

May 15, 2015

Jay Fedczak
Assistant Director for Permitting
WV DEP – Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

Subject: *Class II Administrative Update to Permit R13-2306D*
Consolidation Coal Company – Robinson Run Preparation Plant

Dear Mr. Fedczak:

Consolidation Coal Company (CCC) is submitting this request for a Class II Administrative Update to the (45 CSR 13) Permit to Construct (R13-2306D) issued on August 27, 2010, for a coal preparation plant located in Harrison County, West Virginia (Robinson Run Preparation Plant). CCC is submitting this request for a Class II Administrative Update to increase the maximum area for raw coal stockpile 1 (006) at the Robinson Run Preparation Plant. CCC intends to increase the maximum base area of the raw coal stockpile to 9.69 acres, with a maximum raw coal storage capacity of 750,000 tons. This change will allow for increased operational flexibility at the mine and will prevent CCC from having to stop underground mining during periods in which the preparation plant is overloaded. CCC notes, however, that maximum hourly and annual throughputs of the associated process equipment at the Robinson Run Preparation Plant will not increase as a result of this project.

Please see Attachment N of the application package for detailed emissions calculations demonstrating that the emissions increases do not exceed the modification thresholds of six (6) pounds per hour (lb/hr) **and** ten (10) tons per year (tpy) or 144 lb/day provided in 45 CSR 13-2.17. Therefore, the proposed project does not constitute a modification under 45 CSR 13-2.17 and can be incorporated through a Class II Administrative Update to R13-2306D.

With respect to baseline emissions for the facility, CCC would like to note that the baseline emissions from storage piles presented in this application differ slightly from what was provided in the 2010 Title V renewal application. The calculation methodology for stockpiles was updated to incorporate values specified in the emission calculation spreadsheet for General Permit G10-D. Specifically, the number of days per year with greater than 0.01 inches of precipitation (p) and percentage of time that the unobstructed wind speed exceeds 12 miles per hour (mph) at the mean pile height (f) were both updated to be consistent with the G10-D emission calculation spreadsheet. As a result, the total pre-project facility-wide emissions in this application differ slightly from the 2010 Title V renewal application. Please see the table below for a summary of the updated baseline stockpile emissions.

Table 1. Summary of Updated Baseline Stockpile Emissions

	Controlled Potential Emissions (tpy)		
	PM	PM₁₀	PM_{2.5}
2010 Title V Renewal Application	10.74	5.11	0.77
Baseline for this Application	7.51	3.57	0.54

As discussed in Attachment D of the enclosed application, the main change with respect to the regulatory applicability analysis provided in the 2010 Title V renewal application is that the modified raw coal storage pile will now be subject to the provisions of 40 CFR 60, Subpart Y for Coal Preparation and Processing Plants. As provided in Attachment D, CCC will develop and operate the modified stockpile in accordance with a fugitive coal dust emissions control plan that is appropriate for site conditions.

Please find enclosed one (1) hard copy and two (2) CDs containing the Class II Administrative Update application with the required attachments and revised forms, as appropriate. The provisions for permit application fees contained in 45 CSR 13-12.1 specify that applications for permits under 45 CSR 13-4 (e.g., administrative updates) are only subject to the fee provisions of 45 CSR 13-4. Therefore, please note that the appropriate application fee of three hundred dollars (\$300) is included with this application package in accordance with 45 CSR 13-4.4.

Should you have any questions on this, please do not hesitate to contact Mr. Drew Hudson at (740) 338-3100.

Sincerely,

Ohio Valley Resources, Inc.

Robert D. Moore
Vice President

Enclosures



CLASS II ADMINISTRATIVE UPDATE APPLICATION

**Consolidation Coal Company
Robinson Run Preparation Plant**

Permit R13-2306D

Prepared By:

TRINITY CONSULTANTS

8425 Pulsar Place
Suite 280
Columbus, Ohio 43240
(614) 443-0733

May 2015

Project 153601.0031



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TABLE OF CONTENTS

GENERAL APPLICATION FORM	1
ATTACHMENT A: BUSINESS CERTIFICATE	A-1
ATTACHMENT B: MAP	B-1
ATTACHMENT C: INSTALLATION AND STARTUP SCHEDULE	C-1
ATTACHMENT D: REGULATORY DISCUSSION	D-1
ATTACHMENT E: PLOT PLAN	E-1
ATTACHMENT F: PROCESS FLOW DIAGRAM	F-1
ATTACHMENT G: PROCESS DESCRIPTION	G-1
ATTACHMENT I: EMISSION UNITS TABLE	I-1
ATTACHMENT J: EMISSION POINTS DATA SUMMARY SHEET	J-1
ATTACHMENT K: FUGITIVE EMISSIONS DATA SUMMARY SHEET	K-1
ATTACHMENT L: EMISSIONS UNIT DATA SHEET	L-1
ATTACHMENT N: SUPPORTING EMISSIONS CALCULATIONS	N-1
ATTACHMENT O: MONITORING, RECORDKEEPING, REPORTING AND TESTING PLANS	O-1
ATTACHMENT P: AFFIDAVIT OF PUBLICATION	P-1
ATTACHMENT S: TITLE V REVISION	S-1

GENERAL APPLICATION FORM



WEST VIRGINIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
www.dep.wv.gov/daq

**APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):

- ☐ CONSTRUCTION ☐ MODIFICATION ☐ RELOCATION
☐ CLASS I ADMINISTRATIVE UPDATE ☐ TEMPORARY
☒ CLASS II ADMINISTRATIVE UPDATE ☐ AFTER-THE-FACT

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):

- ☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION
☐ SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): Consolidation Coal Company		2. Federal Employer ID No. (FEIN): 13-2566594	
3. Name of facility (if different from above): Robinson Run Preparation Plant		4. The applicant is the: <input type="checkbox"/> OWNER <input checked="" type="checkbox"/> OPERATOR <input type="checkbox"/> BOTH	
5A. Applicant's mailing address: 46226 National Road W St. Clairsville, OH 43950		5B. Facility's present physical address: Prospect Valley Road, Shinnston, WV	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO ⇒ If YES , provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A . ⇒ If NO , provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation:			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO ⇒ If YES , please explain: The land occupied by the Robinson Run Preparation Plant is owned by CCC. ⇒ If NO , you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Underground Coal Mine and associated Preparation Plant		10. North American Industry Classification System (NAICS) code for the facility: 212112	
11A. DAQ Plant ID No. (for existing facilities only): — 03-54-03300018		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R30-03300018-2011	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

12A. ⇨ For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road; ⇨ For Construction or Relocation permits , please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a MAP as Attachment B . From US Route 19 in Shinnston, travel west on County Road 3 for 2.8 miles. Turn left on County Road 3/4 for 1.2 miles to the preparation plant.		
12.B. New site address (if applicable): N/A	12C. Nearest city or town: Shinnston	12D. County: Harrison
12.E. UTM Northing (KM): 4,361.54	12F. UTM Easting (KM): 554.82	12G. UTM Zone: 17
13. Briefly describe the proposed change(s) at the facility: CCC plans to increase the maximum size of raw coal stockpile 1 to 9.69 acres (maximum storage capacity of xxx tons)		
14A. Provide the date of anticipated installation or change: 07 / 01 / 2015 ⇨ If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: / / N/A		14B. Date of anticipated Start-Up if a permit is granted: Upon permit issuance
14C. Provide a Schedule of the planned Installation of/ Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved). See attached.		
15. Provide maximum projected Operating Schedule of activity/activities outlined in this application: 24 Hours Per Day 7 Days Per Week 52 Weeks Per Year		
16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U. S. EPA Region III. ^{N/A}		
18. Regulatory Discussion. List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as Attachment D . See attached.		
Section II. Additional attachments and supporting documents.		
19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13). To be submitted.		
20. Include a Table of Contents as the first page of your application package. See attached.		
21. Provide a Plot Plan , e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance) . ⇨ Indicate the location of the nearest occupied structure (e.g. church, school, business, residence). See attached.		
22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F . See attached.		
23. Provide a Process Description as Attachment G . See attached. ⇨ Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).		
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.		

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.
 ⇨ For chemical processes, provide a MSDS for each compound emitted to the air. N/A - no chemical process involved in proposed modifications.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**. See attached.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**. See attached.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**. See attached.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger	
<input type="checkbox"/> General Emission Unit, specify	<input checked="" type="checkbox"/> Nonmetallic Minerals Processing	

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**. See attached.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System
<input type="checkbox"/> Other Collectors, specify		

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31. See attached.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**. See attached.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt. See attached.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

☐ YES ☒ NO

➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's **"Precautionary Notice – Claims of Confidentiality"** guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

<input checked="" type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**. NA - signed by responsible official.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. Certification of Information. To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned ☒ **Responsible Official** / ☐ **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE 
(Please use blue ink)

DATE: 5-05-15
(Please use blue ink)

35B. Printed name of signee: **Robert D. Moore**

35C. Title: **Vice President**

35D. E-mail:
rmoore@coalsource.com

36E. Phone:
(740) 338-3100

36F. FAX:
(740) 338-3416

36A. Printed name of contact person (if different from above):
Drew Hudson

36B. Title:
Permitting Manager

36C. E-mail:
dhudson@coalsource.com

36D. Phone:
(740) 338-3100

36E. FAX:
(740) 338-3416

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

- | | |
|--|--|
| <input checked="" type="checkbox"/> Attachment A: Business Certificate | <input checked="" type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet |
| <input checked="" type="checkbox"/> Attachment B: Map(s) | <input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s) |
| <input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule | <input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s) |
| <input checked="" type="checkbox"/> Attachment D: Regulatory Discussion | <input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations |
| <input checked="" type="checkbox"/> Attachment E: Plot Plan | <input checked="" type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans |
| <input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s) | <input checked="" type="checkbox"/> Attachment P: Public Notice |
| <input checked="" type="checkbox"/> Attachment G: Process Description | <input type="checkbox"/> Attachment Q: Business Confidential Claims |
| <input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS) | <input type="checkbox"/> Attachment R: Authority Forms |
| <input checked="" type="checkbox"/> Attachment I: Emission Units Table | <input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information |
| <input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet | <input checked="" type="checkbox"/> Application Fee |

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

- ☐ Forward 1 copy of the application to the Title V Permitting Group and:
- ☐ For Title V Administrative Amendments:
- ☐ NSR permit writer should notify Title V permit writer of draft permit,
- ☐ For Title V Minor Modifications:
- ☐ Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
- ☐ NSR permit writer should notify Title V permit writer of draft permit.
- ☐ For Title V Significant Modifications processed in parallel with NSR Permit revision:
- ☐ NSR permit writer should notify a Title V permit writer of draft permit,
- ☐ Public notice should reference both 45CSR13 and Title V permits,
- ☐ EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

ATTACHMENT A: BUSINESS CERTIFICATE

**WEST VIRGINIA
STATE TAX DEPARTMENT
BUSINESS REGISTRATION
CERTIFICATE**

ISSUED TO:
**CONSOLIDATION COAL COMPANY
RR 2 BOX 152
MANNINGTON, WV 26582-9101**

BUSINESS REGISTRATION ACCOUNT NUMBER: **1007-4775**

This certificate is issued on: **06/10/2011**

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with Chapter 11, Article 12, of the West Virginia Code*

*The person or organization identified on this certificate is registered
to conduct business in the State of West Virginia at the location above.*

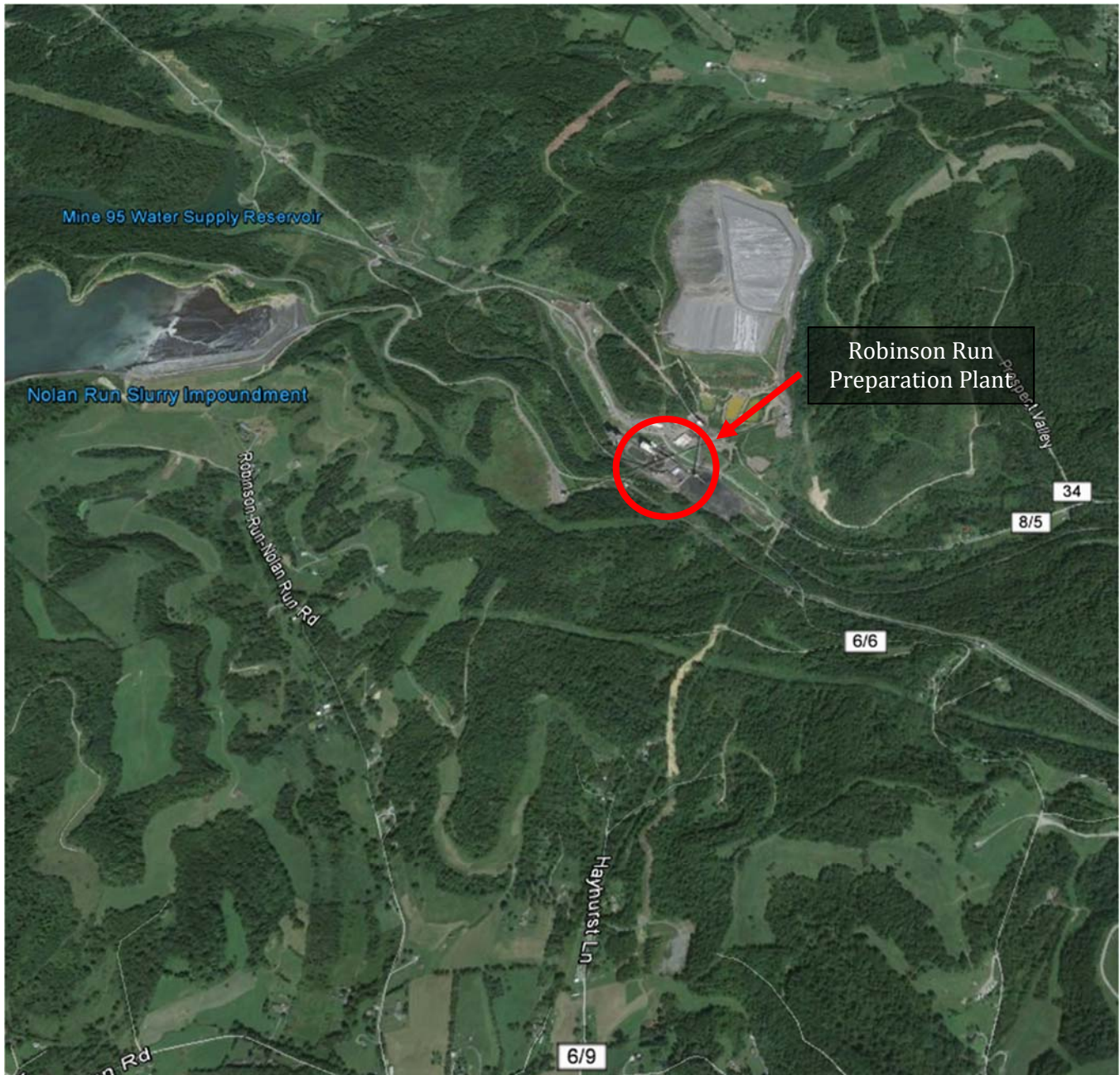
This certificate is not transferrable and must be displayed at the location for which issued.

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them.
CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

Figure B-1. Area Map for the Robinson Run Preparation Plant



ATTACHMENT C: INSTALLATION AND STARTUP SCHEDULE

The Robinson Run Preparation Plant was issued Permit to Construct R13-2306D on August 27, 2010. This application for a Class II Administrative Permit Update is submitted to update the R13 permit to accommodate a potential increase in the base area of raw coal stockpile 1 (006). This potential size increase will not involve construction activities, nor will it occur until the revised R13 permit has been issued.

ATTACHMENT D: REGULATORY DISCUSSION

This section documents the applicability determinations made for federal and state air quality regulations. Federal and WVDEP state regulations that are potentially applicable to the Robinson Run Preparation Plant are listed in Tables D-1 and D-2. Notes are provided for each applicability determination briefly summarizing why each regulation is considered applicable.

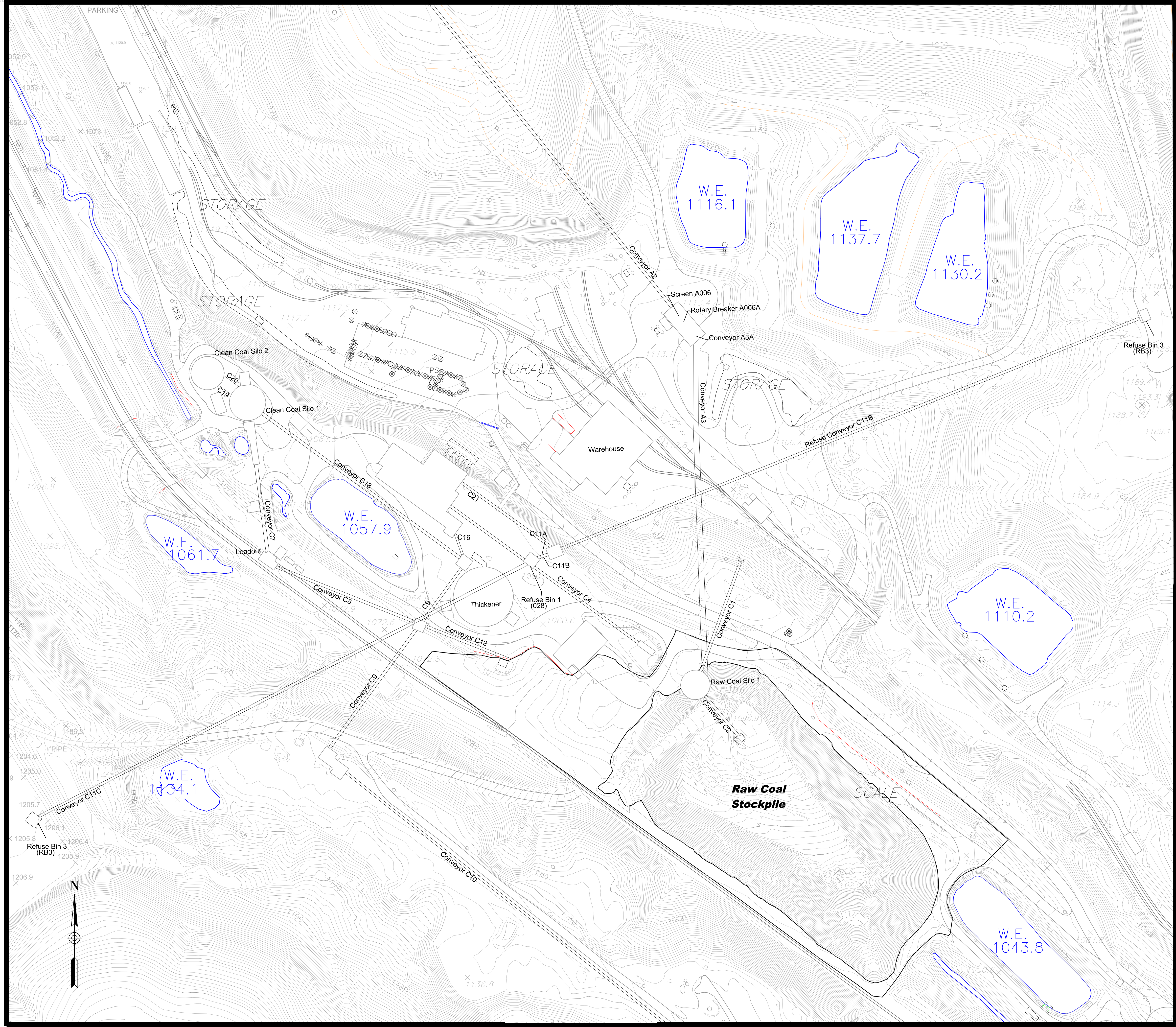
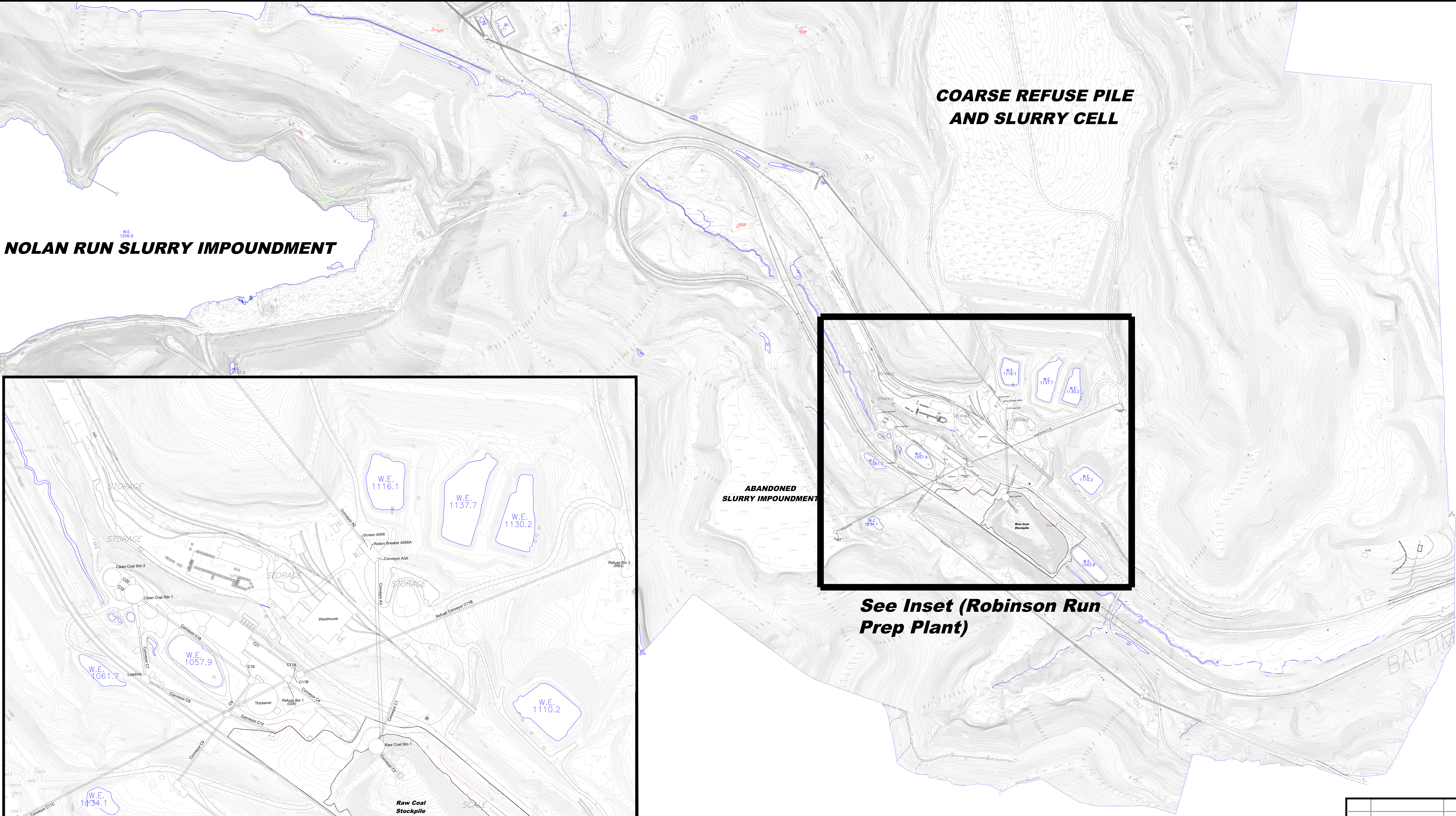
Table D-1. Federal Applicability

Regulation	Applicability
40 CFR 60, Subpart A – “General Provisions”	These general requirements are applicable to stationary sources that are subject to a source-specific NSPS that references 40 CFR 60, Subpart A. CCC is required to comply with Subpart Y.
40 CFR 60, Subpart Y – “Standards of Performance for Coal Preparation and Processing Plants”	The modified stockpile is subject to the provisions of this rule. Accordingly, CCC will develop and operate the stockpile in accordance with a fugitive coal dust emissions control plan that is appropriate for site conditions.
40 CFR 70 – “State Operating Programs”	CCC is submitting a simultaneous request for a minor permit modification to incorporate the proposed changes into the R30 operating permit.

Table D-2. State Rule Applicability

Rule	Applicability
45CSR5 – “To Prevent and Control Particulate Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations, and Coal Refuse Disposal Areas”	CCC is subject to the standards and provisions in 45CSR5. The raw coal stockpile will be subject to these provisions. CCC will comply with this rule by observing good operating practices to minimize dust generation.
45CSR13 – “Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation”	Generally applicable. CCC is required to apply for a Class II administrative update for the proposed change to the raw coal stockpile 1 (006).
45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60”	The modified raw coal stockpile is subject to 40 CFR 60, Subpart Y for coal preparation and processing operations and, therefore, must comply with these requirements. As noted in Table D-1, CCC will develop and operate the stockpile in accordance with a fugitive coal dust emissions control plan that is appropriate for site conditions.
45CSR22 – “Air Quality Management Fee Program”	Generally applicable.
45CSR30 – “Requirements for Operating Permits”	CCC is submitting a simultaneous request for a minor permit modification to incorporate the proposed changes into the R30 operating permit.

ATTACHMENT E: PLOT PLAN



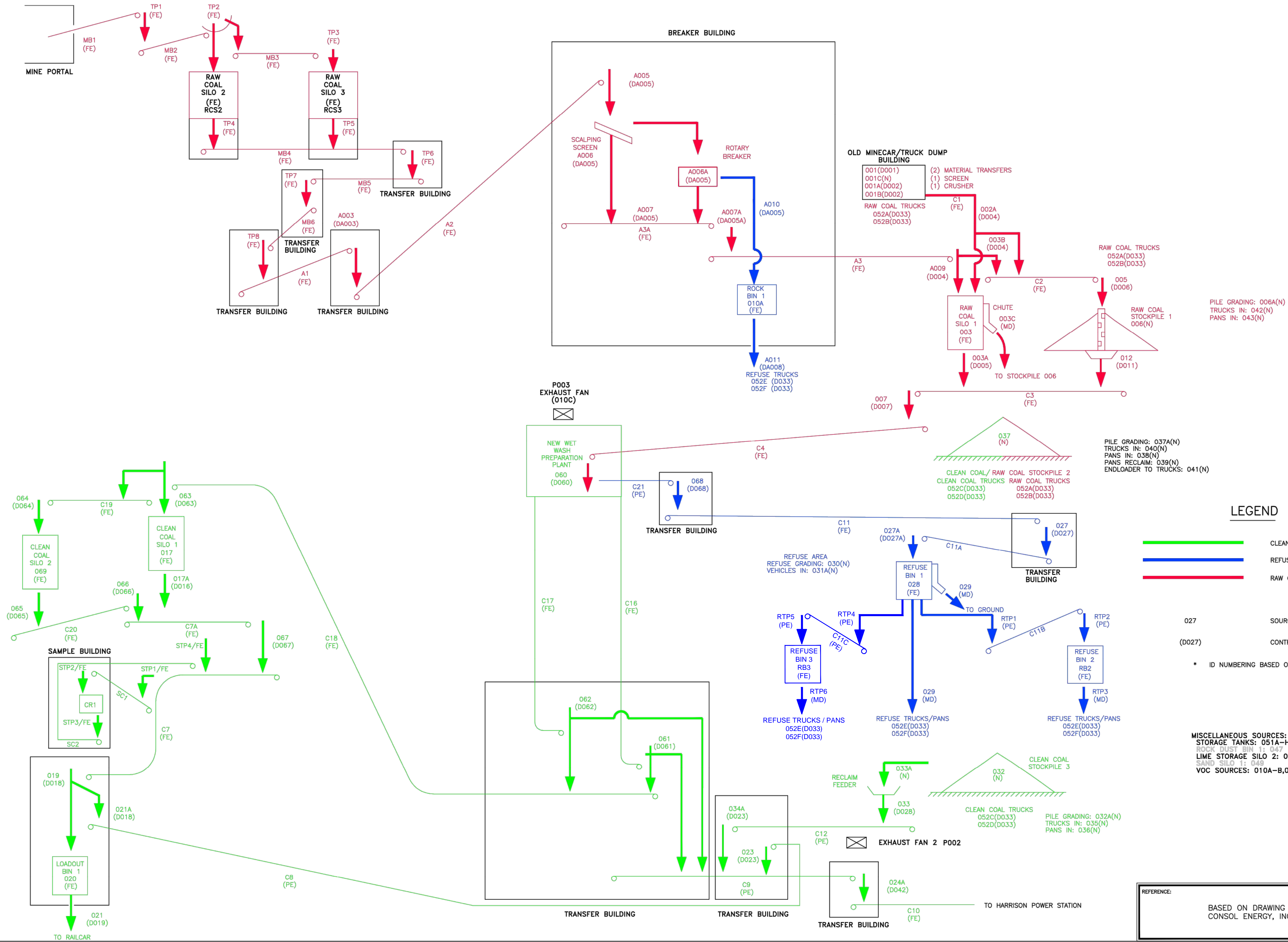
INSET (Robinson Run Prep Plant)

Scale: 1" = 95'-0"
0' 23.75' 47.5' 95'

No.	Revision/Draftsman	Date
Consolidation Coal Company		
Plot Plan Robinson Run Mine Preparation Plant and Refuse Area		
Date	March 6, 2015	Author

ATTACHMENT F: PROCESS FLOW DIAGRAM

REF: P101, MADE FILE:
File: SAC3D-Project-09-0407-ROBINSON RUN\09-0407-02.dwg
Printed: 10/16/2009 10:23:00 AM
Printed By: E. B. Bland



02
CAD File No.
REO/RSB
Drawn
Checked
Approved
NO SCALE
Scale:
OCT. 2009
Date:
09-0407
Project No.

Consolidation
Coal Company

Client
CONSOLIDATION COAL COMPANY
ROBINSON RUN PREPARATION PLANT
HARRISON COUNTY, WEST VIRGINIA

Title
PROCESS FLOW DIAGRAM

Drawing No.

ATTACHMENT G: PROCESS DESCRIPTION

Operations at the Robinson Run Preparation Plant consist of conveying the raw coal procured from an existing mine portal to two (2) raw coal storage silos. From the raw coal storage silos, coal is conveyed to a breaker building, where the raw coal is screened and separated into two (2) distinct material streams: the refuse stream is crushed, conveyed to a rock storage bin, and ultimately transported to refuse storage piles by refuse trucks, and the “plant feed” coal is conveyed to a raw coal storage silo and the raw coal stockpile, and ultimately transported to the wet wash preparation plant. As described throughout this application, CCC proposes to increase the base area of the raw coal stockpile to 9.69 acres (maximum storage of 750,000 tons) to increase operational flexibility. The project will not involve increases of the permitted hourly or annual maximum throughput of any other process equipment at the Robinson Run Preparation Plant.

Two types of material exit the preparation plant. The first type of material is refuse. The refuse is conveyed to one (1) of three (3) refuse storage bins before ultimately being transferred to the refuse disposal area via truck. The second type of material exiting the preparation plant is clean coal, which is raw coal that has been screened, sized, and washed in the preparation plant. From the wet wash preparation plant, clean coal is either conveyed to two (2) storage silos and ultimately loaded out via railcars or transported to the Harrison Power Station.

ATTACHMENT I: EMISSION UNITS TABLE

Attachment I

Emission Units Table

(includes all emission units and air pollution control devices
e part of this permit application review, regardless of permissi

[illegible]

¹ For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation.

² For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation.

³ New, modification, removal

⁴ For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

ATTACHMENT J: EMISSION POINTS DATA SUMMARY SHEET

Attachment J

EMISSION POINTS DATA SUMMARY SHEET

Table 1: Emissions Data															
Emission Point ID No. <i>(Must match Emission Units Table & Plot Plan)</i>	Emission Point Type ¹	Emission Unit Vented Through This Point <i>(Must match Emission Units Table & Plot Plan)</i>		Air Pollution Control Device <i>(Must match Emission Units Table & Plot Plan)</i>		Vent Time for Emission Unit <i>(chemical processes only)</i>		All Regulated Pollutants - Chemical Name/CAS ³ <i>(Speciate VOCs & HAPS)</i>	Maximum Potential Uncontrolled Emissions ⁴		Maximum Potential Controlled Emissions ⁵		Emission Form or Phase <i>(At exit conditions, Solid, Liquid or Gas/Vapor)</i>	Est. Method Used ⁶	Emission Concentration ⁷ (ppmv or mg/m ⁴)
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
006,012,00 6A,042,04 3	Fugitive	006		MC, ST, UC		N/A	N/A	PM	2.70	11.83	1.35	5.91	Solid	EE	N/A
								PM ₁₀	1.29	5.63	0.64	2.82	Solid	EE	N/A
								PM _{2.5}	0.19	0.84	0.10	0.42	Solid	EE	N/A

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

¹ Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

² Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

³ List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. **DO NOT LIST** H₂, H₂O, N₂, O₂, and Noble Gases.

⁴ Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

⁵ Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

⁶ Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

⁷ Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10).

Attachment J
EMISSION POINTS DATA SUMMARY SHEET

Table 2: Release Parameter Data								
Emission Point ID No. <i>(Must match Emission Units Table)</i>	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow ¹ (acfm) <i>at operating conditions</i>	Velocity (fps)	Ground Level <i>(Height above mean sea level)</i>	Stack Height ² <i>(Release height of emissions above ground level)</i>	Northing	Easting

¹ Give at operating conditions. Include inerts.
² Release height of emissions above ground level.

ATTACHMENT K: FUGITIVE EMISSIONS DATA SUMMARY SHEET

Attachment K

FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process emissions are not typically considered to be fugitive, and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET.

Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions).

APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS
1.) Will there be haul road activities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.
2.) Will there be Storage Piles? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If YES, complete Table 1 of the NONMETALLIC MINERALS PROCESSING EMISSIONS UNIT DATA SHEET.
3.) Will there be Liquid Loading/Unloading Operations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.
4.) Will there be emissions of air pollutants from Wastewater Treatment Evaporation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
5.) Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.
6.) Will there be General Clean-up VOC Operations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
7.) Will there be any other activities that generate fugitive emissions? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.
If you answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions Summary."

FUGITIVE EMISSIONS SUMMARY	All Regulated Pollutants - Chemical Name/CAS ¹	Maximum Potential Uncontrolled Emissions ²		Maximum Potential Controlled Emissions ³		Est. Method Used ⁴
		lb/hr	ton/yr	lb/hr	ton/yr	
Haul Road/Road Dust Emissions Paved Haul Roads	N/A	N/A	N/A	N/A	N/A	N/A
Unpaved Haul Roads	N/A	N/A	N/A	N/A	N/A	N/A
Storage Pile Emissions	PM	2.70	11.83	1.35	5.91	EE
	PM ₁₀	1.29	5.63	0.64	2.82	EE
	PM _{2.5}	0.19	0.84	0.10	0.42	EE
Loading/Unloading Operations	N/A	N/A	N/A	N/A	N/A	N/A
Wastewater Treatment Evaporation & Operations	N/A	N/A	N/A	N/A	N/A	N/A
Equipment Leaks	N/A	N/A	N/A	N/A	N/A	N/A
General Clean-up VOC Emissions	N/A	N/A	N/A	N/A	N/A	N/A
Other						

¹ List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. DO NOT LIST H₂, H₂O, N₂, O₂, and Noble Gases.

² Give rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

³ Give rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

⁴ Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

ATTACHMENT L: EMISSIONS UNIT DATA SHEET

Control Device ID No. (must match List Form):

1. Plant Type: <div> <input type="checkbox"/> Hot-mix asphalt facility that reduces the size of nonmetallic minerals embedded in recycled asphalt pavement <input type="checkbox"/> Plant without crushers or grinding mills and containing a stand-alone screening operation <input type="checkbox"/> Sand and gravel plant <input type="checkbox"/> Common clay plant <input type="checkbox"/> Crushed stone plant <input type="checkbox"/> Pumice plant <input checked="" type="checkbox"/> Other, specify Coal Preparation Plant </div>																																																																																					
2. Plant Style: <div> <input checked="" type="checkbox"/> Fixed Plant <input type="checkbox"/> Portable Plant </div>			3. Plant Capacity: 2,800 tons/hr																																																																																		
4. Underground mine: <div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div>			5. Storage: <div> <input checked="" type="checkbox"/> Open <input type="checkbox"/> Enclosed </div>																																																																																		
6. <table border="1"> <thead> <tr> <th>Emission Facility Type</th> <th>Equipment Type Used</th> <th>ID Number of Emission Unit</th> <th>Manufacturer</th> <th>Model Number/Serial Number</th> <th>Date of Manufacture</th> </tr> </thead> <tbody> <tr><td>Conveyors</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Crusher</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Secondary Crushers</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Tertiary Crushers</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Grinder</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Hoppers</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Rock Drills</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Screens</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Enclosed Storage</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td></tr> <tr><td>Other</td><td>Raw Coal Stockpile</td><td>006</td><td>N/A</td><td>N/A</td><td>1968</td></tr> <tr><td>Other</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td></td></tr> <tr><td>Other</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td></td></tr> </tbody> </table>						Emission Facility Type	Equipment Type Used	ID Number of Emission Unit	Manufacturer	Model Number/Serial Number	Date of Manufacture	Conveyors	N/A	N/A	N/A	N/A	N/A	Crusher	N/A	N/A	N/A	N/A	N/A	Secondary Crushers	N/A	N/A	N/A	N/A	N/A	Tertiary Crushers	N/A	N/A	N/A	N/A	N/A	Grinder	N/A	N/A	N/A	N/A	N/A	Hoppers	N/A	N/A	N/A	N/A	N/A	Rock Drills	N/A	N/A	N/A	N/A	N/A	Screens	N/A	N/A	N/A	N/A	N/A	Enclosed Storage	N/A	N/A	N/A	N/A	N/A	Other	Raw Coal Stockpile	006	N/A	N/A	1968	Other	N/A	N/A	N/A	N/A		Other	N/A	N/A	N/A	N/A			
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7. Provide a diagram and/or schematic that shows the proposed process of the operation or plant. The diagram and/or schematic is to show all sources, components and facets of the operation or plant in an understandable line sequence of the operation. The diagram should include all the equipment involved in the operation; such as conveyors, transfer points, stockpiles, crushers, facilities, vents, screens, truck dump bins, truck, barge and railcar loading and unloading, etc. Appropriate sizing and specifications of equipment should be included in the diagram. The diagram shall logical follow the entire process load-in to load-out.

8. Roads	Paved Miles of Road	Unpaved Miles of Road	Watered		Other Control (Specify)
			Miles	Frequency	
Plant Yard	N/A	N/A			N/A
Access Roads	N/A	N/A			N/A

9. Vehicle Type

Vehicle Type	Mean Vehicle Speed in mph	Mean Vehicle Weight in Tons		Number of Wheels	Distance Traveled per Round Trip	
		Empty	Full		Paved Feet or Miles	Unpaved Feet or Miles
Raw Aggregate	N/A	N/A	N/A	N/A	N/A	
Loaders	N/A	N/A	N/A	N/A	N/A	
Product Trucks	N/A	N/A	N/A	N/A	N/A	
Other	N/A	N/A	N/A	N/A	N/A	
Other	N/A	N/A	N/A	N/A	N/A	
Other	N/A	N/A	N/A	N/A	N/A	
Other	N/A	N/A	N/A	N/A	N/A	

10. Describe all proposed materials storage facilities associated with the **Emission Units** listed.

006 - Raw Coal Stockpile 1: 750,000 ton capacity (wind erosion, pan reclaim, grading, truck load-in, pan load-in)

Storage Activity

ID of Emission Unit	006				
Type Storage	Open Stockpile				
Material Stored	Raw Coal				
Typical Moisture Content (%)	5.5				
Avg % of material passing through 200 mesh sieve					
Maximum Total Yearly Throughput in storage (tons)	10,000,000				
Maximum Stockpile Base Area (ft²)	9.69				
Maximum Stockpile height (ft)					
Dust control method applied to storage	MC, ST, UC				
Method of material load-in to bin or stockpile	Conveyor Truck load-in Pan load-in				
Dust control method applied during load-in	Partial Enclosure for Conveyor Load-in				
Method of material load-out to bin or stockpile	Conveyor				
Dust control method applied during load-out	Partial Enclosure				

Storage piles	Estimated Annual Tons	Turnover Rate (Ton/Month)	Wetted as Piled	Number of Sides Enclosed	Other Dust Control	Loading Method (Loader, Conveyor) IN/OUT
Coarse: over 1"						
Fine: 1" to ¼"						
¼" and less						
MFG. Sand						
Other, specify						
Raw Coal: 12" x 0			No	0	Moisture Content, minimized drop heights, etc.	In: Conveyor, truck, and pan Out: Conveyor

Conveying and Transfer

Describe the conveying system including transfer points associated with proposed Emission Units (crushers, etc...).

N/A

Describe any methods of emission control to be used with these proposed conveying systems:

N/A

Revision 03/2007

Crushing and Screening

ID of Emission Unit	N / A					
Type Crusher or Screen						
Material Sized						
Material Sized Throughput:						
Tons/hr						
Tons/yr						
Material sized from/to						
Typical moisture content as crushed or screened (%)						
Dust control methods applied						
Stack Parameters:						
Height (ft)						
Diameter (ft)						
Volume (ACFM)						
Temp (°F)						
Maximum operating schedule:						
Hour/day						
Day/year						
Hour/year						
Approximate Percentage of Operation from:						
Jan – Mar						
April – June						
July – Sept						
Oct – Dec						
Maximum Particulate Emissions:						
LB/HR						
Ton/Year						

List emission sources with request information:

ID of Emission Unit	Type of Emission Unit and Use	Operating Schedule		Max. Amount of Stone Input to Emission (lb/hr)	Crushed or Screened From/To (size)	Date of Emission Unit was Manufacture
		Actual (hrs/yr)	Design (hrs/yr)			
N/A						

List emission sources with request information:

ID of Emission Unit	Maximum expected emissions from Emission Unit without Air Pollution Control Equipment				
	PM ₁₀ (lbs/hr)	SO ₂ (lbs/hr)	CO (lbs/hr)	NO _x (lbs/hr)	VOC (lbs/hr)
N/A					

ID of Emission Unit	Maximum expected emissions from Emission Unit without Air Pollution Control Equipment				
	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	CO (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)
N/A					

Please fill out a separate Air Pollution Control Device Sheet for each Emission Unit equipped with an air pollution control system.

What type of stone will be quarried at this site?

N/A

How will it be quarried?

- ☐ Sawing
- ☐ Blasting
- ☐ Other, Specify:

If blasting is checked, complete the following:

- ☐ Frequency of blasting:
- ☐ What method of air pollution control will be employed during drilling and blasting?

ATTACHMENT N: SUPPORTING EMISSIONS CALCULATIONS

Table N-1. Summary of Facility Emissions and Potential Emissions Increases

Pre-Project Potential Emissions

	PM (tpy)	PM₁₀ (tpy)	PM_{2.5} (tpy)
Transfers	97.5	46.4	7.0
Crushing/Screening	189.8	90.4	13.6
Roads	423.7	125.1	12.5
Piles	7.5	3.6	0.5
Facility Wide PTE	718.5	265.4	33.6

Post-Project Potential Emissions

	PM (tpy)	PM₁₀ (tpy)	PM_{2.5} (tpy)
Transfers	97.5	46.4	7.0
Crushing/Screening	189.8	90.4	13.6
Roads	423.7	125.1	12.5
Piles	10.4	5.0	0.7
TOTAL	721.4	266.8	33.8

Potential Emissions Increases

	PM (tpy)	PM₁₀ (tpy)	PM_{2.5} (tpy)
Piles	2.9	1.4	0.2

Table N-2. Project Emissions Calculation

Fugitive Emissions from Stockpile Wind Erosion																		
Flow Diagram ID	Emission Source Description	Potential	PM	PM ₁₀	PM _{2.5}	Control	PM		PM		PM ₁₀		PM ₁₀		PM _{2.5}		PM _{2.5}	
		Pile Size (Acres)	Emission Factor (lb/day/acre)	Emission Factor (lb/yr/acre)	Emission Factor (lb/yr/acre)	Efficiency (%)	Controlled (lb/hr)	Uncontrolled	Controlled (tpy)	Uncontrolled	Controlled (lb/hr)	Uncontrolled	Controlled (tpy)	Uncontrolled	Controlled (lb/hr)	Uncontrolled	Controlled (tpy)	Uncontrolled
006	Raw coal stockpile 1	9.69	6.69	3.18	4.78E-01	50	1.35	2.70	5.91	11.83	0.64	1.29	2.82	5.63	0.10	0.19	0.42	0.84
<p><u>EMISSION FACTOR and INPUT ASSUMPTIONS</u></p> <p>1. Wind Emission from continuously active storage piles for TSP: E = (1.7) (s/1.5) [(365-p) / 235] (f/15) where: s = Silt content (%) (5%) p = precipitation days (>0.01 in.) per year from WV general permit G10-D emission calculation spreadsheet f = % of time wind speed exceeds 12 mph from WV general permit G10-D emission calculation spreadsheet From Air Pollution Engineering Manual and References</p> <p>2. TSP to PM10 conversion: 2.1 lbs TSP = 1.0 lbs PM10, TSP to PM2.5 conversion: 14 lbs TSP = 1.0 lbs PM2.5</p> <p>3. Control efficiency of 50% (due to moisture content of stored material) assumed consistent with calculations for similar facilities</p>																		

ATTACHMENT O: MONITORING, RECORDKEEPING, REPORTING AND TESTING PLANS

CCC proposes the following monitoring, recordkeeping, reporting, and testing measures be implemented for the proposed project:

CCC proposes the monitoring, recordkeeping, reporting, and testing requirements as specified in the existing R13 permit. These requirements are adequate to demonstrate compliance with applicable emission limits and operating parameters.

ATTACHMENT P: AFFADAVIT OF PUBLICATION

Attachment P includes a copy of the public notice CCC will submit to the TIMES WEST VIRGINIAN for publication. A certificate of publication will be provided to the WV DEP after the notice has been published.

AIR QUALITY PERMIT NOTICE

Notice of Application

NOTICE IS GIVEN that Consolidation Coal Company has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Class II Administrative Permit Update to increase the maximum area of the raw coal storage pile at the Robinson Run Preparation Plant, in Shinnston, in Harrison County, West Virginia. The latitude and longitude coordinates are 39.402984, -80.364170.

The applicant estimates the total increased potential to discharge the following Regulated Air Pollutants will be: Particulate Matter – 2.9 tons per year; Particulate Matter (10 micron diameter or less) – 1.4 tons per year; and Particulate Matter (2.5 micron diameter or less) – 0.2 tons per year.

Startup of operation is planned to begin on or about the 1st day of July, 2015. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this Class II Administrative Permit Update application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the xx day of May, 2015.

By: Consolidation Coal Company
Robert D. Moore
Vice President
46226 National Road W
St. Clairsville, OH 43950
740-338-3100

ATTACHMENT S: TITLE V REVISION

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary

Mark all applicable requirements associated with the changes involved with this permit revision:

<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input checked="" type="checkbox"/> Section 111 NSPS (Subpart(s) <u>Y</u>)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqs.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)

⁽¹⁾ If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

N/A

2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

N/A

☐ **Permit Shield Requested** *(not applicable to Minor Modifications)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? ☐ Yes ☒ No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

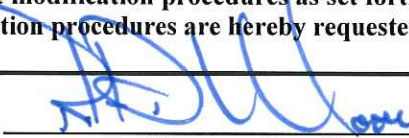
Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-2306D	08/27/2010	
	/ /	
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
PM	+2.9
PM ₁₀	+1.4
PM _{2.5}	+0.2

7. Certification For Use Of Minor Modification Procedures <i>(Required Only for Minor Modification Requests)</i>	
Note:	This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:
<ul style="list-style-type: none"> i. Proposed changes do not violate any applicable requirement; ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit; iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis; iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act; v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19; vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification; <p>Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.</p>	
<p>Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.</p>	
(Signed):	 <div style="text-align: center; font-size: small;">(Please use blue ink)</div>
Date:	<div style="text-align: center;">5 / 05 / 15</div> <div style="text-align: center; font-size: small;">(Please use blue ink)</div>
Named (typed):	<div style="text-align: center;">Robert D. Moore</div> <div style="text-align: center; font-size: small;">Vice President</div>

Note: Please check if the following included (if applicable):	
<input type="checkbox"/>	Compliance Assurance Monitoring Form(s)
<input checked="" type="checkbox"/>	Suggested Title V Draft Permit Language
<p><i>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</i></p>	

TITLE V PERMIT REDLINE

This section includes a redline strikeout version of the appropriate pages of the exiting Title V permit.

006 ^L	006, 012, 006A, 042, 043	Raw Coal Stockpile 1 - 250,000 750,000 ton capacity (wind erosion, pan reclaim, grading, truck load-in,	-----	10,000,000	M2015 1968	D011	ST, UC
C3, C4	007, 009	Conveyors (2) and Transfer Points (plant feed)	2,800	15,768,000	2002	D007, D009	FE, PE(TP-007)
Prep Plant and Clean Coal Circuit							
060	010C	Preparation Plant (raw & wet)	2,800	15,768,000	2002	D060, D040, D041	MC, EM, ES
D040 ³	P003	Exhaust Fan and Dust Collector 1; removes PM from prep plant	N/A	N/A	1968	N/A	N/A
D041 ³	P003	Scrubber; removes PM from prep	N/A	N/A	1968	N/A	N/A
C16	061	Conveyor and Transfer Point	1,800	15,768,000	2002	D061	FE
C17	62	Conveyor and Transfer Point	1,800	15,768,000	2002	D062	FE
C18	063	Conveyor and Transfer Point	1,800	15,768,000	2002	D063	FE
017 ³	017A	Clean Coal Silo 1 - 10,000 ton capacity	-----	15,768,000	1968	D016	FE
C19	064	Conveyor and Transfer Point	1,800	15,768,000	2002	D064	FE
069	065	Clean Coal Silo - 25,000 ton capacity	4,000	15,768,000	2002	D065	FE
C20	066	Conveyor and Transfer Point	4,000	15,768,000	2002	D066	FE
C7A	067	Conveyor and Transfer Point	4,000	15,768,000	2002	D067	FE
C7	019, 021A	Conveyor and Transfer Points (clean coal to rail loadout or by-pass)	4,000	15,768,000	2002	D018	FE
SC1	STP2	Sample System Feed Conveyor	5	43,800	2002	NA	FE
CR1	STP3	Sample System Pulverizer	5	43,800	2002	NA	FE
SC2	STP4	Sample System Return Conveyor	5	43,800	2002	NA	FE
020 ³	021	Railroad Loadout 1 - 100 ton capacity	4,000	15,768,000	1968	D019	FE, TC
C8 ³	023	Conveyor and Transfer Point (rail loadout by-pass belt)	1,200	10,512,000	1968	D023	PE(conv eyor), FE (TP)
C9 ³	024A	Conveyor and Transfer Point (initial belt in power plant feed)	1,300	11,388,000	1968	D042	PE, EM
D042 ³	P002	Exhaust Fan 2 and Dust Collector 2; removes PM from transfer point	N/A	N/A	1968	N/A	N/A
C10 ³	N/A	Conveyor and Transfer Point (second belt in power plant feed)	1,300	11,388,000	1968	N/A	FE
032	032, 033, 032A, 033A, 035, 036	Clean Coal Stockpile 1 - 40,000 ton capacity (wind erosion, reclaim to conveyor, grading, dozer to reclaim, truck load-in, pan load-in)	-----	8,760,000	1986	D028, D033	UC, MC
C12 (034)	034A	Conveyor and Transfer Point (clean coal destock feeder)	1,200	10,512,000	1986	D023	PE(con- veyor), FE (TP)
Refuse Circuit							
C21	068	Conveyor and Transfer Point (2010 - increased the maximum hourly throughput from 500 TPH to 800	800	4,380,000	M 2010 2002	D068	FE

5.1.15. Fugitive Coal Dust Emissions Control Plan for Subpart Y - Fugitive Coal Dust Emissions Control Plan.

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 as specified in paragraphs (c)(1) through (6) of this section.

[40 CFR§60.254(c)]

- (1) 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.

[40 CFR§60.254(c)(1)]
- (2) For open coal storage piles, the fugitive coal dust emissions control plan must require that one or more of the following control measures be used to minimize to the greatest extent practicable fugitive coal dust: Locating the source inside a partial enclosure, installing and operating a water spray or fogging system, applying appropriate chemical dust suppression agents on the source (when the provisions of paragraph (c)(6) of this section are met), use of a wind barrier, comp action, or use of a vegetative cover. The owner or operator must select, for inclusion in the fugitive coal dust emissions control plan, the control measure or measures listed in this paragraph that are most appropriate for site conditions. The plan must also explain how the measures or measures selected are applicable and appropriate for site conditions. In addition, the plan must be revised as needed to reflect any changing conditions at the source.

[40 CFR§60.254(c)(2)]
- (3) Any owner or operator of an affected facility that is required to have a fugitive coal dust emissions control plan may petition the Administrator to approve, for inclusion in the plan for the affected facility, alternative control measures other than those specified in paragraph (c)(2) of this section as specified in paragraphs (c)(3)(i) through (iv) of this section.

[40 CFR§60.254(c)(3)]

 - (i) The petition must include a description of the alternative control measures, a copy of the fugitive coal dust emissions control plan for the affected facility that includes the alternative control measures, and information sufficient for EPA to evaluate the demonstrations required by paragraph (c)(3)(ii) of this section.

[40 CFR§60.254(c)(3)(i)]
 - (ii) The owner or operator must either demonstrate that the fugitive coal dust emissions control plan that includes the alternative control measures will provide equivalent overall environmental protection or demonstrate that it is either economically or technically infeasible for the affected facility to use the control measures specifically identified in paragraph (c)(2).

[40 CFR§60.254(c)(3)(ii)]

(iii) While the petition is pending, the owner or operator must comply with the fugitive coal dust emissions control plan including the alternative control measures submitted with the petition. Operation in accordance with the plan submitted with the petition shall be deemed to constitute compliance with the requirement to operate in accordance with a fugitive coal dust emissions control plan that contains one of the control measures specifically identified in paragraph (c)(2) of this section while the petition is pending.

[40 CFR§60.254(c)(3)(iii)]

(iv) If the petition is approved by the Administrator, the alternative control measures will be approved for inclusion in the fugitive coal dust emissions control plan for the affected facility. In lieu of amending this subpart, a letter will be sent to the facility describing the specific control measures approved. The facility shall make any such letters and the applicable fugitive coal dust emissions control plan available to the public. If the Administrator determines it is appropriate, the conditions and requirements of the letter can be reviewed and changed at any point.

[40 CFR§60.254(c)(3)(iv)]

(4) The owner or operator must submit the fugitive coal dust emissions control plan to the Administrator or delegated authority prior to the startup of the new, reconstructed, or modified affected facility, or 30 days after the effective date of this rule, whichever is later.

[40 CFR§60.254(c)(4)]

(5) The Administrator or delegated authority may object to the fugitive coal dust emissions control plan as specified in paragraphs (c)(5)(i) of this section.

[40 CFR§60.254(c)(5)]

(i) The Administrator or delegated authority may object to any fugitive coal dust emissions control plan that it has determined does not meet the requirements of paragraphs (c)(1) and (c)(2) of this section.

[40 CFR§60.254(c)(5)(i)]

(ii) If an objection is raised, the owner or operator, within 30 days from receipt of the objection, must submit a revised fugitive coal dust emissions control plan to the Administrator or delegate authority. The owner or operator must operate in accordance with the revised fugitive coal dust emissions control plan. The Administrator or delegated authority retain the right, under paragraph (c)(5) of this section, to object to the revised control plan if it determines the plan does not meet the requirements of paragraphs (c)(1) and (c)(2) of this section.

[40 CFR§60.254(c)(5)(ii)]

(6) Where appropriate chemical dust suppressant agents are selected by the owner or operator as a control measure to minimize fugitive coal dust emissions, (1) only chemical dust suppressants with Occupational Safety and Health Administration (OSHA)-compliant material safety data sheets (MDS) are to be allowed; (2) the MSDS must be included in the fugitive coal dust emissions control plan; and (3) the owner or operator must consider and document in the fugitive coal dust emissions control plan the site-specific impacts associated with the use of such chemical dust suppressants.

[40CFR§60.254(c)(6)]