TITLE V (45CSR30)
RENEWAL APPLICATION

POCAHONTAS NO. 51 PREPARATION PLANT
PLANT ID. 03-54-109-00013

PREPARED FOR:

KEPLER PROCESSING COMPANY, LLC
PINEVILLE, WEST VIRGINIA

PREPARED BY:

ENVIRONMENTAL REGULATORY SERVICE GROUP, INC.
2303 ROXALANA ROAD
DUNBAR, WEST VIRGINIA 25064

PROJECT NO. ERSG 06-102-05

AUGUST 2006

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0499

TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. Name of Applicant (As registered with the WV Secretary of State's Office):	2. **Facility Name or Location:**
Kepler Processing Company, LLC	Pocahontas No. 51 Preparation Plant
3. DAQ Plant ID No.: 03-54-109-00013	**4. Federal Employer ID No. (FEIN):** 55-0741627

5. **Permit Application Type:**

☐ Initial Permit — When did operations commence? 1968
☒ Permit Renewal — What is the expiration date of the existing permit? 08/13/2006
☐ Update to Initial Permit Application

6. Type of Business Entity:

☐ Corporation ☐ Governmental Agency
☐ Partnership ☒ Limited Partnership

7. Is the Applicant the:

☐ Owner ☐ Operator ☒ Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

8. Number of onsite employees:

20

9. Governmental Code:

☒ Privately owned and operated; 0
☐ Federally owned and operated; 1
☐ State government owned and operated; 2
☐ County government owned and operated; 3
☐ Municipality government owned and operated; 4
☐ District government owned and operated; 5

10. 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.

11. Mailing Address		
Street or P.O. Box: P.O. Box 1392		
City: Pineville	**State:** WV	**Zip:** 24874
Telephone Number: (304) 732-6452	**Fax Number:** (304) 732-6454	

12. Facility Location		
Street: P.O. Box 1392	**City:** Pineville	**County:** Wyoming
UTM Easting: 449.67 km	**UTM Northing:** 4,158.67 km	**Zone:** ☒ 17 or ☐ 18
Directions: From Pineville travel West on State Route 97 approximately three (3) miles. Facility is adjacent to State Route 97.		
Portable Source? ☐ Yes ☒ No		
Is facility located within a nonattainment area? ☐ Yes ☒ No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? ☒ Yes ☐ No		**If yes, name the affected state(s).** Virginia Kentucky
Is facility located within 100 km of a Class I Area[1]? ☐ Yes ☒ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☒ No		**If yes, name the area(s).**

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information	
Responsible Official: John Harsanyi	**Title:** President
Street or P.O. Box: P.O. Box 1392	

City: Pineville	**State:** WV	**Zip:** 24874
Telephone Number: (304) 732-6452	**Fax Number:** (304) 732-6454	
E-mail address: jharsanyi@alphanr.com		
Environmental Contact: John Harsanyi		**Title:** President
Street or P.O. Box: P.O. Box 1392		
City: Pineville	**State:** WV	**Zip:** 24874
Telephone Number: (304)732 -6452	**Fax Number:** (304)732-6454	
E-mail address: jharsanyi@alphanr.com		
Application Preparer: Jim Cooper		**Title:** Senior Engineer
Company: Environmental Regulatory Service Group, Inc.		
Street or P.O. Box: 2303 Roxalana Road		
City: Dunbar	**State:** WV	**Zip:** 25064
Telephone Number: (304)746-4780	**Fax Number:** (304)746-4783	
E-mail address: jim@ersginc.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Coal Preparation and Handling	Clean Coal	212111	1221

Provide a general description of operations.

The Pocahontas No. 51 Preparation Plant is a coal preparation plant with a thermal dryer. It has the ability to screen, break/size, wash, thermally dry, store, and load out/in coal. The maximum capacity of the preparation plant is 1,000 tons per hour of raw coal feed.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary

Instructions: Mark all applicable requirements.

☒ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☒ PSD (45CSR14)

☒ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☒ Section 111 NSPS	☐ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ Section 112(j) MACT hammer
☐ Section 112(i) Early reduction of HAP	☐ 112(r) RMP
☐ Section 129 Standards/Reqts.	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Tank vessel reqt., section 183(f)	☐ Stratospheric ozone (Title VI)
☐ NAAQS, increments or visibility (temp. sources)	☐ Emissions cap 45CSR§30-2.6.1
☒ 45CSR4 State enforceable only rule	☐ 45CSR27 State enforceable only rule
☐ Emissions Trading and Banking (45CSR28)	☐ Acid Rain (Title IV, 45CSR33)
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)

19. Non Applicability Determinations

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

Section 112 - no MACT standard has been promulgated for thermal dryers.
Section 129 Standards and Requirements - facility does not combust solid waste.
Section 183 (tank vessel requirement) - no tanks/vessels utilized at this facility.
NAAQS increments or visibility (temp. sources) - no temporary sources.
Emission Trading and Banking (45CSR28) - not involved in this program.
NOx Budget Trading Program Non-EGU's (45CSR1) - does not meet the definition of NOx Budget Unit
FIP - none in place
Nonattainment NSR (45CSR19) - Not located in a non-attainment area or will not contribute to a violation of section 107 of the CAA.
Section 183 (e) - facility is not a regulated entity as defined by Section 183 (e)(C).
Statospheric Ozone (Title VI) - does not emit any of the listed pollutants.
Emissions Cap 45CSR30-2.6.1 - none in place
45CSR27 – does not meet definition of chemical processing unit.
Acid Rain (Title IV) - not an EGU.
NOx Budget Trading Program non-EGU's (45CSR1) - not ivolved in this program.
NOx Budget Trading Program EGU's (45CSR26) - not an EGU.

☒ Permit Shield

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

☒ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

Certified emission statement – Permit Condition Number II.E.
Asbestos inspection/removal – Permit Condition Number III.B.1.a.iii.
No open burning – Permit Condition Number III.B.1.a.i. and III.B.1.a.ii.
Annual compliance certification – Permit Condition Number II.I.3.
Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
No objectionable odors – Permit Condition Number III.B.1.b.i.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit for fugitive dust control systems – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Certified emission statement (Permit Condition Number II.E.) – Submit annually with fee
Asbestos inspection/removal (Permit Condition Number III.B.1.a.iii.) – Inspection and reporting
No open burning (Permit Condition Number III.B.1.a.i. and III.B.1.a.ii.) - Inspection
Annual compliance certification (Permit Condition Number II.I.3.) – Monitoring and recordkeeping
Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
No objectionable odors (Permit Condition Number III.B.1.b.i.) – Recordkeeping
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
R30-10900013-1996	02/13/2002	
R13-2104D	06/22/2006	
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22. Inactive Permits/Obsolete Permit Conditions

Permit Number	Date of Issuance	Permit Condition Number
R13-2104A	11/20/2001	
R13-2104B	04/14/2003	
R13-2104C	03/30/2004	
R13-2104	07/01/1997	
	/ /	

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]

Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	135.73
Nitrogen Oxides (NO_X)	221.36
Lead (Pb)	--
Particulate Matter (PM_{10})[1]	158.99
Total Particulate Matter (TSP)	480.22
Sulfur Dioxide (SO_2)	249.29
Volatile Organic Compounds (VOC)	147.77
Hazardous Air Pollutants[2]	Potential Emissions
Acetaldehyde	0.0125
Acetohenone	0.0003
Acrolein	0.0064
Benzene	0.0285
Benzyl Chloride	0.0153
Bromoform	0.0009
Carbon Disulfide	0.0028
2-Chloroacetophenone	0.0002

Chlorobenzene	0.0005
Chloroform	0.0013
Cumene	0.0012
2,4-Dinitrotoluene	1.40E-06
Dimethyl Sulfate	0.0011
Ethyl Benzene	0.0021
Formaldehyde	0.0053
Hexane	0.0015
Methyl Ethyl Ketone	0.0085
Methyl Hydrazine	0.0037
Methyl Methacrylate	0.0004
Mehylene Chloride	0.0064
Phenol	0.0004
Propionaldehyde	0.0083
Tetrachloroethylene	0.0009
Toluene	0.0053
1,1,1-Trichloroethane	0.0004
Styrene	0.0005
Xylenes	0.0008
Vinyle Acetate	0.0002
Hydrocloric Acid	0.3121
Hydroflouric Acid	0.0378
Antimony (Sb2O5)	0.0526
Arsenic (AS2O5)	0.6986
Beryllim (BeO)	0.3176
Cadminum (CdO)	0.0050
Chromium (CrO3)	0.6592

Cobalt (CoO)	0.4271
Manganese (MnO2)	1.0030
Mercury (HgO)	0.0046
Nickel (NiO)	0.6285
Selenium (SeO2)	0.2039
Regulated Pollutants other than Criteria and HAP	Potential Emissions

[1] *PM_{10} is a component of TSP.*
[2] *For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.*

Section 4: Insignificant Activities

		24. Insignificant Activities (Check all that apply)
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☒	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☒	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☒	4.	Bathroom/toilet vent emissions.
☒	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☐	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☐	8.	Boiler water treatment operations, not including cooling towers.
☒	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☒	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☒	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☒	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☐	14.	Demineralized water tanks and demineralizer vents.
☐	15.	Drop hammers or hydraulic presses for forging or metalworking.
☐	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☒	18.	Emergency road flares.
☐	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☐	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☒	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☐	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☒	26.	Fire suppression systems.
☒	27.	Firefighting equipment and the equipment used to train firefighters.
☐	28.	Flares used solely to indicate danger to the public.
☒	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☐	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☒	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☒	34.	Indoor or outdoor kerosene heaters.
☒	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☒	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☐	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.

24. Insignificant Activities (Check all that apply)		
☒	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
☐	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☐	43.	Process water filtration systems and demineralizers.
☒	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☐	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☐	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☐	50.	Space heaters operating by direct heat transfer.
☐	51.	Steam cleaning operations.
☐	52.	Steam leaks.
☐	53.	Steam sterilizers.
☐	54.	Steam vents and safety relief valves.
☐	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☒	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☐	57.	Such other sources or activities as the Director may determine.
☒	58.	Tobacco smoking rooms and areas.
☐	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.
26. Emission Units
For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.
For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.
27. Control Devices
For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

Note: *This Certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. 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.

Responsible official (type or print)

Name: John Harsanyi	Title: President

Responsible official's signature:

Signature: _____ Signature Date: _____

(Must be signed and dated in blue ink)

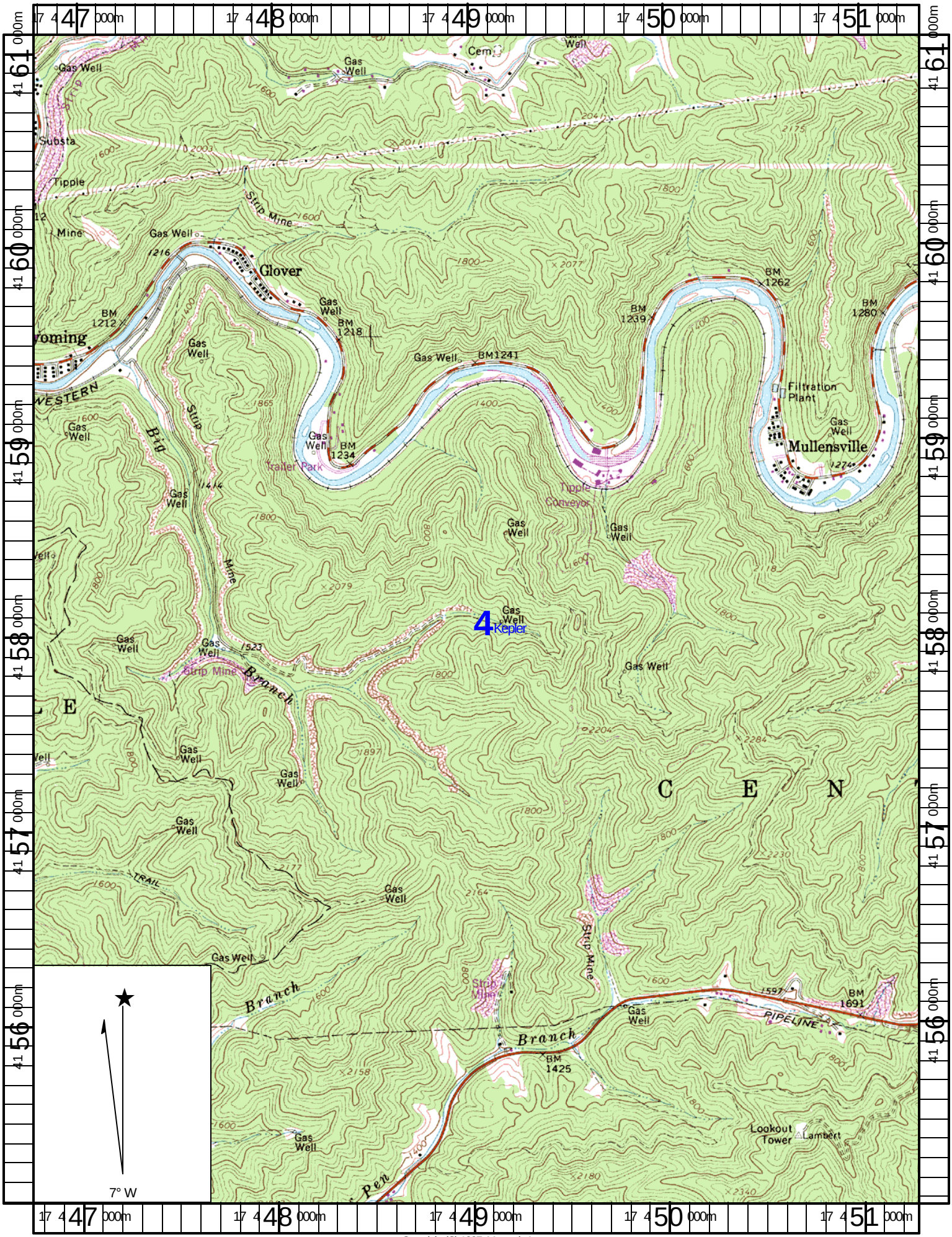
Note: Please check all applicable attachments included with this permit application:

☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☒	ATTACHMENT D: Title V Equipment Table
☒	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☒	ATTACHMENT G: Air Pollution Control Device Form(s)

Table of Content

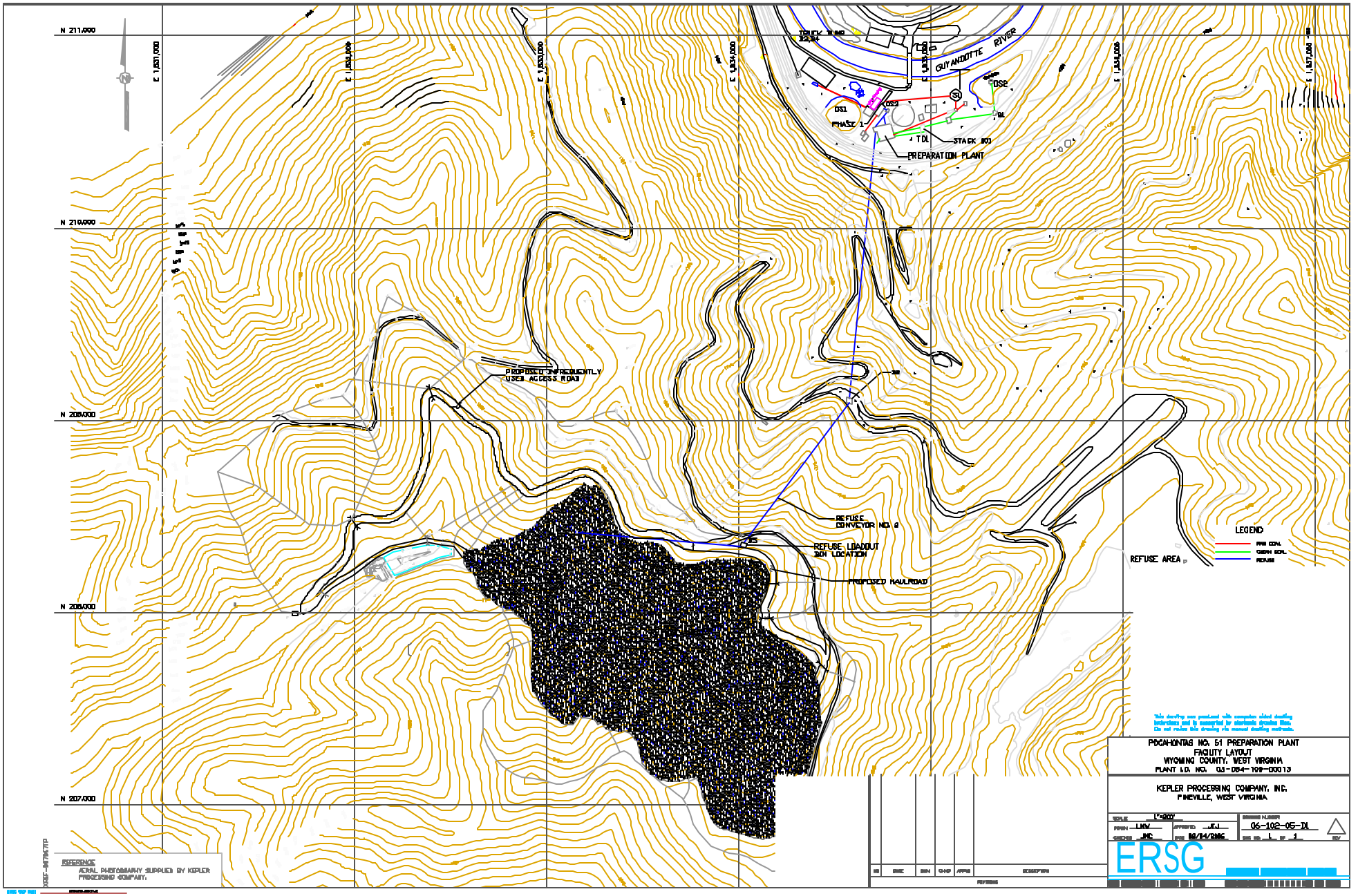
ATTACHMENT A

AREA MAP(S)



ATTACHMENT B

PLOT PLAN(S)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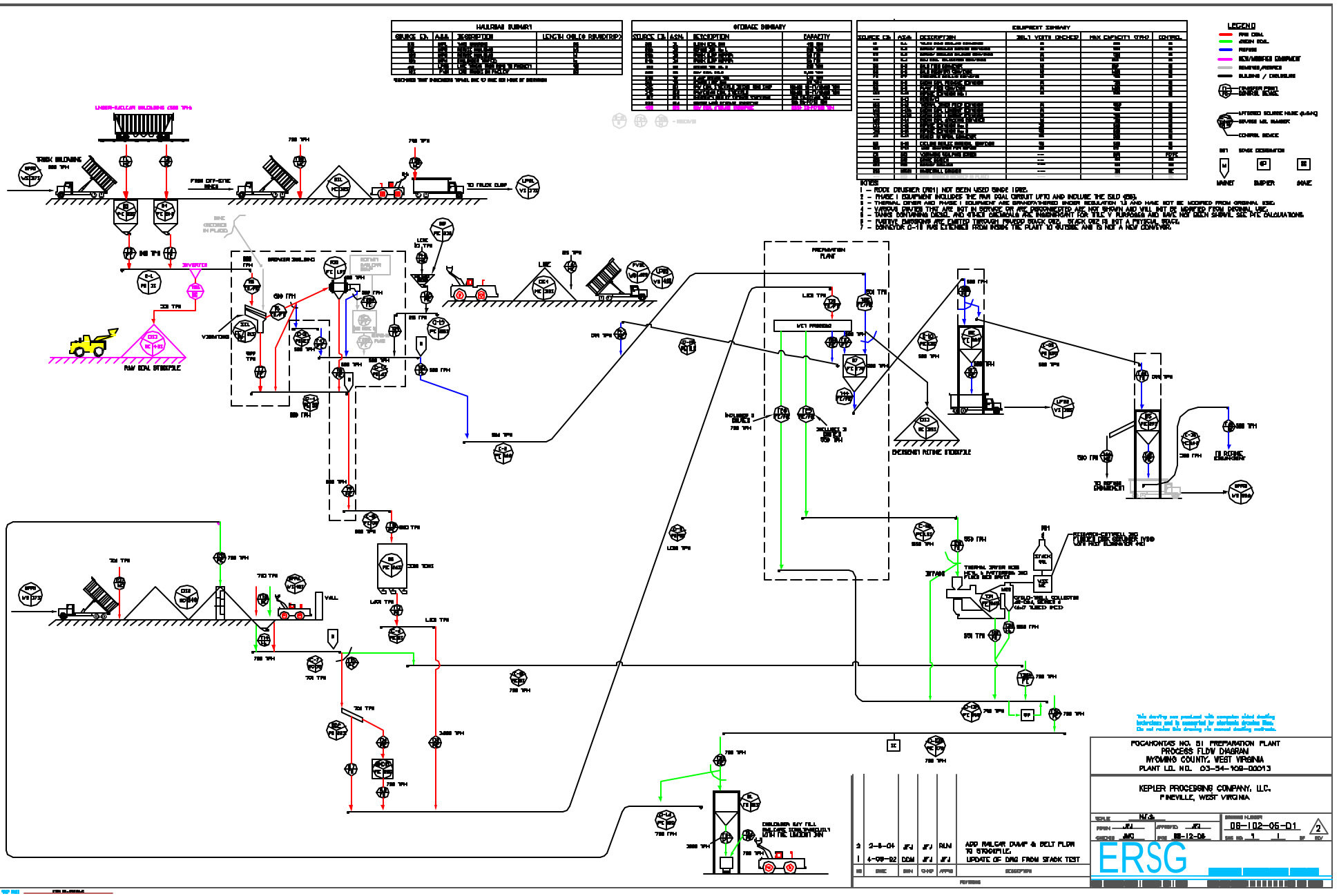
GUYANDOTTE RIVER
TRUCK ROAD
DS1
DS2
DS3
PHASE 1
TDL
STACK 002
PREPARATION PLANT
PROPOSED INFREQUENTLY USED ACCESS ROAD
REFUSE CONVEYOR NO. 2
REFUSE LOADOUT BIN LOCATION
PROPOSED HAULROAD
REFUSE AREA
LEGEND
RAW COAL
CLEAN COAL
REFUSE
REFERENCE
AERIAL PHOTOGRAPHY SUPPLIED BY KEPLER PROCESSING COMPANY.
POCAHONTAS NO. 51 PREPARATION PLANT
FACILITY LAYOUT
WYOMING COUNTY, WEST VIRGINIA
PLANT I.D. NO. 03-054-199-00013
KEPLER PROCESSING COMPANY, INC.
PINEVILLE, WEST VIRGINIA
SCALE 1"=200'
DRWN LMV
CHECKED JMC
APPROVED JCJ
DATE 10/14/2005
DRAWING NUMBER 05-102-05-DL
SHEET NO. 1 OF 1
REV
ERSG

ATTACHMENT C

PROCESS FLOW DIAGRAM(S)


HAULAGE SUMMARY
STORAGE SUMMARY
EQUIPMENT SUMMARY
LEGEND
NOTES
1 – ROCK CRUSHER (CR11) NOT BEEN USED SINCE 1982.
2 – PHASE I EQUIPMENT INCLUDES THE RAW COAL CIRCUIT UP TO AND INCLUDE THE SILO (S5).
3 – THERMAL DRYER AND PHASE I EQUIPMENT ARE GRANDFATHERED UNDER REGULATION 13 AND HAVE NOT BE MODIFIED FROM ORIGINAL USE.
4 – VIBRATING GRIZZLY (T01) ARE NOT IN SERVICE BUT ARE GRANDFATHERED AND HAVE NOT BEEN MODIFIED FROM ORIGINAL USE.
5 – TANKS CONTAINING DIESEL AND OTHER CHEMICALS ARE INSIGNIFICANT FOR TITLE V PURPOSES AND HAVE NOT BEEN SHOWN. SEE PTE CALCULATIONS.
6 – PARTIAL DIMENSIONS ARE CENTER THROUGH FORWARD STACK (S6). STACK (S6) IS NOT A FUGITIVE STACK.
7 – CONVEYOR C-11 WAS EXTENDED FROM INSIDE THE PLANT TO OUTSIDE AND IS NOT A NEW CONVEYOR.
RAW COAL STOCKPILE
PREPARATION PLANT
EMERGENCY RUSTING STOCKPILE
ADD RAILCAR DUMP & BELT FLOW TO STOCKPILE.
UPDATE OF DRG FROM STACK TEST
POCAHONTAS NO. 61 PREPARATION PLANT
PROCESS FLOW DIAGRAM
WYOMING COUNTY, WEST VIRGINIA
PLANT I.D. NO. 03-54-109-00013
KEPLER PROCESSING COMPANY, LLC.
PINEVILLE, WEST VIRGINIA
08-102-05-D1
ERSG

ATTACHMENT D

TITLE V EQUIPMENT TABLE

ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
T5, T6, and T7	FE/FE	SC1	Vibrating Scalping Screen	800 ton/hr	1968
T15, T16, and T17	PE	SC2	Stationary Grate Screen	700 ton/hr	1976
T16 and T18	FE	HMCR1	Hammermill Crusher	700 ton/hr	1976
T6, T8, and T20A	FE	RB1	Rotary Breaker	600 ton/hr	1968
T38 and T39	MC	OS1	Raw Coal Stockpile	100,000 ft^2/ 20,000 ton	1982
T35, T37, T13, and T14	MC	OS2	Raw/Clean Coal Stockpile	100,000 ft^2/ 30,000 ton	1996
T22	MC	OS3	Emergency Refuse Stockpile	200 ft^2/400 ton	1996
T47 and T48	MC	OS4	Lime Stockpile	500 ft^2/50 ton	1999
T5A	MC	OS5	Raw Coal Stockpile	2,544 ft^2/500 ton	2004
T33 and T34	FE	B1	Train Loadout Bin	450 ton	1997
T26 and T27	FE	B2	Refuse Bin	200 ton	1997
T1 and T3	PE	B3	Truck Dump Hopper	50 ton	1976
T2 and T4	PE	B4	Truck Dump Hopper	50 ton	1976
T40, T41, and T46	FE	B5	Refuse Bin	200 ton	1997
T10 and T11	FE	B6	Raw Coal Silo	5,000 ton	1968
T22, T23, and T44	FE	B7	Plant Refuse Bin	175 ton	1997
T48 and T49	PE	B8	Lime Bin	25 ton	1999
001, T30, T31, and T32	Multi-Clone, Wet Scrubber, Mist	TD1	Thermal Dryer	Design - 130 MMBtu/hr Actual – 105 MMBtu/hr	1968
T1, T2, T37, T38, and T39	WS	UPR1	Raw/Clean Coal Truck Traffic	0.5 mile/trip	NA
T27	WS	UPR2	Refuse Truck Traffic	0.5 mile/trip	NA
T41	WS	UPR3	Refuse Truck Traffic	1 mile/trip	NA
T13, T39, T48, and T51	WS	UPR4	Endloader/Dozer Traffic	1 mile/trip	NA
T47	WS	UPR5	Lime Trucks	0.5 mile/trip	NA
T47	WS	PVD1	Lime Trucks	0.5 mile/trip	NA
T3, T4, and T5	PE	C-1	Truck Dump Conveyor to SC1	800 ton/hr	1976

T21, T45, and T22	PE	C-2	Refuse Conveyor to B7	500 ton/hr	1968
T6 and T43	PE	C-3	Raw Coal Conveyor to C-17	500 ton/hr	1996
T6, T7, T8, and T9	PE	C-4	Raw Coal Conveyor to C-5	800 ton/hr	1968
T9 and T10	PE	C-5	Raw Coal Conveyor to C-6	800 ton/hr	1968
T11 and T12	PE	C-6	Silo Recovery Conveyor	1,000 ton/hr	1997
T14 and T15	MC	C-7	Raw Coal Conveyor to SC-2 or C-8	700 ton/hr	1976
T15 and T36A	PE	C-8	Clean Coal Recycle Conveyor	700 ton/hr	1996
T17, T18, T12, and T19	PE	C-9	Raw Coal Conveyor to Wet Wash	1,000 ton/hr	1997
T44 and T26	PE	C-10	Refuse Conveyor to B5 or C-16	500 ton/hr	1997
T29 and T30	PE	C-12	Clean Coal to Thermal Dryer	550 ton/hr	1968
T28, T30, T31, and T36	PE	C-13A	Clean Coal Conveyor to C-13B	700 ton/hr	1997
T36 and T33	PE	C-13B	Clean Coal Conveyor to B1	700 ton/hr	1997
T33 and T35	PE	C-14	Clean Coal Conveyor to OS2	700 ton/hr	1996
T26 and T40	PE	C-15	Refuse Conveyor to B5 or C-16	500 ton/hr	1997
T41 and T42	MC	C-16	Refuse Conveyor to Refuse Embankment	500 ton/hr	1997
T43, T50, and T21	PE	C-17	Refuse Conveyor to OS3 or C-2	500 ton/hr	1968
T52 and T45	PE	C-18	Refuse Conveyor to C-2	500 ton/hr	1968
T49 and T50	PE	C-19	Lime Conveyor	25 ton/hr	1999

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

ATTACHMENT E

EMISSION UNIT FORM(S)

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
TD1	Thermal Dryer	Multi-Clone, Wet Scrubber, and Mist Eliminator

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Coal fired fluidized bed thermal dryer
550 tons per hour
130 MMBtu/hr

Manufacturer:	**Model number:**	**Serial number:**
Heyl and Patterson	Model No. 135	NA
Construction date:	**Installation date:**	**Modification date(s):**
1968	1968	NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
130 MMBtu/hr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
550 tons dried per hour	3,010,000 tons dried annually	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_ Yes ___ No	**If yes, is it?** ___ Indirect Fired _X_ Direct Fired
Maximum design heat input and/or maximum horsepower rating: 130 MMBtu/hr	**Type and Btu/hr rating of burners:** Riley #350 105 MMBtu/hr Furnace Two gas burners @ 6 MMBtu/hr each

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Coal (Primary) – 5 ton/hr and 43,800 ton/yr
Natural Gas (Secondary) – 11,765 ft^3/hr and 103,058,824 ft^3/yr

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Coal	1.18%	6%	15,000 Btu/lb
Natural Gas	20 gr/100 ft^3	NA	1020 Btu/ft^3

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	30.99	135.73
Nitrogen Oxides (NO_X)	80.26	221.36
Lead (Pb)	0.065	0.285
Particulate Matter (PM_{10})	24.38	66.71
Total Particulate Matter (TSP)	64.35	176.09
Sulfur Dioxide (SO_2)	56.91	249.28
Volatile Organic Compounds (VOC)	53.96	147.77
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Acetaldehyde	0.0029	0.0125
Acetohenone	0.0001	0.0003
Acrolein	0.0015	0.0064
Benzene	0.0065	0.0285
Benzyl Chloride	0.0035	0.0153
Bromoform	0.0002	0.0009
Carbon Disulfide	0.0007	0.0028
2-Chloroacetophenone	0.0000	0.0002
Chlorobenzene	0.0001	0.0005
Chloroform	0.0003	0.0013
Cumene	0.0003	0.0012
2,4-Dinitrotoluene	0.0000	0.0000
Dimethyl Sulfate	0.0002	0.0011
Ethyl Benzene	0.0005	0.0021
Formaldehyde	0.0012	0.0053
Hexane	0.0003	0.0015
Methyl Ethyl Ketone	0.0020	0.0085
Methyl Hydrazine	0.0009	0.0037
Methyl Methacrylate	0.0001	0.0004
Mehylene Chloride	0.0015	0.0064
Phenol	0.0001	0.0004

Propionaldehyde	0.0019	0.0083
Tetrachloroethylene	0.0002	0.0009
Toluene	0.0012	0.0053
1,1,1-Trichloroethane	0.0001	0.0004
Styrene	0.0001	0.0005
Xylenes	0.0002	0.0008
Vinyle Acetate	3.80E-05	0.0002
Hydrocloric Acid	0.0712	0.3121
Hydroflouric Acid	0.0086	0.0378
Antimony (Sb2O5)	0.0120	0.0526
Arsenic (AS2O5)	0.1595	0.6986
Beryllim (BeO)	0.0725	0.3176
Cadminum (CdO)	0.0012	0.0050
Chromium (CrO3)	0.1505	0.6592
Cobalt (CoO)	0.0975	0.4271
Manganese (MnO2)	0.2290	1.0030
Mercury (HgO)	0.0010	0.0046
Nickel (NiO)	0.1435	0.6285
Selenium (SeO2)	0.0466	0.2039
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Particulate, nitrogen oxides, volatile organic compound, and carbon dioxide potential emissions are based on the emissions factors found in AP-42 - Table 11.10-1 & 11.10-2 (11/'95) and the amount of coal dried in the thermal dryer.

Sulfur dioxide emissions are based on the sulfur content of the fuel and the heat input to the thermal dryer.

The carbon monoxide potential emissions are based on the emission factors found in AP-42 Table 1.4-1 and 1.4-2 (7/'98) and the amount of coal/natural gas combusted.

The VOC HAP potential emissions are based on the emission factors taken from Tables 3-8 and 4-5 of EPA's Guidance for Coal Mining Facilities (EPA 745-B-99-002).

The metal HAP potential emissions are based on the emission factors found in the USGS Coal Qual Database and calculated per EPA 745-B-99-002 that assume that 100 % of the base metal is fully oxidized to determine the quantity of the metal compounds manufactured / emitted.

Note: Stack test data indicates that the actual particulate emission factor is 10X less than the AP-42 Emission factor.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

20% opacity limit for stack emissions – Permit Condition Number III.B.2.a.viii.
No more than 60% opacity for a period or periods aggregating 5 minutes or more during any 60 minute period – Permit Condition Number III.B.2.a.ix
No more than 60% opacity for 8 minutes or more during start-up – Permit Condition Number III.B.2.a.x.
Particulate loading limit of 0.12 grains per cubic foot – Permit Condition Number III.B.2.a.xi.
Adding additional gas to dryer exhaust to circumvent above particulate loading rule – Permit Condition Number III.B.2.a.xii.
Stack emissions must be vented at least 80 feet above foundation grade and at least 10 feet above roof of any structures – Permit Condition Number III.B.2.a.xiii.
Continuous measurements of stack exit temperature – Permit Condition Number III.B.2.a.xiv.
Continuously monitor pressure drop in the scrubber – Permit Condition Number III.B.2.a.xv.
Continuously monitor the water pressure for the scrubber – Permit Condition Number III.B.2.a.xvi.
Sulfur dioxide limit of 2,000 ppm – Permit Condition Number III.2.a.xvii.
Installation of stack gas monitoring device – Permit Condition Number III.B.2.a.xviii.
Calculate sulfur dioxide based on fuel analysis before installation of monitoring device – Permit Condition Number III.B.2.a.xix.
Annual opacity test – Permit Condition Number III.C.7.
Establish operating parameters – Permit Condition Number III.C.5.
Conduct stack testing as required – Permit Condition Number III.C.5.
Fuel sampling as required – Permit Condition Number III.C.6.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

20% opacity limit for stack emissions (Permit Condition Number III.B.2.a.viii.) – Visual inspection and recordkeeping
No more than 60% opacity for a period or periods aggregating 5 minutes or more during any 60 minute period (Permit Condition Number III.B.2.a.ix) - Visual inspection and recordkeeping
No more than 60% opacity for 8 minutes or more during start-up (Permit Condition Number III.B.2.a.x.) - Visual inspection and recordkeeping
Particulate loading limit of 0.12 grains per cubic foot (Permit Condition Number III.B.2.a.xi.) – Recordkeeping and stack testing
Adding additional gas to dryer exhaust to circumvent above particulate loading rule (Permit Condition Number III.B.2.a.xii.) - Inspection
Stack emissions must be vented at least 80 feet above foundation grade and at least 10 feet above roof of any structures (Permit Condition Number III.B.2.a.xiii.) - Inspection
Continuous measurements of stack exit temperature (Permit Condition Number III.B.2.a.xiv.) – Install monitoring and recordkeeping
Continuously monitor pressure drop in the scrubber (Permit Condition Number III.B.2.a.xv.) - Install monitoring and recordkeeping
Continuously monitor the water pressure for the scrubber (Permit Condition Number III.B.2.a.xvi.) - Install monitoring and recordkeeping
Sulfur dioxide limit of 2,000 ppm (Permit Condition Number III.2.a.xvii.) - Recordkeeping
Installation of stack gas monitoring device (Permit Condition Number III.B.2.a.xviii.) – As requested by director
Calculate sulfur dioxide based on fuel analysis before installation of monitoring device (Permit Condition Number III.B.2.a.xix.) – Only needed upon installation of stack gas monitoring device
Annual opacity test (Permit Condition Number III.C.7.) – Testing and reporting
Establish operating parameters (Permit Condition Number III.C.5.) – Testing and reporting
Conduct stack test (Permit Condition Number III.C.5.) – Testing as required
Fuel sampling (Permit Condition Number III.C.6.) – Sample as required

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 22S	**Emission unit name:** Grate Screen (SC2)	**List any control devices associated with this emission unit.** Partial Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.): 700 ton/hr screen		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1976	**Installation date:** 1976	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 700 ton/hr		
Maximum Hourly Throughput: 700 ton/hr	**Maximum Annual Throughput:** 4,300,000 ton/yr	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	0.17	0.51
Total Particulate Matter (TSP)	0.35	1.08
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Particulate matter emissions are calculated based on the emission factors found in the General Permit (G-10C) Calculation Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit for fugitive dust control systems – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 21S	**Emission unit name:** Vibrating Scalping Screen (SC1)	**List any control devices associated with this emission unit.** Full Enclosure within building
Provide a description of the emission unit (type, method of operation, design parameters, etc.): 800 ton/hr screen		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1968	**Installation date:** 1968	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 800 ton/hr		
Maximum Hourly Throughput: 800 ton/hr	**Maximum Annual Throughput:** 4,300,000 ton/yr	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	1.51	4.07
Total Particulate Matter (TSP)	3.2	8.6
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Particulate matter emissions are calculated based on the emission factors found in the General Permit (G-10C) Calculation Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit for fugitive dust control systems – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 20S	**Emission unit name:** Hammermill Crusher (HMCR1)	**List any control devices associated with this emission unit.** Full Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.): 700 ton/hr crusher		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1976	**Installation date:** 1976	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 700 ton/hr		
Maximum Hourly Throughput: 700 ton/hr	**Maximum Annual Throughput:** 4,300,000 ton/yr	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	1.32	4.07
Total Particulate Matter (TSP)	2.8	8.6
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Particulate matter emissions are calculated based on the emission factors found in the General Permit (G-10C) Calculation Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit for fugitive dust control systems – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
19S	Rotary Breaker (RB1)	Full Enclosure

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
600 ton/hr rotary breaker

Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1968	**Installation date:** 1968	**Modification date(s):** NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
600 ton/hr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
600 ton/hr	4,300,000 ton/yr	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	1.14	4.07
Total Particulate Matter (TSP)	2.4	8.6
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Particulate matter emissions are calculated based on the emission factors found in the General Permit (G-10C) Calculation Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit for fugitive dust control systems – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
32S	Raw Coal Stockpile (OS-1)	Moisture Content

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Raw Coal Stockpile – 20,000 ton capacity

100,000 square feet

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: 1982	**Installation date:** 1982	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
20,000 ton capacity/100,000 square feet

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
700 tons	4,300,000 tons	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	0.33	1.46
Total Particulate Matter (TSP)	0.70	3.08
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Stockpile emissions calculated using the emission factors located in the General Permit (G-10C) Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
34S	Raw Coal Stockpile (OS-2)	Moisture Content

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Raw Coal Stockpile – 30,000 ton capacity

100,000 square feet

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: 1996	**Installation date:** 1996	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
30,000 ton capacity/100,000 square feet

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
700 tons	3,010,000 tons	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	0.33	1.46
Total Particulate Matter (TSP)	0.70	3.08
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Stockpile emissions calculated using the emission factors located in the General Permit (G-10C) Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
35S	Refuse Stockpile (OS-3)	Moisture Content

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Raw Coal Stockpile – 400 ton capacity

200 square feet

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: 1968	**Installation date:** 1968	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
400 ton capacity/200 square feet

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
500 tons	100,000 tons	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes __X__ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	0.001	0.004
Total Particulate Matter (TSP)	0.002	0.008
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Stockpile emissions calculated using the emission factors located in the General Permit (G-10C) Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Prevention of pollution from coal refuse area – Permit Condition Number III.B.2.b.i.
Investigate burning coal refuse as required – Permit Condition Number III.B.2.b.ii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Prevention of pollution from coal refuse area (Permit Condition Number III.B.2.b.i.) – Good management practices according to permit conditions mentioned
Investigate burning coal refuse (Permit Condition Number III.B.2.b.ii.) – Performed by the director on an as needed basis

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
33S	Lime Stockpile (OS-4)	Moisture Content

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Raw Coal Stockpile – 50 ton capacity

500 square feet

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: 1999	**Installation date:** 1999	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
50 ton capacity/500 square feet

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
25 tons	219,000 tons	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes __X__ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	0.001	0.005
Total Particulate Matter (TSP)	0.002	0.011
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Stockpile emissions calculated using the emission factors located in the General Permit (G-10C) Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
43S	Raw Coal Stockpile (OS-5)	Moisture Content

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Raw Coal Stockpile – 500 ton capacity

2,544 square feet

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: 2004	**Installation date:** 2004	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
500 ton capacity/2,544 square feet

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
500 tons	4,300,000 tons	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes __X__ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	0.01	0. 04
Total Particulate Matter (TSP)	0.02	0.08
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Stockpile emissions calculated using the emission factors located in the General Permit (G-10C) Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
37S	Unpaved Haulroad 1	Water Spray

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Unpaved haulroad – 0.5 mile per trip

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: NA	**Installation date:** NA	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
20 trips/hr and 130,304 trips/yr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
20 trips	130,304 trips	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	7.59	24.74
Total Particulate Matter (TSP)	29.21	95.15
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Calculated using emission factors from AP-42 Fifth Edition – 13.2.2 Unpaved Roads, last updated:12/2003

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Minimize fugitive dust emissions – Permit Condition Number III.B.1.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Minimize fugitive dust emissions (Permit Condition Number III.B.1.a.vii.) – Water spray recordkeeping according to III.C.10.

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
38S	Unpaved Haulroad 2	Water Spray

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Unpaved haulroad – 0.5 mile per trip

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: NA	**Installation date:** NA	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
10 trips/hr and 37,000 trips/yr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
10 trips	37,000 trips	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	4.15	7.68
Total Particulate Matter (TSP)	15.98	29.55
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Calculated using emission factors from AP-42 Fifth Edition – 13.2.2 Unpaved Roads, last updated:12/2003

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Minimize fugitive dust emissions – Permit Condition Number III.B.1.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Minimize fugitive dust emissions (Permit Condition Number III.B.1.a.vii.) – Water spray recordkeeping according to III.C.10.

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
39S	Unpaved Haulroad 3	Water Spray

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Unpaved haulroad – 1.0 mile per trip

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: NA	**Installation date:** NA	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
10 trips/hr and 37,000 trips/yr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
10 trips	37,000 trips	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	8.31	15.37
Total Particulate Matter (TSP)	31.95	59.11
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Calculated using emission factors from AP-42 Fifth Edition – 13.2.2 Unpaved Roads, last updated:12/2003

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Minimize fugitive dust emissions – Permit Condition Number III.B.1.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Minimize fugitive dust emissions (Permit Condition Number III.B.1.a.vii.) – Water spray recordkeeping according to III.C.10.

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
UPR4	Unpaved Haulroad 4	Water Spray

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Unpaved haulroad (Endloader/Dozer Traffic) – 1.0 mile per trip

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: NA	**Installation date:** NA	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
1 trip/hr and 8,760 trips/yr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
1 trip	8,760 trips	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	1.40	6.13
Total Particulate Matter (TSP)	5.39	23.59
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Calculated using emission factors from AP-42 Fifth Edition – 13.2.2 Unpaved Roads, last updated:12/2003

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Minimize fugitive dust emissions – Permit Condition Number III.B.1.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Minimize fugitive dust emissions (Permit Condition Number III.B.1.a.vii.) – Water spray recordkeeping according to III.C.10.

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
43S	Raw Coal Stockpile (OS-5)	Moisture Content

Provide a description of the emission unit (type, method of operation, design parameters, etc.):

Raw Coal Stockpile – 500 ton capacity

2,544 square feet

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: 2004	**Installation date:** 2004	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
500 ton capacity/2,544 square feet

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
500 tons	4,300,000 tons	8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes __X__ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	0.01	0. 04
Total Particulate Matter (TSP)	0.02	0.08
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Stockpile emissions calculated using the emission factors located in the General Permit (G-10C) Spreadsheet.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
42S	Paved Haulroad 1	Water Spray

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Paved haulroad (Lime Trucks) – 0.5 mile per trip

Manufacturer: NA	**Model number:**	**Serial number:**
Construction date: NA	**Installation date:** NA	**Modification date(s):**

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
2.27 trips/hr and 9,995 trips/yr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
2.27 trips	9,995 trips	8,760 hours/yr

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	2.07	4.53
Total Particulate Matter (TSP)	7.96	17.42
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Calculated paved haulroad emission factor using AP42 Equation 13.21

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B1	**Emission unit name:** Train Loadout Bin	**List any control devices associated with this emission unit.** Full Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1997	**Installation date:** 1997	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 450 ton		
Maximum Hourly Throughput: 700 tons	**Maximum Annual Throughput:** 3,010,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.vi.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Acceptable operating and maintenance procedures – Permit Condition Number III.B.2.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.vi.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Acceptable operating and maintenance procedures (Permit Condition Number III.B.2.a.vii.) – Visual inspection and recordkeeping

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B2	**Emission unit name:** Refuse Bin	**List any control devices associated with this emission unit.** Full Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1997	**Installation date:** 1997	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 200 ton		
Maximum Hourly Throughput: 500 tons	**Maximum Annual Throughput:** 1,850,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.vi.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Acceptable operating and maintenance procedures – Permit Condition Number III.B.2.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.vi.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Acceptable operating and maintenance procedures (Permit Condition Number III.B.2.a.vii.) – Visual inspection and recordkeeping

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B3	**Emission unit name:** Truck Dump Hopper	**List any control devices associated with this emission unit.** Partial Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1976	**Installation date:** 1976	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 50 ton		
Maximum Hourly Throughput: 800 tons	**Maximum Annual Throughput:** 4,300,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.vi.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Acceptable operating and maintenance procedures – Permit Condition Number III.B.2.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.vi.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Acceptable operating and maintenance procedures (Permit Condition Number III.B.2.a.vii.) – Visual inspection and recordkeeping

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B4	**Emission unit name:** Truck Dump Hopper	**List any control devices associated with this emission unit.** Partial Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1976	**Installation date:** 1976	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 50 ton		
Maximum Hourly Throughput: 800 tons	**Maximum Annual Throughput:** 4,300,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.vi.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Acceptable operating and maintenance procedures – Permit Condition Number III.B.2.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.vi.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Acceptable operating and maintenance procedures (Permit Condition Number III.B.2.a.vii.) – Visual inspection and recordkeeping

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B5	**Emission unit name:** Refuse Bin	**List any control devices associated with this emission unit.** Full Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1997	**Installation date:** 1997	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 200 ton		
Maximum Hourly Throughput: 500 tons	**Maximum Annual Throughput:** 1,850,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.vi.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Acceptable operating and maintenance procedures – Permit Condition Number III.B.2.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.vi.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Acceptable operating and maintenance procedures (Permit Condition Number III.B.2.a.vii.) – Visual inspection and recordkeeping

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B6	**Emission unit name:** Raw Coal Silo	**List any control devices associated with this emission unit.** Full Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1968	**Installation date:** 1968	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 5,000 ton		
Maximum Hourly Throughput: 800 tons	**Maximum Annual Throughput:** 4,300,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B7	**Emission unit name:** Plant Refuse Bin	**List any control devices associated with this emission unit.** Full Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1997	**Installation date:** 1997	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 175 ton		
Maximum Hourly Throughput: 500 tons	**Maximum Annual Throughput:** 1,850,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.vi.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
Acceptable operating and maintenance procedures – Permit Condition Number III.B.2.a.vii.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.vi.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
Acceptable operating and maintenance procedures (Permit Condition Number III.B.2.a.vii.) – Visual inspection and recordkeeping

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: B8	**Emission unit name:** Lime Bin	**List any control devices associated with this emission unit.** Partial Enclosure
Provide a description of the emission unit (type, method of operation, design parameters, etc.):		
Manufacturer: Unknown	**Model number:** NA	**Serial number:** NA
Construction date: 1999	**Installation date:** 1999	**Modification date(s):** NA
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 25 ton		
Maximum Hourly Throughput: 25 tons	**Maximum Annual Throughput:** 219,000 tons	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: See attached table	**Emission unit name:** See attached table (C-1 through C-19)	**List any control devices associated with this emission unit.** Enclosures, water sprays, and/or moisture content
Provide a description of the emission unit (type, method of operation, design parameters, etc.): All conveyors and associated transfer points.		
Manufacturer: NA	**Model number:** NA	**Serial number:**
Construction date: See attached table	**Installation date:** See attached table	**Modification date(s):**
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): See attached table		
Maximum Hourly Throughput: See attached table	**Maximum Annual Throughput:** See attached table	**Maximum Operating Schedule:** 8,760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___ Yes _X_ No	**If yes, is it?** ___ Indirect Fired ____ Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	6.14	16.38
Total Particulate Matter (TSP)	12.99	34.63
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Calculating transfer point emission factor using AP-42 Equation 13.2.4 (1/95).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Any newly applicable requirement – Permit Condition Number III.B.1.a.iv.
Testing to be conducted as required – Permit condition number III.B.1.a.v.
Fugitive Dust Control – Permit Condition Number III.B.1.a.vi.
Must be operated according to existing permits and any subsequent amendments – Permit Condition Number II.B.1.a.viii.
Permit revoked or modified if facility is not operated at least 500 hours in any of the previous 5 years – Permit Condition Number III.B.1.b.ii.
Submit standby plan for reduction in pollutants – Permit Condition Number III.B.2.a.i.
20% opacity limit for fugitive dust control systems – Permit Condition Number III.B.2.a.ii.
Maintain fugitive dust control systems – Permit Condition Number III.B.2.a.iii.
Minimize dust generation and atmospheric entrainment through dust control methods and good operating practices – Permit Condition Number III.B.2.a.iv.
Submit annual emission inventory – Permit Condition Number III.B.2.a.v.
C-1 throughput limit of 800 tph and 4,300,000 tpy – Permit Condition Number III.E.1.
C-19 throughput limit of 25 tph and 219,000 tpy - Permit Condition Number III.E.2.
C-9 throughput limit of 1,000 tph and 4,300,000 tpy – Permit Condition Number III.E.3.
C-10 throughput limit of 500 tph and 1,850,000 tpy - Permit Condition Number III.E.4.
C-12 throughput limit of 550 tph and 3,010,000 tpy - Permit Condition Number III.E.5.
C-13A and C-13B throughput limit of 700 tph and 3,010,000 tpy - Permit Condition Number III.E.6.
B1, B2, B3, B4, B5, B7, C-1, C-3, C-6, C-7, C-8, C-9, C-10, C-13A, C-13B, C-14, C-15, C-16, C-18 Opacity limit of 20% - Permit Condition Number III.B.2.a.vi.
B1, B2, B3, B4, B5, B7, C-1, C-3, C-6, C-7, C-8, C-9, C-10, C-13A, C-13B, C-14, C-15, C-16, C-18 Operate and maintain using good air pollution control practices - Permit Condition Number III.B.2.a.vi.

X Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Newly applicable requirement (Permit Condition Number III.B.1.a.iv.) – Notify and submit compliance schedule.
Testing (Permit condition number III.B.1.a.v.) – Conduct as required
Fugitive Dust Control (Permit Condition Number III.B.1.a.vi.) – Installation of water sprays and winterization systems.
Must be operated according to existing permits and any subsequent amendments (Permit Condition Number II.B.1.a.viii.) – Inspection
Operated at least 500 hours in any of the previous 5 years (Permit Condition Number III.B.1.b.ii.) – Reporting
Submit standby plan for reduction in pollutants (Permit Condition Number III.B.2.a.i.) – Submit upon request
20% opacity limit (Permit Condition Number III.B.2.a.ii.) – Visual inspection and recordkeeping
Maintain fugitive dust control systems (Permit Condition Number III.B.2.a.iii.) - Recordkeeping
Minimize dust generation and atmospheric entrainment (Permit Condition Number III.B.2.a.iv.) – Recordkeeping
Annual emission inventory (Permit Condition Number III.B.2.a.v.) – Submit report annually
C-1 throughput limit of 800 tph and 4,300,000 tpy (Permit Condition Number III.E.1.) – Monitoring, Recordkeeping, and Reporting Permit Condition Number III.C.4.
C-19 throughput limit of 25 tph and 219,000 tpy (Permit Condition Number III.E.2.) - Monitoring, Recordkeeping, and Reporting Permit Condition Number III.C.4.
C-9 throughput limit of 1,000 tph and 4,300,000 tpy (Permit Condition Number III.E.3.) - Monitoring, Recordkeeping, and Reporting Permit Condition Number III.C.4.
C-10 throughput limit of 500 tph and 1,850,000 tpy (Permit Condition Number III.E.4.) - Monitoring, Recordkeeping, and Reporting Permit Condition Number III.C.4.
C-12 throughput limit of 550 tph and 3,010,000 tpy (Permit Condition Number III.E.5.) - Monitoring, Recordkeeping, and Reporting Permit Condition Number III.C.4.
C-13A and C-13B throughput limit of 700 tph and 3,010,000 tpy (Permit Condition Number III.E.6.) - Monitoring, Recordkeeping, and Reporting Permit Condition Number III.C.4.
B1, B2, B3, B4, B5, B7, C-1, C-3, C-6, C-7, C-8, C-9, C-10, C-13A, C-13B, C-14, C-15, C-16, C-18 Opacity limit of 20% (Permit Condition Number III.B.2.a.vi.) – Visual Inspection and Recordkeeping Permit Condition Number III.C.1.
B1, B2, B3, B4, B5, B7, C-1, C-3, C-6, C-7, C-8, C-9, C-10, C-13A, C-13B, C-14, C-15, C-16, C-18 Operate and maintain using good air pollution control practices (Permit Condition Number III.B.2.a.vi.) - Visual Inspection and Recordkeeping Permit Condition Number III.C.1.

Are you in compliance with all applicable requirements for this emission unit? __X__ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

CONVEYING AFFECTED SOURCE SHEET – POCAHONTAS NO. 51 PREPARATION PLANT

Source Identification Number[1]	Date of Manufacture[2]	Type of Material Handled[3]	Size of Material Handled[4]	Maximum Material Transfer Rate[5]		Average Moisture Content (%)[6]	Control Device[7]
				tons/hour	tons/year		
C-1	1976	Raw Coal	6” x 0	800	4,300,000	5	PE
C-2	1968	Refuse	6” x 0”	500	1,850,000	7	PE
C-3	1996	Raw Coal	6” x 2”	500	4,300,000	5	PE
C-4	1968	Raw Coal	2” x 0	800	4,300,000	5	PE
C-5	1968	Raw Coal	2” x 0	800	4,300,000	5	PE
C-6	1997	Raw Coal	2” x 0	1,000	4,300,000	5	PE
C-7	1976	Raw Coal	2” x 0	700	4,300,000	5	MC
C-8	1996	Clean/Raw Coal	2” x 0	700	3,010,000	5	PE
C-9	1997	Raw Coal	2” x 0	1,000	4,300,000	5	PE
C-10	1997	Refuse	6” x 0”	500	1,850,000	7	PE
C-12	1968	Clean Coal	2” x 0	550	3,010,000	7	PE
C-13A	1997	Clean Coal	2” x 0	700	3,010,000	7	PE
C-13B	1997	Clean Coal	2” x 0	700	3,010,000	7	PE
C-14	1996	Clean Coal	2” x 0	700	3,010,000	7	PE
C-15	1997	Refuse	6” x 0”	500	1,850,000	7	PE
C-16	1997	Refuse	6” x 0”	500	1,850,000	7	MC
C-17	1968	Refuse/Lime	6” x 0”	500	1,850,000	7 and 2.1	PE
C-18	1968	Refuse	2” x 0	500	1,850,000	7	PE
C-19	1999	Lime	2” x 0	25	219,000	2.1	PE

1. Enter the appropriate Source Identification Number for each conveyor using the following codes. For example, multiple belt conveyors should be designated BC-1, BC-2, BC-3 etc. Transfer points are considered emission points, not sources, and should not be included in the *Conveying Affected Source Sheet*. Transfer Point Identification Numbers shall be assigned in the *Emission Calculation Sheet*.
   a. C Belt Conveyor
   b. DL Drag-link Conveyor
   c. SC Screw Conveyor
   d. OT Other
   BE Bucket Elevator
   PS Pneumatic System
   VC Vibrating Conveyor
2. Enter the date that each conveying device was manufactured.
3. Enter the type of material being handled - Raw Coal (RC) Sized Coal (SC) Clean Coal (CC) Refuse (R) Other (O) ___
4. Enter the nominal size of the material being conveyed (e.g. clean coal - **:**" x 0). If more than one material is handled by the listed conveyor, list each material and enter the appropriate data for each material.
5. Enter the maximum material transfer rate for each conveyor in tons per hour and tons per year.
6. Enter the average percent moisture content of the conveyed material.
7. Enter the control device for the conveyor. PE - Partial Enclosure (example 3/4 hoop) FE - Full Enclosure N – None

ATTACHMENT G

AIR POLLUTION CONTROL DEVICE FORM(S)

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 0005	**List all emission units associated with this control device.** Thermal Dryer	
Manufacturer: Reasearch Cottrell, Inc.	**Model number:** Type C-24 Cyclotrell	**Installation date:** 1968

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter ___ Venturi Scrubber _X_ Multiclone

___ Carbon Bed Adsorber ___ Packed Tower Scrubber ___ Single Cyclone

___ Carbon Drum(s) ___ Other Wet Scrubber ___ Cyclone Bank

___ Catalytic Incinerator ___ Condenser ___ Settling Chamber

___ Thermal Incinerator ___ Flare ___ Other (describe) _____

___ Wet Plate Electrostatic Precipitator ___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
Particulate	100%	40%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Average pressure drop – 4 inches of H_2O

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Pressure Drop
Gas Temperature
Gas Flow Rate
Particulate Loading (Inlet)

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 0007	**List all emission units associated with this control device.** Thermal Dryer	
Manufacturer: NA	**Model number:** NA	**Installation date:** 1968

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter ___ Venturi Scrubber ___ Multiclone

___ Carbon Bed Adsorber ___ Packed Tower Scrubber ___ Single Cyclone

___ Carbon Drum(s) ___ Other Wet Scrubber ___ Cyclone Bank

___ Catalytic Incinerator ___ Condenser ___ Settling Chamber

___ Thermal Incinerator ___ Flare _X_ Other (describe) – Mist Eliminator

___ Wet Plate Electrostatic Precipitator ___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Prohibits the exit of water droplets from the thermal dryer stack.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

Describe the parameters monitored and/or methods used to indicate performance of this control device.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 0006	**List all emission units associated with this control device.** Thermal Dryer	
Manufacturer: Reasearch Cottrell, Inc.	**Model number:** NA	**Installation date:** 1968

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter ___ Venturi Scrubber ___ Multiclone

___ Carbon Bed Adsorber ___ Packed Tower Scrubber ___ Single Cyclone

___ Carbon Drum(s) _X_ Other Wet Scrubber ___ Cyclone Bank

___ Catalytic Incinerator ___ Condenser ___ Settling Chamber

___ Thermal Incinerator ___ Flare ___ Other (describe)

___ Wet Plate Electrostatic Precipitator ___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
Particulate	100%	99.25%
Sulfur Dioxide	NA	70%
Nitrogen Oxides	NA	NA

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Average pressure drop – 25 inches of H_2O

Is this device subject to the CAM requirements of 40 C.F.R. 64? _X_ Yes ___ No

Describe the parameters monitored and/or methods used to indicate performance of this control device.

Pressure Drop
Gas Temperature
Gas Flow Rate
Water Pressure

ATTACHMENT H

COMPLIANCE ASSURANCE MONITORING PLAN

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☒ YES ☐ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☒ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) [a] BACKGROUND DATA AND INFORMATION					
Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.					
PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
TD1	THERMAL DRYER	SO2	VENTURI SCRUBBER	45CSR10-3.3F; 3.2 LBS/MMBTU	DAILY FUEL SAMPLING, COMPOSITE, AND ANALYZE MONTHLY FOR SULFUR AND HEAT CONTENT, CALCULATE MONTHLY SO2 EMISSIONS, AND CONTINUOUSLY MONITOR PRESSURE DROP AND WATER PRESSURE.
				45CSR10-4.1; 2000 PPM	DAILY FUEL SAMPLING, COMPOSITE, AND ANALYZE MONTHLY FOR SULFUR AND HEAT CONTENT, CALCULATE MONTHLY SO2 EMISSIONS, AND CONTINUOUSLY MONITOR PRESSURE DROP AND WATER PRESSURE.
				45CSR13-2104D.6; 56.85 LBS/HR & 249 TPY	DAILY FUEL SAMPLING, COMPOSITE, AND ANALYZE MONTHLY FOR SULFUR AND HEAT CONTENT, CALCULATE MONTHLY SO2 EMISSIONS, AND CONTINUOUSLY MONITOR PRESSURE DROP AND WATER PRESSURE.
				45CSRR10-6.4; Fuel Usage lbs/day (105 MMBtu/hr max)	CONTINUOUSLY MONITOR FUEL USAGE WITH ROTARY COUNTER.
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA			
Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: TD1	**4b) Pollutant:** SULFUR DIOXIDE	**4c) [a] Indicator No. 1:** SULFUR CONTENT OF 1.18% (WITH HEAT CONTENT OF 13,000 BTU/LB)	**4d) [a] Indicator No. 2:** MAXIMUM HEAT INPUT OF 105 MMBTU/HR
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		COAL IS SAMPLED DAILY, COMPOSITED, AND ANALYZED MONTHLY FOR SULFUR AND HEAT CONTENT.	FUEL USAGE IS CONTINUOUSLY MONITORED WITH A ROTARY COUNTER.
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		MAXIMUM SULFUR CONTENT IS 1.18% WITH A HEAT CONTENT OF 13,000 BTU/LB. AS THE HEAT CONTENT INCREASES THE ALLOWABLE SULFUR CONTENT INCREASES PROPORTIONALY.	MAXIMUM MASS EMISSION RATE IS 56.85 LB/HR WITH 12-MONTH ROLLING TOTAL MAXIMUM OF 249 TPY.
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		500 GRAMS OF COAL WILL BE SAMPLED FROM A POINT WHERE A REPRESENTATIVE SAMPLE CAN BE OBTAINED.	FUEL USAGE IS CONTINUOUSLY MEASURED WITH A ROTARY COUNTER ON A LBS/DAY BASIS.
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		NA	NA
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		SAMPLE PREPARATION DONE ACCORDING TO ASTM METHOD D4239.	THE OPERATION OF THE ROTARY COUNTER IS VERIFIED BY VISUAL INSPECTION.
[d] Provide the MONITORING FREQUENCY:		COAL IS SAMPLED ONCE PER DAY DURING NORMAL OPERATION.	CONTINUOUSLY MONITORED AND TOTAL COAL USED IS RECORDED AT THE END OF EACH DAY.
Provide the DATA COLLECTION PROCEDURES that will be used:		COAL SAMPLES ARE COLLECTED AT A POINT WHERE A REPRESENTATIVE SAMPLE CAN BE OBTAINED. THEY ARE PREPARED ACCORDING TO ASTM METHOD D3177	FUEL USAGE IS COMPILED AT THE END OF EACH DAY.
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:		COAL SAMPLES ARE COMPOSITED MONTHLY	DAILY

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device

CAM MONITORING APPROACH CRITERIA			
Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation: TD1	**4b) Pollutant:** SULFUR DIOXIDE	**4c) [a] Indicator No. 3:** PRESSURE DROP	**4d) [a] Indicator No. 4:** WATER PRESSURE
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:		WATER PRESSURE IS CONTINUOUSLY MONITORED.	PRESSURE DROP IS CONTINUOUSLY MONITORED.
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:		AN EXCURSION IS DEFINED AS PRESSURE DROP BELOW 23 INCHES OF H2O.	AN EXCURSION IS DEFINED AS WATER PRESSURE BELOW 10.1 PSI.
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:		PRESSURE DROP MEASUREMENTS ARE TAKEN AT THE INLET OF THE SCRUBBER AND AT A LOCATION BETWEEN THE SCRUBBER AND THE MIST ELIMINATOR.	PRESSURE DROP MEASUREMENTS ARE TAKEN AT THE INLET OF THE SCRUBBER AND AT A LOCATION BETWEEN THE SCRUBBER AND THE MIST ELIMINATOR. WATER PRESSURE IS RECORDED BEFORE THE SCRUBBER.
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:		NA	NA
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):		CALIBRATION PERFORMED ON THE PRESSURE DROP RECORDER/MONITOR IS PERFORMED AS NEEDED BUT AT LEAST ONCE ANNUALLY. PRESSURE DROP IS ACCURATE WITHIN 1 INCH OF H2O.	CALIBRATION PERFORMED ON THE WATER PRESSURE GAUGE IS PERFORMED AS NEEDED BUT AT LEAST ONCE ANNUALLY. THE WATER PRESSURE GAUGE IS ACCURATE TO WITHIN 5%.
[d] Provide the MONITORING FREQUENCY:		PRESSURE DROP MONITORED CONTINUOUSLY.	WATER PRESSURE MONITORED CONTINUOUSLY.
Provide the DATA COLLECTION PROCEDURES that will be used:		CONTINUOUSLY RECORDED BY STRIP CHART AND MANUALLY RECORDED ONCE EVERY 12 HOURS.	CONTINUOUSLY RECORDED BY STRIP CHART AND MANUALLY RECORDED ONCE EVERY 12 HOURS.
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:		3-HOUR ROLLING AVERAGE	3-HOUR ROLLING AVERAGE

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or

operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:	6b) Regulated Air Pollutant:
TD1	SULFUR DIOXIDE

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

Coal sampling and analysis of SO2 content along with measuring the amount of coal burned is a sufficient way to determine SO2 emissions. By knowing the concentration of SO2 in the coal and the fuel usage a simple calculation can be performed to determine compliance. Pressure drop and water pressure monitoring effectivly indicates the scrubber is operating properly.

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.
- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.
- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

Historic coal analysis records indicate the sulfur content is between 0.75 and 0.85 percent. It has never approached its limit of 1.18% per R13-2104D. This indicator range is taken from the R13-2104D permit. This limit was established to eliminate this facility from PSD status.

Fuel throughput records indicate compliance with established parameter of 105 MMBtu/hr. This indicator range is taken from the R13-2104D permit. This is the design heat input rating.

Water pressure (10.1 psi minimum) and pressure drop (23 in. of H2O minimum) are monitored continuously verifying the proper operation of the scrubber. These operating parameters were established following a stack test in 2002.

Stack test data indicates actual SO2 concentrations are well below limits even though the pH of the scrubber liquor was approximately 3. If the facility is in compliance with their SO2 limit with a pH as low as this, establishing a parameter is not necessary. We can not justify monitoring pH for this reason. It seems that if this facility was required to monitor pH it would amount to a parameter being established that has no effect on compliance with the SO2 limit.

KEPLER MONTHLY SO2 CALCULATIONS

The owner or operator of a thermal dryer shall calculate the SO2 emissions for each month based on the design heat input of 105 mmBtu/hr and the results of the analyses for sulfur and heat content for the month according to the following equations:

Equation 1:

SO2 (lb/hr) = 2 x (MFR/ HV) x S

Where: MFR = Design heat input of 104,500,000 Btu/hr

HV = Heating value of fuel in Btu/lb

S = Percent sulfur content of fuel divided by 100

2 = 2 lb SO2 per 1lb S

S =	1.36		Assumed SO2 Control Eff.	70%	
HV (Btu/lb) =	15,000		Max. Operating Hours	8,760	**Limit**
SO2 (lb/hr) =	189.5	(uncontrolled)	Controlled SO2 (lb/hr)	56.8	57
Fuel usage (TPH) =	3.48		Controlled SO2 (TPY)	249	249

Equation 2:

SO2 (ppmv) = SO2 (lb/hr) x (385/64) x (1/133,620) x (1/60) x 10^6

Where: SO2 (ppmv) = Sulfur dioxide concentration by volume

SO2 (lb/hr) = Sulfur dioxide weight rate

385 = Molar volume in scf/lb-mole

64 = Molecular weight of Sulfur dioxide in lb/lb-mole

133,620 = Exhaust fan volumetric exhaust flow rate in scfm

60 = Minutes per hour

SO2 (ppmv) = 142.2 (uncontrolled)

Discussion

The equations above, the maximum design heat input, and minimum volumetric gas flow rate, if compliance with C.S.R. 45-10-4.1. is shown with these “worst case” conditions then compliance at lower heat inputs and/or higher stack gas flow rates will be ensured.

INITIAL STACK TEST RESULTS

		SULFUR	HV	SO2 (lb/hr)	Water Pressure (psi)	Pressure Drop (in. of H2O)
4/2/2002	RUN 1	0.83	14,730	21.16	11.83	26.6
4/2/2002		0.85	15,103			
4/2/2002			15,761			
4/2/2002	RUN 2	0.82	14,784	19.64	11.29	26.3
4/2/2002		0.84	15,083			
4/2/2002			15,739			
4/2/2002	RUN 3	0.81	14,846		10.95	26.7
4/2/2002		0.82	15,091			
4/2/2002			15,743			
4/3/2002	RUN 4	0.82	14,781	21.54	10.83	27.3
4/3/2002		0.84	15,090			
4/3/2002			15,776			
	AVG.	0.83	15,211	20.78	scrubber SO2 eff.	89%

APPENDIX

CALCULATIONS

Project No: 06-102-05
By: JMC
Date: 8-10-06

Title V Renewal
Kepler Processing

Checked by: JFJ
Date: 8-11-06

SUMMARY OF POTENTIAL TO EMIT

	TPH	TPY
Raw Coal	Variable	
Phase I to Silo	800	
Silo Reclaim to Plant	1,000	4,300,000
HMCR1 to Plant Feed	700	
Clean Coal	700	3,010,000
Refuse	500	1,840,000
Dried Clean Coal	550	3,010,000

Point ID	Source	Pollutant	Uncontrolled Emissions (LB/HR)	Uncontrolled Emissions (TPY)	Controlled Emissions (LB/HR)	Controlled Emissions (TPY)
001	Transfer Points	Particulate	31.65	82.59	12.99	34.63
002	Crushing	Particulate	26.00	86.00	5.20	17.20
003	Screening	Particulate	80.70	217.15	3.55	9.68
004	Open Stockpiles	Particulate	1.43	6.26	1.43	6.26
005	Haulroads	Particulate	311.91	772.03	93.58	231.61
006	Thermal Dryer	Particulate	14,300	39,130	64.35	176.09
006	Thermal Dryer	HAP's-Metals (PM)	11.65	51.05	1.08	4.75
		Facility Total PM :	14,763	40,345	182.18	480.22

Point ID	Source	Pollutant	Uncontrolled Emissions (LB/HR)	Uncontrolled Emissions (TPY)	Controlled Emissions (LB/HR)	Controlled Emissions (TPY)	PM-10 portion[1]
001	Transfer Points	PM-10	14.97	39.06	6.15	16.38	47%
002	Crushing	PM-10	12.30	40.68	2.46	8.14	47%
003	Screening	PM-10	38.17	102.71	1.68	4.58	47%
004	Open Stockpiles	PM-10	0.68	2.96	0.68	2.96	47%
005	Haulroads	PM-10	81.10	200.73	24.33	60.22	26%
006	Thermal Dryer	PM-10	5,418	14,824	24.38	66.71	38%
		Facility Total PM_{10} :	5,565	15,211	59.67	158.99	

38% is interpolated between AP42 factors of 26 for TSP and 3.8 for PM2.5

THERMAL DRYER EMISSION - OTHER THAN PARTICULATE

Point ID	Source	Pollutant	Uncontrolled Emissions (LB/HR)	Uncontrolled Emissions (TPY)	Control Efficiency (LB/DAY)	Control Efficiency (%)	Controlled Emissions (LB/HR)	Controlled Emissions (TPY)
006	Thermal Dryer	Carbon Monoxide	30.99	135.73	743.7	0.00	30.99	135.73
006	Thermal Dryer	Sulfur Dioxide	189.71	830.95	4,553	70.00	56.91	249.29
006	Thermal Dryer	Nitrogen Oxides	80.26	245.95	1,348	10.00	80.26	221.36
006	Thermal Dryer	VOC	53.96	147.77	809.7	-	53.96	147.77
006	Thermal Dryer	HAP's-Organics	11.65	51.05	279.7	90.69	1.08	4.75

NOTES:

1 - PER AP-42 PARTICLE SIZE MULTIPLIERS AND WVDEP-DAQ G10-B GUIDANCE.

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TRANSFER POINTS:

Defining empirical expression variables, where:

	Raw coal	Clean Coal	Refuse	Lime	
e =	?	?	?	?	lb/ton
k =	0.74	0.74	0.74	0.74	dimensionless
U =	7	7	7	7	mph
M =	5	7	7	2.1	%

Calculating transfer point emission factor using AP42 Equation 13.2.4 e=k(0.0032)((U/5)1.3/(M/2)1.4)

e =	**0.0010**	**0.0006**	**0.0006**	**0.0034**	**lb/ton**

				Maximum Throughput		Control		Emission	TSP				PM10			
									Uncontrolled Emissions		Controlled Emissions		Uncontrolled Emissions		Controlled Emissions	
Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	(TPH)	(TPY)	Device	Eff. (%)	Factor (LB/TON)	(LB/HR)	(TPY)	(LB/HR)	(TPY)	(LB/HR)	(TPY)	(LB/HR)	(TPY)
T1(UPR1)	37S	Truck dump	1976	800	4,300,000	MC	0	0.0010	0.80	2.15	0.80	2.15	0.38	1.02	0.38	1.02
T2(UPR1)	37S	Truck dump	1976	800	4,300,000	MC	0	0.0010	0.80	2.15	0.80	2.15	0.38	1.02	0.38	1.02
T3(B3)	23S	Raw coal bin outlet	1976	800	4,300,000	FE	80	0.0010	0.80	2.15	0.16	0.43	0.38	1.02	0.08	0.20
T4(B4)	24S	Raw coal bin outlet	1976	800	4,300,000	FE	80	0.0010	0.80	2.15	0.16	0.43	0.38	1.02	0.08	0.20
T5 (C-1)	1S	Belt Conveyor	1976	800	4,300,000	FE/FE	96	0.0010	0.80	2.15	0.03	0.09	0.38	1.02	0.02	0.04
T5A	1S	Belt Conveyor	2004	500	4,300,000	MC	0	0.0010	0.51	2.19	0.51	2.19	0.24	1.03	0.24	1.03
T6(SC1)	21S	Vibrating screen outlet	1968	800	4,300,000	FE/FE	96	0.0010	0.80	2.15	0.03	0.09	0.38	1.02	0.02	0.04
T7(SC1)	21S	Vibrating screen outlet	1968	800	4,300,000	FE	80	0.0010	0.80	2.15	0.16	0.43	0.38	1.02	0.08	0.20
T8(RB1)	19S	Rotary breaker outlet	1968	600	4,300,000	FE	80	0.0010	0.60	2.15	0.12	0.43	0.28	1.02	0.06	0.20
T9(C-4)	3S	Belt Conveyor	1968	800	4,300,000	FE	80	0.0010	0.80	2.15	0.16	0.43	0.38	1.02	0.08	0.20
T10(C-5)	5S	Belt Conveyor	1968	800	4,300,000	PE	50	0.0010	0.80	2.15	0.40	1.08	0.38	1.02	0.19	0.51
T11(B6)	26S	Raw coal bin outlet	1968	1000	4,300,000	PE	50	0.0010	1.00	2.15	0.50	1.08	0.47	1.02	0.24	0.51
T12(C-6)	6S	Belt Conveyor	1968	1000	4,300,000	PE	50	0.0010	1.00	2.15	0.50	1.08	0.47	1.02	0.24	0.51
T13(UPR4)	40S	Endloader dump	1976	700	4,300,000	MC	0	0.0010	0.70	2.15	0.70	2.15	0.33	1.02	0.33	1.02
T14(T13)		Underground feed to belt	1976	700	4,300,000	FE	80	0.0010	0.70	2.15	0.14	0.43	0.33	1.02	0.07	0.20
T15(C-7)	7S	Stockpile Reclaim	1976	700	4,300,000	PE	50	0.0010	0.70	2.15	0.35	1.08	0.33	1.02	0.17	0.51
T16(SC2)	22S	Grate Screen outlet	1976	700	4,300,000	FE	80	0.0010	0.70	2.15	0.14	0.43	0.33	1.02	0.07	0.20
T17(SC2)	22S	Grate Screen outlet	1976	700	4,300,000	FE	80	0.0010	0.70	2.15	0.14	0.43	0.33	1.02	0.07	0.20
T18(HMCR1)	20S	Crusher outlet	1976	700	4,300,000	FE	80	0.0010	0.70	2.15	0.14	0.43	0.33	1.02	0.07	0.20
T19(C-9)	9S	Belt Conveyor	1968	1000	4,300,000	FE/FE	96	0.0010	1.00	2.15	0.04	0.09	0.47	1.02	0.02	0.04
T20A(RB1)	19S	Rotary breaker outlet	1968	600	4,300,000	FE	80	0.0010	0.60	2.15	0.12	0.43	0.28	1.02	0.06	0.20
T20B		Rotary breaker outlet		Reserved									-	-	-	-
T21(C-17)	4S	Belt Conveyor	1968	500	1,850,000	PE	50	0.0010	0.50	0.93	0.25	0.46	0.24	0.44	0.12	0.22
T22(C-2)	10S	Belt Conveyor	1968	500	1,850,000	FE/FE	96	0.0010	0.50	0.93	0.02	0.04	0.24	0.44	0.01	0.02
T23(WET WASH)		Wet Wash outlet	1968	500	3,010,000	FE	80	0.0010	0.50	1.51	0.10	0.30	0.24	0.71	0.05	0.14
T24				Reserved									-	-	-	-
T25				Reserved									-	-	-	-
T26(C-10)	12S	Belt Conveyor	1968	500	1,850,000	FE	80	0.0010	0.50	0.93	0.10	0.19	0.24	0.44	0.05	0.09
T27(B2)	28S	Refuse bin outlet	1968	500	1,850,000	PE	50	0.0010	0.50	0.93	0.25	0.46	0.24	0.44	0.12	0.22
T28(WET WASH)		Wet Wash outlet	1968	700	3,010,000	FE/FE	96	0.0010	0.70	1.51	0.03	0.06	0.33	0.71	0.01	0.03
T29(WET WASH)		Wet Wash outlet	1968	550	3,010,000	FE/FE	96	0.0010	0.55	1.51	0.02	0.06	0.26	0.71	0.01	0.03
T30(C-12)	15S	Belt Conveyor	1968	550	3,010,000	FE	80	0.0010	0.55	1.51	0.11	0.30	0.26	0.71	0.05	0.14
T31(TD1)	36S	Thermal Dryer outlet	1968	550	3,010,000	FE	80	0.0010	0.55	1.51	0.11	0.30	0.26	0.71	0.05	0.14
T32(TD1)	36S	Thermal Dryer outlet	1968	550	3,010,000	FE	80	0.0010	0.55	1.51	0.11	0.30	0.26	0.71	0.05	0.14
T33(C-13B)	17S	Belt Conveyor	1968	700	3,010,000	FE	80	0.0010	0.70	1.51	0.14	0.30	0.33	0.71	0.07	0.14
T34(B1)	30S	Clean coal bin outlet	1968	700	3,010,000	PE	50	0.0010	0.70	1.51	0.35	0.75	0.33	0.71	0.17	0.36
T35(C-14)	18S	Belt Conveyor	1996	700	3,010,000	PE	50	0.0010	0.70	1.51	0.35	0.75	0.33	0.71	0.17	0.36
T36(C-13A)	16S	Belt Conveyor	1968	700	3,010,000	PE	50	0.0010	0.70	1.51	0.35	0.75	0.33	0.71	0.17	0.36
T36A(C-8)	8S	Belt Conveyor	1996	700	3,010,000	PE	50	0.0010	0.70	1.51	0.35	0.75	0.33	0.71	0.17	0.36
T37(UPR1)	37S	Truck dump	1968	700	4,300,000	MC	0	0.0010	0.70	2.15	0.70	2.15	0.33	1.02	0.33	1.02

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By: JMC
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TRANSFER POINTS:

Defining empirical expression variables, where:

	Raw coal	Clean Coal	Refuse	Lime	
e =	?	?	?	?	lb/ton
k =	0.74	0.74	0.74	0.74	dimensionless
U =	7	7	7	7	mph
M =	5	7	7	2.1	%

Calculating transfer point emission factor using AP42 Equation 13.2.4

e=k(0.0032)((U/5)1.3/(M/2)1.4)

e =	**0.0010**	**0.0006**	**0.0006**	**0.0034**	**lb/ton**

			Year	Maximum Throughput		Control		Emission	TSP				PM10			
									Uncontrolled Emissions		Controlled Emissions		Uncontrolled Emissions		Controlled Emissions	
Emission Unit ID	Emission Point ID	Emission Unit Description	Installed	(TPH)	(TPY)	Device	Eff. (%)	Factor (LB/TON)	(LB/HR)	(TPY)	(LB/HR)	(TPY)	(LB/HR)	(TPY)	(LB/HR)	(TPY)
T38(UPR1)	37S	Truck dump	1968	700	4,300,000	MC	0	0.0010	0.70	2.15	0.70	2.15	0.33	1.02	0.33	1.02
T39(ENDLOADER OS1)		Endloader dump	1968	700	4,300,000	MC	0	0.0010	0.70	2.15	0.70	2.15	0.33	1.02	0.33	1.02
T40(C-15)	13S	Belt Conveyor	1997	500	1,850,000	FE	80	0.0010	0.50	0.93	0.10	0.19	0.24	0.44	0.05	0.09
T41(B5)	29S	Refuse bin outlet	1997	500	1,850,000	FE	80	0.0010	0.50	0.93	0.10	0.19	0.24	0.44	0.05	0.09
T42(C-16)	14S	Belt Conveyor	1997	500	1,850,000	MC	0	0.0010	0.50	0.93	0.50	0.93	0.24	0.44	0.24	0.44
T43(C-3)	2S	Belt Conveyor	1996	500	4,300,000	FE	80	0.0010	0.50	2.15	0.10	0.43	0.24	1.02	0.05	0.20
T44(B7)	27S	Refuse bin outlet	1968	500	1,850,000	FE/FE	96	0.0010	0.50	0.93	0.02	0.04	0.24	0.44	0.01	0.02
T45(C-18)	11S	Belt Conveyor	1997	500	1,850,000	PE	50	0.0010	0.50	0.93	0.25	0.46	0.24	0.44	0.12	0.22
T46(B5)	29S	Refuse bin outlet	1997	500	1,850,000	MC	0	0.0010	0.50	0.93	0.50	0.93	0.24	0.44	0.24	0.44
T47(TRUCK DUMP OS4)	33S	Truck dump	1999	25	219000	MC	0	0.0034	0.09	0.37	0.09	0.37	0.04	0.18	0.04	0.18
T48(ENDLOADER OS4)		Endloader dump	1999	25	219000	MC	0	0.0034	0.09	0.37	0.09	0.37	0.04	0.18	0.04	0.18
T49(B8)	31S	Lime bin outlet	1999	25	219000	PE	50	0.0034	0.09	0.37	0.04	0.19	0.04	0.18	0.02	0.09
T50(C-19)	25S	Belt Conveyor	1999	25	219000	FE	80	0.0034	0.09	0.37	0.02	0.07	0.04	0.18	0.01	0.04
T51(ENDLOADER OS3)		Endloader dump	1968	700	3,010,000	PE	50	0.0010	0.70	1.51	0.35	0.75	0.33	0.71	0.17	0.36

Uncontrolled		**Controlled**		**Uncontrolled**		**Controlled**	
31.65	82.59	12.99	34.63	14.97	39.06	6.15	16.38

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CRUSHING OPERATIONS:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	TONS PROCESSED (TPH)	TONS PROCESSED (TPY)	Control Device	Control Eff. %	EMISSION FACTOR (LBS/TON PROCESSED)	TSP Uncontrolled Emissions (LB/HR)	TSP Uncontrolled Emissions (TPY)	TSP Controlled Emissions (LB/HR)	TSP Controlled Emissions (TPY)	PM10 Uncontrolled Emissions (LB/HR)	PM10 Uncontrolled Emissions (TPY)	PM10 Controlled Emissions (LB/HR)	PM10 Controlled Emissions (TPY)
19S	RB1	Rotary Breaker	1968	600	4,300,000	FE	80	0.02	12.00	43.00	2.40	8.60	5.68	20.34	1.14	4.07
29S	HMCR1	Hammermill Crusher	1976	700	4,300,000	FE	80	0.02	14.00	43.00	2.80	8.60	6.62	20.34	1.32	4.07
									Uncontrolled		**Controlled**		**Uncontrolled**		**Controlled**	
									26.00	86.00	5.20	17.20	12.30	40.68	2.46	8.14

SCREEN OPERATIONS:

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	TONS PROCESSED (TPH)	TONS PROCESSED (TPY)	Control Device	Control Eff. %	EMISSION FACTOR (LBS/TON PROCESSED)	TSP Uncontrolled Emissions (LB/HR)	TSP Uncontrolled Emissions (TPY)	TSP Controlled Emissions (LB/HR)	TSP Controlled Emissions (TPY)	PM10 Uncontrolled Emissions (LB/HR)	PM10 Uncontrolled Emissions (TPY)	PM10 Controlled Emissions (LB/HR)	PM10 Controlled Emissions (TPY)
21S	SC1	Vibrating Screen	1968	800	4,300,000	FE/FE	96.00	0.10	80.00	215.00	3.20	8.60	37.84	101.70	1.51	4.07
22S	SC2*	Grate Screen	1976	700	4,300,000	PE	50.00	0.0010	0.70	2.15	0.35	1.08	0.33	1.02	0.17	0.51
									Uncontrolled		**Controlled**		**Uncontrolled**		**Controlled**	
									80.70	217.15	3.55	9.68	38.17	102.71	1.68	4.58

* - This is a stationary bar grate, and is modeled as a transfer point per WVDEP-DAQ guidance.

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OPEN STOCKPILES

Defining empirical expression variables, where:

	Raw Coal	Clean Coal	Refuse	Lime	
e =	?	?	?	?	lb/day/acre
s =	5.5	32	7	3.9	%
p =	157	157	157	157	days
f =	20	20	20	20	%

Calculating open stockpile emission factor using G10-C guidance

e = 1.7 X (s/1.5) X ((365-p)/235) X (f/15)

e =	**7.36**	**42.80**	**9.36**	5.22	lb/day/acre		

								TSP				PM10			
Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Storage Capacity (tons)	Base Area (SQ FT)	Control Device ID	Eff. (%)	EMISSION FACTOR (LB/DY/AC.)	Uncontrolled Emissions (LB/HR)	(TPY)	Controlled Emissions (LB/HR)	(TPY)	Uncontrolled Emissions (LB/HR)	(TPY)	Controlled Emissions (LB/HR)	(TPY)
OS-1	32S	Raw Coal Stockpile	1982	20,000	100,000	MC	0.00	7.36	0.70	3.08	0.70	3.08	0.33	1.46	0.33	1.46
OS-2	34S	Raw Coal Stockpile	1996	30,000	100,000	MC	0.00	7.36	0.70	3.08	0.70	3.08	0.33	1.46	0.33	1.46
OS-3	35S	Refuse Coal Stockpile	1968	400	200	MC	0.00	9.36	0.002	0.008	0.002	0.008	0.001	0.004	0.001	0.004
OS-4	33S	Lime Stockpile	1999	50	500	MC	0.00	5.22	0.002	0.011	0.002	0.011	0.001	0.005	0.001	0.005
OS-5	43S	Raw Coal Stockpile	2004	500	2,544	MC	0.00	7.36	0.02	0.08	0.02	0.08	0.01	0.04	0.01	0.04
									Uncontrolled		**Controlled**		**Uncontrolled**		**Controlled**	
							Totals:		**1.43**	**6.26**	**1.43**	**6.26**	**0.68**	**2.96**	**0.68**	**2.96**

GF = Grandfathered under Regualtion 13.

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UNPAVED HAULROAD

Defining empirical expression variables, where:

	Yard Haulroad	To Refuse Dump	Endloader	Lime	
e =	?	?	?	?	lb/VMT
k =	10	10	10	10	PM > 30um
s =	5	5	5	5	%
W =	38.5	47	150	33	tons
p =	157	157	157	157	days

	PM	PM-10	PM-2.5
a =	0.7	0.9	0.9
b =	0.45	0.45	0.45
c =	-	-	-

Source: *AP-42 Fifth Edition – 13.2.2 Unpaved Roads,* last updated:12/2003

$e = [k \times (s \div 12)^a \times (W \div 3)^b] \times ((365 - p) \div 365)$

Note: Eliminate variable (S/15) if vehicle speed is greater than 15 mph.

e =	9.74	10.65	17.95	9.08	lb/VMT

ID No.	TRIPS PER HOUR	TRIPS PER YEAR	VMT PER Trip	EMISSION FACTOR (LB/VMT)	CONTROL DEVICE	CONTROL EFFICIENCY (%)	TSP Uncontrolled Emissions (LB/HR)	TSP Uncontrolled Emissions (TPY)	TSP Controlled Emissions (LB/HR)	TSP Controlled Emissions (TPY)	PM10 Uncontrolled Emissions (LB/HR)	PM10 Uncontrolled Emissions (TPY)	PM10 Controlled Emissions (LB/HR)	PM10 Controlled Emissions (TPY)
UPR1	20	130,304	0.5	9.74	WS	70	97.36	317.16	29.21	95.15	25.31	82.46	7.59	24.74
UPR2	10	37,000	0.5	10.65	WS	70	53.25	98.52	15.98	29.55	13.85	25.61	4.15	7.68
UPR3	10	37,000	1	10.65	WS	70	106.50	197.03	31.95	59.11	27.69	51.23	8.31	15.37
UPR4	1	8,760	1	17.95	WS	70	17.95	78.64	5.39	23.59	4.67	20.45	1.40	6.13
UPR5	2	9,955	0.5	9.08	WS	70	10.32	22.61	3.10	6.78	2.68	5.88	0.81	1.76

TSP UNCONTROLLED		TSP CONTROLLED		PM10 UNCONTROLLED		PM10 CONTROLLED	
285.39	713.95	85.62	214.18	74.20	185.63	22.26	55.69

	Raw Coal	Refuse	Lime
Tons per Truck (tons)=	33	50	22
Truck Weight (tons)=	22	22	22
Avg.Truck Travel Weight (tons)=	38.5	47	33
Trucked Yearly Tonnage (tpy) =	4,300,000	1,850,000	219,000
Number of Trucks per Year =	130,304	37,000	9,955
Number of Trucks per Hour =	20	10	2

GF = Grandfathered under Regualtion 13.

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PAVED HAULROAD

Defining empirical expression variables, where:

Lime handling

? e = particulate emission factor (having units matching the units of k)
0.082 k = base emission factor for particle size range and units of interest
70 sL = road surface silt loading
30 W = vechile weight
157 P=mean number of days with >0.01 inch or more of precipatation per year
365 N= number of days in averaging period

Calculating paved haulroads emission factor using AP42 Equation 13.21 E = k * [sL/2]^0.65 * [W/3]^1.5 * [1 - (P / (4*N)] = lb / Vehicle Mile Traveled (VMT)

e = 23.34 lb/VMT

								TSP				PM10			
SOURCE ID NO.	A.S.N.	TRIPS PER HOUR	TRIPS PER YEAR	VMT PER TRIP	EMISSION FACTOR (LB/VMT)	CONTROL DEVICE	CONTROL EFFICIENCY (%)	Uncontrolled Emissions		Controlled Emissions		Uncontrolled Emissions		Controlled Emissions	
								(LB/HR)	(TPY)	(LB/HR)	(TPY)	(LB/HR)	(TPY)	(LB/HR)	(TPY)
42S	PVD1	2.27	9,955	0.5	23.34	WS	70	26.52	58.08	7.96	17.42	6.90	15.10	2.07	4.53

UNCONTROLLED		CONTROLLED		UNCONTROLLED		CONTROLLED	
26.52	58.08	7.96	17.42	6.90	15.10	2.07	4.53

	Lime
Tons per Truck (tons)=	22
Truck Weight (tons)=	22
Avg.Truck Travel Weight (tons)=	33
Trucked Yearly Tonnage (tpy) =	219,000
Number of Trucks per Year =	9,955
Number of Trucks per Hour =	2.27

THERMAL DRYER - COAL DRIED FROM WASH PROCESS + PRODUCTS OF COMBUSTION

SOURCE ID NO.	A.S.N.	THERMAL DRYER POLLUTANT	EMISSION FACTOR[2] (LB/TON)	MAX. DRYER FEED RATE (LB/HR)	(TON/YR)	Uncontrolled Emissions (LB/HR)	(TPY)	Control Device	Eff. (%)	Controlled Emissions (LB/HR)	(TPY)
36S	TD1	Particulate	26.00	1,100,000	3,010,000	14,300	39,130	MC+WS	99.55	64.35	176.08
		Sulfur Dioxide	See alternate SO2 calculations								
		Nitrogen Oxides	0.16	1,100,000	3,010,000	88.00	240.80	-	10	79.20	216.72
		VOC	0.098	1,100,000	3,010,000	53.90	147.49	-	0	53.90	147.49

THERMAL DRYER - PRODUCTS OF COMBUSTION

SOURCE ID NO.	A.S.N.	THERMAL DRYER POLLUTANT	EMISSION FACTOR[3] (LB/TON)	MAX. DRYER BURN RATE (LB/HR)	(TON/YR)	Uncontrolled Emissions (LB/HR)	(TPY)	Control Device	Eff. (%)	Controlled Emissions (LB/HR)	(TPY)
COAL											
36S	TD1	CO	6.00	10,000	43,800	30.00	131.40	MC+WS	0	30.00	131.40
SOURCE ID NO.	A.S.N.	THERMAL DRYER POLLUTANT	EMISSION FACTOR (LB/MCF)	MAX. DRYER BURN RATE (MCF/HR)	(MCF/YR)	Uncontrolled Emissions (LB/HR)	(TPY)	Control Device	Eff. (%)	Controlled Emissions (LB/HR)	(TPY)
NAT. GAS											
36S	TD1	CO	0.084	11.76	103,059	0.99	4.33	MC+WS	0	0.99	4.33
		SO_2	0.00060	11.76	103,059	0.01	0.03	MC+WS	70	0.0021	0.01
		NOx	0.10	11.76	103,059	1.18	5.15	MC+WS	10	1.06	4.64
		PM	0.0076	11.76	103,059	0.09	0.39	MC+WS	99.55	0.0004	0.0018
		VOC	0.0055	11.76	103,059	0.06	0.28	MC+WS	0	0.06	0.28

WORST CASE EMISSIONS

	UNCONTROLLED (LB/HR)	CONTROLLED (LB/HR)	UNCONTROLLED (TPY)	CONTROLLED (TPY)
Particulate	14,300	64.35	39,130	176.09
CO	30.99	30.99	135.73	135.73
SO2	189.71	56.91	830.95	249.29
NOx	89.18	80.26	245.95	221.36
VOC	53.96	53.96	147.77	147.77

Notes:

1. The overall particulate collection efficiency is based on an efficiency of 40% for the cyclone system and an efficiency of 99.25% for the wet scrubber system (100*40% + 60*99.25% = 99.55%).

2. Particulate, sulfur dioxide, nitrogen oxides, volatile organic compound, and carbon dioxide emissions factors are based on the amount of coal dried in the thermal dryer. (AP-42 - Table 11.10-1 & 11.10-2 (11/'95)).

3. The carbon monoxide emission factor is based on the amount of coal/nat. gas burned in the thermal dryer (AP-42 Table 1.4-1 and 1.4-2 (7/'98)). Factors are converted to mcf due to gas usage is in mcf.
GF = Grandfathered under Regulation 13.

4. Natural gas burner information:

There are two burners rated at	6	mmBtu/hr each
Heat content	1,020	Btu/ft^3
Total capacity	11,765	ft^3/hr
	103,058,824	ft^3/yr

Sulfur Dioxide Calculations - Maximum Emissions*

Client:	Kepler Processing Thermal Dryer	
Maximum Operating Hours	8,760	Hrs.
Max. Coal Burn	35,208	Tons/yr. (per Title V Permit)
Max. Sulfur	1.180	%
Min. GCV	13,000	BTU/lb (per AP-42)
Max. Heat Input	104,500,000	BTU/hr (per Title V Permit)
SO_2 emission	831	Tons/yr.- Uncontrolled
Wet Scrubber SO2 Control Efficiency**	70	% (per Title V Permit)
	249	**Tons/yr - Controlled**
Ts	130.0	F
	590.0	R
Psa	26.8	inHg @1800 ft. elev. above sea level & -17.6 static pressure
Design Inlet Fan Flow	150,000	acfm
	120,355	scfm (to EPA std. conditions)
Max. SO_2 concentration	207.5	ppm, wet basis (controlled)

*Assumes all Sulfur compounds are 100% fully oxided to SO2.

**Per AP-42: Scrubbers may achieve between 0 and 95 percent control of SO2 emissions. The use of a neutralizing agent (such as NaOH) in the scrubber water increases the SO2 removal efficiency of the scrubber.

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HAZARDOUS AIR POLLUTANTS
Volatile Organic Compounds - Coal Burned in Dryer

C.A.S. No.	Pollutant	Emission Factors1 (LB/Ton)	Dryer Burn Rate (lbs/Hr)	Dryer Burn Rate (TON/YR)	Potential Emissions (Lb /Hr)	Potential Emissions (Tons/Yr)	Control Efficiency (%)	Controlled Emissions (lbs/Hr)	Controlled Emissions (Tons/Yr)
75070	Acetaldehyde	5.70E-04	10,000	43,800	0.0029	0.0125	-	0.0029	0.0125
98862	Acetohenone	1.50E-05	10,000	43,800	0.0001	0.0003	-	0.0001	0.0003
107028	Acrolein	2.90E-04	10,000	43,800	0.0015	0.0064	-	0.0015	0.0064
71432	Benzene	1.30E-03	10,000	43,800	0.0065	0.0285	-	0.0065	0.0285
100447	Benzyl Chloride	7.00E-04	10,000	43,800	0.0035	0.0153	-	0.0035	0.0153
75252	Bromoform	3.90E-05	10,000	43,800	0.0002	0.0009	-	0.0002	0.0009
75150	Carbon Disulfide	1.30E-04	10,000	43,800	0.0007	0.0028	-	0.0007	0.0028
532274	2-Chloroacetophenone	7.00E-06	10,000	43,800	0.0000	0.0002	-	0.0000	0.0002
108907	Chlorobenzene	2.20E-05	10,000	43,800	0.0001	0.0005	-	0.0001	0.0005
67663	Chloroform	5.90E-05	10,000	43,800	0.0003	0.0013	-	0.0003	0.0013
98828	Cumene	5.30E-05	10,000	43,800	0.0003	0.0012	-	0.0003	0.0012
121142	2,4-Dinitrotoluene	2.80E-07	10,000	43,800	1.40E-06	0.0000	-	0.0000	0.0000
77781	Dimethyl Sulfate	4.80E-05	10,000	43,800	0.0002	0.0011	-	0.0002	0.0011
100414	Ethyl Benzene	9.40E-05	10,000	43,800	0.0005	0.0021	-	0.0005	0.0021
50000	Formaldehyde	2.40E-04	10,000	43,800	0.0012	0.0053	-	0.0012	0.0053
110543	Hexane	6.70E-05	10,000	43,800	0.0003	0.0015	-	0.0003	0.0015
78933	Methyl Ethyl Ketone	3.90E-04	10,000	43,800	0.0020	0.0085	-	0.0020	0.0085
60344	Methyl Hydrazine	1.70E-04	10,000	43,800	0.0009	0.0037	-	0.0009	0.0037
80626	Methyl Methacrylate	2.00E-05	10,000	43,800	0.0001	0.0004	-	0.0001	0.0004
75092	Mehylene Chloride	2.90E-04	10,000	43,800	0.0015	0.0064	-	0.0015	0.0064
108952	Phenol	1.60E-05	10,000	43,800	0.0001	0.0004	-	0.0001	0.0004
123386	Propionaldehyde	3.80E-04	10,000	43,800	0.0019	0.0083	-	0.0019	0.0083
127184	Tetrachloroethylene	4.30E-05	10,000	43,800	0.0002	0.0009	-	0.0002	0.0009
108883	Toluene	2.40E-04	10,000	43,800	0.0012	0.0053	-	0.0012	0.0053
79005	1,1,1-Trichloroethane	2.00E-05	10,000	43,800	0.0001	0.0004	-	0.0001	0.0004
100425	Styrene	2.50E-05	10,000	43,800	0.0001	0.0005	-	0.0001	0.0005
1330207	Xylenes	3.70E-05	10,000	43,800	0.0002	0.0008	-	0.0002	0.0008
108054	Vinyle Acetate	7.60E-06	10,000	43,800	3.80E-05	0.0002	-	3.80E-05	0.0002
7647010	Hydrochloric Acid	1.90E+00	10,000	43,800	9.5000	41.6100	99.25	0.0712	0.3121
7664393	Hydroflouric Acid	2.30E-01	10,000	43,800	1.1500	5.0370	99.25	0.0086	0.0378
	Subtotal Organic HAP's[2]				10.68	46.76		0.11	0.47

Notes: 1. Emission factor taken from Tables 3-8 and 4-5 of EPA's Guidance for Coal Mining Facilities (EPA 745-B-99-002)

2. Insignificant emission units are units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.

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Metalic Compounds - Coal Burned in Dryer

C.A.S. No.	Pollutant	Emission Factors1 (Lb/Ton)	Dryer Burn Rate (LB/HR)	Dryer Burn Rate (TON/YR)	Potential Emissions (Lb /Hr)	Potential Emissions (Tons/Yr)	Control Efficiency (%)	Controlled Emissions (lbs/Hr)	Controlled Emissions (Tons/Yr)
----	Antimony (Sb2O5)	2.40E-03	10,000	43,800	0.012	0.05	-	0.012	0.05
----	Arsenic (AS2O5)	3.19E-02	10,000	43,800	0.16	0.70	-	0.16	0.70
----	Beryllim (BeO)	1.45E-02	10,000	43,800	0.07	0.32	-	0.07	0.32
----	Cadmium (CdO)	2.30E-04	10,000	43,800	0.0012	0.005	-	0.0012	0.005
----	Chromium (CrO3)	3.01E-02	10,000	43,800	0.15	0.66	-	0.15	0.66
----	Cobalt (CoO)	1.95E-02	10,000	43,800	0.098	0.43	-	0.098	0.43
----	Lead (PbO2)	1.30E-02	10,000	43,800	0.07	0.28	-	0.07	0.28
----	Manganese (MnO2)	4.58E-02	10,000	43,800	0.23	1.00	-	0.23	1.00
----	Mercury (HgO)	2.08E-04	10,000	43,800	0.0010	0.005	-	0.0010	0.005
----	Nickel (NiO)	2.87E-02	10,000	43,800	0.14	0.63	-	0.14	0.63
----	Selenium (SeO2)	9.31E-03	10,000	43,800	0.05	0.20	-	0.05	0.20
	Subtotal - Metals				0.98	4.29		0.98	4.29
					Uncontrolled			Controlled	
	Hazardous Air Pollutants - Aggregated[2]				11.65	51.05		1.08	4.75

Notes:

1. Emission factors for the trace elements were taken from USGS Coal Qual Database and calculated per EPA 745-B-99-002 that assume that 100 % of the base metal is fully oxidized to determine the quantity of the metal compounds manufactured / emitted.

2. Insignificant emission units are units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.

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INSIGNIFICANT EMISSIONS - STORAGE TANKS

Discussion

As shown on the attached Tanks 4.0 Program printed Emissions Report - Brief Format for the largest tank (1,600 gallons capacity), the total VOC emissions with 100 turnovers in a year is only 1.63 lbs/yr. Considering the tank is at the site for the entire year, 24 hr/day and 365 days/yr, the hourly emissions would be 0.0002 lbs/hr. If all the tanks were 1,600 gallon tanks with 100 turnovers the approximate maximum emissions would be 8.2 lbs/year or 0.004 tons/year.

Material	Tank ID	Storage capacity gallons	No. of turnovers 1968	Total Losses lbs/yr[1]	Control Device ID	Efficiency %	Maximum VOC Emissions[2]		
							lbs/yr	lbs/hr	TPY
Diesel	5	1,600	100	1.63	No vapor recovery	0.00%	1.63	0.0002	0.0008
						Worse case total:	**8.15**	**0.001**	**0.004**

Other tanks

Material	Tank ID	Storage capacity gallons
Diesel	12	1,000
Diesel	13	500
Diesel	15	1,500
Diesel	16	1,500

1968

Notes:
(1) Tanks 4.0 software was used to calculate losses

(2) Insignificant emission units are units which do not have any applicable requirements and which emit criteria pollutants (CO, NOx, SO2, VOC, and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.

The tank emissions for this facility are insignificant / de minimis source