

Fact Sheet



*For Final Renewal Permitting Action Under 45CSR30 and
Title V of the Clean Air Act*

Permit Number: **R30-04700017-2008**
Application Received: **November 7, 2007**
Plant Identification Number: **047-00017**
Permittee: **Consolidation Coal Company**
Facility Name: **Amonate Preparation Plant**
Mailing Address: **P.O. Drawer L**
Oakwood, VA 24613

Physical Location: Beech Fork, McDowell County, West Virginia
UTM Coordinates: 441.76 km Easting • 4118.34 km Northing • Zone 17
Directions: Take I-77 South to Route 52N to 460W going into Virginia. At approximately 24 miles into Virginia, turn right (North) onto SR 637 near Maxwell, VA. Follow SR 637 to the intersection of SR 637 and SR 631. Turn right for about 0.2 miles then turn left onto SR 637 again. Travel for approximately 10 miles. Then turn left at bridge. Follow to facility, turn right.

Facility Description

The Amonate Preparation Plant, a wet-wash coal preparation plant with thermal dryer, has the ability to screen, break/size, wash, thermally dry, store and load out/in coal. The maximum capacity of the preparation plant is 658 tons per hour and 5,764,000 tons per year of raw coal input. The facility has the potential to operate twenty-fours (24) hours a day for seven (7) days per week. SIC Code: 1221

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|---|----------------------------|------------------------------|
| Regulated Pollutants | Potential Emissions | 2006 Actual Emissions |
| Carbon Monoxide (CO) | 709.68 | 165.92 |
| Nitrogen Oxides (NO _x) | 215.11 | 50.53 |
| Particulate Matter (PM ₁₀) | 386.91 | 74.75 |
| Total Particulate Matter (TSP) | 812.54 | 156.98 |
| Sulfur Dioxide (SO ₂) | 832.2 | 27.55 |
| Volatile Organic Compounds (VOC) | 208.36 | 27.08 |
| <i>PM₁₀ is a component of TSP.</i> | | |
| Hazardous Air Pollutants | Potential Emissions | 2006 Actual Emissions |
| Total HAP's | 8.6 | 1.30 |
| <i>Some of the above HAPs may be counted as PM or VOCs.</i> | | |

Title V Program Applicability Basis

This facility has the potential to emit 709 TPY CO, 215 TPY NO_x, 386 TPY PM₁₀, 832 TPY SO₂, and 208 TPY VOC's. Due to this facility's potential to emit over 100 TPY of CO, NO_x, PM₁₀, SO₂, and VOC's, Amonate Preparation Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

| | | |
|--------------------|---------|--|
| Federal and State: | 45CSR5 | Operation of Coal Preparation Plants |
| | 45CSR6 | Open burning prohibited. |
| | 45CSR10 | Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers |
| | 45CSR11 | Standby plans for emergency episodes. |
| | 45CSR13 | Permits for Construction, Modification, Relocation and Operation of Stationary Sources |
| | 45CSR16 | Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60 |

| | | |
|-------------|------------------------------|--|
| | WV Code § 22-5-4 (a) (14) | The Secretary can request any pertinent information such as annual emission inventory reporting. |
| | 45CSR30 | Operating permit requirement. |
| | 40 C.F.R. Part 60 Subpart Y | Standards of Performance for Coal Preparation Plants |
| | 40 C.F.R. Part 61 | Asbestos inspection and removal |
| | 40 C.F.R. Part 64 | Compliance Assurance Monitoring |
| | 40 C.F.R. Part 82, Subpart F | Ozone depleting substances |
| State Only: | 45CSR4 | No objectionable odors. |

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit (<i>if any</i>) |
|--------------------------------|------------------|--|
| R13-0267A | 1/07/03 | |
| | | |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The changes to the May 30, 2003 Title V Permit and Fact Sheet consists of the following:

40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

This facility has a pollutant specific emissions unit (PSEU) for Total Particulate Matter (TSP) meeting the applicability requirements of 40 C.F.R. §64.2 and therefore has submitted a CAM plan in accordance with the CAM rule.

The submitted plan meets the requirements of the CAM rule for the Venturi Scrubber and Mist Eliminator controlling TSP from the thermal dryer. The primary use of this scrubber is for particulate matter (PM) control.

Monitoring per the CAM Plan for TSP emissions will be as follows:

Note: The corresponding permit conditions are italicized in parentheses.

| | Indicator No. 1 | Indicator No. 2 | Indicator No. 3 |
|--|--|--|--|
| I. Indicator | Water Pressure to Scrubber <i>(4.2.1(2)(ii))</i> | Pressure Drop Across Scrubber <i>(4.2.1(2)(i))</i> | Temperature of the gas stream at the exit of the thermal dryer <i>(4.2.1(1))</i> |
| Measurement Approach | Gauges are monitored by operator during periods of normal operation. | Gauges are monitored by operator during periods of normal operation. | Gauges are monitored by operator during periods of normal operation. |
| II. Indicator Range | 20-30 psi <i>(4.3.1)</i> | 25-35 inches <i>(4.3.1)</i> | 140-160°F <i>(4.3.1)</i> |
| III. Performance Criteria | | | |
| A. Data Representativeness | Water pressure sensor is located close to the water discharge point <i>(4.2.1(2)(ii))</i> | Pressure drop will be measured between the inlet airflow to the scrubber and the outlet airflow of the scrubber, which is the atmospheric loss through the venture constriction of the control equipment <i>(4.4.4.g)</i> | Monitored at the exit of the thermal dryer <i>(4.2.1.1(1))</i> |
| B. Verification of Operational Status | <i>Does not apply to existing non-modified monitoring equipment.</i> | <i>Does not apply to existing non-modified monitoring equipment.</i> | <i>Does not apply to existing non-modified monitoring equipment.</i> |
| C. QA/QC Practices and Criteria | Recalibration is conducted annually in accordance with procedures under 40 C.F.R. §60.13(b) <i>(4.2.2)</i> | Recalibration is conducted annually in accordance with procedures under 40 C.F.R. §60.13(b) <i>(4.2.2)</i> | Recalibration is conducted annually in accordance with procedures under 40 C.F.R. §60.13(b) <i>(4.2.2)</i> |
| D. Monitoring Frequency | Continuously monitored and recorded by charts. <i>(4.2.1 and 4.4.6)</i> | Continuously monitored and recorded by charts. <i>(4.2.1 and 4.4.6)</i> | Continuously monitored and recorded by charts. <i>(4.2.1 and 4.4.6)</i> |
| Data Collection Procedures | Continuously recorded by strip chart and manually recorded once every 12 hours during normal operation. <i>(4.4.6)</i> | Continuously recorded by strip chart and manually recorded once every 12 hours during normal operation. <i>(4.4.6)</i> | Continuously recorded by strip chart and manually recorded once every 12 hours during normal operation. <i>(4.4.6)</i> |
| Averaging Period | Three hour rolling average <i>(4.3.1)</i> | Three hour rolling average <i>(4.3.1)</i> | Three hour rolling average <i>(4.3.1)</i> |

This facility is not subject to following criteria pollutants for the following reasons:

CO – 40CFR§64.2(a)(1) - The facility is not subject to emission limitations for this pollutant.

NO_x – 40CFR§64.2(a)(1) - The facility is not subject to emission limitations for this pollutant.

SO₂ – 40CFR§64.2(a)(2) - The facility does not use a control device to meet compliance with emission limitations. They instead limit the sulfur content of the coal.

VOC – 40CFR§64.2(a)(1) - The facility is not subject to emission limitations for this pollutant.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 45CSR§10-5.1 - The thermal dryer is not defined as a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 3, 2008

Ending Date: April 2, 2008

All written comments should be addressed to the following individual and office:

Mike Egnor
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.