



PERMIT TO CONSTRUCT APPLICATION

**Consolidation Coal Company
McElroy Facility**

Coal Combustion Product Beltline Project

Prepared By:

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September 2015

Project 153601.0106

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Consultants

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TABLE OF CONTENTS

1. APPLICATION OVERVIEW	1
1.1. Introduction	1
1.2. Overview of Proposed Project	1
1.3. Project Potential to Emit (PTE)	1
1.4. Organization of Application	2
2. REGULATORY APPLICABILITY	3
2.1. Federal Regulatory Applicability	3
2.2. New Source Performance Standards (NSPS)	4
2.3. National Emission Standards for Hazardous Air Pollutants (NESHAP)	5
2.4. West Virginia SIP Regulations	5
3. PERMIT APPLICATION FORMS	7
Attachment A: CCC’s West Virginia Business Certificate	A-1
Attachment B: Area Map	B-1
Attachment C: Schedule for the Planned Installation and Start-Up of New Equipment	C-1
Attachment D: Regulatory Applicability Analysis	D-1
Attachment E: Plot Plan of the Facility	E-1
Attachment F: Process Flow Diagrams	F-1
Attachment G: Process Description of the Facility	G-1
Attachment I: Equipment List Form	I-1
Attachment J: Emission Points Data Summary Sheet	J-1
Attachment K: Fugitive Emission Points Data Summary Sheet	K-1
Attachment L: Emission Unit Data Sheet	L-1
Attachment M: Air Pollution Control Device Sheet	M-1
Attachment N: Detailed Emission Calculations	N-1
Attachment O: Monitoring, Recordkeeping, Reporting, and Testing Plans	O-1
Attachment P: Affidavit of Publication	P-1

LIST OF TABLES

Table 1-1. Project Potential Emissions Increases 1

1. APPLICATION OVERVIEW

1.1. INTRODUCTION

Consolidation Coal Company (CCC) operates a coal preparation plant located in Marshall County near Moundsville, West Virginia (referred to as the McElroy facility). The McElroy Facility is currently operating in accordance with West Virginia Department of Environmental Protection (WVDEP) Division of Air Quality (DAQ) state operating permit R13-2177E, issued on July 28, 2009.

With this application, CCC is requesting authorization to construct a conveyor system and river unloading facility to handle coal combustion product (CCP) at the McElroy Facility. Details regarding the proposed project are found in Section 1.2 below.

1.2. OVERVIEW OF PROPOSED PROJECT

A barge mounted crane will be used to unload CCP from barges. The CCP will be conveyed to a truck bin via a series of 4 conveyors. The truck bin will then dump into haul trucks. The haul trucks will transport the CCP to the existing refuse disposal areas.

With this project, CCC is proposing to install the following equipment:

- > Four (4) conveyors, each rated at 1,600 tons per hour (tph);
- > One (1) refuse truck bin; and
- > One (1) barge mounted crane for unloading barges.

1.3. PROJECT POTENTIAL TO EMIT (PTE)

The proposed project will result in an increase in potential emissions of PM, PM₁₀, and PM_{2.5}. Emissions increases are attributable to the new transfer points associated with the installation of the new equipment as well as the increased haul roads traffic associated with transporting CCP from the truck bin to the refuse disposal area. Attachment N provides the detailed methodology for calculating these emissions increases. Additionally, Table 1-1 presents the facility-wide increases in potential emissions attributable to the proposed project.

Table 1-1. Project Potential Emissions Increases

	PM (tpy)	PM₁₀ (tpy)	PM_{2.5} (tpy)
Transfer Points	0.12	0.06	0.01
Haul Roads	94.55	26.95	2.69
TOTAL	94.67	27.01	2.70

1.4. ORGANIZATION OF APPLICATION

This application to modify Permit to Construct R13-2177E contains the following elements:

- Section 2: Regulatory Applicability
- Section 3: WVDAQ Application Forms
- Attachment A: CCC's West Virginia Business Certificate
- Attachment B: Area Map
- Attachment C: Schedule for the Planned Installation and Start-Up of New Equipment
- Attachment D: Regulatory Applicability Analysis
- Attachment E: Plot Plan of the Facility
- Attachment F: Process Flow Diagrams
- Attachment G: Process Description of the Facility
- Attachment I: Equipment List Form
- Attachment J: Emission Points Data Summary Sheet
- Attachment K: Fugitive Emission Points Data Summary Sheet
- Attachment L: Emission Unit Data Sheet
- Attachment M: Air Pollution Control Device Sheet
- Attachment N: Detailed Emission Calculations
- Attachment O: Monitoring, Recordkeeping, Reporting, and Testing Plans
- Attachment P: Affidavit of Publication

2. REGULATORY APPLICABILITY

This section documents the applicability determinations made for federal and state air quality regulations that potentially apply to the proposed modification of the McElroy Facility. Applicability or non-applicability of the following regulatory programs is addressed:

- Prevention of Significant Deterioration (PSD);
- Title V Operating Permit Program;
- Non-Attainment New Source Review (NANSR);
- National Emission Standards for Hazardous Air Pollutants (NESHAP);
- New Source Performance Standards (NSPS); and
- West Virginia State Implementation Plan (SIP) Regulations.

Regulations potentially applicable to the proposed project are also detailed in Attachment D included as part of this application.

This review is presented to supplement and/or add clarification to the information provided in the WVDEP application forms, which fulfill the requirement to include citations and descriptions of applicable statutory and administrative code requirements.

In addition to providing a summary of applicable requirements, this section of the application also provides non-applicability determinations for certain regulations, thereby providing WVDEP a full regulatory applicability analysis for the proposed project. Note that explanations of non-applicability are limited to those regulations for which there may be some question of applicability specific to the proposed modifications at the McElroy Facility.

2.1. FEDERAL REGULATORY APPLICABILITY

2.1.1. PSD Applicability

The applicability of PSD is evaluated for proposed construction, reconstruction, and modification projects that result in an emission increase of a regulated New Source Review (NSR) pollutant for which the area is in attainment with the National Ambient Air Quality Standards (NAAQS). As previously mentioned, the proposed modifications to the McElroy Facility result in emissions increases of filterable PM (i.e., PM/PM₁₀/PM_{2.5}). Marshall County has been designated “in attainment” or “unclassifiable” for all regulated NSR pollutants involved in the proposed project.¹ Coal cleaning plants without thermal dryers are not classified as one of the 28 listed source categories in 45CSR14-2.43.a. Therefore, the McElroy Facility is subject to a PSD major source threshold of 250 tons for each NSR-regulated pollutant as provided in 45CSR14-2.43.b.

The McElroy Facility has potential emissions of less than 250 tpy of all NSR-regulated pollutants and is therefore considered an existing “minor” source for the purposes of PSD.² Accordingly, any modifications of the facility would not be subject to PSD unless the modification in and of itself resulted in an emissions increase of more than 250 tons of a NSR-regulated pollutant. As demonstrated in Table 1-1, the project-

¹ Attainment designations for West Virginia counties are established in 40 CFR 81.349.

² Consistent with the provisions of 45CSR14-2.43.e-g, fugitive emissions from haul roads at the McElroy Facility are not included when determining major source status under PSD.

associated emissions increases for all NSR-regulated pollutants do not exceed the applicable threshold, and the McElroy Facility is not subject to PSD review for the proposed project.

2.1.2. NANSR Applicability

The applicability of NANSR is evaluated for proposed construction, reconstruction, and modification projects that result in an emission increase of a regulated NSR pollutant for which the area is not attaining the NAAQS. Because Marshall County has been designated as “in attainment” or “unclassifiable” for all regulated NSR pollutants with emissions affected by the proposed project, NANSR does not apply to the proposed project.

2.1.3. Title V Operating Permit Program Applicability

Title 40 of the Code of Federal Regulations Part 70 (40 CFR 70) establishes the federal Title V operating permit program. West Virginia has incorporated the provisions of this federal program in its Title V operating permit program in 45CSR30. The major source thresholds with respect to the West Virginia Title V operating permit program regulations are 10 tons per year (tpy) of a single hazardous air pollutant (HAP), 25 tpy of any combination of HAP, and 100 tpy of all other regulated pollutants.

As demonstrated in Attachment N, facility-wide post-project potential emissions for all regulated pollutants, excluding fugitive emissions (e.g., haul roads), are below the corresponding Title V thresholds. Therefore, the McElroy Facility will remain a minor source with respect to the Title V operating permit program.

2.2. NEW SOURCE PERFORMANCE STANDARDS (NSPS)

The federal NSPS require new, modified, or reconstructed sources to control emissions to the level that is achievable by the best system of emissions reduction as specified in the provisions of the applicable rule. This section provides applicability determinations for each of the NSPS to which the proposed modification at the McElroy Facility is potentially subject.

In addition to the specific standards described below, CCC must also comply with the general provisions of Title 40, Code of Federal Regulations, Part 60 (40 CFR 60), Subpart A, which establish notification, recordkeeping, testing, monitoring, and reporting requirements for any and all sources subject to a particular NSPS.

2.2.1. NSPS Subpart Y - Coal Preparation and Processing

Subpart Y applies to the affected facilities identified in 40 CFR 60.250 which are located at coal preparation plants that process more than 200 tons per day where construction, reconstruction, or modification occurred after October 27, 1974. A coal preparation and processing plant is any facility (excluding underground mining operations) which prepares coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying. Affected sources under NSPS Y include (but are not limited to) coal processing and conveying equipment (including breakers and crushers), coal storage systems, transfer and loading systems, and open storage piles. As specified in 40 CFR 60.251(d), for units constructed, reconstructed, or modified after May 27, 2009, coal is defined as

*...all solid fossil fuels classified as anthracite, bituminous, subbituminous, or lignite by ASTM D388
...and coal refuse.*

The proposed modifications at the McElroy Facility will include the installation of new affected facilities under NSPS Y. The four (4) conveyors being installed as part of the proposed project are considered “coal processing and conveying equipment” in accordance with the definition provided at 40 CFR 60.251(f). Furthermore, the truck bin is a “coal storage system” pursuant to the definition in 40 CFR 60.251(h). Pursuant to 40 CFR 60.254(b)(1), CCC must not cause any gases which exhibit 10 percent opacity or greater to be discharged into the atmosphere from the conveyors or the truck bin.

2.3. NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP)

National Emission Standards for Hazardous Air Pollutants (NESHAPs), located in 40 CFR 63, are typically applicable to specific categories of sources that have the potential to emit HAP in levels greater than 10 tpy for any individual HAP or 25 tpy for any combination of HAP (i.e., major HAP sources). Emissions and operational limitations provided in the NESHAPs are established on the basis of a Maximum Achievable Control Technology (MACT) determination for a particular major source category.

Furthermore, generally available control technology (GACT)-based NESHAPs (located in 40 CFR 63) require area (i.e., non-major) sources to control emissions to the level achievable by the use of generally available control technologies or management practices to reduce emissions of HAP.

Because the McElroy Facility emits total and individual HAP in quantities less than 25 and 10 tpy, respectively, the facility is considered an area (i.e., non-major) source of HAP. The McElroy Facility is not subject to any NESHAP requirements applicable to specific source categories, and because the McElroy Facility is an area source of HAP, CCC is not required to conduct a case-by-case MACT determination under Section 112(g) and 45CSR 34 for facilities not regulated by a specific industrial source type.

2.4. WEST VIRGINIA SIP REGULATIONS

The McElroy Facility is currently permitted under the regulations contained in West Virginia’s Title 45 Legislative Rules (CSR) of the Department of Environmental Protection Office of Air Quality (WVDEP regulations). This section of the application highlights applicability of specific West Virginia State Implementation Plan (SIP) regulations that may apply to the proposed modification at the McElroy Facility.

Title 45 is divided into various series, each covering a specific aspect of the state’s air pollution regulatory program. The series that contain requirements that could be applicable to the proposed modification at the McElroy Facility are discussed in the following paragraphs. West Virginia regulations that are generally applicable to the mine as a whole are not discussed in this application.

2.4.1. 45CSR5

Series 5 To Prevent and Control Particulate Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations, and Coal Refuse Disposal Areas contains particulate regulations that apply to the proposed project. 45CSR5-3.4 establishes visible emissions limits of less than 20% opacity from fugitive sources; the new conveyors and the modified vehicular traffic that are part of the proposed project are subject to this opacity requirement.

45CSR5-6.1 requires that coal handling operations be equipped with a fugitive dust control system (as defined in 45CSR5-2.13). The new coal handling operations included as part of this proposed project will comply with 45CSR5-6.1.

Additionally, 45CSR5-6.2 requires that CCC maintain dust control of the premises or controlled access roads by paving, watering, or other suitable measures. Additionally, good operating practices shall be observed in relation to stockpiling, car loading, breaking, screening and general maintenance to minimize dust generation and atmospheric entrainment. CCC will continue to comply with 45CSR5-6.2.

2.4.2. 45CSR6

45CSR6 *To Prevent and Control Air Pollution from Combustion of Refuse* prohibits the open burning of refuse. The McElroy Facility is subject to 45CSR6 and maintains compliance with this provision by prohibiting the practice.

2.4.3. 45CSR17

Series 17 *To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter* regulates PM emissions from processing operations. According to 45 CSR 5-6.3:

Fugitive emissions from coal preparation plants and handling operations which are subject to this rule [45 CSR 5] shall be exempt from the provisions of 45CSR17, provided that such sources shall not be exempt from the provisions of W. Va. Code §§22-5-1 et seq., including the provisions of W. Va. Code §22-5-3 relating to statutory air pollution.

As such, the McElroy Facility is exempt from the requirements of 45CSR17.

3. PERMIT APPLICATION FORMS

The permit application forms in Attachments A through P are being submitted as required by WVDAQ for a permit to construct.

CCC will submit an appropriate check under a separate cover. The check will cover the permit application fee of \$1,000 provided in 45CSR22-3.4.a and the additional NSPS review fee of \$1,000 for the applicability of NSPS Y in accordance with 45CSR22-3.4.b.

GENERAL APPLICATION FORM



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY

601 57th Street, SE
Charleston, WV 25304
(304) 926-0475
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): Consolidation Coal Company		2. Federal Employer ID No. (FEIN): 13-2566594	
3. Name of facility (if different from above): McElroy Facility		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: 46226 National Road W St. Clairsville, OH 43950		5B. Facility's present physical address: West Virginia State Rt. 2, Moundsville, WV 26041	
6. West Virginia Business Registration. 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 Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A . ⇒ If NO , provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation:			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO ⇒ If YES , please explain: The land occupied by the McElroy Preparation Plant is owned by CCC. ⇒ If NO , you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Underground Coal Mine and associated Preparation Plant		10. North American Industry Classification System (NAICS) code for the facility: 212112	
11A. DAQ Plant ID No. (for existing facilities only): 051-00020		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2177E	

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

<p>12A.</p> <p>⇒ For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road;</p> <p>⇒ For Construction or Relocation permits, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a MAP as Attachment B.</p> <p>I-70 East to 7 South. Moundsville 12th Street Exit. Rt. on Rt 2 South to Roberts Ridge. Follow Roberts Ridge to Salem Church. Left at Salem Church onto Goshorn Ridge. Follow road to Portal on Rt.</p>		
12.B. New site address (if applicable): N/A	12C. Nearest city or town: Moundsville	12D. County: Marshall
12.E. UTM Northing (KM): 4,409	12F. UTM Easting (KM): 516	12G. UTM Zone: 17
<p>13. Briefly describe the proposed change(s) at the facility: CCC plans to construct a conveyor system and river unloading facility to handle coal combustion product (CCP) at the McElroy Facility.</p>		
<p>14A. Provide the date of anticipated installation or change: 1 / 1 / 2017</p> <p>⇒ If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: / / N/A</p>		<p>14B. Date of anticipated Start-Up if a permit is granted: Upon permit issuance</p>
<p>14C. Provide a Schedule of the planned Installation of/Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved). See attached.</p>		
<p>15. Provide maximum projected Operating Schedule of activity/activities outlined in this application: 24 Hours Per Day 7 Days Per Week 52 Weeks Per Year</p>		
<p>16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</p>		
<p>17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U. S. EPA Region III. ^{N/A}</p>		
<p>18. Regulatory Discussion. 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 Attachment D. See attached.</p>		
<p>Section II. Additional attachments and supporting documents.</p>		
<p>19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13). To be submitted.</p>		
<p>20. Include a Table of Contents as the first page of your application package. See attached.</p>		
<p>21. Provide a Plot Plan, 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 Attachment E (Refer to Plot Plan Guidance) .</p> <p>⇒ Indicate the location of the nearest occupied structure (e.g. church, school, business, residence). See attached.</p>		
<p>22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F. See attached.</p>		
<p>23. Provide a Process Description as Attachment G. See attached.</p> <p>⇒ Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).</p>		
<p>All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.</p>		

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. N/A

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 checked="" 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 type="checkbox"/> Indirect Heat Exchanger	
<input type="checkbox"/> General Emission Unit, specify	<input checked="" type="checkbox"/> Nonmetallic Minerals Processing	

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
<input checked="" type="checkbox"/> Other Collectors, specify	Enclosure systems, water truck	

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

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 checked="" 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: 9/11/13
(Please use blue ink)

35B. Printed name of signee: **Robert D. Moore**

35C. Title: **Vice President**

35D. E-mail: **rmoore@coalsource.com**

36E. Phone: **(740) 338-3100**

36F. FAX: **(740) 338-3416**

36A. Printed name of contact person (if different from above): **Drew Hudson**

36B. Title: **Permitting Manager**

36C. E-mail: **dHUDSON@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 checked="" 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 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

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

ISSUED TO:
**MCELROY COAL COMPANY
RR 1 BOX 67A
GLEN EASTON, WV 26039-9713**

BUSINESS REGISTRATION ACCOUNT NUMBER: **1023-2751**

This certificate is issued on: **06/15/2010**

*This certificate is issued by
the West Virginia State Tax Commissioner
in accordance with W.Va. Code § 11-12.*

*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.

atL006 v.1
L1957010176

MCELROY - MARSHALL

Figure B-1. McElroy Facility Aerial View of Surrounding Area



ATTACHMENT C: INSTALLATION AND STARTUP SCHEDULE

The McElroy Facility was issued Permit to Construct R13-2177E on July 28, 2009. This modification application is submitted to update the R13 permit to authorize the installation of new equipment to transfer coal combustion product to the existing refuse disposal areas. Construction activities associated with the proposed project will not commence until the revised R13 permit has been issued.

ATTACHMENT D: REGULATORY DISCUSSION

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 McElroy Facility 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

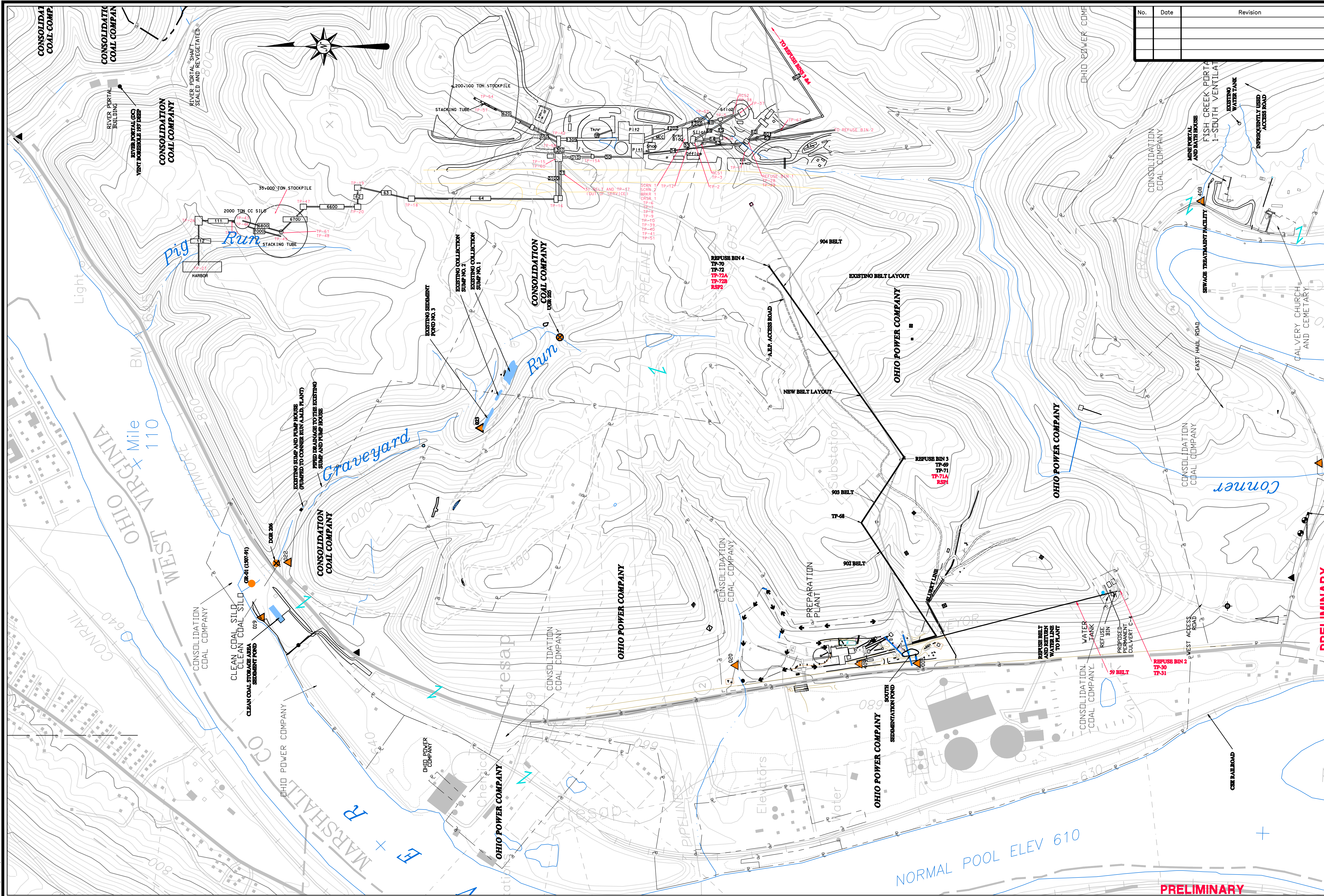
Regulation	Applicability
40 CFR 60, Subpart A – “General Provisions”	These general requirements are applicable to stationary sources that are subject to a source-specific NSPS that references 40 CFR 60, Subpart A. CCC is required to comply with Subpart Y.
40 CFR 60, Subpart Y – “Standards of Performance for Coal Preparation and Processing Plants”	Because the new conveyors and the truck bin are affected facilities as defined in this subpart, the equipment involved in the proposed project is subject to the provisions in 40 CFR 60, Subpart Y. Pursuant to 40 CFR 60.254(b)(1), CCC must not cause any gases which exhibit 10 percent opacity or greater to be discharged into the atmosphere from the conveyors or the truck bin.
40 CFR 70 – “State Operating Programs”	As detailed in Section 2.1.3 of the application, the McElroy facility will remain a minor source with respect to the Title V operating permit program after installation of the proposed equipment.

Table D-2. State Rule Applicability

Rule	Applicability
45CSR5 – “To Prevent and Control Particulate Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations, and Coal Refuse Disposal Areas”	CCC is subject to the standards and provisions in 45CSR5. The new conveyors and vehicular traffic will be subject to these provisions. CCC will comply with this rule by employing good air pollution control practices to minimize visible emissions and by updating the fugitive dust control plan to reflect the proposed project.
45CSR6 – “To Prevent and Control Air Pollution from Combustion of Refuse”	The McElroy facility is subject to 45CSR6 and maintains compliance with this provision by prohibiting the practice.
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. CCC is required to apply for a permit to construct for the proposed project.
45CSR16 - “Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60”	The new conveyors and truck bin are subject to 40 CFR 60, Subpart Y for coal preparation and processing operations and, therefore, must comply with these requirements.
45CSR22 – “Air Quality Management Fee Program”	Generally applicable.
45CSR30 – “Requirements for Operating Permits”	As detailed in Section 2.1.3 of the application, the McElroy facility will remain a minor source with respect to the Title V operating permit program after installation of the proposed equipment.

ATTACHMENT E: PLOT PLAN

FILE: \\POT\Projects\08-0650-MCELROY COAL\08-0650-02A.dwg
 PLOT: 08-0650-02A.dwg
 PLOT DATE: 01/28/2010 10:58:00 AM
 PLOT BY: J. POTESTA



No.	Date	Revision

08-0650-02A
 CAD File No.
 FSB
 Drawn
 Checked
 Approved
NOT TO SCALE
 Scale:
 MARCH 2009
 Date:
 08-0650
 Project No.

Potesta & Associates, Inc.
 ENGINEERS AND ENVIRONMENTAL CONSULTANTS
 7012 MacCorruba Ave. SE, Charleston, WV 25304
 TEL: (304) 343-1400 FAX: (304) 343-9031
 E-Mail Address: potesta@potesta.com



Client:
MCELROY COAL COMPANY
MCELROY PREPARATION PLANT
MOUNDSVILLE, WV 26041

Title
SITE PLAN
MCELROY PREPARATION PLANT
STATE RT. 2 GRAYSVILLE, WV

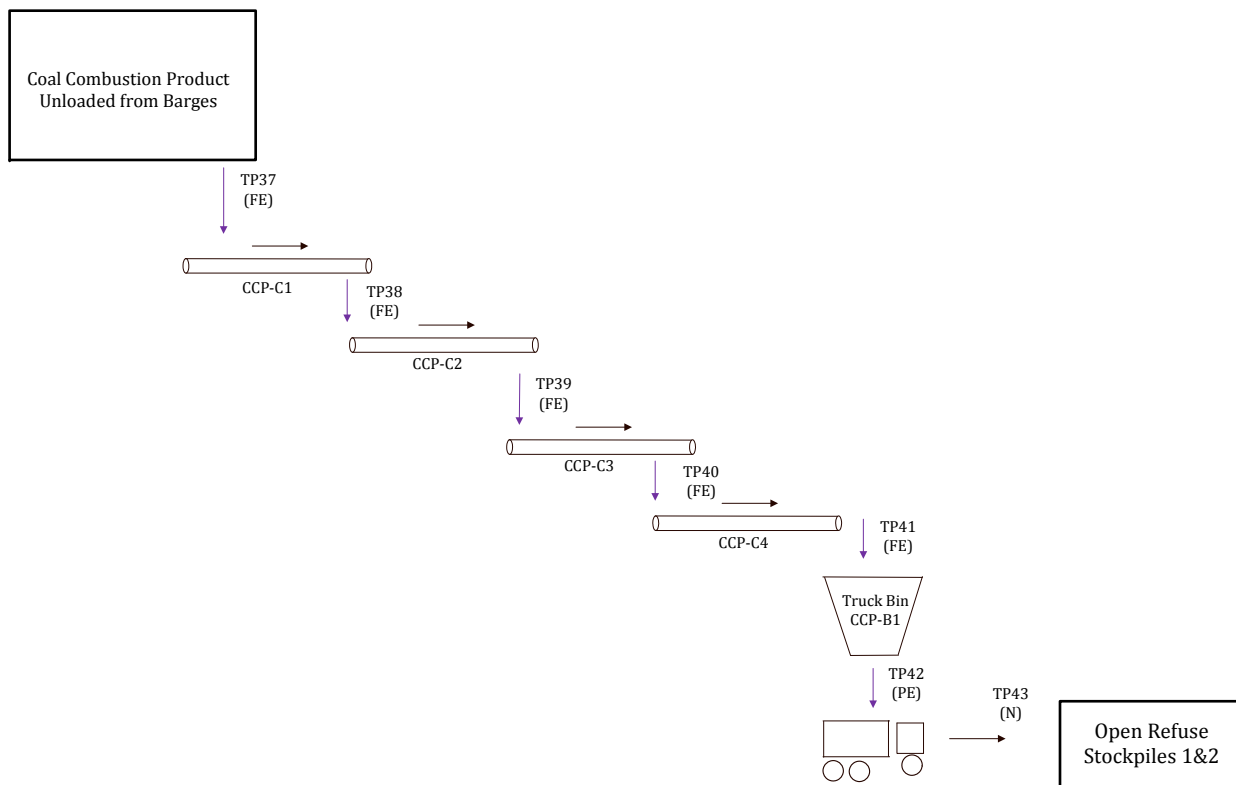
Drawing No.
1

PRELIMINARY

PRELIMINARY

ATTACHMENT F: PROCESS FLOW DIAGRAM

Attachment F. Coal Combustion Product Unloading Project Process Flow Diagram



Consolidation Coal Company –

McElroy Facility

Process Flow Diagram

ATTACHMENT G: PROCESS DESCRIPTION

The McElroy Facility is an active bituminous coal underground mine. The coal is procured from an existing mine portal and is conveyed to two raw coal storage silos. From the raw coal storage pile, coal is conveyed to a screening tower, where the raw coal is screened and separated into two distinct material streams: the refuse stream is crushed, conveyed to refuse storage bins, and ultimately transported to refuse storage piles, and the “plant feed” coal is conveyed to a silo and ultimately transported to the preparation plant. Two types of material exit the preparation plant. The first type of material is refuse. The refuse is conveyed to a refuse storage bin and ultimately transferred to the refuse storage piles. 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 conveyed to the clean coal storage bin and ultimately transferred to the barge loadout area.

With this application, CCC is requesting authorization to construct a conveyor system and river unloading facility to handle coal combustion product (CCP) at the McElroy Facility. Specifically, a crane will be used to unload CCP from barges. The CCP will be conveyed to a truck bin via a series of 4 conveyors. The truck bin will then dump into trucks. The trucks will then transport the CCP to the existing refuse stockpiles at the facility.

ATTACHMENT I: EMISSION UNITS TABLE

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 ¹	Emission Point ID ²	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type ³ and Date of Change	Control Device ⁴
CCP-C1	TP38	Coal Combustion Product Conveyor 1	2015	1,600 tph	New	FE
CCP-C2	TP39	Coal Combustion Product Conveyor 2	2015	1,600 tph	New	FE
CCP-C3	TP40	Coal Combustion Product Conveyor 3	2015	1,600 tph	New	FE
CCP-C4	TP41	Coal Combustion Product Conveyor 4	2015	1,600 tph	New	FE
CCP-B1	TP42	Truck Bin	2015	300 ton	New	PE
VT-UP	N/A	Vehicular Traffic	2009/2015 M	N/A	Modification	WT

¹ For Emission Units (or Sources) use the following numbering system:1S, 2S, 3S,... or other appropriate designation.
² For Emission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation.
³ New, modification, removal
⁴ For Control Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

ATTACHMENT J: EMISSION POINTS DATA SUMMARY SHEET

**Attachment J
EMISSION POINTS DATA SUMMARY SHEET**

Table 1: Emissions Data															
Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type ¹	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS ³ (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions ⁴		Maximum Potential Controlled Emissions ⁵		Emission Form or Phase (At exit conditions, Solid, Liquid or Gas/Vapor)	Est. Method Used ⁶	Emission Concentration ⁷ (ppmv or mg/m ⁴)
		ID No.	Source	ID No.	Device Type	Short Term ²	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr			
TP-37	Fugitive	N/A	FE	N/A	N/A	PM	0.05	0.05	0.01	0.01	Solid	EE	N/A		
						PM ₁₀	0.02	0.02	0.005	0.005	Solid	EE	N/A		
						PM _{2.5}	0.004	0.003	0.0007	0.0007	Solid	EE	N/A		
TP-38	Fugitive	CCP-C1	FE	N/A	N/A	PM	0.05	0.05	0.01	0.01	Solid	EE	N/A		
						PM ₁₀	0.02	0.02	0.005	0.005	Solid	EE	N/A		
						PM _{2.5}	0.004	0.003	0.0007	0.0007	Solid	EE	N/A		
TP-39	Fugitive	CCP-C2	FE	N/A	N/A	PM	0.05	0.05	0.01	0.01	Solid	EE	N/A		
						PM ₁₀	0.02	0.02	0.005	0.005	Solid	EE	N/A		
						PM _{2.5}	0.004	0.003	0.0007	0.0007	Solid	EE	N/A		
TP-40	Fugitive	CCP-C3	FE	N/A	N/A	PM	0.05	0.05	0.01	0.01	Solid	EE	N/A		
						PM ₁₀	0.02	0.02	0.005	0.005	Solid	EE	N/A		
						PM _{2.5}	0.004	0.003	0.0007	0.0007	Solid	EE	N/A		
TP-41	Fugitive	CCP-C4	FE	N/A	N/A	PM	0.05	0.05	0.01	0.01	Solid	EE	N/A		
						PM ₁₀	0.02	0.02	0.005	0.005	Solid	EE	N/A		
						PM _{2.5}	0.004	0.003	0.0007	0.0007	Solid	EE	N/A		
TP-42	Fugitive	CCP-B1	PE	N/A	N/A	PM	0.05	0.05	0.03	0.02	Solid	EE	N/A		
						PM ₁₀	0.02	0.02	0.01	0.01	Solid	EE	N/A		
						PM _{2.5}	0.004	0.003	0.002	0.002	Solid	EE	N/A		
TP-43	Fugitive	N/A	N	N/A	N/A	PM	0.05	0.05	0.05	0.05	Solid	EE	N/A		
						PM ₁₀	0.02	0.02	0.02	0.02	Solid	EE	N/A		
						PM _{2.5}	0.004	0.003	0.004	0.003	Solid	EE	N/A		
VT-UP	Fugitive	VT-UP	WT	N/A	N/A	PM	71.95	315.15	21.59	94.55	Solid	EE	N/A		
						PM ₁₀	20.51	89.83	6.15	26.95	Solid	EE	N/A		
						PM _{2.5}	2.05	8.98	0.62	2.69	Solid	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.

- ¹ Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.
- ² 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).
- ³ List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. **DO NOT LIST** H₂, H₂O, N₂, O₂, and Noble Gases.
- ⁴ 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).
- ⁵ 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).
- ⁶ 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).
- ⁷ 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/m³) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO₂, use units of ppmv (See 45CSR10).

**Attachment J
EMISSION POINTS DATA SUMMARY SHEET**

Table 2: Release Parameter Data

Emission Point ID No. <i>(Must match Emission Units Table)</i>	Inner Diameter (ft.)	Exit Gas			Emission Point Elevation (ft)		UTM Coordinates (km)	
		Temp. (°F)	Volumetric Flow ¹ (acfm) <i>at operating conditions</i>	Velocity (fps)	Ground Level <i>(Height above mean sea level)</i>	Stack Height ² <i>(Release height of emissions above ground level)</i>	Northing	Easting

¹ Give at operating conditions. Include inerts.
² Release height of emissions above ground level.

ATTACHMENT K: FUGITIVE EMISSIONS DATA SUMMARY SHEET

Attachment K

FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process 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).

APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS
1.) Will there be haul road activities? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.
2.) Will there be Storage Piles? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete Table 1 of the NONMETALLIC MINERALS PROCESSING EMISSIONS UNIT DATA SHEET.
3.) Will there be Liquid Loading/Unloading Operations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.
4.) Will there be emissions of air pollutants from Wastewater Treatment Evaporation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
5.) Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.
6.) Will there be General Clean-up VOC Operations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
7.) Will there be any other activities that generate fugitive emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.
If you answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions Summary."

FUGITIVE EMISSIONS SUMMARY	All Regulated Pollutants - Chemical Name/CAS ¹	Maximum Potential Uncontrolled Emissions ²		Maximum Potential Controlled Emissions ³		Est. Method Used ⁴
		lb/hr	ton/yr	lb/hr	ton/yr	
Haul Road/Road Dust Emissions Paved Haul Roads	N/A	N/A	N/A	N/A	N/A	N/A
Unpaved Haul Roads	PM	71.95	315.15	21.59	94.55	EE
	PM ₁₀	20.51	89.83	6.15	26.95	EE
	PM _{2.5}	2.05	8.98	0.62	2.69	EE
Storage Pile Emissions	N/A	N/A	N/A	N/A	N/A	N/A
Loading/Unloading Operations	N/A	N/A	N/A	N/A	N/A	N/A
Wastewater Treatment Evaporation & Operations	N/A	N/A	N/A	N/A	N/A	N/A
Equipment Leaks	N/A	N/A	N/A	N/A	N/A	N/A
General Clean-up VOC Emissions	N/A	N/A	N/A	N/A	N/A	N/A
Other	PM	0.36	0.34	0.13	0.12	EE
	PM ₁₀	0.17	0.16	0.06	0.06	EE
	PM _{2.5}	0.03	0.02	0.01	0.01	EE

¹ List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs, H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. DO NOT LIST H₂, H₂O, N₂, O₂, and Noble Gases.

² Give 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).

³ Give 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).

⁴ 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).

ATTACHMENT L: EMISSIONS UNIT DATA SHEET

7. Provide a diagram and/or schematic that shows the proposed process of the operation or plant. The diagram and/or schematic is to show all sources, components and facets of the operation or plant in an understandable line sequence of the operation. The diagram should include all the equipment involved in the operation; such as conveyors, transfer points, stockpiles, crushers, facilities, vents, screens, truck dump bins, truck, barge and railcar loading and unloading, etc. Appropriate sizing and specifications of equipment should be included in the diagram. The diagram shall logical follow the entire process load-in to load-out.

8. Roads	Paved Miles of Road	Unpaved Miles of Road	Watered		Other Control (Specify)
			Miles	Frequency	
Plant Yard	N/A	0.5	0.5	N/A	15 mph speed limit
Access Roads	N/A	N/A	N/A	N/A	N/A

9. Vehicle Type						
Vehicle Type	Mean Vehicle Speed in mph	Mean Vehicle Weight in Tons		Number of Wheels	Distance Traveled per Round Trip	
		Empty	Full		Paved Feet or Miles	Unpaved Feet or Miles
Raw Aggregate	N/A	N/A	N/A	N/A	N/A	N/A
Loaders	N/A	N/A	N/A	N/A	N/A	N/A
Product Trucks	N/A	N/A	N/A	N/A	N/A	N/A
Other CCP Haul Truck	10	76	126	4	0	1
Other	N/A	N/A	N/A	N/A	N/A	N/A
Other	N/A	N/A	N/A	N/A	N/A	N/A
Other	N/A	N/A	N/A	N/A	N/A	N/A

10. Describe all proposed materials storage facilities associated with the **Emission Units** listed.
 N/A

Storage Activity

ID of Emission Unit	N/A				
Type Storage					
Material Stored					
Typical Moisture Content (%)					
Avg % of material passing through 200 mesh sieve					
Maximum Total Yearly Throughput in storage (tons)					
Maximum Stockpile Base Area (ft²)					
Maximum Stockpile height (ft)					
Dust control method applied to storage					
Method of material load-in to bin or stockpile					
Dust control method applied during load-in					
Method of material load-out to bin or stockpile					
Dust control method applied during load-out					

Storage piles	Estimated Annual Tons	Turnover Rate (Ton/Month)	Wetted as Piled	Number of Sides Enclosed	Other Dust Control	Loading Method (Loader, Conveyor) IN/OUT
Coarse: over 1"						
Fine: 1" to ¼"						
¼" and less						
MFG. Sand						
Other, specify						
Raw Coal: 12" x 0						

Conveying and Transfer

Describe the conveying system including transfer points associated with proposed Emission Units (crushers, etc...).

Refer to the attached application narrative, process flow diagram (Attachment F), and process description (Attachment G).

Describe any methods of emission control to be used with these proposed conveying systems:

Full and partial enclosures will be utilized for some transfers as shown in Attachment F. Transfer drop heights will be minimized when possible.

Crushing and Screening

ID of Emission Unit	N / A					
Type Crusher or Screen						
Material Sized						
Material Sized Throughput:						
Tons/hr						
Tons/yr						
Material sized from/to						
Typical moisture content as crushed or screened (%)						
Dust control methods applied						
Stack Parameters:						
Height (ft)						
Diameter (ft)						
Volume (ACFM)						
Temp (°F)						
Maximum operating schedule:						
Hour/day						
Day/year						
Hour/year						
Approximate Percentage of Operation from:						
Jan – Mar						
April – June						
July – Sept						
Oct – Dec						
Maximum Particulate Emissions:						
LB/HR						
Ton/Year						

List emission sources with request information:

ID of Emission Unit	Type of Emission Unit and Use	Operating Schedule		Max. Amount of Stone Input to Emission (lb/hr)	Crushed or Screened From/To (size)	Date of Emission Unit was Manufacture
		Actual (hrs/yr)	Design (hrs/yr)			
N/A						

List emission sources with request information:

ID of Emission Unit	Maximum expected emissions from Emission Unit without Air Pollution Control Equipment				
	PM ₁₀ (lbs/hr)	SO ₂ (lbs/hr)	CO (lbs/hr)	NO _x (lbs/hr)	VOC (lbs/hr)
N/A					

ID of Emission Unit	Maximum expected emissions from Emission Unit without Air Pollution Control Equipment				
	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	CO (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)
N/A					

Please fill out a separate Air Pollution Control Device Sheet for each Emission Unit equipped with an air pollution control system.

What type of stone will be quarried at this site?

N/A

How will it be quarried?

- Sawing
- Blasting
- Other, Specify:

If blasting is checked, complete the following:

- Frequency of blasting:
- What method of air pollution control will be employed during drilling and blasting?

Attachment L FUGITIVE EMISSIONS FROM UNPAVED HAULROADS

UNPAVED HAULROADS (including all equipment traffic involved in process, haul trucks, endloaders, etc.)

		PM	PM-10
k =	Particle size multiplier	0.80	0.36
s =	Silt content of road surface material (%)	8.4	8.4
p =	Number of days per year with precipitation >0.01 in.	157	157

Item Number	Description	Number of Wheels	Mean Vehicle Weight (tons)	Mean Vehicle Speed (mph)	Miles per Trip	Maximum Trips per Hour	Maximum Trips per Year	Control Device ID Number	Control Efficiency (%)
1	Coal Combustion Product to Storage Pile	4	101	10	0.5	14	120,000		70
2									
3									
4									
5									
6									
7									
8									

Source: AP-42 Fifth Edition – 13.2.2 Unpaved Roads

$$E = k \times 5.9 \times (s \div 12) \times (S \div 30) \times (W \div 3)^{0.7} \times (w \div 4)^{0.5} \times ((365 - p) \div 365) = \text{lb/Vehicle Mile Traveled (VMT)}$$

Where:

		PM	PM-10
k =	Particle size multiplier	0.80	0.36
s =	Silt content of road surface material (%)	8.4	8.4
S =	Mean vehicle speed (mph)	10	10
W =	Mean vehicle weight (tons)	101	101
w =	Mean number of wheels per vehicle	4	4
p =	Number of days per year with precipitation >0.01 in.	157	157

For lb/hr: $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] = \text{lb/hr}$

For TPY: $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] \times [\text{Ton} \div 2000 \text{ lb}] = \text{Tons/year}$

SUMMARY OF UNPAVED HAULROAD EMISSIONS

Item No.	PM				PM-10			
	Uncontrolled		Controlled		Uncontrolled		Controlled	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
1	71.95	315.15	21.59	94.55	20.51	89.83	6.15	26.95
2								
3								
4								
5								
6								
7								
8								
TOTALS								

FUGITIVE EMISSIONS FROM PAVED HAULROADS

INDUSTRIAL PAVED HAULROADS (including all equipment traffic involved in process, haul trucks, endloaders, etc.)

I =	Industrial augmentation factor (dimensionless)	
n =	Number of traffic lanes	
s =	Surface material silt content (%)	
L =	Surface dust loading (lb/mile)	

Item Number	Description	Mean Vehicle Weight (tons)	Miles per Trip	Maximum Trips per Hour	Maximum Trips per Year	Control Device ID Number	Control Efficiency (%)
1							
2							
3							
4							
5							
6							
7							
8							

Source: AP-42 Fifth Edition – 11.2.6 Industrial Paved Roads

$$E = 0.077 \times I \times (4 \div n) \times (s \div 10) \times (L \div 1000) \times (W \div 3)^{0.7} = \text{lb/Vehicle Mile Traveled (VMT)}$$

Where:

I =	Industrial augmentation factor (dimensionless)	
n =	Number of traffic lanes	
s =	Surface material silt content (%)	
L =	Surface dust loading (lb/mile)	
W =	Average vehicle weight (tons)	

For lb/hr: $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] = \text{lb/hr}$

For TPY: $[\text{lb} \div \text{VMT}] \times [\text{VMT} \div \text{trip}] \times [\text{Trips} \div \text{Hour}] \times [\text{Ton} \div 2000 \text{ lb}] = \text{Tons/year}$

SUMMARY OF PAVED HAULROAD EMISSIONS

Item No.	Uncontrolled		Controlled	
	lb/hr	TPY	lb/hr	TPY
1				
2				
3				
4				
5				
6				
7				
8				
TOTALS				

ATTACHMENT M: AIR POLLUTION CONTROL DEVICE SHEET

Attachment M
Air Pollution Control Device Sheet
 (OTHER COLLECTORS)

Control Device ID No. (must match Emission Units Table): FE

Equipment Information

1. Manufacturer: Model No. N/A	2. Control Device Name: Type: Full Enclosure
3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency. N/A	
4. On a separate sheet(s) supply all data and calculations used in selecting or designing this collection device. N/A	
5. Provide a scale diagram of the control device showing internal construction. N/A	
6. Submit a schematic and diagram with dimensions and flow rates. N/A	
7. Guaranteed minimum collection efficiency for each pollutant collected: N/A	
8. Attached efficiency curve and/or other efficiency information. Estimated PM10 Control Efficiency: 80% in accordance with Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants"	
9. Design inlet volume: N/A SCFM	10. Capacity: N/A
11. Indicate the liquid flow rate and describe equipment provided to measure pressure drop and flow rate, if any. N/A	
12. Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment. N/A	
13. Description of method of handling the collected material(s) for reuse or disposal. N/A	

Gas Stream Characteristics

14. Are halogenated organics present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Are particulates present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Are metals present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
15. Inlet Emission stream parameters:	Maximum	Typical	
Pressure (mmHg):	N/A	N/A	
Heat Content (BTU/scf):	N/A	N/A	
Oxygen Content (%):	N/A	N/A	

80 – 90	N/A	N/A
90 – 100	N/A	N/A
>100	N/A	N/A

27. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification): **N/A**

28. Describe the collection material disposal system: **N/A**

29. Have you included **Other Collectores Control Device** in the Emissions Points Data Summary Sheet? **Yes**

30. 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: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

RECORDKEEPING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

REPORTING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

TESTING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

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 or air control device.

RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant. **N/A**

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant. **N/A**

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

Attachment M
Air Pollution Control Device Sheet
(OTHER COLLECTORS)

Control Device ID No. (must match Emission Units Table): PE

Equipment Information

1. Manufacturer: Model No. N/A	2. Control Device Name: Type: Partial Enclosure
3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency. N/A	
4. On a separate sheet(s) supply all data and calculations used in selecting or designing this collection device. N/A	
5. Provide a scale diagram of the control device showing internal construction. N/A	
6. Submit a schematic and diagram with dimensions and flow rates. N/A	
7. Guaranteed minimum collection efficiency for each pollutant collected: N/A	
8. Attached efficiency curve and/or other efficiency information. Estimated PM10 Control Efficiency: 50% in accordance with Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants"	
9. Design inlet volume: N/A SCFM	10. Capacity: N/A
11. Indicate the liquid flow rate and describe equipment provided to measure pressure drop and flow rate, if any. N/A	
12. Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment. N/A	
13. Description of method of handling the collected material(s) for reuse or disposal. N/A	

Gas Stream Characteristics

14. Are halogenated organics present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Are particulates present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Are metals present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
15. Inlet Emission stream parameters:	Maximum	Typical	
Pressure (mmHg):	N/A	N/A	
Heat Content (BTU/scf):	N/A	N/A	
Oxygen Content (%):	N/A	N/A	

80 – 90	N/A	N/A
90 – 100	N/A	N/A
>100	N/A	N/A

27. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification): **N/A**

28. Describe the collection material disposal system: **N/A**

29. Have you included **Other Collectores Control Device** in the Emissions Points Data Summary Sheet? **Yes**

30. 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: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

RECORDKEEPING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

REPORTING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

TESTING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

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 or air control device.

RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant. **N/A**

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant. **N/A**

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

Attachment M
Air Pollution Control Device Sheet
(OTHER COLLECTORS)

Control Device ID No. (must match Emission Units Table): WT

Equipment Information

1. Manufacturer: Model No. N/A	2. Control Device Name: Type: Water Truck
3. Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency. N/A	
4. On a separate sheet(s) supply all data and calculations used in selecting or designing this collection device. N/A	
5. Provide a scale diagram of the control device showing internal construction. N/A	
6. Submit a schematic and diagram with dimensions and flow rates. N/A	
7. Guaranteed minimum collection efficiency for each pollutant collected: N/A	
8. Attached efficiency curve and/or other efficiency information. Estimated PM10 Control Efficiency: 70% in accordance with Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants"	
9. Design inlet volume: N/A SCFM	10. Capacity: N/A
11. Indicate the liquid flow rate and describe equipment provided to measure pressure drop and flow rate, if any. N/A	
12. Attach any additional data including auxiliary equipment and operation details to thoroughly evaluate the control equipment. N/A	
13. Description of method of handling the collected material(s) for reuse or disposal. N/A	

Gas Stream Characteristics

14. Are halogenated organics present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Are particulates present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Are metals present? N/A	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
15. Inlet Emission stream parameters:	Maximum	Typical	
Pressure (mmHg):	N/A	N/A	
Heat Content (BTU/scf):	N/A	N/A	
Oxygen Content (%):	N/A	N/A	

80 – 90	N/A	N/A
90 – 100	N/A	N/A
>100	N/A	N/A

27. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas reheating, gas humidification): **N/A**

28. Describe the collection material disposal system: **N/A**

29. Have you included **Other Collectores Control Device** in the Emissions Points Data Summary Sheet? **Yes**

30. 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: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

RECORDKEEPING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

REPORTING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

TESTING: *Control efficiency values came from Table A of WV DEP's "Application Instructions and Forms for General Permit G40-C for the Prevention and Control of Air Pollution in regard to the Construction, Modification, Relocation, Administrative Update and Operation of Nonmetallic Mineral Processing Plants."*

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 or air control device.

RECORDKEEPING: Please describe the proposed recordkeeping that will accompany the monitoring.

REPORTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

TESTING: Please describe any proposed emissions testing for this process equipment on air pollution control device.

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant. **N/A**

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant. **N/A**

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

ATTACHMENT N: SUPPORTING EMISSIONS CALCULATIONS

Table N-1. Coal Combustion Product Beltline Project Potential to Emit

	PM Filterable (tpy)	PM₁₀ Filterable (tpy)	PM_{2.5} Filterable (tpy)
Transfers	0.12	0.06	0.01
Roads	94.55	26.95	2.69
Project Total	94.67	27.01	2.70
Pre-Project PTE	300.52	118.52	31.87
Pre-Project PTE (w/o roadways)	165.29	79.97	28.01
Postproject PTE	395.19	145.53	34.57
Postproject PTE (w/o roadways)	165.41	80.03	28.02

Table N-2. Transfer Points

EMISSIONS CALCULATIONS

Flow Diagram ID	Emission Source Description	Transfer Capacity (tph) (tpy)		PM Emission Factor ^a (lb/ton)	Contr. Effic. ^b (%)	Moist. Content (%)	Potential to Emit			
							PM (lb/hr)		PM (tpy)	
							Controlled	Uncontrolled	Controlled	Uncontrolled
TP37	Crane to CCP conveyor 1	1,600	3,000,000	3.19E-05	80	52.9	0.01	0.05	0.01	0.05
TP38	CCP conveyor 1 to CCP conveyor 2	1,600	3,000,000	3.19E-05	80	52.9	0.01	0.05	0.01	0.05
TP39	CCP conveyor 2 to CCP conveyor 3	1,600	3,000,000	3.19E-05	80	52.9	0.01	0.05	0.01	0.05
TP40	CCP conveyor 3 to CCP conveyor 4	1,600	3,000,000	3.19E-05	80	52.9	0.01	0.05	0.01	0.05
TP41	CCP conveyor 4 to truck bin	1,600	3,000,000	3.19E-05	80	52.9	0.01	0.05	0.01	0.05
TP42	Truck bin to trucks	1,600	3,000,000	3.19E-05	50	52.9	0.03	0.05	0.02	0.05
TP43	Trucks to refuse disposal area	1,600	3,000,000	3.19E-05	0	52.9	0.05	0.05	0.05	0.05
TOTAL PM							0.13	0.36	0.12	0.34
TOTAL PM₁₀^c							0.06	0.17	0.06	0.16
TOTAL PM_{2.5}^d							0.01	0.03	0.01	0.02

EMISSION FACTORS AND ASSUMPTIONS

a. Transfer Points (batch and continuous drop operation)

AP42, Section 13.2.4.3, Aggregate Handling and Storage Piles

$$\text{Particulate (lb/ton)} = k \cdot (0.0032) \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

where: k = particle size multiplier (0.74 for TSP; 0.35 for PM10; 0.053 for PM2.5)
 U = mean wind speed (@ 6.2 mph for all sources)
 M = material moisture content (%)

b. Control efficiency for full and partial enclosures taken from application instructions for G10-D available from WVDEP.

c. Total PM₁₀ Emissions = Total PM Emissions * (k_{PM10}/k_{PM})

d. Total PM_{2.5} Emissions = Total PM Emissions * (k_{PM2.5}/k_{PM})

Table N-3. Haulroads

$$E = k (s/12)^a (W/3)^b (365-P)/365$$

AP-42 Section 13.2.2, Equation 2 (November 2006)

DIMENSIONAL ANALYSIS

Mass Conversion	2,000 lb/ton	NIST SP1038
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POTENTIAL VEHICLE PARAMETERS

Path	Roadway Length - Round Trip (miles/vehicle) ^a	Vehicle Traffic (trips/hr)	Vehicle Traffic (trips/year)	Mean Vehicle Wt. & Capacity (tons)	Vehicle Capacity (tons)	Potential Throughput (tons)
CCP to Disposal Area	0.50	7	60,000	126	50	3,000,000
return trip	0.50	7	60,000	76		

OPERATING PARAMETERS

Potential VMT - CCP to Disposal Area	3.4 miles/hr	= Roadway Length (miles/vehicle) * Vehicle Traffic (trips/hr)
Potential VMT - Return Trip	3.4 miles/hr	= Roadway Length (miles/vehicle) * Vehicle Traffic (trips/hr)
Potential VMT - CCP to Disposal Area	30,000.0 miles/year	= Roadway Length (miles/vehicle) * Vehicle Traffic (trips/year)
Potential VMT - Return Trip	30,000.0 miles/year	= Roadway Length (miles/vehicle) * Vehicle Traffic (trips/year)
Silt Loading	8.4 %	
Number of Days w/ at least 0.01" of Precipitation (P)	157 days	Consistent with G10-D application instructions
Control Efficiency	70%	Consistent with G10-D application instructions for use of a water truck on unpaved surfaces.

EMISSION FACTORS

Pollutant		
Particle Size Multiplier - PM (k)	4.9 lb/VMT	AP-42 Section 13.2.2, Table 13.2.2-2 (11/06)
Particle Size Multiplier - PM10 (k)	1.5 lb/VMT	AP-42 Section 13.2.2, Table 13.2.2-2 (11/06)
Particle Size Multiplier - PM2.5 (k)	0.15 lb/VMT	AP-42 Section 13.2.2, Table 13.2.2-2 (11/06)
Empirical Constant - PM, a	0.7	AP-42 Section 13.2.2, Table 13.2.2-2 (11/06)
Empirical Constant - PM ₁₀ /PM _{2.5} , a	0.9	AP-42 Section 13.2.2, Table 13.2.2-2 (11/06)
Empirical Constant - PM/PM ₁₀ /PM _{2.5} , b	0.45	AP-42 Section 13.2.2, Table 13.2.2-2 (11/06)
PM Emission Factor - CCP to Disposal Area	11.69 lb/VMT	$E = k_{PM} (s/12)^a (W/3)^b x (365-P)/365$
PM ₁₀ Emission Factor - CCP to Disposal Area	3.33 lb/VMT	$E = k_{PM10} (s/12)^a (W/3)^b x (365-P)/365$
PM _{2.5} Emission Factor - CCP to Disposal Area	0.33 lb/VMT	$E = k_{PM2.5} (s/12)^a (W/3)^b x (365-P)/365$
PM Emission Factor - Return Trip	9.32 lb/VMT	$E = k_{PM} (s/12)^a (W/3)^b x (365-P)/365$
PM ₁₀ Emission Factor - Return Trip	2.66 lb/VMT	$E = k_{PM10} (s/12)^a (W/3)^b x (365-P)/365$
PM _{2.5} Emission Factor - Return Trip	0.27 lb/VMT	$E = k_{PM2.5} (s/12)^a (W/3)^b x (365-P)/365$

Table N-3. Haulroads

$$E = k (s/12)^a (W/3)^b (365 \cdot P) / 365$$

AP-42 Section 13.2.2, Equation 2 (November 2006)

EMISSIONS CALCULATIONS

Uncontrolled

Path	Potential Emissions - PM		Potential Emissions - PM ₁₀		Potential Emissions - PM _{2.5}	
	lb/hr ^a	tpy ^b	lb/hr ^a	tpy ^b	lb/hr ^a	tpy ^b
CCP to Disposal Area	40.05	175.42	11.42	50.00	1.14	5.00
return trip	31.90	139.73	9.09	39.83	0.91	3.98
TOTAL	71.95	315.15	20.51	89.83	2.05	8.98

^a Potential uncontrolled Pollutant Emissions (lb/hr) = Potential Paved VMT (miles/hr) x Path Pollutant EF (lb/VMT)

^b Potential uncontrolled Pollutant Emissions (tpy) = Potential Paved VMT (miles/yr) x Path Pollutant EF (lb/VMT) / 2,000 (lbs/ton)

Controlled

Path	Potential Emissions - PM		Potential Emissions - PM ₁₀		Potential Emissions - PM _{2.5}	
	lb/hr ^a	tpy ^b	lb/hr ^a	tpy ^b	lb/hr ^a	tpy ^b
CCP to Disposal Area	12.02	52.63	3.42	15.00	0.34	1.50
return trip	9.57	41.92	2.73	11.95	0.27	1.19
TOTAL	21.59	94.55	6.15	26.95	0.62	2.69

^a Potential controlled Pollutant Emissions (lb/hr) = Potential Paved VMT (miles/hr) x Path Pollutant EF (lb/VMT) * (1-Control Efficiency (%))

^b Potential controlled Pollutant Emissions (tpy) = Potential Paved VMT (miles/yr) x Path Pollutant EF (lb/VMT) / 2,000 (lbs/ton) * (1-Control Efficiency (%))

ATTACHMENT O: MONITORING, RECORDKEEPING, REPORTING AND TESTING PLANS

CCC proposes the following monitoring, recordkeeping, reporting, and testing measures be implemented for the proposed project:

CCC proposes the monitoring, recordkeeping, reporting, and testing requirements as specified in the existing R13 permit. These requirements are adequate to demonstrate compliance with emission limits and operating parameters.

ATTACHMENT P: AFFADAVIT OF PUBLICATION

Attachment P includes a copy of the public notice CCC will submit to the Moundsville Echo for publication. A certificate of publication will be provided to the WV DEP after the notice has been published.

AIR QUALITY PERMIT NOTICE

Notice of Application

NOTICE IS GIVEN that Consolidation Coal Company has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Construction Permit for a new coal combustion product unloading system at West Virginia State Rt 2, in Moundsville, in Marshall County, West Virginia. The latitude and longitude coordinates are 39.828, -80.813.

The applicant estimates the total increased potential to discharge the following Regulated Air Pollutants will be: Particulate Matter – 94.67 tons per year; Particulate Matter (10 micron diameter or less) – 27.01 tons per year; and Particulate Matter (2.5 micron diameter or less) – 2.70 tons per year.

Startup of operation is planned to begin on or about the 1st day of January, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th 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 September, 2015.

By: Consolidation Coal Company
Robert D. Moore
Vice President
46226 National Road W
St. Clairsville, OH 43950
740-338-3100