West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: **R30-04900019-2014**
Application Received: **April 1, 2013**
Plant Identification Number: **04900019**
Permittee: **Consolidation Coal Company**
Facility Name: **Loveridge Preparation Plant**
Mailing Address: **P. O. Box 100, Osage, WV 26543**

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

Consolidation Coal Company's Loveridge Preparation Plant consists of a coal mining operation and a preparation plant with a thermal dryer.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions	2012 Actual Emissions
Carbon Monoxide (CO)	178.7	64.17
Nitrogen Oxides (NO_X)	239.4	133.57
Particulate Matter ($PM_{2.5}$)	126.5	34.81
Particulate Matter (PM_{10})	158.9	59.96
Total Particulate Matter (TSP)	201.1	81.68
Sulfur Dioxide (SO_2)	586.0	379.23
Volatile Organic Compounds (VOC)	945.4	209.39

PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2012 Actual Emissions
HF	2.0	0.57
HCl	15.7	2.0
Arsenic	5.35E-03	3.0E-3
Chromium (III)	3.39E-03	1.9E-03
Chromium (IV)	1.03E-03	5.8E-04
Manganese	6.39E-03	3.6E-03
Nickel	3.66E-03	2.1E-03

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

This facility has the potential to emit equal to or greater than 100,000 tons per year of carbon dioxide equivalent (CO_2e) and 100 tons per year of greenhouse gases (GHGs) on a mass basis.

Title V Program Applicability Basis

This facility has the potential to emit 178.7 tons per year of CO, 239.4 tons per year of NO_x, 158.9 tons per year of PM_{10}, 586.0 tons per year of SO_2, 945.4 tons per year of VOC, 15.7 tons per year of HCl, and over 100,000 tons per year of carbon dioxide equivalent and 100 tons per year of greenhouse gases on a mass basis. Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 100,000 tons per year of carbon dioxide equivalent and 100 tons per year of greenhouse gases on a mass basis, 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	Control of Particulate Emissions from Coal Preparation Plants, Coal Handling Operations and Coal Refuse Disposal Areas
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur dioxide limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	Emission Standards 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. 60, Subpart Y	New Source Performance Standards 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 *(if any)*
R13-0760D	May 12, 2008	

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

Compliance Assurance Monitoring (CAM):

- Since the Horizontal Venturi Scrubber (SCR1) controls emissions of particulate matter and SO_2 from the Thermal Dryer (045A/045C), and the Thermal Dryer (045A/045C) is subject to particulate matter and SO_2 emission limits with the pre-control device emissions for each pollutant greater than 100 tons per year, the Horizontal Venturi Scrubber (SCR1) is subject to the CAM requirements of 40 C.F.R. 64. CAM requirements for this Scrubber (SCR1) were added in the previous permit. No changes have been made or requested to the CAM requirements since the last permit. Additional CAM general requirements were added as conditions 4.2.9, 4.2.10, 4.2.11, 4.2.12 and 4.2.13.

- Conditions 4.1.7, 4.2.7, 4.2.8, and 4.3.3 have been updated; and 4.3.5, 4.3.6 and 4.5.5 have been added due to the 40 CFR 60 Subpart Y being revised on October 8, 2009.
- The underground coal mine has been added to the emission units table. There are no applicable requirements for it in the permit.
- As required by conditions 4.3.3 and 4.3.4, the stack testing for the Thermal Dryer was conducted on September 14, 2011. To demonstrate compliance with the emission limits for the Thermal Dryer, the permittee must conduct performance test(s) for SO_2, NO_x, VOC, and CO at least once every 5 years. Compliance testing for particulate matter must be conducted according to the schedule in condition 4.3.3. Based on the results of the last test, the next test must be conducted on or before September 14, 2016.

Non-Applicability Determinations

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

None

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:	December 9, 2013
Ending Date:	January 8, 2014

Point of Contact

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

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Division of Air Quality
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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)

- On December 8, 2013, a letter was received from Consolidation Coal Company regarding changes that need to be made to the Prep Plant's existing 45CSR13 permit and 45CSR30/ Title V permit to reflect current operational conditions. No specific changes were identified in this letter; therefore no changes were made to this Title V renewal permit.