

Fact Sheet



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

Permit Number: **R30-04700008-2012**
Application Received: **April 15, 2011**
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**

Revised: N/A

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.

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-fours (24) hours a day for seven (7) days per week.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	55	34.74
Nitrogen Oxides (NO _x)	178	111.93
Particulate Matter (PM ₁₀)	826.55	92.0
Total Particulate Matter (TSP)	1735.76	239.28
Sulfur Dioxide (SO ₂)	44.1	35.29
Volatile Organic Compounds (VOC)	127	82.71

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Total HAPs	18.46	0.038

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

Title V Program Applicability Basis

This facility has the potential to emit 272.64 tons per year of PM₁₀, 140.1 tons per year of NO_x, and 103.5 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of a 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.

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 |
| 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 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 |
| 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. 60, Subpart Y | Requirements for coal preparation plants |

40 C.F.R. Part 61 Asbestos Inspection And Removal
 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>)
R13-0308D	07/14/2006	
R13-1142	9/21/1989	

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

This is a renewal of the Title V permit which was issued on October 17, 2006. Changes to the most recent version of the Title V Permit consist of the following:

1) Title V Boilerplate changes

- Condition 1.2. - This condition has been added to show the latest version of any Rule 13, 14, and 19 permits with the Issuance date of such permit.
- Condition 2.1.4. – The word “monthly” was added to the definition of “rolling yearly total.”
- Conditions 3.1.1. and 3.1.2. – These conditions were revised because the language in 45CSR§§6-3.1. & 3.2. was revised.
- Condition 3.1.3. - The citation of authority was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34. Also expanded 40 C.F.R. 61 citation to 40 C.F.R. §61.145(b). Slight language revision.
- Condition 3.3.1. – Subsection “d” was added to this condition. Also section 14 of WV Code §§22-5-4 (a) was added in the citation of authority.

- Conditions 3.5.3. and 3.5.5. - These conditions were revised to require electronic submittal of the annual certification to USEPA. The certification shall now only be submitted to the USEPA by e-mail.
- 2) **NSR Permit Revision designation.** – The letter that designates the NSR permit revision was deleted from the citation of authority where applicable (e.g., R13-0308D is now R13-0308). This change is in conjunction with the addition of condition 1.2. as described above.
- 3) Where appropriate and/or omitted, the citation of authority was updated to include references to the conditions of permit R13-0308. Also the references to conditions of 40 CFR 60 Subpart Y were updated to reflect the renumbered conditions as revised in Subpart Y.
- 4) **Condition 3.1.9.** – This condition of the current permit has been relocated to section 6 as condition 6.1.5.b. The subsequent conditions have been renumbered.
- 5) **Condition 3.2.1.** – This condition of the current permit has been deleted in this renewal. The monitoring for these sources for which this condition pertained, are located in Section 6 and therefore the VE monitoring requirements for the equipment with opacity limits were added to Section 6. The subsequent condition, 3.2.2. was renumbered as 3.2.1.
- 6) **Condition 4.1.6.** – The streamlining language has been moved to 4.1.6.a. and revised for clarity. Also, since the opacity limit of 45CSR§5-3.1 is 20%, the streamlining reference to 45CSR§5-3.1. was removed.
- 7) **Condition 4.1.7.** – The opacity limit in this condition is the same as that contained in condition 4.1.6. and therefore the requirement has been deleted.
- 8) **Condition 4.2.1.** – This condition was updated and includes reference to 40 CFR 60 Subpart Y.
- 9) **Condition 4.3.2.** – The language in this condition has been updated to delete the language referring to initial testing.
- 10) **Condition 4.3.5.** – Compliance demonstration with the thermal dryer opacity limit is already contained in condition 4.2.1. therefore this requirement has been deleted.
- 11) **Condition 6.1.1.** – Revised the language for clarification of “affected facility.”
- 12) **Condition 6.1.5.** – Revised language (added condition 6.1.5.b.) for 45CSR5 opacity requirements.
- 13) **Condition 6.2.1.** – Added monitoring language for VE checks for demonstration of compliance with condition 6.1.5.
- 14) **Condition 6.3.1.** – If visible emissions are detected during the Method 22-like observations, compliance is demonstrated using Method 9 procedures according to 40 CFR 60 Subpart Y as per condition 6.2.1. Therefore this requirement is redundant and has been deleted.
- 15) **Sections 7.0 and 8.0** – These two sections of the permit have been deleted. The CAM requirements from these sections have been integrated into Section 4 of the permit. Also, required language from 40 C.F.R. Part 64 (CAM Rule) that was not previously included in the permit has been added to Section 4. The CAM requirements are contained in conditions 4.2.7. – 4.2.11., 4.4.2., 4.4.3., and 4.5.2.

- 16) Appendix A “45 CSR10 Monitoring Plan”** – Deleted the letter of approval from the DAQ director because it is not considered to be part of the monitoring plan.

Non-Applicability Determinations

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

- 45CSR§10-5. 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: February 22, 2012
Ending Date: March 23, 2012

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 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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.