

# Fact Sheet



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

Permit Number: **R30-04700008-2017**  
Application Received: **October 11, 2016**  
Plant Identification Number: **03-54-047-00008**  
Permittee: **Second Sterling Corporation**  
Facility Name: **Keystone Number 1 Coal Preparation Plant**  
Mailing Address: **P. O. Box 1085, Beckley, WV 25802-1085**

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Physical Location: Keystone, McDowell County, West Virginia  
UTM Coordinates: 460.38 km Easting • 4141.305 km Northing • Zone 17  
Directions: From Charleston take I-77 south to exit 9. Proceed west on U.S. Route 460 to U.S. Route 52. Take U.S. Route 52 northwest to Keystone. At Keystone turn right on Bridge Street, cross the railroad tracks and turn right.

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### **Facility Description**

The Keystone Number 1 Preparation Plant (SIC 1221 and NAICS 212111), a wet-wash coal preparation plant with thermal dryer, has the ability to screen, crush/size, wash, thermally dry, store and load out/in coal. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week.

## Emissions Summary

| <b>Plantwide Emissions Summary [Tons per Year]</b> |                            |                               |
|--|----------------------------|-------------------------------|
| <b>Regulated Pollutants</b>                        | <b>Potential Emissions</b> | <b>2014* Actual Emissions</b> |
| Carbon Monoxide (CO)                               | 43.5                       | NA                            |
| Nitrogen Oxides (NO <sub>x</sub> )                 | 140.1                      | NA                            |
| Particulate Matter (PM <sub>2.5</sub> )            | 40.90                      | 0.08                          |
| Particulate Matter (PM <sub>10</sub> )             | 272.62                     | 0.53                          |
| Total Particulate Matter (TSP)                     | 572.53                     | 1.1                           |
| Sulfur Dioxide (SO <sub>2</sub> )                  | 44.1                       | NA                            |
| Volatile Organic Compounds (VOC)                   | 103.5                      | NA                            |

*PM<sub>10</sub> is a component of TSP.*

| <b>Hazardous Air Pollutants</b> | <b>Potential Emissions</b> | <b>2014* Actual Emissions</b> |
|---------------------------------|----------------------------|-------------------------------|
| Total HAPs                      | 0.06                       | NA                            |

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

*\* Keystone Number 1 Coal Preparation Plant is temporarily shutdown and the 2014 actual emissions are the most recently submitted emissions.*

## Title V Program Applicability Basis

This facility has the potential to emit 272.62 tons per year of PM<sub>10</sub>, 140.1 tons per year of NO<sub>x</sub>, and 103.5 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Second Sterling Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

### Federal and State:

|         |  |
|---------|--|
| 45CSR5  | Control of particulate matter from coal preparation plants   |
| 45CSR6  | Open burning prohibited.   |
| 45CSR10 | Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers  |
| 45CSR11 | Standby plans for emergency episodes.  |
| 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 |
| 45CSR16 | Standards of performance for new stationary sources pursuant to 40 CFR part 60   |

|  |  |
|--|--|
| WV Code § 22-5-4 (a) (14)<br><br>45CSR30<br>40 C.F.R. 60, Subpart Y<br>40 C.F.R. Part 61<br>40 C.F.R. Part 82, Subpart F | The Secretary Can Request Any Pertinent Information Such As Annual Emission Inventory Reporting, Operating Permit Requirement, Requirements for coal preparation plants Asbestos Inspection And Removal Ozone Depleting Substances |
|--|--|

State Only:

|        |                         |
|--------|-------------------------|
| 45CSR4 | No objectionable odors. |
|--------|-------------------------|

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit <i>(if any)</i> |
|--------------------------------|------------------|--|
| R13-0308F                      | 03/13/2013       |  |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

40 C.F.R. 64 – This is the third renewal. Since CAM applicability was addressed in the previous renewals and there were no modifications to the facility that would have triggered a CAM review subsequent to the second renewal, a CAM evaluation was not made.

**Non-Applicability Determinations**

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

|             |   |
|-------------|---|
| 45CSR§10-5. | The thermal dryer is not defined as a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted |
|-------------|---|

**Request for Variances or Alternatives**

None

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: Friday, July 21, 2017  
Ending Date: Monday, August 21, 2017

### **Point of Contact**

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

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

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.