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**west virginia department of environmental protection**

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**ENGINEERING EVALUATION / FACT SHEET**

**BACKGROUND INFORMATION**

Application No.: G10-D099E  
Plant ID No.: 045-00018  
Applicant: Bandmill Coal Corporation  
Facility Name: Rum Creek Preparation Plant  
Location: Stollings, Logan County, WV  
SIC Code: 1221 (Bituminous Coal & Lignite - Surface)  
1222 (Bituminous Coal & Lignite - Underground)  
NAICS Code: 212111 (Bituminous Coal and Lignite Surface Mining)  
212112 (Bituminous Coal Underground Mining)  
Application Type: Modification  
Received Date: April 30, 2015  
Engineer Assigned: Dan Roberts  
Fee Amount: \$1,500  
Date Received: May 1, 2015  
Applicant's Ad Date: April 29, 2015  
Newspaper: *Logan Banner*  
Complete Date: June 2, 2015  
UTM Coordinates: Easting: 420.2 km      Northing: 4185.4 km      NAD83 Zone 17N  
Lat/Lon Coordinates: Latitude: 37.812510      Longitude: -81.906599      NAD83  
Description: Modification to add four refuse belt conveyors (BC-28, BC-29, BC-30 and BC-31) rated for 200 TPH and 1,752,000 TPY which will transfer rock from existing crusher CR-01 to existing refuse belt conveyor BC-20.

**BACKGROUND**

Bandmill Coal Corporation owns and operates the existing Rum Creek Preparation Plant under current general permit registration G10-D099D, which was approved on October 18, 2011. Bandmill Coal Corporation is a subsidiary of Alpha Natural Resources.

## DESCRIPTION OF PROCESS

The Bandmill Preparation Plant Facility is located on Rum Creek, near Dehue, Logan County, WV and processes coal received from local surface and deep mines via belt conveyors and/or through truck dump facilities. The existing and proposed NSPS equipment is listed at the maximum operating rate.

Raw coal from underground is sent from BC-07(PE) @ TP-01(TC-FE) to BC-01(PE) @ TP-02(TC-PE) for storage in the Alma Deep Mine Stockpile. Stored coal is then transferred back by belt conveyor BC-02(PE) @ TP-03(TC-FE) to a fully-enclosed double roll crusher CR-01(FE) @ TP-04(TC-FW), which discharges to belt conveyor BC-03(PE) @ TP-05(TC-FE). Belt conveyor BC-03 will transfer to the plant @ TP-06(TC-WW). As proposed in application G10-D099E, rock refuse rejected from crusher CR-01 (FE) will drop onto belt conveyor BC-28(NC) @ TP-56(TC-FE), belt conveyor BC-29(NC) @ TP-57(TC-PE), belt conveyor BC-30(NC) @ TP-58(TC-PE), belt conveyor BC-31(NC) @ TP-59(TC-PE) and then onto existing refuse conveyor BC-20(PE) @ TP-60(TC-PE).

Belt conveyor BC-03 will transfer inside the plant to two separate raw coal screens SS-01(FW) and Screen SS-02(FW) @ TP-51(TC-FW) and TP-52(TC-FW) which discharge directly to the wet wash process. Belt BC-08 transfers to the direct ship crusher CR-03(FW) inside the plant @ TP-54(TC-FW) and then to belt conveyor BC-09 @ TP-55(TC-FW) inside the plant. After the wet wash process, oversize clean coal is processed by clean coal crusher CR-04(FW) inside the plant before being transferred to clean coal belt BC-10.

Raw coal will also be transferred ROM to belt conveyor BC-04(PE) @ TP-07(TC-FE) and to open stockpile OS-01(SW-WS) @ TP-08(TC-MDH). Stockpile OS-01 will transfer underpile to belt conveyor BC-05(PE) @ TP-09(LO-UC) and then to the plant feed belt BC-07(PE) @ TP-10(TC-FE). Raw coal will also transfer ROM to belt conveyor BC-06(PE) @ TP-11(TC-FE) and onto the plant feed conveyor BC-07 @ TP-12(TC-FE) which will transfer to the plant @ TP-13(TC-WW). Please note that even though belt conveyors BC-05, BC-06 and BC-07 are rated for 1000TPH, we are limiting the throughput on these belt conveyors.

Direct ship clean coal delivered by truck on paved haulroads to the partially-enclosed w/water Bandmill Truck Dump BS-01(PW) @ TP-14(UD-PW) will transfer through a fully-enclosed feeder-breaker CR-02(FE) @ TP-15(TC-FE) before transferring onto belt conveyor BC-08(PE) @ TP-16(TC-FE). Belt conveyor BC-08 will transfer inside the plant to belt conveyor BC-09(PE) @ TP-17(TC-FE), which will feed the direct ship stockpile OS-02(SW-WS) @ TP-18(TC-PE). Some direct ship coal will be processed inside the plant through direct ship crusher CR-03(FW) @ TP-53(TC-FW) and transfer to belt conveyor BC-09 @ TP-54(TC-FW).

A certain percentage of the clean coal will be processed through a DR clean coal crusher CR-04(FW) @ TP-55(TC-FW) before it exits the plant on belt conveyor BC-10 @ TP-19(TC-FW). Clean coal from the preparation plant will transfer to the clean coal stockpiles OS-03(SW-WS) and OS-04(SW-WS) via a series of partially-enclosed belt conveyors BC-10(PE) thru BC-13(PE) @ TP-19(TC-FW) thru TP-24(TC-PE). This clean coal will be reclaimed to belt conveyor BC-14(FE) @ TP-25(LO-UC) thru TP-27(LO-UC) for transfer to the loadout belt BC-15(PE) @ TP-28(TC-FE).

Stoker coal will transfer from the plant to the stoker silos, BS-04(FE), BS-05(FE), and BS-06(FE) via belt conveyors BC-16(PE) thru BC-18(PE) @ TP-29(TC-WW) and TP-34(TC-FE). Stoker will be reclaimed underpile by belt conveyor BC-19(FE) @ TP-35(LO-UC) thru TP-37(LO-UC) and also transfer to the loadout belt BC-15 @ TP-38(TC-FE). Belt conveyor BC-15 will transfer clean coal to the rail loadout via the loadout bin BS-02(FE) @ TP-39(TC-FE) and surge bin BS-03(FE) @ TP-40(TC-FE). The transfer to railcar takes place @ TP-41(LR-TC).

Refuse is transferred from the plant to the disposal area via a series of controlled and uncontrolled belt conveyors BC-20(PE) thru BC-27(NC) @ TP-42(TC-WW) thru TP-50(TC-MDH).

**MODIFICATION APRIL 2015:**

This modification addresses the addition of four rock belts BC-28(NC), BC-29(NC), BC-30(NC) and BC-31(FE) that will run from the primary crusher building and intersect back to refuse belt conveyor BC-20. The refuse or rock will bypass crusher CR-01 and transfer out accordingly at TP-56(TC-FE), TP-57(TC-PE), TP-58(TC-PE), TP-59(TC-PE) and TP-60(TC-PE).

Please note that the belt conveyor BC-13, stockpile OS-04, belt conveyor BC-18 and silo BS-06 have not been constructed.

The facility shall be modified and operated in accordance with the following equipment and control device information taken from registration application G10-D099E and any amendments thereto:

Equipment ID No.	Date of Construction, Reconstruction or Modification <sup>1</sup>	G10-D Applicable Sections <sup>2</sup>	Emission Unit Description	Maximum Permitted Throughput		Control Device <sup>3</sup>	Associated Transfer Points		
				TPH	TPY		Location: B -Before A -After	ID No.	Control Device <sup>3</sup>
<b>Raw Coal Circuit - Alma Stockpile Area</b>									
BC-02	M 2010 C 2009	5 and 8	48" Alma Reclaim Conveyor - receives raw coal from the Alma Stockpile Area and transfers it to CR-01	1,300	11,388,000	PE	B A	TP-03 TP-04	TC-FE TC-FW
CR-01	C 2009	5 and 8	Raw Coal Sizer - receives raw coal from BC-02, crushes it to 4"x 0 and then drops it onto BC-03 and the rock refuse onto BC-28 (see Rock Refuse Circuit below)	1,300	11,388,000	FE	B A	TP-04 TP-05	TC-FW TC-FE
BC-03	M 2010 C 2009	5 and 8	48" Belt Conveyor - receives crushed raw coal from CR-01 and transfers it to the prep plant	1,300	11,388,000	PE	B A	TP-05 TP-06	TC-FE TC-WW
<b>Raw Coal Circuit - Hershaw Deep Mine and Other Underground Mine</b>									
BC-04	M 2010 C 2004	5 and 8	48" Hershaw ROM Conveyor - receives raw coal from the Hershaw mine and transfers it to OS-01	600	5,256,000	PE	B A	TP-07 TP-08	TC-FE TC-MDH
OS-01	M 2010 C 2004	5 and 8	Hershaw Raw Coal Stockpile - maximum 20,000 tons capacity, 38,869 ft <sup>2</sup> base area and 65' height - receives raw coal from BC-04, stores it, and then underpile reclaim feeders feed it onto BC-05	----	5,265,000	SW-WS	B A	TP-08 TP-09	TC-MDH LO-UC
BC-05	M 2010 C 2004	5 and 8	48" Hershaw Raw Coal Transfer Conveyor - reclaims raw coal from OS-01 and transfers it to BC-07	1,000	5,256,000	PE	B A	TP-09 TP-10	LO-UC TC-FE
BC-06	M 2011 M 2010 C 2009	5 and 8	48" ROM Conveyor - receives raw coal from underground mine and transfers it to BC-07	1,000	5,500,000	PE	B A	TP-11 TP-12	TC-FE TC-FE

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				TPH	TPY		Location: B -Before A -After	ID No.	Control Device <sup>3</sup>
BC-07	C 2009	5 and 8	48" Plant Feed Conveyor - receives raw coal from BC-05 and BC-06 and transfers it to BC-01 at the prep plant	1,000	8,760,000	PE	B B A	TP-10 TP-12 TP-13	TC-FE TC-FE TC-WW
BC-01	M 2010 C 2009	5 and 8	48" Alma Stockpile Feed Conveyor - receives raw coal from BC-07 at the prep plant and transfers it to the Alma Stockpile Area	1,000	8,760,000	PE	B A	TP-01 TP-02	TC-FE TC-WW
<b>Direct Ship Circuit Bandmill Truck Dump</b>									
BS-01	M 2010 C 2004	5 and 8	Truck Dump Bin - 100 tons capacity - receives trucked direct ship coal and transfers it to CR-02	---	5,694,000	PW	B A	TP-14 TP-15	UD-PW TC-FE
CR-02	C 2009	5 and 8	Stamler Feeder-Breaker - receives direct ship coal from BS-01, crushes to 2x0 and then drops it onto BC-08	650	5,694,000	FE	B A	TP-15 TP-16	TC-FE TC-FE
BC-08	M 2010 C 2009	5 and 8	48" Belt Conveyor - receives direct ship crushed coal from CR-02 and transfers it to CR-03 or BC-09	650	5,694,000	PE	B A A	TP-16 TP-53 TP-17	TC-FE TC-FW TC-FE
CR-03	C 2011	5 and 8	Single Roll Direct Ship Crusher - receives some direct ship coal from BC-08, crushes it and then drops it onto BC-09	400	3,504,000	FW	B A	TP- 53 TP-54	TC-FW TC-FW
BC-09	M 2010 C 2009	5 and 8	48" Belt Conveyor - receives crushed direct ship coal from BC-08 and CR-03 and transfers it to OS-02	650	5,694,000	PE	B B A	TP-17 TP-54 TP-18	TC-FE TC-FW TC-PE
OS-02	C 2009	5 and 8	Direct Ship Coal Stockpile - maximum 25,000 tons capacity, 38,869 ft <sup>2</sup> base area and 75' height - receives crushed direct ship coal from BC-09, stores it and then underpile reclaim feeders feed it onto BC-14 (see Railcar Loadout Circuit below)	----	5,694,000	SW-WS	B A	TP-18 TP-27	TC-PE LO-UC
<b>Bandmill Prep Plant - Raw Coal Processing</b>									
SS-01	C 2011	5 and 8	Double Deck Screen - receives raw coal from BC-03 (see Raw Coal Circuit - Alma Deep Mine above), classifies it and then sized coal discharges directly to the wet wash system	650	5,694,000	FW	B A	TP-51 N/A	TC-FW TC-WW
SS-02	C 2011	5 and 8	Double Deck Screen - receives raw coal from BC-03 (see Raw Coal Circuit - Alma Deep Mine above), classifies it and then sized coal discharges directly to the wet wash system	650	5,694,000	FW	B A	TP-52 N/A	TC-FW TC-WW
<b>Bandmill Prep Plant - Clean Coal</b>									
CR-04	C 2011	5 and 8	Double Roll Crusher - receives a certain percentage of the clean coal from the wet wash system, crushes it and then drops it onto BC-10	100	876,000	FW	B A	TP-55 TP-19	TC-FW TC-WW
BC-10	M 2010 C 2009	5 and 8	48" Clean Coal Transfer Belt - receives clean coal from CR-04 and the wet wash system and transfers it to BC-11	680	5,956,000	PE	B A	TP-19 TP-20	TC-WW TC-FE
BC-11	M 2010 C 2009	5 and 8	48" Clean Coal Transfer Belt - receives clean coal from BC-10 and transfers it to BC-12	680	5,956,000	PE	B A	TP-20 TP-21	TC-FE TC-FE
BC-12	M 2010 C 2009	5 and 8	48" Clean Coal Stacking Tube Feed Belt - receives clean coal from BC-11 and transfers it to OS-03 or BC-13	680	5,956,000	PE	B A A	TP-21 TP-22 TP-23	TC-FE TC-PE TC-FE
OS-03	C 2009	5 and 8	Clean Coal Stockpile - maximum 25,000 tons capacity, 38,869 ft <sup>2</sup> base area and 75' height - receives clean coal from belt BC-12, stores it and then underground feeders feed it onto BC-14 (see Railcar Loadout Circuit below)	----	5,956,000	SW-WS	B A	TP-22 TP-26	TC-PE LO-UC
BC-13	Not Yet Constructed *	5 and 8	48" Clean Coal Stacking Tube Feed Belt - receives clean coal from BC-12 and transfers it to OS-04 (* Permitted in 2010, but not yet constructed as of 2015)	680	5,956,000	PE	B A	TP-23 TP-24	TC-FE TC-PE

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				TPH	TPY		Location: B - Before A - After	ID No.	Control Device <sup>3</sup>
OS-04	Not Yet Constructed *	5 and 8	Clean Coal Stockpile - maximum 25,000 tons capacity, 38,869 ft <sup>2</sup> base area and 75' height - receives clean coal from belt BC-13, stores it and then underground feeders feed it onto BC-14 (see Railcar Loadout Circuit below) (* Permitted in 2010, but not yet constructed as of 2015)	---	5,956,000	SW-WS	B A	TP-24 TP-25	TC-PE LO-UC
<b>Bandmill Prep Plant - Clean Stoker Coal</b>									
BC-16	C 2009	5 and 8	36" Clean Stoker Coal Transfer Conveyor - receives clean stoker coal from the wet wash system and transfers it to BC-17	250	2,190,000	PE	B A	TP-39 TP-30	TC-WW TC-PE
BC-17	C 2009	5 and 8	36" Clean Stoker Coal Transfer Conveyor - receives clean stoker coal from BC-16 and transfers it to BS-04 or BC-18	250	2,190,000	PE	B A A	TP-30 TP-31 TP-32	TC-PE TC-FE TC-FE
BS-04	C 2004	5 and 6	Clean Stoker Coal Silo - 1,500 tons capacity - receives clean stoker coal from BC-17, stores it and then discharges it onto BC-19	---	2,190,000	FE	B A	TP-31 TP-37	TC-FE LO-UC
BC-18	Not Yet Constructed *	5 and 8	36" Clean Stoker Coal Conveyor - receives clean stoker coal from BC-17 transfers it to BS-05 and BS-06 (* Permitted in 2004, but not yet constructed as of 2015)	250	2,190,000	PE	B A A	TP-32 TP-33 TP-34	TC-FE TC-FE TC-FE
BS-05	C 2004	5 and 6	Clean Stoker Coal Silo - 2,500 tons capacity - receives clean stoker coal from BC-18, stores it and then discharges it onto BC-19	---	2,190,000	FE	B A	TP-33 TP-36	TC-FE LO-UC
BS-06	Not Yet Constructed *	5 and 8	Clean Stoker Coal Silo - 5,000 tons capacity - receives clean stoker coal from BC-18, stores it and then discharges it onto BC-19 (* Permitted in 2004, but not yet constructed as of 2015)	---	2,190,000	FE	B A	TP-34 TP-35	TC-FE LO-UC
BC-19	C 2009	5 and 8	60" Clean Stoker Coal Reclaim Conveyor - reclaims clean stoker coal from BS-04, BS-05 and BS-06 and transfers it to BC-15	1,500	2,190,000	FE	B B B A	TP-37 TP-36 TP-35 TP-38	LO-UC LO-UC LO-UC TC-FE
<b>Rail Car Loadout Circuit</b>									
BC-14	C 2009	5 and 8	72" Clean Coal Stockpile Reclaim Conveyor - receives direct ship coal from OS-02 and clean coal from OS-03 and OS-04 and transfers it to BC-15	3,500	10,950,000	FE	B B B A	TP-27 TP-26 TP-25 TP-28	LO-UC LO-UC LO-UC TC-FE
BC-15	C 2009	5 and 8	72" Clean Coal Loadout Conveyor - receives direct ship and clean coal from BC-14 and BC-19 and transfers it to BS-02	3,500	10,950,000	PE	B B A	TP-28 TP-38 TP-39	TC-FE TC-FE TC-FE
BS-02	C 2009	5 and 8	Loadout Bin - 420 tons capacity - receives direct ship and clean coal from belt BC-15 and then discharges it into BS-03	---	10,950,000	FE	B A	TP-39 TP-40	TC-FE TC-FE
BS-03	C 2009	5 and 8	Surge Bin - 120 tons capacity - receives direct ship and clean coal from BS-02 and transfers it to railcar through a telescopic chute	---	10,950,000	FE	B A	TP-40 TP-41	TC-FE LR-TC
<b>Rock Refuse Circuit - from Crusher CR-01</b>									
BC-28	C 2015	5 and 8	42" Rock Refuse Belt Conveyor - transfers rock refuse from CR-01 to BC-29	200	1,752,000	N	B A	TP-56 TP-57	TC-FE TC-PE
BC-29	C 2015	5 and 8	42" Rock Refuse Belt Conveyor - transfers rock refuse from BC-28 to BC-30	200	1,752,000	N	B A	TP-57 TP-58	TC-PE TC-PE
BC-30	C 2015	5 and 8	42" Rock Refuse Belt Conveyor - transfers rock refuse from BC-29 to BC-31	200	1,752,000	N	B A	TP-58 TP-59	TC-PE TC-PE
BC-31	C 2015	5 and 8	42" Rock Refuse Belt Conveyor - transfers rock refuse from BC-31 to BC-20 (see Bandmill Prep Plant - Refuse Circuit below)	200	1,752,000	FE	B A	TP-59 TP-60	TC-PE TC-PE
<b>Bandmill Prep Plant - Refuse Circuit</b>									

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				TPH	TPY		Location: B -Before A -After	ID No.	Control Device <sup>3</sup>
BC-20	C 2004	5 and 6	42" Plant Refuse Belt Conveyor - receives refuse from the wet wash system and BC-31 and transfers it to BC-21	650	5,694,000	PE	B B A	TP-42 TP-60 TP-43	TC-WW TC-PE TC-FE
BC-21	C 2004	5 and 6	42" Refuse Transfer Belt Conveyor - receives refuse from BC-20 and transfers it to BC-22	650	5,694,000	PE	B A	TP-43 TP-44	TC-FE TC-FE
BC-22	C 2004	5 and 6	42" Refuse Transfer Belt Conveyor - receives refuse from BC-21 and transfers it to BC-23	650	5,694,000	PE	B A	TP-44 TP-45	TC-FE TC-PE
BC-23	C 2004	5 and 6	42" Refuse Transfer Belt Conveyor - receives refuse from BC-22 and transfers it to BC-24	650	5,694,000	N	B A	TP-45 TP-46	TC-PE TC-PE
BC-24	C 2004	5 and 6	42" Refuse Transfer Belt Conveyor - receives refuse from BC-23 and transfers it to BC-25	650	5,694,000	N	B A	TP-46 TP-47	TC-PE TC-PE
BC-25	C 2004	5 and 6	42" Refuse Transfer Belt Conveyor - receives refuse from BC-24 and transfers it to BC-26	650	5,694,000	N	B A	TP-47 TP-48	TC-PE TC-PE
BC-26	C 2004	5 and 6	42" Refuse Transfer Belt Conveyor - receives refuse from BC-25 and transfers it to BC-27	650	5,694,000	N	B A	TP-48 TP-49	TC-PE TC-PE
BC-27	C 2004	5 and 6	42" Refuse Transfer Belt Conveyor - receives refuse from BC-26 and transfers it to the refuse disposal area	650	5,694,000	N	B A	TP-49 TP-50	TC-PE TC-MDH

<sup>1</sup> In accordance with 40 CFR 60 Subpart Y, coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems constructed, reconstructed, or modified on or before April 28, 2008 shall not discharge gases which exhibit 20 percent opacity or greater. Coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems constructed, reconstructed, or modified after April 28, 2008 shall not discharge gases which exhibit 10 percent opacity or greater. For open storage piles constructed, reconstructed, or modified after May 27, 2009, the permittee shall prepare and operate in accordance with a fugitive coal dust emissions control plan that is appropriate for site conditions.

<sup>2</sup> All registered affected facilities under Class II General Permit G10-D are subject to Sections 1.0, 1.1, 2.0, 3.0 and 4.0.

<sup>3</sup> Control Device Abbreviations: FE - Full Enclosure; FW - Full Enclosure with Water Sprays; PE - Partial Enclosure; PW - Partial Enclosure with Water Sprays; WS - Water Sprays; TC - Telescopic Chute; UC - Under-pile Conveyor; MDH - Minimize Drop Height; N - No Control; and NA - Not Applicable.

## DESCRIPTION OF FUGITIVE EMISSIONS (taken directly from the application)

Potential sources of fugitive particulate emissions for this facility include emissions, which are not captured by pollution control equipment and emissions from open stockpiles and vehicular traffic on paved haulroads and work areas. The haulroads and work areas will be controlled by water truck in accordance with section E.6.c.i. of the General Permit.

The water truck is equipped with pumps sufficient to maintain haulroads and work areas. The water truck will be operated three times daily, and more as needed in dry periods.

The stacking tubes will be equipped with a time-delay water spray system to control fugitive emissions from wind erosion of the stockpiles.

An additive to prevent freezing will be utilized in the winter months when freezing conditions are present

## SITE INSPECTION

On November 21, 2013, Fred Teel of the DAQ's Compliance and Enforcement Section performed a full on-site targeted inspection of the facility. Mr. Teel did not find any violations at the time of the inspection and the facility was given a status code of 30 - In Compliance.

Directions from Charleston, WV are to take US119 South to Logan, take Route 10 toward Man, take County Route 14 at Rum Creek intersection and travel two miles and the facility will be on the right adjacent to the highway.

### ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Fugitive emission calculations for continuous and batch drop operations, transfer points, crushing and screening, storage piles, and paved and unpaved haulroads are based on AP-42 Fifth Edition "Compilation of Air Pollution Emission Factors", Volume 1. Control efficiencies were applied based on "Calculation of Particulate Matter Emission - Coal Preparation Plants and Material Handling Operations." The emission factors for crushing/breaking and screening operations were obtained from the Air Pollution Engineering Manual - Air & Waste Management Association - June 1992. The calculations were performed by the applicant's consultant using the DAQ's G10-C Excel Emission Calculation Spreadsheet and were checked for accuracy and completeness by the writer. The writer performed the increase in emissions calculations using the DAQ's G10-C Excel Emission Calculation Spreadsheet and a copy has been attached.

The proposed modification will result in an increase in the facility's potential to discharge controlled particulate matter emissions of 0.45 pounds per hour (PPH) and 1.96 tons per year (TPY) of particulate matter (PM), of which 0.21 PPH and 0.93 TPY will be particulate matter less than 10 microns in diameter (PM<sub>10</sub>). Refer to the following table for a complete summary of the proposed facility's potential to discharge:

<b>- Increase in Emissions - Bandmill Coal Corporation G10-D099E</b>	<b>Controlled PM Emissions</b>		<b>Controlled PM<sub>10</sub> Emissions</b>	
	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>				
Open Storage Pile Emissions	0.00	0.00	0.00	0.00
Unpaved Haulroad Emissions	0.00	0.00	0.00	0.00
Paved Haulroad Emissions	0.00	0.00	0.00	0.00
<i>Fugitive Emissions Total</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
<b>Point Source Emissions</b>				
Equipment Emissions	0.00	0.00	0.00	0.00
Transfer Point Emissions	0.45	1.96	0.21	0.93
<i>Point Source Emissions Total (PTE)</i>	<i>0.45</i>	<i>1.96</i>	<i>0.21</i>	<i>0.93</i>
<b>INCREASE IN EMISSIONS</b>	<b>0.45</b>	<b>1.96</b>	<b>0.21</b>	<b>0.93</b>

The proposed modification will result in a new facility-wide potential to discharge controlled particulate matter emissions of 74.16 PPH and 310.98 TPY of PM, of which 22.11 PPH and 90.32

TPY will be PM<sub>10</sub>. Refer to the following table for a complete summary of the proposed facility's potential to discharge:

- <i>New Facility-wide Emissions</i> - Bandmill Coal Corporation G10-D099E	Controlled PM Emissions		Controlled PM <sub>10</sub> Emissions	
	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>				
Open Storage Pile Emissions	0.21	0.93	0.10	0.44
Unpaved Haulroad Emissions	0.00	0.00	0.00	0.00
Paved Haulroad Emissions	46.43	203.41	9.06	39.67
<i>Fugitive Emissions Total</i>	<i>46.64</i>	<i>204.34</i>	<i>9.15</i>	<i>40.11</i>
<b>Point Source Emissions</b>				
Equipment Emissions	17.90	78.40	8.41	36.85
Transfer Point Emissions	9.62	28.24	4.55	13.36
<i>Point Source Emissions Total (PTE)</i>	<i>27.52</i>	<i>106.64</i>	<i>12.96</i>	<i>50.21</i>
<b>BANDMILL EMISSIONS TOTAL</b>	<b>74.16</b>	<b>310.98</b>	<b>22.11</b>	<b>90.32</b>

Bandmill Coal Corporation (G10-D099E), Highland Mining Company (G10-D119B) and Aracoma Coal Company's (R13-2364C) facilities meet the definition of "Building, Structure, Facility, or Installation" in 45CSR14.2.10 and "Major Source" in 45CSR30.2.26 and shall continue to be considered as one facility for determining applicability to 45CSR14 (PSD) and 45CSR30 (Title V). Therefore, Bandmill Coal Corporation (G10-D099E), Highland Mining Company (G10-D119B) and Aracoma Coal Company's (R13-2364C) facilities emissions shall be combined when determining applicability to 45CSR14 (PSD) and 45CSR30 (Title V).

Highland Mining Company's existing truck dump and coal processing facility permitted under G10-C119B issued on March 28, 2014 has an estimated potential to discharge controlled emissions of 99.32 PPH and 435.04 TPY of PM, of which 30.64 PPH and 134.21 TPY are PM<sub>10</sub>. Also, Highland Mining Company's existing facility has an estimated potential to emit (point source emissions only) of 31.71 TPY of PM, of which 14.94 TPY are PM<sub>10</sub>. Refer to the following table for a summary of Highland Mining Company's emissions:

<b>- Emissions Summary - Highland Mining Company G10-D119B</b>	<b>Controlled PM Emissions</b>		<b>Controlled PM<sub>10</sub> Emissions</b>	
	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>				
Stockpile Emissions	0.30	1.32	0.14	0.62
Unpaved Haulroad Emissions	91.78	402.00	27.09	118.65
Paved Haulroad Emissions	0.00	0.00	0.00	0.00
<b>Fugitive Emissions Total</b>	<b>92.08</b>	<b>403.32</b>	<b>27.23</b>	<b>119.28</b>
<b>Point Source Emissions</b>				
Equipment Emissions	4.80	21.02	2.26	9.88
Transfer Point Emissions	2.44	10.69	1.15	5.06
<b>Point Source Emissions Total (PTE)</b>	<b>7.24</b>	<b>31.71</b>	<b>3.41</b>	<b>14.94</b>
<b>HIGHLAND EMISSIONS TOTAL</b>				
	<b>99.32</b>	<b>435.04</b>	<b>30.64</b>	<b>134.21</b>

Aracoma's existing conveying system from the Alma and Chilton deep mines permitted under R13-2364C approved on December 1, 2005 has an estimated potential to discharge controlled emissions of 46.30 PPH and 31.90 TPY of PM, of which 13.63 PPH and 12.04 TPY are PM<sub>10</sub>. Also, Aracoma's existing facility has an estimated potential to emit (point source emissions only) of 16.53 TPY of PM, of which 7.82 TPY are PM<sub>10</sub>. Refer to the following table for a summary of Aracoma Coal Company's emissions:

<b>- Emissions Summary - Aracoma Coal Company R13-2364C</b>	<b>Controlled PM Emissions</b>		<b>Controlled PM<sub>10</sub> Emissions</b>	
	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>				
Stockpile Emissions	0.98	4.30	0.46	2.02
Unpaved Haulroad Emissions	30.12	11.06	5.98	2.20
Paved Haulroad Emissions	0.00	0.00	0.00	0.00
<b>Fugitive Emissions Total</b>	<b>31.11</b>	<b>15.37</b>	<b>6.44</b>	<b>4.22</b>
<b>Point Source Emissions</b>				
Equipment Emissions	0.00	0.00	0.00	0.00
Transfer Point Emissions	15.20	16.53	7.19	7.82
<b>Point Source Emissions Total (PTE)</b>	<b>15.20</b>	<b>16.53</b>	<b>7.19</b>	<b>7.82</b>
<b>ARACOMA EMISSIONS TOTAL</b>				
	<b>46.30</b>	<b>31.90</b>	<b>13.63</b>	<b>12.04</b>

Bandmill Coal Corporation (G10-D099E), Highland Mining Company (G10-D119B) and Aracoma Coal Company (R13-2364C) will have a combined estimated potential to discharge controlled emissions of 777.92 TPY of PM (particulate matter), of which 235.64 TPY are PM<sub>10</sub>. The facilities will have a combined estimated potential to emit (point source emissions only) of 154.88 TPY of PM, of which 72.04 TPY are PM<sub>10</sub>. Refer to the following table for a summary of Bandmill

Coal Corporation (G10-D099E), Highland Mining Company (G10-D119B) and Aracoma Coal Company's (R13-2364C) combined emissions:

- Combined Emissions Summary - Bandmill Coal Corporation (G10-D099E), Highland Mining Company (G10-D119B) and Aracoma Coal Company (R13-2364C)	Controlled PM Emissions		Controlled PM <sub>10</sub> Emissions	
	lb/hour	TPY	lb/hour	TPY
<b>Fugitive Emissions</b>				
Stockpile Emissions	1.49	6.55	0.70	3.08
Unpaved Haulroad Emissions	121.90	413.06	33.07	120.85
Paved Haulroad Emissions	46.43	203.34	9.15	40.11
<b>Fugitive Emissions Total</b>	<i>169.83</i>	<i>623.03</i>	<i>42.82</i>	<i>163.61</i>
<b>Point Source Emissions</b>				
Equipment Emissions	22.70	99.42	10.67	46.73
Transfer Point Emissions	27.26	55.46	12.89	26.24
<b>Point Source Emissions Total (PTE)</b>	<i>49.96</i>	<i>154.88</i>	<i>39.72</i>	<i>137.19</i>
<b>COMBINED EMISSIONS TOTAL</b>				
	<b>219.78</b>	<b>777.92</b>	<b>67.38</b>	<b>236.57</b>

## REGULATORY APPLICABILITY

NESHAPS and PSD have no applicability to the modified facility. The modification of Bandmill Coal Corporation's existing wet wash coal preparation plant and railcar loadout is subject to the following state and federal rules:

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

The facility is subject to the requirements of 45CSR5 because it meets the definition of "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 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 involve the construction of four belt conveyors, which are defined as affected facilities and subject to 40 CFR 60 NSPS Subpart Y. The applicant has submitted an application for a modification registration. The applicant published a Class I legal advertisement in *Logan Banner* on March 29, 2015 and submitted \$500 for the General Permit application fee and

In accordance with 45CSR14 Major Source Determination, Bandmill Coal Corporation, Highland Mining Company and Aracoma Coal Company's facilities are not one of the 100 TPY stationary sources listed under the definition of "Major Stationary Source" in subsection 2.43.a. Therefore, the combined facilities 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, these facilities are 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. Highland Mining Company, Bandmill Coal Corporation and Aracoma Coal Company's combined potential to emit will be 154.88 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 primary 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 performed due to the size and location of this facility and the extent of the proposed modification. This facility is located in Logan County, WV, which is currently in attainment for PM (particulate matter) and PM<sub>10</sub> (particulate matter less than 10 microns in diameter). This modified facility will remain a minor source as defined by 45CSR14, therefore, an air quality impact analysis is not required.

### GENERAL PERMIT ELIGIBILITY

The proposed modification of this facility meets the applicability criteria (Section 2.3), siting criteria (Section 3.1) and limitations and standards (Section 5.1) as specified in General Permit G10-D.

All registered facilities under Class II General Permit G10-D are subject to Sections 1.0, 1.1, 2.0, 3.0 and 4.0.

### MONITORING OF OPERATIONS

The coal processing and conveying equipment and storage areas should be observed to make

Fact Sheet G10-D099E  
Bandmill Coal Corporation  
Rum Creek Preparation Plant

Increase in Emissions

5/21/15  
OPR

### EMISSIONS SUMMARY

Name of applicant: Bandmill Coal Corp  
Name of plant: Rum Creek G10-D099E

#### Particulate Matter or PM (for 45CSR14 Major Source Determination)

Uncontrolled PM		Controlled PM	
lb/hr	TPY	lb/hr	TPY

FUGITIVE EMISSIONS				
<i>Stockpile Emissions</i>	0.00	0.00	0.00	0.00
<i>Unpaved Haulroad Emissions</i>	0.00	0.00	0.00	0.00
<i>Paved Haulroad Emissions</i>	0.00	0.00	0.00	0.00
<b>Fugitive Emissions Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

POINT SOURCE EMISSIONS				
<i>Equipment Emissions</i>	0.00	0.00	0.00	0.00
<i>Transfer Point Emissions</i>	1.02	4.45	0.45	1.96
<b>Point Source Emissions Total*</b>	<b>1.02</b>	<b>4.45</b>	<b>0.45</b>	<b>1.96</b>

\*Note: Point Source Total Controlled PM TPY emissions is used for 45CSR14 Major Source determination (see below)

<b>Facility Emissions Total</b>	<b>1.02</b>	<b>4.45</b>	<b>0.45</b>	<b>1.96</b>
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**\*Facility Potential to Emit (PTE) (Baseline Emissions) = 1.96**  
 (Based on Point Source Total controlled PM TPY emissions from above) **ENTER ON LINE 26 OF APPLICATION**

#### Particulate Matter under 10 microns, or PM-10 (for 45CSR30 Major Source Determination)

Uncontrolled PM-10		Controlled PM-10	
lb/hr	TPY	lb/hr	TPY

FUGITIVE EMISSIONS				
<i>Stockpile Emissions</i>	0.00	0.00	0.00	0.00
<i>Unpaved Haulroad Emissions</i>	0.00	0.00	0.00	0.00
<i>Paved Haulroad Emissions</i>	0.00	0.00	0.00	0.00
<b>Fugitive Emissions Total</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

POINT SOURCE EMISSIONS				
<i>Equipment Emissions</i>	0.00	0.00	0.00	0.00
<i>Transfer Point Emissions</i>	0.48	2.11	0.21	0.93
<b>Point Source Emissions Total*</b>	<b>0.48</b>	<b>2.11</b>	<b>0.21</b>	<b>0.93</b>

\*Note: Point Source Total Controlled PM-10 TPY emissions is used for 45CSR30 Major Source determination

<b>Facility Emissions Total</b>	<b>0.48</b>	<b>2.11</b>	<b>0.21</b>	<b>0.93</b>
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