

Fact Sheet



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

Permit Number: **R30-04700017-2013**
Application Received: **October 24, 2012**
Plant Identification Number: **03-54-047-00017**
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 Consolidation Coal Company's 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-four (24) hours a day for seven (7) days per week. The Consolidation Coal Company's Amonate Preparation Plant is covered by SIC Code 1221 and NAICS Code 212111.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	709.68	0
Nitrogen Oxides (NO _x)	215.11	0
Particulate Matter (PM ₁₀)	386.91	0
Total Particulate Matter (TSP)	812.54	0
Sulfur Dioxide (SO ₂)	832.2	0
Volatile Organic Compounds (VOC)	208.36	0
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Hydrochloric Acid Aerosols	4.8	0
Hydrofluoric Acid	3.8	0
Total HAPs	8.6	0
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

Note:

The facility has been temporarily shut down since January of 2010.

Title V Program Applicability Basis

This facility has the potential to emit 709.68 TPY of Carbon Monoxide (CO), 215.11 TPY of Nitrogen Oxides (NO_x), 386.91 TPY of Particulate Matter (PM₁₀), 832.2 TPY of Sulfur Dioxide (SO₂), and 208.36 TPY of Volatile Organic Compounds (VOC). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Consolidation Coal Company'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
	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 C.F.R. 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 Subpart M	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 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>)
R13-0267A	January 7, 2003	

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 R30-04700017-2008 was issued, there have been no changes to the Consolidation Coal Company's Amonate Preparation Plant Title V Permit. The Amonate Preparation Plant is idle because of the current economic situation.

The following updates were made to the renewal permit:

1. The Emission Unit Table 1.1 was not revised since the facility did not add, revise or delete any equipment between the 2008 renewal and the 2012 renewal.
2. The regulatory language was updated for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2, respectively.

3. 45CSR34 incorporates and is now cited with 40 C.F.R. Part 61 because 45CSR15 was repealed. The citation for 3.1.3 has been revised accordingly.
4. 40 C.F.R. Part 60 Subpart Y was revised on October 8, 2009. The following sections of the current Title V permit that reference 40 C.F.R. Part 60 Subpart Y have been updated in the renewal permit to the current rule.
 - 4.1. Revised Section 3.1.16. In the citation, 40 C.F.R. § 60.252 (c) was replaced with 40 C.F.R. § 60.254 (a).
 - 4.2. Revised Section 3.3.2. In the citation, 40 C.F.R. § 60.254 (a) was changed with 40 C.F.R. § 60.255 (a).
 - 4.3. Revised Section 3.3.3. In the citation, 40 C.F.R. § 60.254 (b) was replaced with 40 C.F.R. § 60.257 (a). The requirements previously included as Section 3.3.3 (1) are now included in Section 4.3.2. (5).
 - 4.4. Slightly revised the wording in Section 4.1.1.
 - 4.5. Revised Section 4.2.1 and merged Section 4.2.2 with Section 4.2.1. Section 4.2 was renumbered accordingly. In the citation, 40 C.F.R. §§ 60.253 (a) and (b) were changed to 40 C.F.R. § 60.256 (a).
 - 4.6. Sections 4.3.2 [40 C.F.R. § 60.257 (b)], 4.5.2 [40 C.F.R. § 60.258 (b)], and 4.5.3 [40 C.F.R. § 60.258 (d)] were included because of the current 40 C.F.R. Part 60 Subpart Y requirements for testing and reporting.
5. The boilerplate language for Section 3.3.1 was revised with the addition of Section 3.3.1.d and the citation was also revised to expand the authority of the West Virginia state code.
6. Sections 3.5.3 and 3.5.5 were revised according to US EPA Region 3's request that all annual compliance certifications be submitted electronically (e-mail). Also, the US EPA Region 3 address in Section 3.5.3 was revised. This is a general change to the boiler plate language.
7. The following requirements were included for 40 C.F.R. Part 64 Compliance Assurance Monitoring (CAM): proper maintenance (Section 4.2.6); continued operation (Section 4.2.7); response to excursions or exceedances (Section 4.2.8); documentation of need for improved monitoring (Section 4.2.9); and quality improvement monitoring (Section 4.2.10).
8. Since the thermal dryer has been temporarily shut down due to economic conditions, stack testing to determine compliance with the stack emission limitations for PM Concentration, PM and PM₁₀ as required in Section 4.3.1 will begin within one year of the thermal dryer coming back online for continuous operation.

Consolidation Coal Company has not submitted any modifications to the Amonate Preparation Plant that triggered a PSD permit; therefore, the requirements of the GHG tailoring rule do not apply.

Non-Applicability Determinations

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

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: November 21, 2012
Ending Date: December 21, 2012

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

Wayne Green
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

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

The following comments were received on December 20, 2012 from Consolidation Coal Company for the Amonate Preparation Plant, Title V Permit R30-04700017-2013. Following are DAQ's response for each comment.

Comment Item 1:

On page 3 of 42, the emission unit description for TP-6 is listed as Transfer Bin to Breaker Feel Belt (C3). Please change the word “Feel” to “Feed” in the description.

Response Item 1:

DAQ concurs with the suggested changes.

Comment Item 2:

On page 9 of 42, the reference that follows 2.10.1.f is [45CSR'30-5.9.]. This should be [45CSR§30-5.9.].

Response Item 2:

DAQ made the suggested change.