



west virginia department of environmental protection

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

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

Evaluation Memo

Application Number: R13-1582D
Facility ID Number: 051-00006
Name of Applicant: Kentucky Power Company
Name of Facility: Kammer Coal Handling Facility
Application Type: Class 1 Administrative Update
Submission Date: September 21, 2015
Applicant Ad Date: Not Applicable
Applicant Ad Newspaper: Not Applicable
Complete Date: October 13, 2015
Due Date: December 12, 2015
Engineer: Joe Kessler

Description of Proposed Changes

On September 21, 2015, Kentucky Power Company (KPC) submitted a permit application for a Class 1 Administrative Update (A/U) to R13-1582C. The request was to remove coal processing equipment (primarily crushers) that had been added under R13-1582C and had resulted in the coal handling facility remaining subject to Title V (through the applicability of the facility to 40 CFR 60, Subpart Y) after the permanent shutdown of the associated Kammer Power Generating Station. The removal of this equipment from the permit will allow the modified facility to, in the absence of the power plant, to become exempt from Title V deferred-source status and pay annual operating fees under the 45CSR22 fee program.

Regulatory Applicability

The modification reviewed herein will result in changes to the facility's regulatory applicability. Each of these changes are discussed below.

45CSR5: To Prevent and Control Air Pollution from Coal Preparation Plants, Coal Handling Operations, and Coal Refuse Disposal Operations

While the associated Kammer Power Generating Station was in operation, the coal handling operations were regulated under 45CSR2, Section 5. With the permanent shutdown of the power plant, the coal handling operations at the facility are defined as a “coal preparation plant” under §45-5-2.4 and are, therefore, subject to the applicable requirements of 45CSR5. The substantive requirements applicable to the new/modified equipment are discussed below.

45CSR5 Emission of Particulate Matter - Section 3

Section 3 of 45CSR5 sets a twenty percent (20%) opacity limit on all stack and fugitive dust control systems. KPC’s use of full enclosures on most transfer points should allow them to meet this requirement.

45CSR5 Fugitive Emissions - Section 6

Section 6 of 45CSR5 requires all facilities subject to the rule to minimize emissions through the use of a fugitive dust control system. KPC’s use of full enclosures on most transfer points are considered appropriate fugitive emissions minimization.

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

Under §45-13-4.2a, Class I Administrative Updates are limited to a list of potential permit changes including a “[c]hange in a permit condition as necessary to allow changes in operating parameters, emission points, control equipment or any other aspect of a source which results in a decrease in the emission of any existing regulated air pollutant or any new regulated air pollutant.”

In assessing the changes requested by KPC, it has been determined that removal of the equipment and processes will result in a decrease of particulate matter potential-to-emit (PTE) from the facility (self-evident as the only changes in the PTE are from the removal of equipment). Therefore, the issuance of a Class I Administrative Update to incorporate the requested changes is appropriate.

40 CFR 60, Subpart Y: Standards of Performance for Coal Preparation and Processing Plants (Non-Applicability)

Subpart Y contains requirements relating to the performance of coal preparation plants. Pursuant to §60.250, affected facilities under Subpart Y include “[t]hermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, transfer and loading systems, and open storage piles” located at “coal preparation and processing plants” that process greater than 200 tons per day. “Coal preparation and processing plants” are defined as “any facility (excluding underground mining operations) which prepares coal by one or more of the following processes: breaking, crushing, screening, wet or dry

cleaning, and thermal drying.” With the removal of the permitted crushing equipment, the modified Kammer Coal Handling Facility will not meet the definition of a “coal preparation plant” or a “coal processing plant” under 40 CFR 60, Subpart Y and, therefore, the facility will no longer be subject to Subpart Y.

45CSR30: Requirements for Operating Permits (Non-Applicability)

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The modified Kammer Coal Handling Facility does not meet the definition of a “major source under §112 of the Clean Air Act” as outlined under §45-30-2.26 and clarified (fugitive policy) under 45CSR30b. Additionally, as there will be no emissions sources at the facility subject to requirements promulgated under §111 or §112(r) of the Clean Air Act (specifically 40 CFR 60, Subparts Y), the facility will be reclassified as a non-Title V source subject to the fees required under 45CSR22.

Changes to Permit R13-1582C

The following substantive changes were made to Permit Number R13-1582C:

- Removal of specified equipment (crushers and associated conveyer belts) in Emissions Table 1.0;
- Addition of four (4) existing, grandfathered transfer points to Emissions Table 1.0;
- Removal of the control device table under 4.1.4. and adding reference to control devices as listed under Emissions Table 1.0; and
- Removal of all language requiring compliance with 40 CFR 60, Subpart Y.

Recommendation

The information provided in permit application R13-1582D indicates that compliance with all applicable federal and state air quality regulations will be achieved. Therefore, I recommend to the Director the issuance of the Class 1 Administrative Update R13-1582D to Kentucky Power Company for the changes outlined above at the Kammer Coal Handling Facility.



Joe Kessler, PE
Engineer

10/14/15

Date