

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 January 24, 2014.

Permit Number: **R30-04900019-2014**

Application Received: **March 14, 2016**

Plant Identification Number: **04900019**

Permittee: **The Marion County Coal Company**

Facility Name: **Marion County Preparation Plant**

Mailing Address: **P. O. Box 100, Osage, WV 26543**

Permit Action Number: *MM02* Revised: *October 12, 2016*

Physical Location: Fairview, Marion County, West Virginia
UTM Coordinates: 561.6 km Easting • 4,383.9 km Northing • Zone 17
Directions: Approximately 1 mile NW of Fairview on State Route 17. Turn left on
Sugar Run Road.

Facility Description

The Marion County Coal Company's Marion County Preparation Plant consists of a coal mining operation and a preparation plant with a thermal dryer.

This modification incorporates the changes made in R13-0760F to: (1) Increase the allowable short-term sulfur content of coal combusted in the thermal dryer from 3.4% to 3.9% by weight, (2) Lower the maximum allowable hourly heat input of the thermal dryer to 130 mmBtu/hr, and correct several miscellaneous errors in the permit.

Emissions Summary

There is no change in potential annual emissions associated with the Minor Modification (MM02).

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 178.7 tons per year of CO, 239.4 tons per year of NO_x, 159.5 tons per year of PM₁₀, 586.0 tons per year of SO₂, 945.4 tons per year of VOC, and 15.7 tons per year of HCl. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, and over 10 tons per year of a single HAP, The Marion County 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.

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

Federal and State:	45CSR10	To prevent and control air pollution from the emission of sulfur oxides
	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary sources
	45CSR30	Operating permit requirement.
State Only:	N/A	

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>)
R13-0760F	August 2, 2016	

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 from R13-0760F have been incorporated in the Title V permit. These changes include the following:

- The thermal dryer SO₂ emission limit given in Table 4.1.4. was revised to 235 lb-SO₂/hr;

Previously, the DAQ has regulated thermal dryers as “manufacturing processes” subject to section 4.1 of 45CSR10. Section 4.1 of Rule 10 requires that no in-stack SO₂ concentration exceed 2,000 parts per million by volume (ppm_v) from any manufacturing process source operation. Based on the estimated maximum revised SO₂ emission rate of the furnace (235 lb-SO₂/hr) and the stack parameters given in the application, the estimated worst-case in-stack SO₂ concentration was calculated to be 137.08 ppm_v or 6.85% of the limit. So the new hourly SO₂ emission limit of the thermal dryer will meet section 4.1 of 45CSR10.
- The maximum combustion rate of methane in the thermal dryer was corrected in 4.1.5(b);
- The maximum sulfur content of the fuel coal combusted in the thermal dryer was revised to 3.90% under 4.1.5(c);
- The maximum heat input of the thermal dryer furnace was revised down to 130 mmBtu/hr in 4.1.5(g);
- The methodology of calculating the annual sulfur content of the fuel coal sulfur was added in 4.2.2.; and
- New performance testing replaced the existing testing language under 4.3.1.

Non-Applicability Determinations

40 CFR 60, Subpart Y: Standards of Performance for Coal Preparation Plants

The thermal dryer at the Marion County Preparation Plant is subject to the requirements established in Subpart Y for dryers constructed, reconstructed, or modified on or before April 28, 2008. Given that the thermal dryer was designed to accommodate the higher sulfur coal prior to the effective date (April 28, 2008) of the revised Subpart Y (that first included SO₂ emission standards), the unit is not considered “modified” as defined under the NSPS and subject to the SO₂ emission standards. Therefore, this proposed modification didn't trigger SO₂ emission limits under 40 CFR 60, Subpart Y.

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: N/A
Ending Date: N/A

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.j.modi@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)

None