



west virginia department of environmental protection

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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: G10-D002B
Plant ID No.: 061-00051
Applicant: Coresco, LLC
Facility Name: Maidsville River Dock
Location: Maidsville, Monongalia County, WV
SIC Codes: 1221 (Bituminous Coal & Lignite - Surface)
1222 (Bituminous Coal & Lignite - Underground)
NAICS Codes: 212111 (Bituminous Coal and Lignite Surface Mining)
212112 (Bituminous Coal Underground Mining)
Application Type: Modification
Received Date: October 16, 2017
Engineer Assigned: Dan Roberts
Fee Amount: \$1,500
Date Received: October 20, 2017
Applicant's Ad Date: October 18, 2017
Newspaper: *The Dominion Post*
Complete Date: December 19, 2017
UTM Coordinates: Easting: 590.2 km Northing: 4393.1 km NAD83 Zone 17N
Lat/Lon Coordinates: Latitude: 39.682973 Longitude: -79.948154 NAD83
Description: Modification to convert the facility from a coal preparation plant with a crusher, screen and barge loadout to a barge offloading and storage facility. The new facility will consist of one hopper, three belt conveyors, one open storage pile and one truck loadout bin.

BACKGROUND

Coresco, LLC owns and operates the existing Maidsville River Dock under current permit G10-C002A, which was approved on June 23, 2006.

In a letter dated October 24, 2017, the applicant submitted the appropriate forms and requested a name change for the facility from Mepco, LLC to Coresco, LLC. In a letter dated November 6, 2017, the DAQ acknowledge the name change from from Mepco, LLC to Coresco, LLC.

DESCRIPTION OF PROCESS *(taken directly from the application)*

Coresco, LLC proposes to convert its coal coal loadout facility into a coal offloading facility, resulting in a reduction of air emissions. The facility is located near Maudsville in Monongalia County, West Virginia. The process description is revised to reflect the proposed equipment configuration for the facility.

Clean coal will arrive at the site by barge. Coal will be removed from barges with an offloader powered by an electric engine. The offloader will place the coal into a hopper B-1 (TP-1/PE), which will transfer the coal to a series of two conveyor belts BC-1 and BC-2 (TP-2/PE, TP-3/PE). The coal will be deposited by a radial stacker (RS-1/PE) onto stockpile OS-1/NC (TP-4/PE). Coal from OS-1/NC is moved by dozer/endloader to an underground reclaim belt BC-3 (TP-5/FE, TP-6/FE). The coal from the reclaim belt is transferred to hopper B-2 (TP-7/PE) and loaded to coal trucks (TP-8/PE).

The facility shall be modified and operated in accordance with the following equipment and control device information taken from registration application G10-D002B and any amendments thereto:

Equipment ID No.	Date of Construction, Reconstruction or Modification ¹	G10-D Applicable Sections ²	Description	Maximum Capacity		Control Device ³	Associated Transfer Points		
				TPH	TPY		Location: B -Before A -After	ID. No.	Control Device ³
B-1	C 2017	5	Barge Off Loading Hopper - maximum 140 tons capacity - receives raw coal off loaded from barges and feeds it onto BC-1	1,500	2,000,000	PW	B A	TP-1 TP-2	TC-PE TC-PE
BC-1	C 2017	5	Belt Conveyor - receives raw coal from B-1 and transfers it to BC-2	1,500	2,000,000	PE	A A	TP-2 TP-3	TC-PE TC-PE
BC-2	C 2017	5	Belt Conveyor - receives raw coal from BC-1 and transfers it onto OS-01	1,500	2,000,000	PE	A A	TP-3 TP-4	TC-PE TC-PE
OS-01	C 2017	5	Raw Coal Stockpile - maximum 14,000 tons capacity, 6,000 ft ² base area and 30' height - receives raw coal from BC-2, stores it and then dozers/endloaders move it onto BC-3	1,500	2,000,000	N	B A A	TP-4 TP-5 TP-6	TC-PE TC-FE TC-FE
BC-3	C 2017	5	Belt Conveyor - receives raw coal from OS-1 and transfers it to B-2	1,500	2,000,000	PE	B B A	TP-5 TP-6 TP-7	TC-FE TC-FE TC-PE
B-2	C 2017	5	Truck Loadout Bin - maximum 126 tons capacity - receives raw coal from BC-3 and loads it into trucks	1,500 in 750 out	2,000,000	PW	B A	TP-7 TP-8	TC-PE TC-PE

¹ In accordance with 45CSR5 Section 3.1, no person shall cause, suffer, allow or permit emission of particulate matter into the open air from any stack which is twenty percent (20%) opacity or greater, except as noted in subsection 3.2. In accordance with

45CSR5 Section 3.4, no person shall cause, suffer, allow or permit emission of particulate matter into the open air from any fugitive dust control system which is twenty percent (20%) opacity or greater.

² All registered affected facilities under Class II General Permit G10-D are subject to Sections 1.0, 1.1, 2.0, 3.0 and 4.0.

³ Control Device Abbreviations: FE - Full Enclosure; FW - Full Enclosure with Water Sprays; PE - Partial Enclosure; PW - Partial Enclosure with Water Sprays; WS - Water Sprays; and N - No Control.

DESCRIPTION OF FUGITIVE EMISSIONS *(taken directly from the application)*

Fugitive emissions from the facility include particulate emissions from the haulroad, stockpile, and work areas. The haulroad surfaces are course gravel and are used by coal trucks, and by endloaders/dozers. Water is applied to the haulroads as needed via a water truck.

SITE INSPECTION

On September 26, 2012, Brian Tephabock of the DAQ's North Central Regional Office performed a scheduled full on-site targeted inspection. Mr. Tephabock did not include any notes on the inspection report. At the time of the inspection, the facility was found to be in compliance and was given a status code of 30 - In Compliance.

Directions from Charleston are to I-79 North, take Exit 155 for Osage, turn right onto State Route 7 East, turn left onto State Route 100 North, turn right onto County Route 53 and travel approximately 2 miles and the site will be on the right side of the road.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Fugitive emission calculations for continuous and batch drop operations, transfer points, crushing and screening, storage piles, and paved and unpaved haulroads are based on AP-42 Fifth Edition "Compilation of Air Pollution Emission Factors", Volume 1. Control efficiencies were applied based on "Calculation of Particulate Matter Emission - Coal Preparation Plants and Material Handling Operations." The emission factors for crushing/breaking and screening operations were obtained from the Air Pollution Engineering Manual - Air & Waste Management Association - June 1992. The calculations were performed by the applicant's consultant using the DAQ's G10-C Excel Emission Calculation Spreadsheet and were checked for accuracy and completeness by the writer. The increase in emissions calculations were performed by the writer using the DAQ's G10-C Excel Emission Calculation Spreadsheet and a copy has been attached.

The proposed modification will result in a new facility-wide potential to discharge controlled particulate matter emissions of 69.18 lb/hour and 133.63 TPY of particulate matter (PM), of which 20.88 lb/hour and 39.84 TPY will be particulate matter less than 10 microns in diameter (PM₁₀). Refer to the following table for a complete summary of the proposed facility's potential to discharge:

- <i>New Facility-wide Emissions -</i> Coresco, LLC Maidsville River Dock	Controlled PM Emissions		Controlled PM ₁₀ Emissions	
	lb/hour	TPY	lb/hour	TPY
Fugitive Emissions				
Open Storage Pile Emissions	0.08	0.35	0.04	0.16
Unpaved Haulroad Emissions	66.56	131.40	19.65	38.79
Paved Haulroad Emissions	0.00	0.00	0.00	0.00
<i>Fugitive Emissions Total</i>	<i>66.64</i>	<i>131.75</i>	<i>19.68</i>	<i>38.95</i>
Point Source Emissions				
Equipment Emissions	0.00	0.00	0.00	0.00
Transfer Point Emissions	2.54	1.88	1.20	0.89
<i>Point Source Emissions Total (PTE)</i>	<i>2.54</i>	<i>1.88</i>	<i>1.20</i>	<i>0.89</i>
FACILITY EMISSIONS TOTAL				
	69.18	133.63	20.88	39.84

REGULATORY APPLICABILITY

NESHAPS, PSD and NSPS have no applicability to the modified facility. The proposed modification of Coresco, LLC's coal handling facility is subject to the following state and federal rules:

45CSR5 *To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations and Coal Refuse Disposal Areas*

The facility is subject to the requirements of 45CSR5 because it meets the definition of "Coal Preparation Plant" found in subsection 45CSR5.2.4. The facility should be in compliance with Section 3 (less than 20% opacity) and Section 6 (fugitive dust control system and dust control of the premises and access roads) when the particulate matter control methods and devices proposed are in operation.

45CSR13 *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation*

The proposed modification is subject to the requirements of 45CSR13 because it will involve the construction of one hopper, three belt conveyors, one open storage pile and one truck loadout bin, which are defined as affected facilities in 40 CFR 60 Subpart Y. The applicant has submitted an application for a registration to modify. The applicant published a Class I legal advertisement in *The Dominion Post* on October 18, 2017.

45CSR22 *Air Quality Management Fee Program*

The facility is subject to the requirements of 45CSR22 and shall pay all fees according to the application fee schedule and Certificate to Operate fee schedule.

The proposed modification of Coresco, LLC's coal handling facility is not subject to the following state and federal rules:

45CSR14 Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration

In accordance with 45CSR14 Major Source Determination, the facility is not one of the 100 TPY stationary sources listed under the definition of "Major Stationary Source" in subsection 2.43.a. Therefore, it must have the potential to emit 250 TPY or more of any regulated pollutant to meet the definition of a major source in subsection 2.43.b. At the end of subsection 2.4.3, this facility is not listed in Table 1 - Source Categories Which Must Include Fugitive Emissions. So, fugitive emissions (from open storage piles constructed or modified on or before May 27, 2009 and haulroads) are not included when determining major stationary source applicability. The facility's potential to emit will be 2.23 TPY for PM (open storage piles constructed or modified after May 27, 2009 and point sources combined), which is less than the 45CSR14 threshold of 250 TPY for a regulated air pollutant used to define a major stationary source. Therefore, the proposed modification is not subject to the requirements set forth within 45CSR14.

45CSR16 Standards of Performance for New Stationary Sources
40 CFR 60 Subpart Y: Standards of Performance for Coal Preparation and Processing Plants

This facility is *not* subject to 40 CFR 60 Subpart Y because it does not prepare the coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying. There will be no crushers, screens, wet wash processes or thermal dryers on site.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

A toxicity analysis was not performed because the primary pollutants that will be emitted from this facility are PM (particulate matter) and PM₁₀ (particulate matter less than 10 microns in diameter), which are non-toxic pollutants.

AIR QUALITY IMPACT ANALYSIS

Air dispersion modeling was not performed due to the size and location of this facility and the extent of the proposed modification. This facility is located in Monongalia County, WV, which is currently in attainment for PM (particulate matter) and PM₁₀ (particulate matter less than 10 microns in diameter). This modified facility will remain a minor source as defined by 45CSR14, therefore, an air quality impact analysis is not required.

GENERAL PERMIT ELIGIBILITY

The proposed modification of this facility meets the applicability criteria (Section 2.3), siting criteria (Section 3.1) and limitations and standards (Section 5.1) as specified in General Permit G10-D.

All registered facilities under Class II General Permit G10-D are subject to Sections 1.0, 1.1, 2.0, 3.0 and 4.0.

MONITORING OF OPERATIONS

The coal processing and conveying equipment and storage areas should be observed to make sure that the facility is meeting the applicable visible emission standards of 45CSR5. In accordance with Section 3.1, no person shall cause, suffer, allow or permit emission of particulate matter into the open air from any stack which is twenty percent (20%) opacity or greater, except as noted in subsection 3.2. In accordance with Section 3.4, no person shall cause, suffer, allow or permit emission of particulate matter into the open air from any fugitive dust control system which is twenty percent (20%) opacity or greater.

RECOMMENDATION TO DIRECTOR

The information contained in this modification application indicates that compliance with all applicable regulations should be achieved when all of the proposed particulate matter control methods are in operation. Due to the location, nature of the process, and control methods proposed, adverse impacts on the surrounding area should be minimized. No comments were received during the comment period. Therefore, the granting of a General Permit G10-D registration to Coresco, LLC for the modification of their coal handling facility located near Madsville, Monongalia County, WV is hereby recommended.



Daniel P. Roberts, Engineer Trainee
NSR Permitting Section

December 19, 2017

Date