



46226 NATIONAL ROAD  
ST. CLAIRSVILLE, OHIO 43950

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www.murrayenergycorp.com

February 27, 2017

Ms. Beverly D. McKeone  
WV Department of Environmental Protection  
Division of Air Quality  
601 - 57th Street  
Charleston, WV 25304

**RE: *Marion County Coal Company – Marion County, West Virginia,  
Marion County Preparation Plant – Class II Administrative Update Request***

Dear Ms. McKeone:

The Marion County Coal Company (MCCC) operates the Marion County Preparation Plant located in Marion County, West Virginia. Operations at the Marion County Preparation Plant are permitted under a Title 45 Legislative Rule of the Division of Air Quality (DAQ) Series 13 (45CSR13) construction/modification permit (Permit R13-0760G) and the facility's Title V operating permit (R30-04900019-2014[MM02] issued on October 12, 2016).<sup>1</sup>

In accordance with condition 4.1.5.b., the plant's thermal dryer is currently permitted to fire up to 130,000 scf/hr and 1,139 mmscf/yr of natural gas or coal-bed methane. Due to concerns regarding availability of gas in the future, the plant plans to switch to propane. Consistent with current usage of natural gas, propane will be fired primarily during start-up and shut down, with coal being the primary fuel source during normal operation. However, consistent with the current permit, MCCC proposes to retain the capability to co-fire either propane or natural gas with coal. MCCC proposes maximum propane combustion limits of 500 gal/hr and 4,380,000 gal/yr.

As detailed in the calculations provided in Attachment N, the emission factors for propane and natural gas are nearly identical on a heat input basis. Additionally, MCCC is proposing a maximum propane combustion rate that is much lower than what is currently permitted for natural gas on a heat input basis. Accordingly, there are no increases in emissions expected with the switch to propane, and the proposed change therefore qualifies as a Class II administrative update.

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<sup>1</sup> R30-04900019-2014[MM03] is currently in public comment and is expected to be issued final in early 2017.

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MCCC appreciates your consideration in this matter. Should you have any questions on the specifics of this request, please do not hesitate to contact either Mike Burr of Trinity Consultants at (614) 433-0733 or Crellin Scott of Murray Energy Corporation at 740-338-3100.

Sincerely,

MARION COUNTY COAL COMPANY



Jason D. Witt

Attachments

## APPLICATION FORMS

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The enclosed application forms are being submitted as required by DAQ for a Class II Administrative Update.

MCCC will deliver a check for \$300 under separate cover in accordance with 45CSR13-4.4.

# GENERAL APPLICATION FORM



EST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
**DIVISION OF AIR QUALITY**  
 601 57<sup>th</sup> Street, SE  
 Charleston, WV 25304  
 (304) 926-0475  
[www.dep.wv.gov/daq](http://www.dep.wv.gov/daq)

**APPLICATION FOR NSR PERMIT  
 AND  
 TITLE V PERMIT REVISION  
 (OPTIONAL)**

PLEASE CHECK ALL THAT APPLY TO **NSR (45CSR13)** (IF KNOWN):  
 CONSTRUCTION     MODIFICATION     RELOCATION  
 CLASS I ADMINISTRATIVE UPDATE     TEMPORARY  
 CLASS II ADMINISTRATIVE UPDATE     AFTER-THE-FACT

PLEASE CHECK TYPE OF **45CSR30 (TITLE V)** REVISION (IF ANY):  
 ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION  
 SIGNIFICANT MODIFICATION  
 IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS **ATTACHMENT S** TO THIS APPLICATION

**FOR TITLE V FACILITIES ONLY:** Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

**Section I. General**

1. Name of applicant (as registered with the WV Secretary of State's Office): <i>Marion County Coal Company</i>		2. Federal Employer ID No. (FEIN): <i>13-2566594</i>	
3. Name of facility (if different from above): <i>Marion County Preparation Plant</i>		4. The applicant is the: <input type="checkbox"/> OWNER <input checked="" type="checkbox"/> OPERATOR <input type="checkbox"/> BOTH	
5A. Applicant's mailing address: <i>46226 National Road W St. Clairsville, OH 43950</i>		5B. Facility's present physical address: <i>Sugar Run Rd Fairview, WV 26570</i>	
6. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b> . – If NO, provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b> .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation: <i>Murray American Energy, Inc.</i>			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the proposed site? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, please explain: <i>The land occupied by the Facility is owned by MCCC.</i> – If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.):  <i>Underground coal mine and associated preparation plant with a thermal dryer</i>		10. North American Industry Classification System (NAICS) code for the facility:  <i>212112</i>	
11A. DAQ Plant ID No. (for existing facilities only): <i>049-00019</i>		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): <i>R30-04900019-2014(MM02); R13-0760G</i>	

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

12A.

- For **Modifications, Administrative Updates or Temporary permits** at an existing facility, please provide directions to the *present location* of the facility from the nearest state road;
- For **Construction or Relocation permits**, please provide directions to the *proposed new site location* from the nearest state road. Include a **MAP as Attachment B**.

1. From Fairview, head North on State Route 17.

2. After approximately one mile, turn left onto Sugar Run Rd

12.B. New site address (if applicable):	12C. Nearest city or town: <i>Fairview</i>	12D. County: <i>Marion</i>
12.E. UTM Northing (KM): <i>4,383.9</i>	12F. UTM Easting (KM): <i>561.6</i>	12G. UTM Zone: <i>17</i>
13. Briefly describe the proposed change(s) at the facility: <i>Please see attached cover letter..</i>		
14A. Provide the date of anticipated installation or change: <i>Upon permit issuance</i> – If this is an <b>After-The-Fact</b> permit application, provide the date upon which the proposed change did happen: <i>N/A</i>		14B. Date of anticipated Start-Up if a permit is granted: <i>Upon permit issuance</i>
14C. Provide a <b>Schedule</b> of the planned <b>Installation of/Change</b> to and <b>Start-Up</b> of each of the units proposed in this permit application as <b>Attachment C</b> (if more than one unit is involved). <i>See attached.</i>		
15. Provide maximum projected <b>Operating Schedule</b> of activity/activities outlined in this application: Hours Per Day Varies      Days Per Week Varies      Weeks Per Year Varies		
16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> <b>YES</b> <input checked="" type="checkbox"/> <b>NO</b>		
17. <b>Risk Management Plans.</b> If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see <a href="http://www.epa.gov/ceppo">www.epa.gov/ceppo</a> ), submit your <b>Risk Management Plan (RMP)</b> to U. S. EPA Region III. <i>N/A</i>		
18. <b>Regulatory Discussion.</b> List all Federal and State air pollution control regulations that you believe are applicable to the proposed process ( <i>if known</i> ). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance ( <i>if known</i> ). Provide this information as <b>Attachment D</b> . <i>See attached.</i>		
<b>Section II. Additional attachments and supporting documents.</b>		
19. Include a check payable to WVDEP – Division of Air Quality with the appropriate <b>application fee</b> (per 45CSR22 and 45CSR13). <i>See attached.</i>		
20. Include a <b>Table of Contents</b> as the first page of your application package. <i>See attached.</i>		
21. Provide a <b>Plot Plan</b> , e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as <b>Attachment E</b> (Refer to <b>Plot Plan Guidance</b> ) . – Indicate the location of the nearest occupied structure (e.g. church, school, business, residence). <i>See attached.</i>		
22. Provide a <b>Detailed Process Flow Diagram(s)</b> showing each proposed or modified emissions unit, emission point and control device as <b>Attachment F</b> . <i>See attached.</i>		
23. Provide a <b>Process Description</b> as <b>Attachment G</b> . – Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable). <i>See attached.</i>		

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

24. Provide **Material Safety Data Sheets (MSDS)** for all materials processed, used or produced as **Attachment H**.  
– For chemical processes, provide a MSDS for each compound emitted to the air. NA – no chemical process involved in proposed modifications.

25. Fill out the **Emission Units Table** and provide it as **Attachment I**. *See attached.*

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**. *See attached.*

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**. *See attached.*

28. Check all applicable **Emissions Unit Data Sheets** listed below:

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Bulk Liquid Transfer Operations | <input type="checkbox"/> Haul Road Emissions                | <input type="checkbox"/> Quarry  |
| <input type="checkbox"/> Chemical Processes              | <input type="checkbox"/> Hot Mix Asphalt Plant              | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant            | <input type="checkbox"/> Incinerator                        | <input type="checkbox"/> Storage Tanks   |
| <input type="checkbox"/> Grey Iron and Steel Foundry     | <input checked="" type="checkbox"/> Indirect Heat Exchanger |  |
| <input type="checkbox"/> General Emission Unit, specify  |   |  |

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**. *See attached.*

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Absorption Systems | <input type="checkbox"/> Baghouse                   | <input type="checkbox"/> Flare                 |
| <input type="checkbox"/> Adsorption Systems | <input type="checkbox"/> Condenser                  | <input type="checkbox"/> Mechanical Collector  |
| <input type="checkbox"/> Afterburner        | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |

Other Collectors, specify:

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**. *See attached.*

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31. *See attached.*

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**. *See attached.*

- Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt. *See attached.*

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES     NO

- If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's **"Precautionary Notice – Claims of Confidentiality"** guidance found in the **General Instructions** as **Attachment Q**.

### **Section III. Certification of Information**

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

- |  |   |
|--|---|
| <input type="checkbox"/> Authority of Corporation or Other Business Entity | <input type="checkbox"/> Authority of Partnership         |
| <input type="checkbox"/> Authority of Governmental Agency                  | <input type="checkbox"/> Authority of Limited Partnership |

Submit completed and signed **Authority Form** as **Attachment R**. NA – signed by responsible official.

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

35A. Certification of Information. To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

**Certification of Truth, Accuracy, and Completeness**

I, the undersigned  Responsible Official /  Authorized Representative, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

**Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE  \_\_\_\_\_  
(Please use blue ink)

DATE: 2/27/17  
(Please use blue ink)

35B. Printed name of signee: Jason D. Witt		35C. Secretary
35D. E-mail: jwitt@coalsource.com	36E. Phone: 740-338-3100	36F. FAX: 740-338-3416
36A. Printed name of contact person (if different from above): Crellin Scott		36B. Title: Director of Environmental Compliance
36C. E-mail: cscott@coalsource.com	36D. Phone: 740-338-3100	36E. FAX: 740-338-3416

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

<input checked="" type="checkbox"/> Attachment A: Business Certificate	<input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet
<input checked="" type="checkbox"/> Attachment B: Map(s)	<input checked="" type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)
<input checked="" type="checkbox"/> Attachment C: Installation and Start Up Schedule	<input checked="" type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)
<input checked="" type="checkbox"/> Attachment D: Regulatory Discussion	<input checked="" type="checkbox"/> Attachment N: Supporting Emissions Calculations
<input checked="" type="checkbox"/> Attachment E: Plot Plan	<input checked="" type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans
<input checked="" type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)	<input checked="" type="checkbox"/> Attachment P: Public Notice
<input checked="" type="checkbox"/> Attachment G: Process Description	<input type="checkbox"/> Attachment Q: Business Confidential Claims
<input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)	<input type="checkbox"/> Attachment R: Authority Forms
<input checked="" type="checkbox"/> Attachment I: Emission Units Table	<input checked="" type="checkbox"/> Attachment S: Title V Permit Revision Information
<input checked="" type="checkbox"/> Attachment J: Emission Points Data Summary Sheet	<input checked="" type="checkbox"/> Application Fee

*Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.*

**FOR AGENCY USE ONLY -- IF THIS IS A TITLE V SOURCE:**

Forward 1 copy of the application to the Title V Permitting Group and:

For Title V Administrative Amendments:

NSR permit writer should notify Title V permit writer of draft permit.

For Title V Minor Modifications:

Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt.

NSR permit writer should notify Title V permit writer of draft permit.

For Title V Significant Modifications processed in parallel with NSR Permit revision:

NSR permit writer should notify a Title V permit writer of draft permit.

Public notice should reference both 45CSR13 and Title V permits.

EPA has 45 day review period of a draft permit.

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

## ATTACHMENT A: BUSINESS CERTIFICATE

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WEST VIRGINIA  
STATE TAX DEPARTMENT  
**BUSINESS REGISTRATION  
CERTIFICATE**

ISSUED TO:  
**THE MARION COUNTY COAL COMPANY  
151 JOHNNY CAKE RD  
MANNINGTON, WV 26585-0000**

**BUSINESS REGISTRATION ACCOUNT NUMBER: 2291-5651**

This certificate is issued on: **02/20/2014**

*This certificate is issued by  
the West Virginia State Tax Commissioner  
in accordance with Chapter 11, Article 12, of the West Virginia Code*

*The person or organization identified on this certificate is registered  
to conduct business in the State of West Virginia at the location above.*

**This certificate is not transferrable and must be displayed at the location for which issued**

This certificate shall be permanent until cessation of the business for which the certificate of registration was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

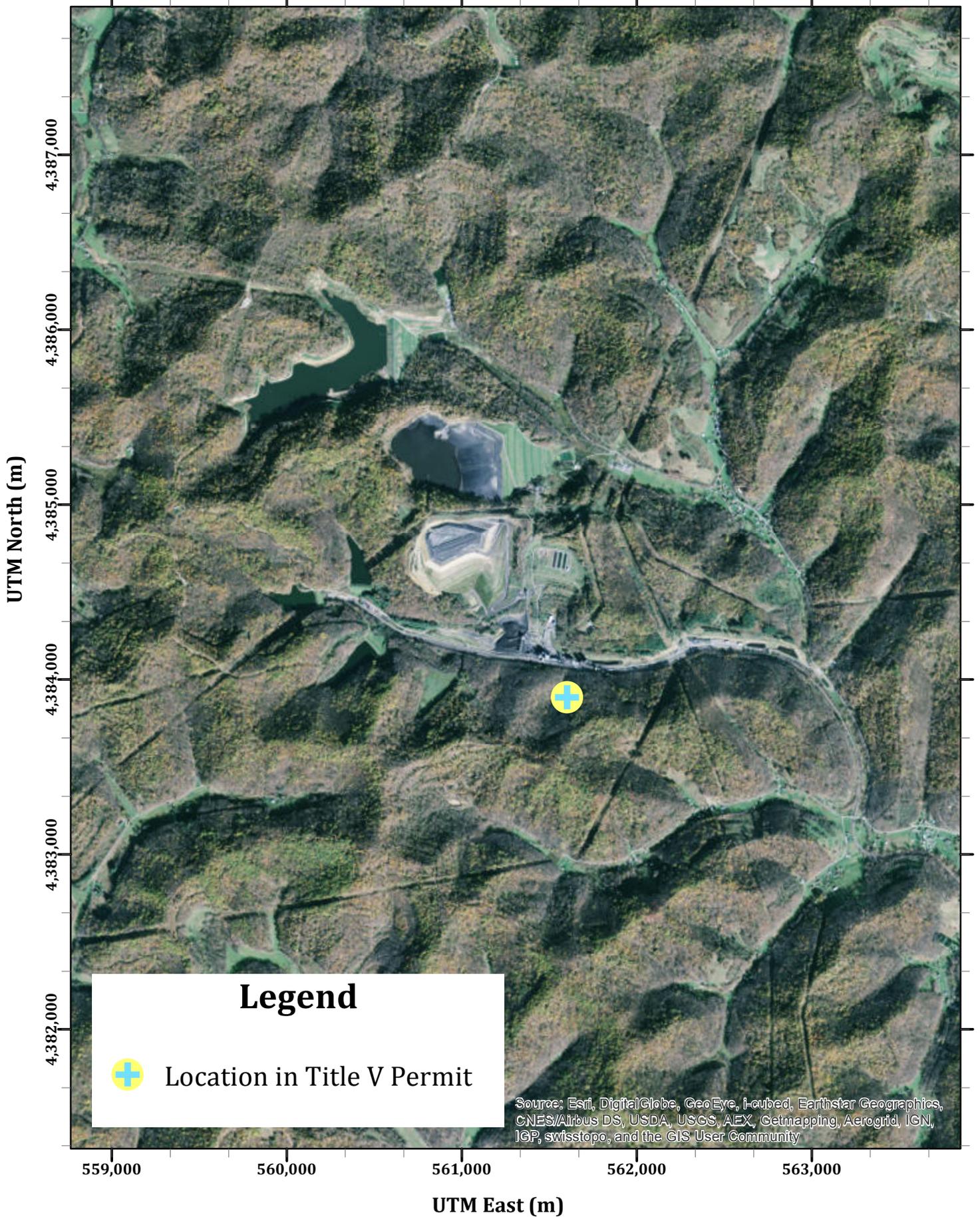
Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

**TRAVELING/STREET VENDORS:** Must carry a copy of this certificate in every vehicle operated by them.  
**CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS:** Must have a copy of this certificate displayed at every job site within West Virginia.



# Attachment B - Area Map

Marion County Preparation Plant - Marion County Coal Company  
Marion County, WV



## ATTACHMENT C: INSTALLATION AND STARTUP SCHEDULE

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Any activities associated with changes proposed in this application will not commence until the revised R13 permit has been issued.

## ATTACHMENT D: REGULATORY DISCUSSION

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This section documents the applicability determinations made for federal and state air quality regulations. Federal and WVDEP state regulations that are potentially applicable to the Marion County Preparation Plant are listed in Tables D-1 and D-2. Notes are provided for each applicability determination briefly summarizing why each regulation is considered applicable.

**Table D-1. Federal Applicability**

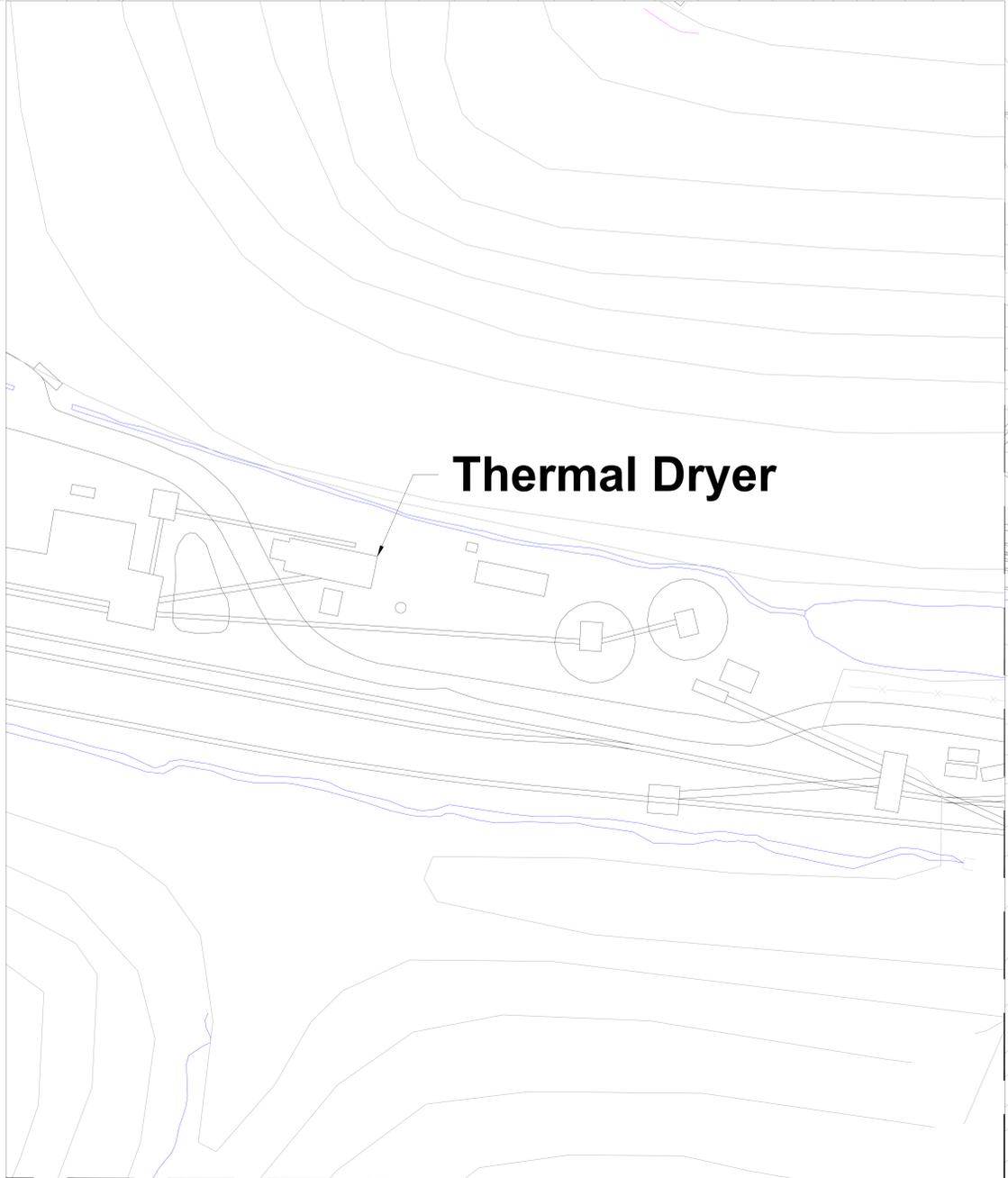
<b>Regulation</b>	<b>Applicability</b>
40 CFR 60, Subpart A – “General Provisions”	These general requirements are applicable to stationary sources that are subject to a source-specific NSPS that references 40 CFR 60, Subpart A. MCCC is required to comply with Subpart Y.
40 CFR 60, Subpart Y – “Standards of Performance for Coal Preparation and Processing Plants”	As noted in the application, the thermal dryer is subject to the requirements in 40 CFR 60 Subpart Y that apply to units constructed, reconstructed, or modified on or before April 28, 2008.
40 CFR 70 – “State Operating Programs”	The Marion County Preparation Plant is subject to 45CSR30. Accordingly, MCCC is submitting a request contained within Attachment S of this application for concurrent modification of the facility’s R30 operating permit.

**Table D-2. State Rule Applicability**

<b>Rule</b>	<b>Applicability</b>
45CSR10 – “To Prevent and Control Air Pollution from the Emission of Sulfur Oxides”	MCCC is subject to 45CSR10 and will maintain the stack SO <sub>2</sub> concentration below 2,000 ppmv.
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”	Generally applicable. MCCC is applying for a Class II administrative update for the proposed changes described herein.
45CSR16 – “Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60”	The thermal dryer is subject to NSPS Y. The applicability of NSPS Y to the thermal dryer will be unchanged with this application.
45CSR22 – “Air Quality Management Fee Program”	Generally applicable.
45CSR30 – “Requirements for Operating Permits”	The Marion County Preparation Plant is subject to 45CSR30. MCCC is submitting a simultaneous request for a minor permit modification to incorporate the proposed updates into the R30 operating permit.

## ATTACHMENT E: PLOT PLAN

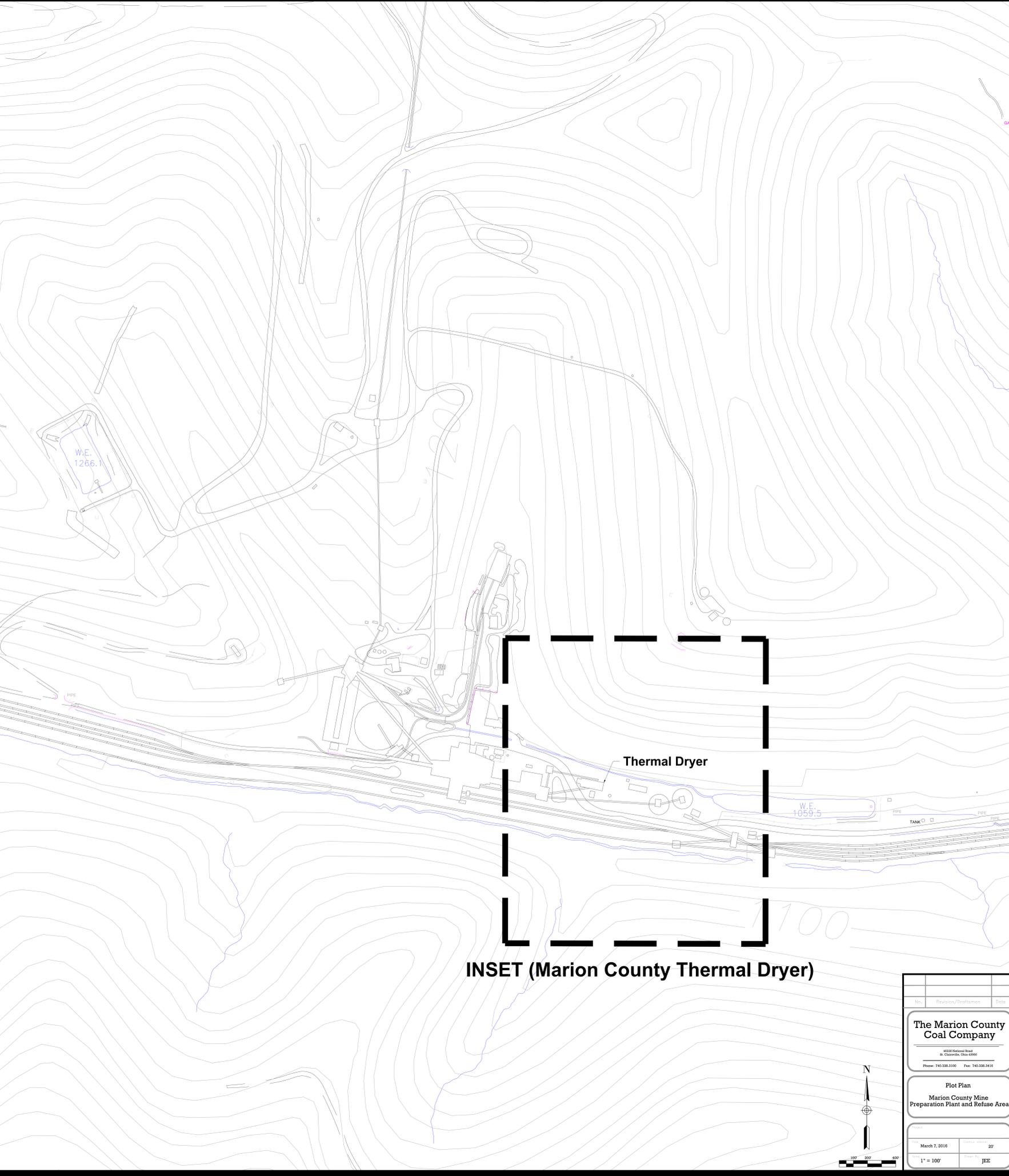
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**Thermal Dryer**

**INSET (Marion County Thermal Dryer)**

Scale: 1" = 40'



**Thermal Dryer**

**INSET (Marion County Thermal Dryer)**

1100

No.	Revision/Draftsman	Date

**The Marion County Coal Company**  
 4628 National Road  
 St. Charles, Ohio 43080  
 Phone: 740.328.3100 Fax: 740.328.3416

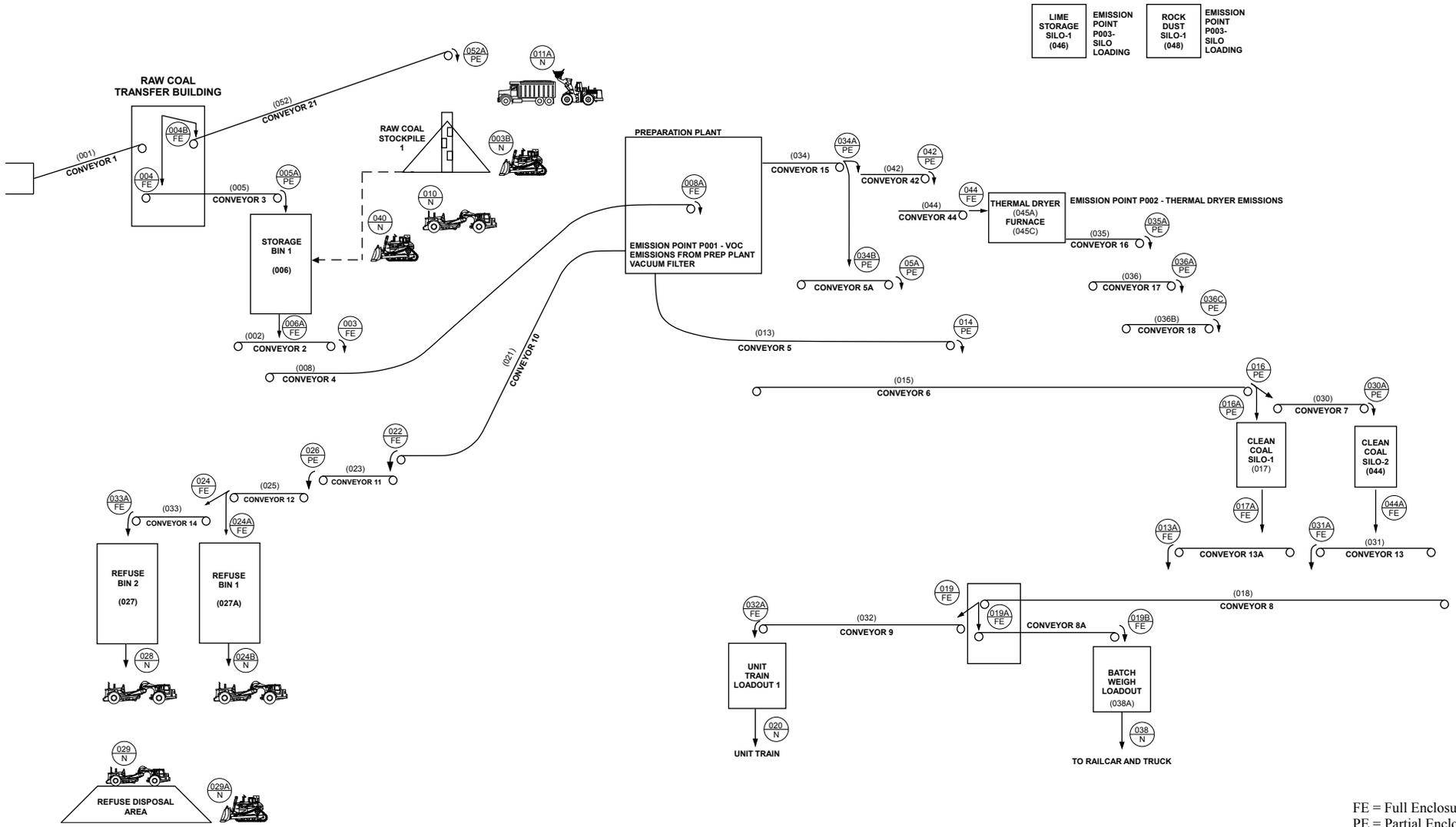
**Plot Plan**  
 Marion County Mine  
 Preparation Plant and Refuse Area

March 7, 2016	20'
1" = 100'	JEE



## ATTACHMENT F: PROCESS FLOW DIAGRAM

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Revised 7-21-14	SRK
<b>Marion County Prep Plant</b> <b>The Marion County Coal Company</b>	
<b>PROCESS FLOW DIAGRAM</b>	
NOT TO SCALE	

## ATTACHMENT G: PROCESS DESCRIPTION

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Coal at the Marion County Preparation Plant is procured from an existing mine portal and is conveyed to a raw coal transfer building. From the raw coal transfer building, coal is conveyed either to storage bin 1 or raw coal stockpile 1. Coal from raw coal stockpile 1 is ultimately reclaimed back to storage bin 1. Coal from storage bin 1 is conveyed to the preparation plant. Two types of material exit the preparation plant. The first type of material is refuse. The refuse is conveyed to two refuse bins and ultimately transferred to the refuse disposal area. The second type of material is clean coal, which is raw coal that has been screened, sized, and washed in the preparation plant. Clean coal is either conveyed to the thermal dryer for drying and then to the clean coal silos or is conveyed directly to the clean coal silos. From the silos, clean coal is conveyed to either the train or truck/railcar loadout points.

With this application, MCCC is requesting permit updates to allow for combustion of propane in addition to natural gas and coal in the thermal dryer.

## ATTACHMENT I: EMISSION UNITS TABLE

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**Attachment I**  
**Emission Units Table**  
(includes all emission units and air pollution control devices  
that will be part of this permit application review, regardless of permitting status)

Emission Unit ID <sup>1</sup>	Emission Point ID <sup>2</sup>	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type <sup>3</sup> and Date of Change	Control Device <sup>4</sup>
045A/04 5C	P002	<b>Thermal Dryer</b> - ENI Eng. Co. Fluidized Bed Dryer	1985	4.35 tph 26,100 tpy	N/A	Horizontal Venturi Scrubber

<sup>1</sup> For Emission Units (or Sources) use the following numbering system: 1S, 2S, 3S,... or other appropriate designation.

<sup>2</sup> For Emission Points use the following numbering system: 1E, 2E, 3E, ... or other appropriate designation.

<sup>3</sup> New, modification, removal

<sup>4</sup> For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

## ATTACHMENT J: EMISSION POINTS DATA SUMMARY SHEET

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**Attachment J  
EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data															
Emission Point ID No. <i>(Must match Emission Units Table &amp; Plot Plan)</i>	Emission Point Type <sup>1</sup>	Emission Unit Vented Through This Point <i>(Must match Emission Units Table &amp; Plot Plan)</i>		Air Pollution Control Device <i>(Must match Emission Units Table &amp; Plot Plan)</i>		Vent Time for Emission Unit <i>(chemical processes only)</i>		All Regulated Pollutants - Chemical Name/CAS <sup>3</sup>  <i>(Speciate VOCs &amp; HAPS)</i>	Maximum Potential Uncontrolled Emissions <sup>4</sup>		Maximum Potential Controlled Emissions <sup>5</sup>		Emission Form or Phase  <i>(At exit conditions, Solid, Liquid or Gas/Vapor)</i>	Est. Method Used <sup>6</sup>	Emission Concentration <sup>7</sup>  <i>(ppmv or mg/m<sup>4</sup>)</i>
		ID No.	Source	ID No.	Device Type	Short Term <sup>2</sup>	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
P002	Stack	Thermal Dryer (045A/045C)		Horizontal Venturi Scrubber (SCR1)		N/A		PM			40.0	120.0	Solid	EE	N/A
								SO <sub>2</sub>			235.0	586.0	Gas/Vapor	EE	N/A
								NO <sub>x</sub>			63.6	190.8	Gas/Vapor	EE	N/A
								VOC			135.6	406.8	Gas/Vapor	EE	N/A
								CO			57.6	172.8	Gas/Vapor	EE	N/A

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

<sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

<sup>2</sup> Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

<sup>3</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. **DO NOT LIST** H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.

<sup>4</sup> Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>5</sup> Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>6</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

<sup>7</sup> Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m<sup>3</sup>) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO<sub>2</sub>, use units of ppmv (See 45CSR10).



## ATTACHMENT L: EMISSIONS UNIT DATA SHEET

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**Attachment L**  
**EMISSIONS UNIT DATA SHEET**  
**GENERAL**

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on *Equipment List Form*): 045A/045C

1. Name or type and model of proposed affected source:

ENI Engineering Company, Fluidized Bed Dryer

2. On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.

3. Name(s) and maximum amount of proposed process material(s) charged per hour:

Input of wet coal is 600 tph maximum

4. Name(s) and maximum amount of proposed material(s) produced per hour:

Thermally dried coal is produced at a maximum rate of 600 tph.

5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:

Coal is combusted to generate heat required to dry the wet coal.

\* The identification number which appears here must correspond to the air pollution control device identification number appearing on the *List Form*.

<p>6. Combustion Data (if applicable):</p> <p>(a) Type and amount in appropriate units of fuel(s) to be burned:</p> <p>Coal up to 4.35 tons per hour and 26,100 tph  Coal Bed Methane up to 182,000 ft<sup>3</sup>/hr and 1,092 mmcf/yr  Proposed propane up to 500 gal/hr and 4,380,000 gal/yr.</p>											
<p>(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:</p> <p>The purpose of this submittal is to allow for propane combustion in addition to coal and natural gas. Ash and sulfur in the propane is negligible.</p>											
<p>(c) Theoretical combustion air requirement (ACF/unit of fuel):</p> <p style="text-align: center;">N/A                      @                      N/A                      °F and                      N/A                      psia.</p>											
<p>(d) Percent excess air:    N/A</p>											
<p>(e) Type and BTU/hr of burners and all other firing equipment planned to be used:</p> <p>One (1) Bigelow-Liptak forced draft gas burner limited to 130 MMBtu/hr.</p>											
<p>(f) If coal is proposed as a source of fuel, identify supplier and seams and give sizing of the coal as it will be fired:</p> <p>Thermal dryer fuel is provided by the Marion County Prep Plant.</p>											
<p>(g) Proposed maximum design heat input:                      130                      × 10<sup>6</sup> BTU/hr.</p>											
<p>7. Projected operating schedule:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Hours/Day</td> <td style="width: 15%;">Varies</td> <td style="width: 15%;">Days/Week</td> <td style="width: 15%;">Varies</td> <td style="width: 15%;">Weeks/Year</td> <td style="width: 15%;">Varies</td> </tr> </table>						Hours/Day	Varies	Days/Week	Varies	Weeks/Year	Varies
Hours/Day	Varies	Days/Week	Varies	Weeks/Year	Varies						

8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:

@	N/A	°F and	N/A	psia
a. NO <sub>x</sub>		Unchanged	lb/hr	grains/ACF
b. SO <sub>2</sub>		Unchanged	lb/hr	grains/ACF
c. CO		Unchanged	lb/hr	grains/ACF
d. PM <sub>10</sub>		Unchanged	lb/hr	grains/ACF
e. Hydrocarbons		Unchanged	lb/hr	grains/ACF
f. VOCs		Unchanged	lb/hr	grains/ACF
g. Pb		N/A	lb/hr	grains/ACF
h. Specify other(s)			lb/hr	grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF
			lb/hr	grains/ACF

NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.

(2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing  
 Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

**MONITORING**

Monitoring will continue to be conducted in accordance with the Title V permit.

**RECORDKEEPING**

Recordkeeping will continue to be conducted in accordance with the Title V permit.

**REPORTING**

Reporting will continue to be conducted in accordance with the Title V permit.

**TESTING**

Testing will continue to be conducted in accordance with the existing Title V permit.

**MONITORING.** PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty  
 N/A

## ATTACHMENT N: SUPPORTING EMISSIONS CALCULATIONS

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## Table N-1 - EMISSION FACTOR COMPARISON

### POTENTIAL PROCESS DATA

Natural Gas Higher Heating Value	1,020 MMBtu/MMscf	AP-42, Section 1.4, Table 1.4-1, footnote a
Propane Higher Heating Value	91.5 MMBtu/1,000 gal	AP-42, Section 1.5, Table 1.5-1, footnote a

### NATURAL GAS COMBUSTION EMISSION FACTORS

#### AP-42 Section 1.4 - Natural Gas Combustion

NO <sub>x</sub>	190 lb/MMscf	AP-42, Section 1.4, Table 1.4-1 (7/98) for uncontrolled emissions from Large Boilers
CO	84 lb/MMscf	AP-42, Section 1.4, Table 1.4-1 (7/98) for uncontrolled emissions
SO <sub>2</sub>	0.6 lb/MMscf	AP-42, Section 1.4, Table 1.4-2 (7/98)
Condensable PM	5.7 lb/MMscf	AP-42, Section 1.4, Table 1.4-2 (7/98)
Filterable PM/PM <sub>10</sub> /PM <sub>2.5</sub>	1.9 lb/MMscf	AP-42, Section 1.4, Table 1.4-2 (7/98)
Total PM <sub>10</sub> /PM <sub>2.5</sub>	7.6 lb/MMscf	AP-42, Section 1.4, Table 1.4-2 (7/98)
TOC	11.0 lb/MMscf	AP-42, Section 1.4, Table 1.4-2 (7/98)

### PROPANE COMBUSTION EMISSION FACTORS

#### AP-42 Section 1.5 - Liquefied Petroleum Gas Combustion

NO <sub>x</sub>	13 lb/1,000 gal	AP-42, Section 1.5, Table 1.5-1
CO	7.5 lb/1,000 gal	AP-42, Section 1.5, Table 1.5-1
SO <sub>2</sub>	0.05 lb/1,000 gal	AP-42, Section 1.5, Table 1.5-1; assumes a propane sulfur content of 0.54 gr/100 ft <sup>3</sup>
Condensable PM	0.5 lb/1,000 gal	AP-42, Section 1.5, Table 1.5-1
Filterable PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.2 lb/1,000 gal	AP-42, Section 1.5, Table 1.5-1
Total PM <sub>10</sub> /PM <sub>2.5</sub>	0.7 lb/1,000 gal	AP-42, Section 1.5, Table 1.5-1
TOC	1.0 lb/1,000 gal	AP-42, Section 1.5, Table 1.5-1

### EMISSION FACTOR COMPARISON - LB/MMBTU

Pollutant	Emission Factor (lb/MMBtu)	
	Natural Gas <sup>a</sup>	Propane <sup>b</sup>
NO <sub>x</sub>	0.19	0.14
CO	0.08	0.08
SO <sub>2</sub>	5.9E-04	5.9E-04
Condensable PM	0.006	0.005
Filterable PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.002	0.002
Total PM <sub>10</sub> /PM <sub>2.5</sub>	0.007	0.008
TOC	0.011	0.011

<sup>a</sup> Natural Gas Emission Factor (lb/MMBtu) = Natural Gas Emission Factor (lb/mmcsf) / Natural Gas HHV (MMBtu/mmcsf)

<sup>b</sup> Propane Emission Factor (lb/MMBtu) = Propane Emission Factor (lb/1,000 gal) / Propane HHV (MMBtu/1,000 gal)

# ATTACHMENT O: MONITORING, RECORDKEEPING, REPORTING AND TESTING PLANS

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Please see Attachment S for MCCC's proposed permit language.

## ATTACHMENT P: AFFIDAVIT OF PUBLICATION

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Attachment P includes a copy of the public notice MCCC will submit to the Dominion Post for publication. A certificate of publication will be provided to DAQ after the notice has been published.

## AIR QUALITY PERMIT MODIFICATION NOTICE

### Notice of Application

NOTICE IS GIVEN that the Marion County Coal Company has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Class II Administrative Update of Permit R13-0760G for the Marion County Preparation Plant on Sugar Run Rd., near Fairview, in Marion County, West Virginia. The latitude and longitude coordinates are approximately 39.606, -80.281. The applicant is not requesting any increases in emissions with the application.

Startup of operation is planned to begin on or about the 1<sup>st</sup> day of May, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1227, during normal business hours.

Dated this the XX day of February, 2017.

By: Marion County Coal Company  
Jason D. Witt  
Secretary  
46226 National Road W  
St. Clairsville, OH 43950  
740-338-3100

## ATTACHMENT S: TITLE V REVISION

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**Attachment S**  
**Title V Permit Revision Information**

<b>1. New Applicable Requirements Summary</b>	
Mark all applicable requirements associated with the changes involved with this permit revision:	
<input checked="" type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input checked="" type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) <sup>(1)</sup>
<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)
<p><sup>(1)</sup> If this box is checked, please include <b>Compliance Assurance Monitoring (CAM) Form(s)</b> for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why <b>Compliance Assurance Monitoring</b> is not applicable:</p> <p style="margin-left: 40px;">N/A</p>	

<b>2. Non Applicability Determinations</b>
<p>List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.</p> <p>N/A</p>
<input type="checkbox"/> <b>Permit Shield Requested</b> <i>(not applicable to Minor Modifications)</i>

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

**3. Suggested Title V Draft Permit Language**

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision?  Yes  No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

**See attached Title V Draft Permit Language.**

**4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision**

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-0760G	11/4/2016	
	/ /	

**5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision**

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

**6. Change in Potential Emissions**

Pollutant	Change in Potential Emissions (+ or -), TPY
N/A	

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

**7. Certification For Use Of Minor Modification Procedures (Required Only for Minor Modification Requests)**

**Note:** This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete. The criteria for allowing the use of Minor Modification Procedures are as follows:

- i. Proposed changes do not violate any applicable requirement;
- ii. Proposed changes do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- iii. Proposed changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient air quality impacts, or a visibility increment analysis;
- iv. Proposed changes do not seek to establish or change a permit term or condition for which there is no underlying applicable requirement and which permit or condition has been used to avoid an applicable requirement to which the source would otherwise be subject (synthetic minor). Such terms and conditions include, but are not limited to a federally enforceable emissions cap used to avoid classification as a modification under any provision of Title I or any alternative emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Clean Air Act;
- v. Proposed changes do not involve preconstruction review under Title I of the Clean Air Act or 45CSR14 and 45CSR19;
- vi. Proposed changes are not required under any rule of the Director to be processed as a significant modification;

Notwithstanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part of the State Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title V operating permit issued under 45CSR30.

Pursuant to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for use of Minor permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Minor permit modification procedures are hereby requested for processing of this application.

(Signed):  Date: 2 / 27 / 17  
 (Please use blue ink) (Please use blue ink)  
 Named (typed): Jason D. Witt Title: Secretary

**Note: Please check if the following included (if applicable):**

<input type="checkbox"/>	Compliance Assurance Monitoring Form(s)
<input checked="" type="checkbox"/>	Suggested Title V Draft Permit Language

*All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.*

**4.1. Limitations and Standards**

- 4.1.1. The permittee shall not exceed the maximum hourly and annual throughput rates and other criteria outlined in the table in Section 1.0 Emission Units.  
**[45CSR13, R13-0760, 4.1.1]**
- 4.1.2. Compliance with all annual throughput limits shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the amount of material received, processed, and/or shipped at any given time during the previous twelve (12) consecutive calendar months.  
**[45CSR13, R13-0760, 4.1.2]**
- 4.1.3. Any and all records, such as throughput, hours of operation of the thermal dryer, SO<sub>2</sub> data, etc., shall be completed, certified and kept on site for a period of no less than five (5) years. Such records shall be made available to the Director or his or her duly authorized representative upon request.  
**[45CSR13, R13-0760, 4.1.3]**
- 4.1.4. Emissions from the permitted fluidized bed coal dryer stack shall not exceed the following rates:

Pollutant	pounds/hour	tons/year
Particulate Matter (PM) <sup>(1)</sup>	40.0	120.0
Sulfur Dioxide (SO <sub>2</sub> )	235.0	586.0
Nitrogen Oxides (NO <sub>x</sub> )	63.6	190.8
Volatile Organic Compounds (VOC)	135.6	406.8
Carbon Monoxide (CO)	57.6	172.8

<sup>(1)</sup>All PM emissions are assumed to be PM<sub>2.5</sub> or smaller.

(045A, 045C) **[45CSR13, R13-0760, 4.1.4]**

- 4.1.5. Operation of the thermal dryer shall be in accordance with the following requirements:
  - a. The furnace shall be limited to a maximum combustion rate of 4.35 tons-coal/hour and 26,100 tons-coal/year (rolling twelve month basis);
  - b. The furnace shall be limited to a maximum combustion rate of 130,000 cubic feet-coal bed methane or natural gas/hour and 1,139 x 10<sup>6</sup> cubic feet-coal bed methane or natural gas/year (rolling twelve month basis);
  - ~~c. The furnace shall be limited to a maximum combustion rate of 500 gallons of propane per hour and 4.38 x 10<sup>6</sup> gallons of propane per year (rolling twelve month basis);~~
  - ~~d.~~ The sulfur content of the coal fired in the furnace shall not exceed 3.90% by weight as based on a composite daily sample or a rolling 365 daily weighted average of 3.40% by weight as determined under 4.2.2.;
  - ~~e.~~ Coal combustion shall be limited to providing 120 MMBtu/hr heat input into the furnace-;
  - ~~f.~~ At all times coal combustion is providing over 90 MMBtu/hr heat input into the furnace a 20% solution of sodium hydroxide (NaOH) shall be sprayed downstream of the venturi scrubber to provide for additional SO<sub>2</sub> control;

**gf.** Additional heat input to the furnace above 120 MMBtu/hr shall be provided by the combustion of coal bed methane, ~~or~~ natural gas, or propane;

**hg.** Heat input to the furnace shall not exceed 130 MMBtu/hr; and

**ih.** The scrubber shall be operated at all times coal is combusted in the furnace.

(045A, 045C) [45CSR13, R13-0760, 4.1.5]

4.1.6. The permittee shall not cause to be discharged into the atmosphere from any thermal dryer gases which:

- a. Contain particulate matter in excess of 0.070 g/dscm (0.031 gr/dscf).
- b. Exhibit 20 percent opacity or greater.

Compliance with the 20 percent opacity limit of 40 C.F.R. §60.252(a) shall demonstrate compliance with the less stringent opacity limits of 45CSR§§5-3.1, 3.2, and 3.3. (045A, 045C) [45CSR13, R13-0760, 4.1.6 and 4.1.17; 45CSR16; 40 C.F.R. §60.252(a); 45CSR§§5-3.1, 3.2, 3.3 and 4.1.a]

4.1.7. No person shall circumvent 45CSR5 by adding additional gas to any dryer exhaust or group of dryer exhausts for the purpose of reducing the grain loading. (045A, 045C) [45CSR§5-4.2]

4.1.8. No person shall cause, suffer, allow or permit the exhaust gases from a thermal dryer to be vented into the open air at an altitude of less than eighty (80) feet above the foundation grade of the structure containing the dryer or less than ten (10) feet above the top of said structure or any adjacent structure, whichever is greater. In determining the desirable height of the plant stack, due consideration shall be given to the local topography, meteorology, the location of nearby dwellings and public roads, the stack emission rate and good engineering practice as set forth in 45CSR20. (045A, 045C) [45CSR§5-4.3]

4.1.9. No person shall cause, suffer, allow, or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 ppm, by volume from existing source operations. (045A, 045C) [45CSR§10-4.1]

4.1.10. The permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit 20 percent opacity or greater. The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. (002, 052, 053, 034, 035, 036, 036B, 030, 044, 031, 030A, 044A, 031A, 018, 033, 027) [45CSR13, R13-0760, 4.1.8 and 4.1.18; 45CSR16; 40 C.F.R. §60.254(a); 45CSR§5-3.4]

4.1.11 The permittee shall maintain a water truck on site and in good operating condition, and shall utilize same to apply water, or a mixture of water and an environmentally acceptable dust control additive, hereinafter referred to as solution, as often as is necessary in order to minimize the atmospheric entrainment of fugitive particulate emissions that may be generated from haulroads and other work areas where mobile equipment is used.

The spraybar shall be equipped with commercially available spray nozzles, of sufficient size and number,