

Fact Sheet



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

Permit Number: **R30-06100016-2013**
Application Received: **December 7, 2012**
Plant Identification Number: **03-54-06100016**
Permittee: **Consolidation Coal Company**
Facility Name: **Blacksville No. 2**
Mailing Address: **P.O. Box 24**
Wana, WV 26590

Physical Location: Wana, Monongalia County, West Virginia
UTM Coordinates: 560.47 km Easting • 4395.78 km Northing • Zone 17
Directions: Approximately 1/2 mile NE of Wana and State Route 7 on County Road
12/2

Facility Description

The facility is a coal preparation plant that includes a 115 mmBTU/hr coal-fired thermal dryer and coal handling facility consisting of a wet wash plant with associated coal handling equipment. Facility SIC code is 1222.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2012 Actual Emissions
Carbon Monoxide (CO)	103.0	59.70
Nitrogen Oxides (NO _x)	136.3	95.23
Particulate Matter (PM _{2.5})	20.52	Not reported
Particulate Matter (PM ₁₀)	94.42	Not reported
Total Particulate Matter (TSP)	205.03	72.89
Sulfur Dioxide (SO ₂)	249.4	121.0
Volatile Organic Compounds (VOC)	129.2	82.37

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2012 Actual Emissions
HF	2.0	0.9
HCL	2.6	1.15
Total HAPs	4.6	2.05

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

Title V Program Applicability Basis

This facility has the potential to emit 103 tons/year of CO, 136.3 tons/year of NO_x, 249.4 tons/year of SO₂ and 129.2 tons/year of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Consolidation Coal Company 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	Coal Preparation Plant
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur Dioxide Emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permit
	45CSR16	NSPS
	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	Coal Preparation Plant

	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 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>)
R13-0718D	7-13-2011	

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" which may be downloaded from DAQ's website.

Determinations and Justifications

Changes to the existing permit:

1. Changes to Section 1.1, Emission Units table:
 - a. Under the column "Equipment Description", word "mine" is added for description of Conveyor CB2 (Source I.D. 005).
 - b. For "Haulroads - Unpaved Roads - Trucks transporting coal from Truck Loadout Bin TLB", Source I.D. 052M is added.
2. Boilerplate changes: The following changes have been made due to boilerplate changes:
 - a. Section 2.1.4 has been changed to reflect boilerplate change.
 - b. Section 3.1.3 regarding asbestos and the citation of the section has been changed due to change in boilerplate.
 - c. Paragraph d has been added to section 3.3.1 to reflect boilerplate change requiring reporting of stack test results.
 - d. Sections 3.5.3 and 3.5.5 are changed to include electronic report submittal to EPA.
 - e. Missing section numbers 3.3.2 and 3.3.3 are added.
3. Changes/clarifications to the existing permit besides boilerplate changes:
 - a. Section 1.2 – R13-1551 is deleted because this permit is inactive. Our database shows R13-1551 is a permit for plant I.D. No. 061-00053 and the database shows that 061-00053 is permanently shut down. R13-1551 was issued on January 12, 1993 for construction of a flyash unloading facility which was never built.

- b. Sections 4.1.1 to 4.1.7 and 4.4.1 of the existing permit are deleted because those permit conditions were from R13-1551 which is now inactive. Section 4.1.14 of the existing permit is deleted because this condition came from R13-0718C and revised R13 permit R13-0718D does not have this condition. Sections 4.1.8 to 4.1.25 of the existing permit are renumbered 4.1.1 to 4.1.18 in the draft/proposed permit. Sections 4.4.2 to 4.4.8 of the existing permit are renumbered 4.4.1 to 4.4.7 in the draft/proposed permit.
- c. Section 1.1, Emission Units table: Source ID's 054A, 054B, 054D, 054E, 2S, 3S & 4E are eliminated because these sources were permitted under R13-1551 and were never constructed. References to 054D and 054E are deleted from condition 4.1.6. References to 054A and 054B are deleted from conditions 4.1.8, 4.1.11, 4.1.15 & 4.2.2.
- d. Consent orders (CO-R13-E-2000-9; CO-R13, 14-95-41A; CO-R13, 14-95-41; and CO-R5, 13, 14-93-6) are now closed by enforcement. References to the consent order in sections 4.1.1 and 4.4.1 (sections 4.1.8 & 4.4.2 in existing permit) are deleted. Section 4.5.1 of the existing permit is also deleted because the condition was from a consent order. Sections 4.5.2 to section 4.5.10 of the existing permit are renumbered 4.5.1 to 4.5.9 in the draft/proposed permit.
- e. References to 035 are changed to 037C in section 4.0 (draft/proposed permit conditions 4.1.1, 4.1.4, 4.1.13, 4.1.14, 4.1.17, 4.2.1 and 4.4.1) to match with emission units table thermal dryer designation. References to emission point ID P002 in sections 4.1.2, 4.1.3, 4.1.4, 4.1.10, 4.1.16, 4.1.17, 4.2.4 to 4.2.8, 4.3.1 & 4.5.2 are changed to unit ID 037C.
- f. In section 4.1.6 the following paragraph "Fugitive particulate dust control system(s) shall be properly designed, installed, operated and maintained in such a manner so as to minimize the generation and atmospheric entrainment of fugitive particulate emissions. Such system(s) at a minimum shall include, but not be limited to:" is taken out to be consistent with R13-0718D, section No. 4.1.8.
- g. Section 4.1.8 – Source ID's 007, 007A, 058, CB19, CB20 and CR1 were added because they were constructed or modified between 1974 and 2008 and are subject to 40 C.F.R. §60.254(a).
- h. Emission Unit I.D. 022 was modified after April 28, 2008 – hence section 4.1.9 requirement is applicable to this emission unit instead of section 4.1.8 requirement. Reference to 022 is moved from section 4.1.8 to 4.1.9.
- i. In section 4.1.10, 45CSR§5-4.1.a reference is added because this is applicable to the thermal dryer.
- j. Emission Units CB18, CB18A, TLB and 024 were constructed, reconstructed or modified after April 28, 2008; hence section 4.1.9 is applicable to these units. A listing of these applicable units has been added after the rule citation.
- k. 001A, 001B, 007A, 024, CB18, CB18A, CB19, CB20, CR1 & TLB are added to section 4.1.11 reference because they are subject to 45CSR§5-3.4. The following note "Compliance with section 4.1.9 shall show compliance with this section for emission units CB18, CB18A, TLB, 022, 024" has been added to this section because meeting the 10% opacity limit in section 4.1.9 shall show compliance with 20% opacity limit in section 4.1.11.
- l. 007, 007A, 037C, 058, CB18, CB18A, CB19, CB20, CR1, TLB are added to reference in section 4.1.15 because they are subject to 40 C.F.R. 60 Subpart Y.
- m. Section 4.2.1 – Reference to 40 C.F.R § 60.253 is corrected to 40 C.F.R § 60.256 (a), 40 C.F.R § 60.253 is "Standards for pneumatic coal-cleaning equipment. The appropriate citation for the monitoring requirements under 4.2.1 is 40 C.F.R § 60.256(a).

- n. Section 4.2.2 – in 4.2.2.b, the word “normal” is deleted from “periods of normal facility operation” because “normal” is not defined in the permit. In section 4.2.2.b, the word “of” is replaced by “or” in “presence of absence of visible emissions” to correct mistake in the permit. In 4.2.2.c, “the initial, or any subsequent” is changed to “any” in “If the initial, or any subsequent, visible emissions evaluation” due to permittee’s comments.

022 is deleted from the list of applicable units after the citation because 022 is exempt from this section. 007, 007A, 012, 012A, 015, 016, 018, 020, 037C, 046, 050, 058, CB19, CB20, CR1 are added to the reference in this section because they are subject to opacity limits and the monitoring under this section.

- o. Section 4.2.4 – In the sentence including “alternative method approved by the Director for such testing”, “such testing” is replaced by “testing particulate matter emissions in condition 4.1.4” for clarification.
- p. Section 4.2.5 – in 4.2.5.b, the word “normal” is deleted from “periods of normal facility operation” because “normal” is not defined in the permit.
- q. Section 4.2.6 - CEMS report submission frequency has been changed to quarterly rather than monthly to be consistent with section 4.5.2 and 40CFR75 requirements for CEMs.
- r. Section 4.2.9 – Added reference to 45CSR§5-9.1.
- s. Section 4.2.10 – reference to 40CFR§60.256 is changed to 40CFR§60.256(b) because it is more specific. Added reference to 45CSR16.
- t. Section 4.2.11 & 4.3.9 – Added reference to 45CSR16.
- u. To be consistent with 45CSR13 permit, references to “Attachment B” is changed to “Appendix A”, “Attachment C” is changed to “Appendix B”, “Attachment D” is changed to “Appendix C”.
- v. Sections 4.1.12 & 4.2.3 of R13-0718 were combined in section 4.4.3 of the draft/proposed Title V permit. Previously, sections 4.1.12 & 4.2.2 of R13-0718 were combined in section 4.4.2 of the existing permit. However, because sections 4.1.12 & 4.2.3 of R13-0718 deals with dust suppressants and use the same recordkeeping form, it seemed more appropriate to combine these recordkeeping requirements.

Results of Testing Conducted

- a. Last Stack testing for the thermal dryer was conducted on August 29, 2012. The results of the testing are as follows:

Pollutant	Limit	Maximum*	Average	% of Permit Limit	Next testing due according to sections 4.2.4 and 4.2.7 of the permit
PM	24.2 lb/hr 0.031 gr/dscf	44.4 lb/hr 0.049 gr/dscf	23.0 lb/hr 0.025 gr/dscf	95.1 80.6	August 29, 2013
NO _x (lb/hr)	46.6	37.9	36.7	78.8	August 29, 2015
CO (lb/hr)	43.2	47.5	32.9	76.2	August 29, 2015
nmVOC (lb/hr)	24.6	12.1	9.1	37.0	August 29, 2017

* There were three tests performed during the stack test. Upon completion of test one, test data indicated that the dryer was producing CO emissions higher than normal and in excess of permit limits. Visual inspection of the wet particulate sampling filter and probe rinse during sample recovery indicated that the particulate catch appeared greater than normal compared to previous testing events. These observations are indicative of improper combustion conditions. The process engineer was informed of these deviations from normal and expected results, and upon investigation discovered dryer control parameters that were outside normal operational settings. Process control changes were made to correct the improper combustion conditions, and testing was resumed. Test two and three yielded results that were normal and expected for this unit based on previous testing events. The average results for the three tests were within permit limits.

- b. Opacity testing according to section 4.3.5 of the permit for Belt Conveyors CB18, Belt Conveyor CB18A, Truck Loadout Bin TLB, Belt Conveyor CB10 (022) and Refuse Loadout Bin 1 (024) were conducted on March 9, 2012. All 6-minute average opacity readings in the performance test were equal to or less than half the applicable opacity limit. The next performance tests shall be performed according to section 4.3.5.b.2 of the permit.

Compliance Assurance monitoring

40CFR64 (CAM) – This is the second renewal of the facility. CAM was addressed in the first renewal for particulate matter and SO₂ emissions from the thermal dryer. Since there was a continuous compliance demonstration method for SO₂ (CEMS), the thermal dryer was exempt from CAM requirements for SO₂ according to 40 C.F.R. §64.2(b)(1)(vi).

The fact sheet for the first renewal determined that particulate matter emissions were also exempt from CAM in accordance with 40 C.F.R. §64.2(b)(1)(vi) because a continuous compliance determination method was specified in the existing Title V permit. It has been determined during review of the second renewal, that the compliance determination method for particulate matter is not a continuous compliance determination method as defined in 40 C.F.R. §64.1, and therefore the thermal dryer is not exempt from CAM for particulate matter per 40 C.F.R. §64.2(b)(1)(vi). A CAM plan for PM10 emissions from the thermal dryer has been included in this Title V renewal. Besides the sections mentioned in the table below, 40 C.F.R. §64.9(a) was added as section 4.5.10, 40 C.F.R. §64.9(b) was added as section 4.4.12, 40 C.F.R. §64.7 (b) to (e) was added as section 4.2.12, and 40 C.F.R. §64.8 was added as section 4.2.13.

Particulate Matter

Thermal Dryer (037C)	Indicator No. 1 ¹	Indicator No. 2 ¹	Indicator No. 3 ¹	Indicator No. 4 ¹
I. Indicator	Temperature of the gas stream at the exit of the thermal dryer <i>(4.2.1.a.1)</i>	Pressure Drop Across Scrubber <i>(4.2.1.a.2)</i>	Water Pressure to Scrubber <i>(4.2.1.a.3)</i>	Water Flow Rate to Scrubber <i>(4.2.1.a.4)</i>
Measurement Approach	Temperature monitoring device.	Pressure measurement device.	Pressure measurement device.	Flow rate measurement device.
II. Indicator Range	120 – 220 °F. A temperature outside of this range shall be defined as an excursion. Excursion triggers a system inspection and corrective action. <i>(4.2.1.a.1)</i>	26 – 40 inches of H ₂ O. A pressure outside of this range shall be defined as an excursion. <i>(4.2.1.a.2)</i>	14 -30 psi. A pressure outside of this range shall be defined as an excursion. <i>(4.2.1.a.3)</i>	640 – 1,053 GPM. A flow rate outside of this range shall be defined as an excursion. <i>(4.2.1.a.4)</i>
III. Performance Criteria	Monitored at the exit of the thermal dryer.	Pressure drop will be measured at the inlet of the scrubber and at the outlet of the scrubber. Device has an accuracy of ± 1 inch water gauge. <i>(4.2.1.a.2.)</i>	Water pressure sensor is located close to the water discharge point. Device has an accuracy of ± 5 percent of design water supply pressure. <i>(4.2.1.a.3)</i>	Flow rate measured at the entrance to the scrubber. Device has an accuracy of ± 5 percent of design water supply flow rate <i>(4.2.1.a.4)</i>
A. Data Representativeness	Device has an accuracy of ± 3° Fahrenheit. <i>(4.2.1.a.1)</i>			
B. Verification of Operational Status	N/A	N/A	N/A	N/A
C. QA/QC Practices and Criteria	Recalibration is conducted annually in accordance with procedures in 40 C.F.R. §60.13(b). <i>(4.2.1.b)</i>	Recalibration is conducted annually in accordance with procedures in 40 C.F.R. §60.13(b). <i>(4.2.1.b)</i>	Recalibration is conducted annually in accordance with procedures in 40 C.F.R. §60.13(b). <i>(4.2.1.b)</i>	Recalibration is conducted annually in accordance with procedures in 40 C.F.R. §60.13(b). <i>(4.2.1.b)</i>
D. Monitoring Frequency	Continuously monitored. <i>(4.2.1.a.1)</i>	Continuously monitored. <i>(4.2.1.a.2)</i>	Continuously monitored. <i>(4.2.1.a.3)</i>	Continuously monitored. <i>(4.2.1.a.4)</i>
Data Collection Procedures	Continuously recorded by chart recorder. <i>(4.4.8)</i>	Continuously recorded by chart recorder. <i>(4.4.9)</i>	Continuously recorded by chart recorder. <i>(4.4.10)</i>	Continuously recorded by chart recorder. <i>(4.4.11)</i>
Averaging Period	None.	None.	None.	None.

¹Note: The corresponding permit conditions are italicized in parentheses.

Non-Applicability Determinations

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

Greenhouse Gas Permitting. There have been no modifications to this facility that have triggered PSD permitting, thus there are no applicable greenhouse gas Clean Air Act requirements applicable to this facility.

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: May 22, 2013
 Ending Date: June 21, 2013

Point of Contact

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

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478
Udyot.k.bachhawat@wv.gov

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.

Response to Comments (Statement of Basis)

Not applicable.