

Fact Sheet



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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on July 24, 2012.

Permit Number: **R30-10900013-2012**
Application Received: **April 27, 2012**
Plant Identification Number: **03-54-109-00013**
Permittee: **Kepler Processing Company, LLC**
Facility Name: **Pocahontas No. 51 Preparation Plant**
Mailing Address: **P.O. Box 1392, Pineville, WV 24874**

Permit Action Number: *SM01* Revised: *Draft/Proposed*

Physical Location: Pineville, Wyoming County, West Virginia
UTM Coordinates: 449.67 km Easting • 4158.67 km Northing • Zone 17
Directions: From Pineville, WV, travel west on WV State Route 97 approximately three (3) miles. Facility is adjacent to Route 97.

Facility Description

The Pocahontas No. 51 Preparation Plant is a coal preparation plant with thermal dryer. It operates under SIC Code 1221 and has the ability to screen, break/size, wash, thermally dry, store, and load out/in coal. The maximum capacity of the preparation plant is 1,000 tons per hour of raw coal feed.

The proposed Title V Significant Modification (SM01) incorporates changes associated with the Permit R13-2104F modification. R13-2104F is an after-the-Fact modification permit to replace bar grate screen SC2 and crusher HMCR1 with new vibrating screen SC2, conveyor C-21 and open storage pile OS5; construct new refuse conveyors C-22 and C-23 to deposit refuse directly into the lower portion of the refuse area; and correct the SO₂ emission calculation formula to calculate the controlled SO₂ emissions as opposed to the uncontrolled SO₂ emissions.

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
PM _{2.5}	1.59 Increase
PM ₁₀	10.60 Increase
Total PM	22.85 Increase

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Kepler Processing 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.

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

Federal and State:	45CSR5 45CSR13 45CSR16 45CSR30 40 C.F.R. Part 60 Subpart Y	Operation of Coal Preparation Plants Permits for Construction, Modification, Relocation and Operation of Stationary Sources Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60 Operating permit requirement. Standards of Performance for Coal Preparation Plants
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State Only: NA

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)
R13-2104F	August 13, 2013	

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

This permit modification incorporates the modified R13-2104F permit to replace bar grate screen SC2 and crusher HMCR1 with a new vibrating screen SC2, conveyor C-21 and open storage pile OS5. R13-2104F was also to permit the construction of new refuse conveyors C-22 and C-23 to deposit refuse directly into the lower portion of the refuse area, and corrects the SO₂ emission calculation formula to calculate the controlled SO₂ emissions as opposed to the uncontrolled SO₂ emissions in condition 4.1.7. (Condition 5.2.1.e. in the Title V permit).

- 1) The "Emission Units" table was updated for the removal of the hammermill crusher HMCR1 and conveyor C-16 and the addition of conveyors C-21, C-22 and C-23. Also the "Year Installed" dates and descriptions were updated on various pieces of equipment to match those of R13-2104F.
- 2) R13-2104F was updated to the new boiler plate. Therefore the citations of authority have been updated throughout the Title V permit.
- 3) The "throughput" table in Condition 4.1.1. has been updated to include and/or update the equipment list to match that of R13-2104F. Since the truck and endloader/dozer traffic (*UPR1, UPR2, UPR3, UPR4, UPR5, UPR6* and *PVD1*) do not have throughput limits listed in R13-2104F, they have not been included in this table. Also, R13-2104F incorporated the requirements from 40 CFR 60 Subpart Y. These requirements have been included in Section 4.0 of the Title V permit.
 - The new screen SC2 and conveyor belts C-21, C-22 and C-23 are subject to the provisions in §60.254(b), §§60.255(b), (c), (f) and (g), §60.257, and §60.258 of 40 CFR 60 Subpart Y. Compliance with the streamlined 10 % opacity limit of 40 CFR §60.254(b)(1) will assure compliance with the 20% opacity limit of 45CSR§5-3.4.
- 4) Condition 4.3.8 of Permit R13-2104F was not included in the Title V permit because it contains 40 CFR 60 Subpart Y testing procedures for thermal dryers. The Kepler thermal dryer commenced construction in 1968 and is therefore not subject the Subpart Y.
- 5) In Section 5.1., conditions 5.1.2. and 5.1.1. have been combined as condition 5.1.1. to match the language in R13-2104F. Also the SO₂ emission calculation in condition 5.2.1.e. has been modified to include the control efficiency of the wet scrubber. This change is a result of the R13-2104F modification.

Non-Applicability Determinations

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

40 CFR Part 64 None of the equipment associated with this modification use a control device to achieve compliance with any emission limitation or standard. Therefore CAM is not applicable

Greenhouse Gas (GHG) Permitting – The R13-2104F modification has not triggered a PSD permit. Therefore, there are no applicable GHG requirements

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: October 2, 2013
Ending Date: November 1, 2013

Point of Contact

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

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
frederick.tipane@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.