

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 10, 2012.

Permit Number: **R30-04700008-2012**

Application Received: **April 15, 2010**

Plant Identification Number: **03-54-047-00008**

Permittee: **Second Sterling Corporation**

Facility Name: **Keystone Number 1 Coal Preparation Plant**

Mailing Address: **P. O. Box 1085, Beckley, WV 25802-1085**

Permit Action Number: *MM01*      Revised: *February 4, 2013*

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|                    |  |
|--------------------|--|
| Physical Location: | Keystone, McDowell County, West Virginia   |
| UTM Coordinates:   | 460.38 km Easting • 4141.305 km Northing • Zone 17   |
| Directions:        | From Charleston take I-77 south to exit 9. Proceed west on U.S. Route 460 to U.S. Route 52. Take U.S. Route 52 northwest to Keystone. At Keystone turn right on Bridge Street, cross the railroad tracks and turn right. |

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### Facility Description

The Keystone Number 1 Preparation Plant (SIC 1221 and NAICS 212111), a wet-wash coal preparation plant with thermal dryer, has the ability to screen, crush/size, wash, thermally dry, store and load out/in coal. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week.

The proposed Title V modification incorporates changes associated with the R13-0308E modification for the increase of the hourly raw coal input to the wet wash plant from 350 tons per hour (TPH) to 470 TPH without any increase in annual throughput; increase of the hourly throughput of five (5) belt conveyors and one screen; addition of an emergency truck loadout refuse belt conveyor and associated refuse haulroad; removal of the "Synfuel" conveying system; authorization for the stockpiling of commingled coal (a

mixture of thermally and non-thermally dried coal) in stockpile ST8 that was prohibited under R13-1142; and addition of a raw coal overflow stockpile that was previously added in 2007 but not permitted.

Permit R13-0308E was also updated to the new boilerplate format. This Title V modification also incorporates the changes associated with the conversion of Permit R13-0308D from the old format to the new boilerplate format in R13-0308E.

### Emissions Summary

The change in emissions as a result of this modification is as follows:

| Plantwide Emissions Summary [Tons per Year] |                     |
|---|---------------------|
| Criteria Pollutants                         | Potential Emissions |
| Particulate Matter (PM <sub>10</sub> )      | 0.001 Increase      |
| Total Particulate Matter (TSP)              | 0.003 Increase      |

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 826.55 tons per year of PM<sub>10</sub>, 178.00 tons per year of NO<sub>x</sub> and 127.00 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Second Sterling Corporation 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.

The modification to this facility has been found to be subject to the following applicable rules:

#### Federal and State:

|                         |  |
|-------------------------|--|
| 45CSR5                  | Control of particulate matter from coal preparation plants   |
| 45CSR13                 | Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation |
| 45CSR16                 | Standards of performance for new stationary sources pursuant to 40 CFR part 60   |
| 45CSR30                 | Operating Permit Requirement.  |
| 40 C.F.R. 60, Subpart Y | Requirements for coal preparation plants   |

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 (if any) |
|--------------------------------|------------------|---|
| R13-0308E                      | April 16, 2012   |   |

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

- 1) The "Emission Units" table was updated to include the new equipment, remove the "Synfuel" facility equipment and update the design capacities as described above in the "Facility Description" for the R13-0308E modification. A footnote was added to the table indicating the haulroads are collectively included in the Emission Unit/Source ID "VT" in Table 1.0 of permit R13-0308.
- 2) R13-0308E incorporated the requirements of R13-1142. It consequently superseded and replaced R13-1142. Therefore R13-1142 has been deleted from Section 1.2 of the Title V permit. Also, the Title V permit requirements pertaining to R13-1142 have been deleted. (see conditions 3.1.12., 4.1.10. and 4.1.11.)
- 3) New requirements from R13-0308E include the following:
  - a. Facility wide recordkeeping requirements were added in 3.4.5. and 3.4.6.
  - b. PM<sub>2.5</sub> and PM<sub>10</sub> were added to the *Thermal Dryer Emission Limits* table in 4.1.3.
  - c. A limit on operating hours was added in 4.1.5
  - d. Monitoring requirements were added in 4.2.7., 4.2.8. and 4.2.9.
  - e. A requirement to meet all applicable testing requirements under 45CSR5 and 40 CFR 60 Subpart Y was added in 4.3.9. and 6.3.9.
  - f. TPH throughput of coal into the wet wash plant was increased from 350 to 470 in 6.1.2. Also in 6.1.2., maximum throughputs are established for total clean coal loaded out, and refuse circuits @ conveyors C35 and C20.
  - g. 40 CFR Subpart Y monitoring requirements were added in 6.1.5.b.
  - h. Monitoring Requirements were added in 6.2.2. (revised language and moved from 6.3.1.), 6.2.3, and 6.2.4.
  - i. Testing requirement as the Secretary may designate and referring to the provisions of permit section 3.3. was added in 6.3.1.
  - j. 40 CFR Subpart Y testing requirements were added in 6.3.2. through 6.3.8.
  - k. 40 CFR Subpart Y recordkeeping requirements were added in 6.4.2.

1. 40 CFR Subpart Y reporting requirements were added in 6.5.1. through 6.5.3.
- m. A requirement to meet all applicable reporting requirements under 45CSR5 and 40 CFR 60 Subpart Y was added in 6.5.4.
- 4) The R13-0308E revision also converted R13-0308D to the new permit boilerplate format. During this process, some of the language was revised and/or new requirements added or deleted (see conditions 3.1.9., 3.1.11., 4.1.3., 4.1.4., 4.1.7., 4.2.1., 4.3.5., 4.3.6., 4.3.7., 6.1.2., 6.1.3., 6.1.4., 6.1.5., 6.1.6. and 6.2.1.). The citations of authority from R13-0308 were also updated and or deleted as appropriate.
- 5) Visible emissions streamlining language was added in 4.1.7.b.
- 6) The language in 6.1.1. was updated to include the additional belt conveyors and delete the belt conveyors removed from service.
- 7) The footnote in 6.1.2. (condition 4.1.3. in R13-0308E) refers to the limited capacities under 6.1.6. (condition 4.1.1 in permit R13-0308E). The footnote in R13-0308 contains a typographical error in that it refers to 4.1.2. instead of 4.1.1. Therefore it has been corrected in 6.1.2. of the Title V permit
- 8) The language in 6.0 was amended to include emission point IDs “63E” and “64E”.

### **Non-Applicability Determinations**

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

None

### **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: Not Applicable for minor modifications.  
Ending Date: N/A

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

Frederick Tipane  
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**

Frederick Tipane  
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. (1215) • Fax: 304/926-0478

**Response to Comments (Statement of Basis)**

Not applicable.