

Consolidation Coal Company
1 Bridge Street
Monongah, WV 26554

Telephone Number: (304)534-4700
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CERTIFIED MAIL RECEIPT

October 2, 2015



William, Durham, Director
Division of Air Quality
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, West Virginia 25304

Re: Consolidation Coal Company
Blacksville No. 2 Preparation Plant
Permit R30-06100016-2013
R13-0718E
Facility ID 03-54-061-00016

Dear Mr. Durham:

Consolidation Coal Company requests a class 1 administrative update to our permit R13-0718E to clarify the requirements applicable to the Blacksville No. 2 Preparation Plant, and specifically, the thermal dryer.

Paragraphs 1 and 2 of Section 4.5.6 of permit R13-0718E provide as follows:

4.5.6 For the purpose of reports required under section 60.7(c), any owner operator subject to the provision of this subpart also shall report semiannually periods of excess emissions as follows:
[40CFR§60.258(b)]

(1) The owner or operator of an affected facility with a wet scrubber shall submit semiannual reports to the Administrator or a delegated authority of occurrences when the measurements of the scrubber pressure loss, water supply flow rate, or pH of the wet scrubber liquid vary by more than 10 percent from the average determined during the most recent performance test.

[40CFR§60.258(b)(2)]

(2) The owner or operator of an affected facility with control equipment other than a wet scrubber shall submit semiannual reports to the Administrator or delegated authority of occurrences when the measurements of the reagent injection flow rate, as applicable, vary by more than 10 percent from the average determined during the most recent performance test.

[40CFR60.258(b)(3)]

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These requirements are applicable to coal preparation and processing plants that commenced construction, reconstruction, or modification after April 28, 2008. *See* 40 CFR 60.258(a) and 40 CFR§60.250(c) Because the Blackville No. 2 Preparation Plant was constructed in 1984 and has not been reconstructed or modified since that time, these requirements are inapplicable. As such, Paragraphs 1 and 2 of Section 4.5.6 should be deleted. These requirements are replicated in permit R30-06100016-2013 at Paragraphs 1 and 2 of Section 4.5.7 and should be deleted from that permit as well. .

Thank you for your time and if you have any questions please call me at (304)-534-4726.

Sincerely,



David Roddy
Environmental Engineer

Enclosure

Cc:

S. Roberts
B. Tephabock
R. Smith
C. Scott