

# Fact Sheet



## For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10900006-2011**  
Application Received: **September 13, 2011**  
Plant Identification Number: **109-00006**  
Permittee: **Pinnacle Mining Company, LLC**  
Facility Name: **Pinnacle Preparation Plant**  
Mailing Address: **P.O. Box 338, Pineville, West Virginia 24874**

*Revised: N/A*

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Physical Location: Pineville, Wyoming County, West Virginia  
UTM Coordinates: 456.10 km Easting • 4,155.40 km Northing • Zone 17  
Directions: At Pineville take Route 10 South approximately one mile, turn right onto Route 16 South, travel approximately one mile before turning left onto Pinnacle Creek Road.

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### Facility Description

The facility is a coal preparation plant which processes raw coal from an associated underground bituminous coal mine plus other raw coal sources. The preparation involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash and low sulfur coal. Operations at the plant include breaking, crushing, handling, screening, washing, and drying. The facility is characterized by SIC code 1222.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Carbon Monoxide (CO)	178	66
Nitrogen Oxides (NO <sub>x</sub> )	333	124
Particulate Matter (PM <sub>2.5</sub> )	152	27
Particulate Matter (PM <sub>10</sub> ) <sup>1</sup>	288	53
Total Particulate Matter (TSP) <sup>1</sup>	414	70
Sulfur Dioxide (SO <sub>2</sub> )	178	43
Volatile Organic Compounds (VOC)	186	102

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2010 Actual Emissions</b>
Benzene	2.33	0.17
Hexane	4.66	0.34
Hydrochloric acid	8.01	2.03
Aggregate HAPs	17.62	2.92

*Some of the above HAPs may be counted as PM or VOCs.*

<sup>1</sup>*Potential emissions have increased due to the fact that the ownership of the portion of Pinnacle Creek Road that this facility uses to haul coal from Green Ridge Mine to the prep plant transferred from the state of West Virginia to Pinnacle Mining Company, LLC since the previous renewal application.*

### Title V Program Applicability Basis

This facility has the potential to emit 178 TPY of CO, 333 TPY of NO<sub>x</sub>, 288 TPY of PM<sub>10</sub>, 414 TPY of TSP, 178 TPY of SO<sub>2</sub>, and 186 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Pinnacle Mining Company, LLC 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 45CSR6 45CSR10 45CSR11 45CSR13 45CSR16 WV Code § 22-5-4 (a) (14)  45CSR30 45CSR34 40 C.F.R. Part 60, Subpart Y 40 C.F.R. Part 61 40 C.F.R. Part 64 40 C.F.R. Part 82, Subpart F	Coal Preparation and Handling Operations Open burning prohibited Emission of Sulfur Oxides Standby plans for emergency episodes Minor NSR Permits NSPS pursuant to 40 C.F.R. Part 60 The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. HAP Emission Standards Coal Preparation Plants Asbestos inspection and removal Compliance Assurance Monitoring Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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, 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> )
R13-2183K	April 28, 2008	

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

Since the previous Title V permit (R30-10900006-2007) was issued, R13-2183K was issued on April 28, 2008. At that time, Pinnacle did not get a Title V permit modification for these changes. These changes are being incorporated into this renewal as follows:

1. Stockpile ST-15 (ST-15), Dump Hopper DH118-1 (DH118-1) and Conveyor C118-1 (C118-1) were removed from the permit. According to the Evaluation for R13-2183K, these units were never constructed.
2. An open stockpile (ST-16) and three conveyors (C120, C121 and C122) were added to this permit. According to the Evaluation for R13-2183K, they were installed by DTE Smith Branch, LLC, which ceased operation in 2007, for a synfuel plant which tied directly to Pinnacle Mining's Conveyor RC-5. These units were previously permitted under R13-2210-X approved February 13, 2001. Conveyors C121 and C122 are part of a system to collect samples of material being handled through ST-16. This sampling system has yet to be used since Pinnacle assumed ownership from DTE Smith Branch.
3. A new dump hopper (DHRC-4) was added to this permit. This unit, which has yet to be installed, will receive coal and/or pond fines by front-end loader and transfer it to a conveyor (C120).

In addition to formatting and boilerplate changes, the following changes were made in this Title V permit:

- The Emission Units table was updated to incorporate the changes in items 1-3 above.
- Condition B.4 in R13-2183K was revised to include 40 CFR 60, Subpart Y requirements that apply to the conveyors (C120, C121 and C122) and dump hopper (DHRC-4) which were added to this permit. 40 CFR 60, Subpart Y language was already included in the previous Title V Permit (R30-10900006-2007) as Conditions 3.1.11 and 5.1.2. The permit references for these conditions were updated to include references to Condition B.4 of R13-2183K.
- References to the three conveyors (C120, C121 and C122) and dump hopper (DHRC-4) mentioned in items 2-3 above were added to the heading for Section 5.
- Condition 5.1.2 was removed from this permit. This condition previously referenced Condition A.14 from R13-2183J. It required Screen OSS-1 and Conveyors (OSC-1, OSC-2, and OSC-3) used to screen coal from Stockpile OS-1 before it is trucked to Storage Pit ST-10 to be disconnected and removed. This equipment has been removed, thus this condition is no longer necessary and was not included in R13-2183K.
- A reference to ST-16 was added to the heading for Section 6. The reference to ST-15 was deleted.
- Condition 6.1.1 was updated for the removal of Stockpile ST-15 (ST-15). Open Stockpile ST-16 (ST-16) was added to this condition in its place. Open Stockpile ST-16 (ST-16) can store coal or coal fines with a combined maximum storage of 120,000 tons. Up to 360,000 TPY of coal may be received at or shipped from Open Stockpile ST-16 (ST-16) by truck (footnote 7), and up to 500,000 TPY of coal fines may be received at Open Stockpile ST-16 (ST-16) by truck (footnote 8).
- Condition 6.1.2 was updated for the removal of Stockpile ST-15 (ST-15). All references to Stockpile ST-15 (ST-15) were replaced by references to Open Stockpile ST-16 (ST-16).
- Condition 6.1.3 was removed from this permit. This condition previously referenced Condition A.11 from R13-2183J and required the permittee to remove coal from stockpile ST-9 and stop using the area for coal storage. Dump Hopper DHRC-3 was also required to be removed from service. This has already been done, thus this condition is unnecessary and was not included in R13-2183K.

Performance testing requirements for the new dump hopper (DHRC-4) and three conveyors (C120, C121 and C122) were added to this permit as condition 3.3.3. after the dump hopper is installed and has been placed into operation. This performance testing is required by condition B.4 of R13-2183K.

**Greenhouse Gas Tailoring Rule:** This is a renewal Title V Permit and there have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

### Non-Applicability Determinations

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

45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer.
40 C.F.R. Part 60, Subpart Y	Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 & 13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b).
40 C.F.R. Part 64	This is the second permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the first renewal that would require any additional CAM permit conditions.

### 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: December 14, 2011  
Ending Date: January 13, 2012

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

Rex Compston, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

### Response to Comments (Statement of Basis)

Not applicable.