-D which will in turn feed back onto BC-12 via fully enclosed CCTP-E. The maximum throughputs for CCTP-C, CCTP-D, and CCTP-E will be 500 tph and 250,000 tpy.

When not re-directing to BC-C, BS-4 loads clean coal to the #32 clean coal boom conveyor (BC-13) via fully enclosed CCTP-3. Finally, BC-13 loads clean coal to barge via fully enclosed CCTP-4. The maximum throughput for CCTP-3 and CCTP-4 will be 2,400 tph and 13,000,000 tpy.

There are no VOC's or HAP's associated with the Shoemaker Preparation Plant.

The facility shall be modified and operated in accordance with the following equipment and control device information:

Equip-ment ID No.	Year Installed /Modified	Description	Maximum Capacity		Control Equip-ment <sup>1</sup>
			TPH	TPY	
<b>Raw Coal Circuit - Shoemaker Mine Portal</b>					
BC-1	2009 <sup>3</sup>	Slope Conveyor S6 – transfers raw coal from Shoemaker Mine Portal to BC-2	5,000	15,000,000	PE

Equipment ID No.	Year Installed /Modified	Description	Maximum Capacity		Control Equipment <sup>1</sup>
			TPH	TPY	
BC-2	2009 <sup>3</sup>	Stacker Feed Conveyor S5 – transfers raw coal from BC 1 to raw coal stockpile OS-1 w/stacking tube	5,000	15,000,000	PE
OS-1	2009 <sup>3</sup>	350,000 ton Raw Coal Open Stockpile with stacking tube – receives raw coal from BC-2 and truck, stores it and drops to underground reclaim conveyor BC-3	----	15,000,000	MC
BC-3	2008 <sup>2</sup>	Stockpile Reclaim Conveyor S4 – receives raw coal from OS-1 and transfers to BC-4	2,500	15,000,000	PE
BC-4	2008 <sup>2</sup>	S3 Overland Conveyor #1 – receives raw coal from BC-3 and transfers to BC-5	2,500	15,000,000	PE
BC-5	2009 <sup>3</sup>	S2 Overland Conveyor #2 – receives raw coal from BC-4 and transfers to BC-6	2,500	15,000,000	PE
BC-6	2008 <sup>2</sup>	S1 Overland Conveyor #3 – receives raw coal from BC-5 and transfers to SC-1	2,500	15,000,000	PE
OS-4	2009 <sup>3</sup>	2,000 ton low sulfur coal open stockpile – low sulfur coal trucked in and added to clean coal loadout as needed	----	500,000	MC
<b>Screen Tower Circuit</b>					
SC-1	2008 <sup>2</sup>	Single Deck Screen – receives raw coal from BC-6 and drops raw coal to BC-9 and rock to CR-2	2,500	15,000,000	FE
BC-A	2014	ROM Storage Conveyor - transfers raw coal from BC-6 to OS-A	2,500	5,000,000	PE
CR-2	2008 <sup>2</sup>	Crusher – receives rock from SC-1, crushes it and drops to BS-2	100	876,000	FE
BC-9	2006	#13 Silo Feed Belt – transfers raw coal from BC-8 and SC-1 to BS-3	2,500	15,000,000	PE
<b>Refurbished Crusher Building</b>					
OS-A	2006	300,000 ton Run of Mine Coal Storage Pile –receives run of mine coal from BC-6, stores it and drops to BC-B	----	5,000,000	MC
BC-B	2014	ROM Reclaim Conveyor transfers raw coal from OS-A to SC-A	2,500	5,000,000	PE
SC-A	2014	ROM Scalping Screen – receives raw coal from OS-A and drops to CR-1 and BC-8	2,500	5,000,000	PE
CR-1	2006	Crusher – receives raw coal from SC-A, crushes it and drops to BC-8	100	200,000	FE
BC-8	2006	#10 Raw Coal Conveyor (Rock Coal Batch Operation) – transfers raw coal from SC-A and CR-1 to BC-9	2,500	5,000,000	PE
<b>Clean Coal Circuit</b>					
BS-3	2006	8,000 ton Raw Coal Silo – receives raw coal from BC-9 and drops to BC-11	----	15,000,000	FE
BC-11	2006	#16 Plant Feed Conveyor – transfers raw coal from BS-3 to Preparation Plant	2,200	15,000,000	PE
BC-12	2009 <sup>3</sup>	#30 Clean Coal Conveyor – transfers clean coal from the Preparation Plant, BC-D, or BC-18 to BS-4	2,200	15,000,000	PE
BS-4	2009 <sup>3</sup>	400 ton Sample Building Bin – receives clean coal from BC-12 and drops to BC-13	----	13,000,000	FE

Equipment ID No.	Year Installed / Modified	Description	Maximum Capacity		Control Equipment <sup>1</sup>
			TPH	TPY	
BC-13	2008 <sup>2</sup>	#32 Clean Coal Boom Conveyor – receives clean coal from Sample Building Bin and drops to barge	2,400	12,000,000	PE
BC-C	2014	Clean Coal Storage Conveyor - Transfers clean coal from BS-4 to OS-B	1,500	2,000,000	PE
OS-B	2014	30,000 ton Clean Coal Storage Pile – receives clean coal from BS-4, stores it and drops to CF-A	----	2,000,000	MC
CF-A	2014	Clean Coal Reclaim Conveyor Feeder - Transfers clean coal from OS-B to BC-D	500	250,000	FE
BC-D	2014	Clean Coal Reclaim Conveyor - Transfers clean coal from CF-A to BC-12	500	250,000	PE
CCF	2009 <sup>3</sup>	Stamler Clean Coal Feeder – receives low sulfur coal from OS-4 via frontend loader and drops onto BC-18	300	2,000,000	PE
BC-18	2009 <sup>3</sup>	Belt Conveyor – receives clean coal from the Stamler Clean Coal Feeder (CCF) and transfers to BC-12	300	2,000,000	N
<b>Refuse Circuit</b>					
BS-2	2006	100 ton Rock Bin – receives rock from CR-2 and drops to BC-10	----	876,000	FE
BC-10	2006	#34 Plant Refuse Conveyor – transfers refuse from the preparation plant and BS-2 to BC-14	600	3,000,000	PE
BC-E	2014	Refuse Bypass Conveyor #1 - Transfers refuse from BC-10 to BC-F	550	50,000	PE
BC-F	2014	Refuse Bypass Conveyor #2 - Transfers refuse from BC-E to Refuse Storage Pile (OS-D)	550	50,000	PE
OS-D	2014	3,000 ton Refuse Storage Pile – receives refuse from BC-F, stores it and drops to CF-B	----	50,000,000	MC
CF-B	2014	Refuse Bypass Conveyor #3 Feeder - Transfers refuse from Refuse Storage Pile (OS-D) to BC-G	200	50,000	FE
BC-G	2014	Refuse Bypass Conveyor #3 - Transfers refuse from CF-B to BC-10	200	50,000	PE
BC-14	2006	Underground Refuse Conveyor – transfers refuse from BC-10 or BC-G to BC-15	600	3,000,000	FE
BC-15	2006	Refuse Slope Conveyor – transfers refuse from BC-14 to BS-5 or BC-16	600	3,000,000	PE
BC-16	2006	Refuse Conveyor #2 – receives refuse from BC-15 and drops to BS-6	600	3,000,000	PE
BS-5	2006	300 ton Refuse Bin #1 – receives refuse from BC-15 for loadout to truck truck	----	3,000,000	FE
BS-6	2006	300 ton Refuse Bin #2 – receives refuse from BC-16 for loadout to truck	----	3,000,000	FE
RSP-1	2008 <sup>2</sup>	Refuse Area #1 (Brown's Run) – receives refuse from truck and stores it	----	3,000,000	WT
RSP-2	2008 <sup>2</sup>	Refuse Area #2 (Cunningham Hollow) – receives refuse from truck and stores it	----	3,000,000	WT

<sup>1</sup> FE - Full Enclosure; PE - Partial Enclosure; WT - Water Truck; MC - Moisture Content; N - None

## INSTALLATION AND STARTUP SCHEDULE

CCC is submitting this application concurrently with an application to commence construction in advance of permit issuance in accordance with 45CSR13-16.

## DESCRIPTION OF FUGITIVE EMISSIONS

Potential sources of fugitive particulate emissions for this facility include emissions, which are not captured by pollution control equipment, emissions from open stockpiles and vehicular traffic on existing unpaved haulroads.

The main truck routes at the facility consist of:

- Raw coal trucking from OS-1:
  - o 0.40 miles per trip (roundtrip)
  - o Maximum of 30,417 trips per year
- Trucking of low sulfur coal to OS-4:
  - o 0.40 miles per trip (round trip)
  - o Maximum of 53,229 trips per year
- Trucking of raw coal to/from OS-A:
  - o 0.50 miles per trip (roundtrip)
  - o Maximum of 83,333 trips per year; and
- Trucking of refuse to RSP-1 or RSP-2:
  - o 1.0 miles per trip (roundtrip)
  - o Maximum of 100,000 trips per year.

The maximum speed of all trucks on these routes is 15 miles per hour (mph). Additionally, fugitive dust will be controlled on all roadways using a water truck. Fugitive dust from the refuse storage areas will be controlled using water sprays. Fugitive dust from the raw and clean coal storage areas will be limited by the inherent moisture content of the material being stored. An additive to prevent freezing will be utilized in the winter months when freezing conditions are present.

## SITE INSPECTION

A site inspection was conducted by Al Carducci of the Northern Panhandle Regional Office on September 19, 2013. The facility was given a Status Code 30 - Facility In Compliance.

The Shoemaker Coal Preparation Plant is located adjacent to State Route 2 in Benwood, West Virginia approximately 0.5 mile north of the toll bridge. Take 4th Street Exit from WV Rte. 2 South. Turn right off ramp and then next right into plant.

## ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Fugitive emission calculations for continuous and batch drop operations, transfer points, storage piles and unpaved haulroads are based on AP-42 “Compilation of Air Pollution Emission Factors.” Control efficiencies were applied based on “Calculation of Particulate Matter Emission - Coal Preparation Plants and Material Handling Operations.” The estimated emission calculations were performed by the applicant’s consultant and were checked for accuracy and completeness by the writer.

Upon acquiring the Shoemaker Facility, OVRI performed a comprehensive review of the existing operations at the mine to ensure the accuracy of the equipment inventory and existing potential emissions calculations for the facility. The following tables outline emissions for facility as currently operating, emissions increase from proposed modification and final proposed emissions estimate for the facility.

**Table 1a: Estimated Facility Emissions as Received by OVRI**

Emissions Summary - <i>Shoemaker Facility</i> <i>(Prior to Modifications)</i>	Controlled PM Emissions		Controlled PM <sub>10</sub> Emissions		Controlled PM <sub>2.5</sub> Emissions	
	lb/hour	TPY	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>						
Stockpile Emissions	1.84	8.08	0.92	4.04	0.92	4.04
Unpaved Haulroad Emissions	40.69	178.22	11.60	50.80	1.16	5.08
Paved Haulroad Emissions	0.00	0.00	0.00	0.00	0.00	0.00
<b>Fugitive Emissions Total</b>	<i>42.53</i>	<i>186.30</i>	<i>12.52</i>	<i>54.84</i>	<i>2.08</i>	<i>9.12</i>
<b>Point Source Emissions</b>						
Equipment Emissions	1.50	4.70	0.75	2.39	0.75	2.39
Transfer Point Emissions	8.57	22.77	4.05	10.77	0.61	1.63
<b>Point Source Emissions Total (PTE)</b>	<i>10.07</i>	<i>27.47</i>	<i>4.80</i>	<i>13.16</i>	<i>1.36</i>	<i>3.99</i>
<b>FACILITY EMISSIONS TOTAL</b>	<b>52.60</b>	<b>213.77</b>	<b>17.32</b>	<b>68.00</b>	<b>3.44</b>	<b>13.11</b>

The proposed modification will result in an estimated increase in potential to discharge controlled emissions of 16.13 pounds per hour and 50.19 TPY of particulate matter, of which 5.97 pounds per hour and 16.11 TPY are less than ten (10) microns in diameter. PM<sub>2.5</sub> is estimated at 1.64 pounds per hour and 3.50 TPY.

**Table 1b: Estimated Increase in Emissions**

Emissions Summary - <i>Shoemaker Facility</i> <i>(Change from Modifications)</i>	Controlled PM Emissions		Controlled PM <sub>10</sub> Emissions		Controlled PM <sub>2.5</sub> Emissions	
	lb/hour	TPY	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>						
Stockpile Emissions	0.46	2.34	0.27	1.17	0.27	1.17
Unpaved Haulroad Emissions	9.34	40.93	2.66	11.67	0.27	1.17
Paved Haulroad Emissions	0.00	0.00	0.00	0.00	0.00	0.00
<b>Fugitive Emissions Total</b>	<i>9.80</i>	<i>43.27</i>	<i>2.93</i>	<i>12.84</i>	<i>0.54</i>	<i>2.34</i>
<b>Point Source Emissions</b>						
Equipment Emissions	1.50	1.58	0.75	0.75	0.75	0.75
Transfer Point Emissions	4.83	5.34	2.29	2.52	0.35	0.38
<b>Point Source Emissions Total (PTE)</b>	<i>6.33</i>	<i>6.92</i>	<i>3.04</i>	<i>3.27</i>	<i>1.10</i>	<i>1.16</i>

<b>FACILITY EMISSIONS TOTAL</b>	<b>16.13</b>	<b>50.19</b>	<b>5.97</b>	<b>16.11</b>	<b>1.64</b>	<b>3.50</b>
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Consolidation Coal Company’s proposed modification will result in the following estimated potential to discharge controlled emissions:

**Table 1c: Estimated Facility Emissions Post - Modifications**

Emissions Summary - <i>Shoemaker Facility</i> <i>(After Modifications)</i>	Controlled PM Emissions		Controlled PM <sub>10</sub> Emissions		Controlled PM <sub>2.5</sub> Emissions	
	lb/hour	TPY	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>						
Stockpile Emissions	2.30	10.42	1.19	5.21	1.19	5.21
Unpaved Haulroad Emissions	50.03	219.15	14.26	62.47	1.43	6.25
Paved Haulroad Emissions	0.00	0.00	0.00	0.00	0.00	0.00
<b>Fugitive Emissions Total</b>	<i>52.33</i>	<i>229.57</i>	<i>15.45</i>	<i>67.68</i>	<i>2.62</i>	<i>11.46</i>
<b>Point Source Emissions</b>						
Equipment Emissions	3.00	6.28	1.50	3.14	1.50	3.14
Transfer Point Emissions	13.40	28.11	6.34	13.29	0.96	2.01
<b>Point Source Emissions Total (PTE)</b>	<i>16.40</i>	<i>34.39</i>	<i>7.84</i>	<i>16.43</i>	<i>2.46</i>	<i>5.15</i>
<b>FACILITY EMISSIONS TOTAL</b>	<b>68.73</b>	<b>263.96</b>	<b>23.29</b>	<b>84.11</b>	<b>5.08</b>	<b>16.61</b>

The applicants published notice states the applicant estimates the increase in potential to discharge the following Regulated Air Pollutants will be:

PM	-	46.3 TPY
PM <sub>10</sub>	-	14.8 TPY
PM <sub>2.5</sub>	-	3.2 TPY

PM, PM<sub>10</sub> and PM<sub>2.5</sub> were published incorrectly in the applicants notice. Since this application is for permit to modify, DAQ is required to publish a notice of intent to approve and will publish the correct values for PM, PM<sub>10</sub> and PM<sub>2.5</sub> as:

PM	-	50.19 TPY
PM <sub>10</sub>	-	16.11 TPY
PM <sub>2.5</sub>	-	3.50 TPY

### REGULATORY APPLICABILITY

NESHAPS and PSD have no applicability to the proposed facility. The proposed modification is subject to the following state and federal rules:

*45CSR5 To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants and Coal Handling Operations*

The facility is subject to the requirements of 45CSR5 because it meets the definition of “Wet wash coal preparation plant” found in subsection 45CSR5.2.4. The facility should be in compliance with Section 3 (less than 20% opacity) and Section 6 (fugitive dust control

system and dust control of the premises and access roads) when the particulate matter control methods and devices proposed within application R13-2359C and any amendments thereto are in operation.

*45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation*

The proposed modification is subject to the requirements of 45CSR13 because it will result in an increased potential to discharge controlled emissions of greater than six (6) pounds per hour and ten (10) tons per year, and 144 pounds per day of a regulated air pollutant (PM, PM<sub>10</sub> and PM<sub>2.5</sub>). The applicant submitted the proper \$1000 application fee and \$1,000 NSPS fee and published a Class I legal advertisement in the *Moundsville Daily Echo* on June 03, 2014.

*45CSR16 Standards of Performance for New Stationary Sources*  
*40 CFR 60 Subpart Y: Standards of Performance for Coal Preparation Plants*

The proposed modification is subject to 40 CFR 60 Subpart Y because it was constructed and will be modified after October 24, 1974 and processes more than 200 tons of coal per day. The proposed modification includes the addition of equipment and stockpiles, which are defined as affected facilities in 40 CFR 60 Subpart Y. Therefore, the proposed modification is subject to 45CSR16, which incorporates by reference 40 CFR 60 Subpart Y - Standards of Performance for Coal Preparation Plants.

The facility should be in compliance with the following: Section 254(b) (less than 10% opacity for coal processing and conveying equipment, coal storage systems, or coal transfer and loading systems processing coal constructed, re-constructed or modified after April 28, 2008) when the particulate matter control methods and devices proposed are in operation.

The owner or operator of an open storage pile, which includes the equipment used in the loading, unloading, and conveying operations of the affected facility, constructed, reconstructed, or modified after May 27, 2009, must prepare and operate in accordance with a submitted fugitive coal dust emissions control plan that is appropriate for the site conditions. The fugitive coal dust emissions control plan must identify and describe the control measures the owner or operator will use to minimize fugitive coal dust emissions from each open storage pile. The plan must be submitted to the Director prior to startup of the new, reconstructed or modified open storage pile.

*45CSR30 Requirements for Operating Permits*

The facility's potential to emit will be 18.79 TPY for PM<sub>10</sub> (open storage piles constructed or modified after May 27, 2009 and point sources combined), which is less than the 45CSR30

threshold of 100 TPY of a regulated air pollutant used to define a major stationary source. Therefore, the facility will be subject to 45CSR30 and remain classified as a Title V deferred non-major source.

The proposed modification will not be subject to the following state and federal rules:

*45CSR14 Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration*

In accordance with 45CSR14 Major Source Determination, this wet wash coal preparation plant is not one of the 100 TPY stationary sources listed under the definition of “Major Stationary Source” in subsection 2.43.a. Therefore, it must have the potential to emit 250 TPY or more of any regulated pollutant to meet the definition of a major source in subsection 2.43.b. At the end of subsection 2.4.3, this facility is not listed in Table 1 - Source Categories Which Must Include Fugitive Emissions. So, fugitive emissions (from open storage piles constructed or modified on or before May 27, 2009 and haulroads) are not included when determining major stationary source applicability. The facility’s potential to emit will be 36.73 TPY for PM (open storage piles constructed or modified after May 27, 2009 and point sources combined), which is less than the 45CSR14 threshold of 250 TPY for a regulated air pollutant used to define a major stationary source. Therefore, the proposed modification is not subject to the requirements set forth within 45CSR14.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

A toxicity analysis was not performed because the pollutants that will be emitted from this facility are PM (particulate matter) and PM<sub>10</sub> (particulate matter less than 10 microns in diameter), which are non-toxic pollutants.

AIR QUALITY IMPACT ANALYSIS

Air dispersion modeling was not required due to the size and location of this facility. This facility is located in Marshall County, WV, which is currently in attainment for PM (particulate matter), PM<sub>10</sub> (particulate matter less than 10 microns in diameter) and PM<sub>2.5</sub> (particulate matter less than 2.5 microns in diameter). This facility is not a major source as defined by 45CSR14, therefore, an air quality impact analysis is not required.

MONITORING OF OPERATIONS

For the purposes of determining compliance with maximum throughput limits, the applicant shall maintain certified daily and monthly records. An example form is included as Appendix A to Permit R13-2359C. An example form for tracking the amount of water applied through the water truck is included as Appendix B to Permit R13-2359C. The Certification Of Data Accuracy statement shall be completed within fifteen (15) days of the end of the reporting period. These records shall be maintained on site by the permittee for at least five (5) years and shall be made

available to the Director of the Division of Air Quality or his or her duly authorized representative upon request.

RECOMMENDATION TO DIRECTOR

The information contained in this modification permit application indicates that compliance with all applicable regulations should be achieved when all of the proposed particulate matter control methods are in operation. Due to the location, nature of the process, and control methods proposed, adverse impacts on the surrounding area should be minimized. No public comments were received. Therefore, the granting of a permit to Consolidation Coal Company for the modification of their Shoemaker Preparation Plant located in Benwood, Marshall County, WV is hereby recommended.

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Thornton E. Martin Jr.,  
Permit Engineer

July 01, 2014  
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Date