July 6, 2018

Ms. Carrie McCumbers
WV Department of Environmental Protection
Division of Air Quality
601 - 57th Street
Charleston, WV 25304

RE: ***The Marion County Coal Company – Marion County, West Virginia,***
The Marion County Preparation Plant – Title V Renewal Application

Dear Ms. McCumbers:

The Marion County Coal Company (MCCC) operates the Marion County Preparation Plant located in Marion County, West Virginia. Operations at the Marion County Preparation Plant are permitted under R30-04900019-2014 [MM04] which expires on January 24, 2019. In accordance with 45CSR30-4.1.a.3, a timely renewal application for the facility is due six (6) months prior to expiration, or by July 24, 2018. Please find the required components of the R30 renewal application enclosed.

In addition to the required application components, MCCC has also enclosed a redline-strikeout version of the current R30 permit detailing numerous corrections and requested revisions. A summary of the substantive changes presented in the redline strikeout version of the permit is as follows:

- ***Equipment Table*** – Several updates were made to the equipment table in Section 1.0.

  First, MCCC revised the maximum throughput for several emission units. These changes are intended to better reflect the maximum throughput for each piece of equipment based on the operational limitations of the preparation plant and do not reflect any physical change or change in the method of operation of any of the affected equipment.

  Second, the following equipment were removed from the equipment table as they have either been removed or are no longer in operation:

  > 053, Conveyor 22
  > 007, Raw Coal Stockpile 2
  > 037, Conveyor 19
  > 051A, Conveyor 20
  > 030A, Conveyor 7A
  > 044A, Clean Coal Silo 3

Additionally, based on the process flow diagram provided as Attachment C, the following equipment was identified as missing from the equipment table, and was therefore added:

- 056, Conveyor 5A
- 054, Conveyor 42
- 055 Conveyor 44
- 057, Sample Conveyor 1
- 058, Sample Crusher
- 059, Sample Conveyor 2

MCCC notes that it intends to submit an R13 permit update to include the above equipment shortly after the filing of this renewal application.

Finally, revisions were made to the emission unit descriptions for certain equipment as necessary to reflect the general process flow as provided in Attachment C.

- ***4.1.2*** – Condition 4.1.2 specifies that compliance with all annual throughput limitations shall be determined using a 12 month rolling total. MCCC proposes to update this condition to specify that compliance with all hourly throughput limitations also be determined using a 12 month rolling total. Specifically, compliance will be demonstrated by dividing the rolling 12 month throughput by the rolling 12 month hours of operation each month.

- ***4.1.10 –*** Condition 4.1.10 contains a 20% opacity requirement for any 'coal processing and conveying equipment, coal storage system, or coal transfer and loading system'. Based on the wording of the condition, it appears the primarily regulatory basis for the requirement is NSPS Y [i.e., 40 CFR 60.254(a)]. However, 45CSR5-3.4 is also cited as a regulatory basis for the condition despite also being the basis for 4.1.12. Further, the applicability criteria for 45CSR5-3.4 do not exactly match those of 40 CFR 60.254(a). Accordingly, MCCC proposes to revise 4.1.10 to better align with the language of 40 CFR 60.254(a) and to remove 45CSR5-3.4 as a regulatory basis for the condition.

  MCCC further notes that 40 CFR 60.251(d)(1) specifies that for units constructed, reconstructed, or modified on or before May 27, 2009, the definition of coal *does not* include coal refuse. Accordingly, refuse processing and conveying equipment and refuse storage systems installed prior to May 27, 2009 are not subject to the opacity requirement of 40 CFR 60.254(a). Therefore, units 033 and 027 have been removed from the applicability section of this condition.

- ***4.2.6.*** – Condition 4.2.6 of the existing permit requires MCCC to perform prescribed visible emissions checks/evaluations to confirm compliance with the various opacity requirements in the permit.

  The condition is ambiguous as currently written. For example, 4.2.6.b requires that MCCC perform a Method 9 evaluation within 72 hours for any emission unit where the required weekly visible emissions checks indicate opacity in exceedance of 50% of the allowable limit. However, no Method 9 is required if the issue is corrected as expeditiously as possible, but no later than 24 hours from required the weekly observation where the potential

exceedance was observed. However, Condition 4.2.6.c specifies that if any visible emissions evaluation indicates visible emissions in excess of 50 percent of the allowable limit, a Method 9 shall be performed at least once every two (2) weeks until three (3) consecutive evaluations indicate visible emissions less than or equal to 50% of the allowable limit. As currently written, it is unclear whether the trigger for the bi-weekly Method 9 evaluations is the weekly visible emissions checks or the first Method 9 evaluation triggered by a weekly observation indicating visible emissions in excess of 50% of the allowable limit.

Further, 4.2.6.d requires that a visible emissions evaluation be conducted on all 'process and control equipment' at least once per calendar month. Given that MCCC is required to perform weekly checks on every emission unit subject to an opacity requirement, it is unclear what equipment would potentially be subject to this less stringent requirement. Further, this condition seemingly conflicts with Condition 4.4.10 which requires that the permittee inspect all fugitive dust control systems on a weekly basis.

The redline permit provided with this application seeks to provide clarification by streamlining and simplifying the language of this condition.

- **4.2.7 –** Condition 4.2.7 of the existing permit requires MCCC to monitor the following:

    - Exit temperature of the thermal dryer
    - Pressure loss through the venturi scrubber
    - Water supply pressure to the control equipment

  Additionally, MCCC is required to maintain each of the above parameters within a specified range.

  The regulatory citation for this requirement in the existing permit is 40 CFR Part 60 and 40 CFR Part 64. The redline version of the permit provided with this renewal application seeks to clarify the regulatory justification for this condition. Specifically, NSPS Y requires thermal dryers constructed on or before April 28, 2008 to monitor exit temperature, pressure loss, and water supply pressure. However, the rule *does not* require operators to establish and operate the thermal dryer within any specified range for any of the parameters. Accordingly, the redline version of the permit seeks to clarify that 40 CFR Part 64 is the basis for the requirement to establish and operate within specified ranges for each parameter.

  Finally, MCCC has proposed language to specify that the monitoring shall be performed in accordance with 40 CFR 60, Subpart A. Specifically, 40 CFR 60.13(e)(2) provides the following:

  > *"All continuous monitoring systems referenced by paragraph (c) of this section for measuring emissions, except opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period."*

  Further, 40 CFR 60.13(h) specifies:

"Owners or operators of all continuous monitoring systems for measurement of opacity shall reduce all data to 6-minute averages and for continuous monitoring systems other than opacity to 1-hour averages for time periods as defined in §60.2..."

Finally, 40 CFR 60.13(h)(2)(i) states:

"Except as provided under paragraph (h)(2)(iii) of this section, for a full operating hour (any clock hour with 60 minutes of unit operation), at least four valid data points are required to calculate the hourly average, i.e., one data point in each of the 15-minute quadrants of the hour."

Therefore, for each parameter, MCCC will obtain at least one (1) data point every 15 minutes. The data will be reduced to hourly averages in accordance with 40 CFR 60.13(h). Finally, MCCC will calculate three-hour average parameters to compare to the required operating range and to ultimately define an excursion.

- **4.4.4 – 4.4.6** – Conditions 4.4.4 through 4.4.6 contain requirements to continuously record temperature, pressure loss, and water supply pressure. As noted above, Condition 4.2.7 was updated to specify that all continuous monitoring be performed in accordance with 40 CFR Part 60, Subpart A, which also defines recordkeeping requirements. Accordingly, MCCC proposes to remove Conditions 4.4.4 through 4.4.6.

***

MCCC appreciates your consideration in this matter. Should you have any questions on the specifics of this request, please do not hesitate to contact either Mike Burr of Trinity Consultants at (216) 278-0500 or Steve Pachol of Murray American Energy at (304) 534-4726.

Sincerely,

THE MARION COUNTY COAL COMPANY

Kimberly Betcher

cc: Steve Pachol (Murray American)
Karl Dettinger (DAQ)
Denton McDerment (DAQ)
Mike Burr (Trinity)

R30 RENEWAL APPLICATION

The Marion County Coal Company
The Marion County Preparation Plant

Prepared By:

TRINITY CONSULTANTS
3401 Enterprise Parkway
Suite 340
Beachwood, OH 44122
(216) 278-0500

July 2018

Project 173601.0133

Trinity Consultants

Environmental solutions delivered uncommonly well

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ADMINISTRATIVE COMPLETENESS CHECKLIST

TITLE V PERMIT APPLICATION CHECKLIST
FOR ADMINISTRATIVE COMPLETENESS

A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a Title V permit application. Any submittal will be considered incomplete if the required information is not included.*

✓	Two signed copies of the application (at least one must contain the original "*Certification*" page signed and dated in blue ink) 1 hard copy and 2 electronic included per current instructions
✓	Correct number of copies of the application on separate CDs or diskettes, (i.e. at least one disc per copy) 1 hard copy and 2 electronic included per current instructions
✓	*Table of Contents (needs to be included but not for administrative completeness) TOC included
✓	Facility information Included on pages 1-3 of general application form
✓	Description of process and products, including NAICS and SIC codes, and including alternative operating scenarios Included on page 4 of general application form
✓	Area map showing plant location Included as Attachment A
✓	Plot plan showing buildings and process areas Included as Attachment B
✓	Process flow diagram(s), showing all emission units, control equipment, emission points, and their relationships Included as Attachment C
✓	Identification of all applicable requirements with a description of the compliance status, the methods used for demonstrating compliance, and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the source is not in compliance Applicable requirements and compliance demonstration methods included with Attachment I.
✓	Listing of all active permits and consent orders (if applicable) Included on page 7 of general application form
✓	Facility-wide emissions summary Included on page 8 of general application form
✓	Identification of Insignificant Activities Included on pages 9-12 of general application form
✓	ATTACHMENT D - Title V Equipment Table completed for all emission units at the facility except those designated as insignificant activities Attachment D included
✓	ATTACHMENT E - Emission Unit Form completed for each emission unit listed in the Title V Equipment Table (ATTACHMENT D) and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the emission unit is not in compliance Attachment E included. Attachment F N/A
✓	ATTACHMENT G - Air Pollution Control Device Form completed for each control device listed in the Title V Equipment Table (ATTACHMENT D) Attachment G included
✓	ATTACHMENT H – Compliance Assurance Monitoring (CAM) Plan Form completed for each control device for which the "Is the device subject to CAM?" question is answered "Yes" on the Air Pollution Control Device Form (ATTACHMENT G) Attachment H included
✓	General Application Forms signed by a Responsible Official Signed general forms included
✓	Confidential Information submitted in accordance with 45CSR31 N/A - no CBI

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.dep.wv.gov/daq

INITIAL/RENEWAL TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):**
The Marion County Coal Company

2. Facility Name or Location:
Marion County Preparation Plant

3. DAQ Plant ID No.:
0 4 9 — 0 0 0 1 9

4. Federal Employer ID No. (FEIN):
1 3 2 5 6 6 5 9 4

5. **Permit Application Type:**

- ☐ Initial Permit — When did operations commence? Pre 1974
- ☒ Permit Renewal — What is the expiration date of the existing permit? 01/24/2019
- ☐ Update to Initial/Renewal Permit Application

6. Type of Business Entity:

☒ Corporation ☐ Governmental Agency ☐ LLC
☐ Partnership ☐ Limited Partnership

7. Is the Applicant the:

☐ Owner ☐ Operator ☒ Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

—

8. Number of onsite employees:
50

9. Governmental Code:

- ☒ Privately owned and operated; 0
- ☐ Federally owned and operated; 1
- ☐ State government owned and operated; 2
- ☐ County government owned and operated; 3
- ☐ Municipality government owned and operated; 4
- ☐ District government owned and operated; 5

10. 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.

11. Mailing Address		
Street or P.O. Box: 1 Bridge St.		
City: Monongah	**State:** WV	**Zip:** 26554
Telephone Number: (304) 534 - 4748	**Fax Number:** (304) 534-4726	

12. Facility Location		
Street: 1 mile NW of Fairview on County Road 17, Turn Left on Sugar Run Road	**City:** Fairview	**County:** Marion
UTM Easting: 561.6 km	**UTM Northing:** 4,409 km	**Zone:** ☒ 17 or ☐ 18
Directions: 1 mile NW of Fairview on County Road 17, Turn Left on Sugar Run Road		
Portable Source? ☐ Yes ☒ No		
Is facility located within a nonattainment area? ☐ Yes ☒ No		**If yes, for what air pollutants?**
Is facility located within 50 miles of another state? ☒ Yes ☐ No		**If yes, name the affected state(s).** Pennsylvania Maryland Virginia
Is facility located within 100 km of a Class I Area[1]? ☒ Yes ☐ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☐ No		**If yes, name the area(s).** Otter Creek Wilderness Area

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: Kimberly Betcher		**Title:** Manager of Permitting
Street or P.O. Box: 46226 National Road W		
City: St. Clairsville	**State:** OH	**Zip:** 43950
Telephone Number: (740) 338-3100	**Fax Number:** (740) 338-3416	
E-mail address:kimbetcher@coalsource.com		
Environmental Contact: Steve Pachol		**Title:** Environmental Engineer
Street or P.O. Box: 1 Bridge Street		
City: Monongah	**State:** WV	**Zip:** 26554
Telephone Number: : (304) 534-4726	**Fax Number:** (740) 338-3416	
E-mail address: StevePachol@coalsource.com		
Application Preparer: Mike Burr		**Title:** Managing Consultant
Company: Trinity Consultants		
Street or P.O. Box: 3401 Enterprise Parkway, Suite 340		
City: Beachwood	**State:** OH	**Zip:** 44122
Telephone Number: (216) 278-0500	**Fax Number:** (614) 433-0734	
E-mail address: mburr@trinityconsultants.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Coal Preparation w Thermal Dryer	Bituminous Coal	212112	1222

Provide a general description of operations.

The Marion County Preparation Plant consists of coal mining and a preparation plant with a thermal dryer.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A**. See attached.

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B**. For instructions, refer to "Plot Plan - Guidelines." See attached.

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C**. Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships. See attached.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☒ SIP	☐ FIP
☒ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☒ Section 111 NSPS	☐ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☒ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☒ **C**ompliance **A**ssurance **M**onitoring (40CFR64)
☐ CAIR NO_x Annual Trading Program (45CSR39)	☐ CAIR NO_x Ozone Season Trading Program (45CSR40)
☐ CAIR SO_2 Trading Program (45CSR41)	

19. Non Applicability Determinations
List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies. N/A
☐ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*).

Refer to suggested Title V permit language.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested facility-wide applicable requirements and proposed compliance demonstration methods.

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to suggested Title V permit language.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested facility-wide applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

21. Active Permits/Consent Orders		
Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
R13-13-0760H	4/7/2017	
R30-0400019-2014 (MM04)	7/31/2017	
	/ /	

22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
R13-0760G	11/4/2016	
R13-0760F	8/1/2016	
R13-0760E	3/6/2015	
R13-0760D	5/12/2008	
R13-0760B	5/2/2006	
R13-0760A	8/13/1984	

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	172.8
Nitrogen Oxides (NO_X)	190.8
Lead (Pb)	5.48E-03
Particulate Matter ($PM_{2.5}$)[1]	137.9
Particulate Matter (PM_{10})[1]	231.8
Total Particulate Matter (TSP)	456.4
Sulfur Dioxide (SO_2)	586
Volatile Organic Compounds (VOC)	594.0
Hazardous Air Pollutants[2]	Potential Emissions
Total	6.9
Regulated Pollutants other than Criteria and HAP	Potential Emissions

[1]$PM_{2.5}$ and PM_{10} are components of TSP.
[2]For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)		
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☒	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☒	3.	Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
☒	4.	Bathroom/toilet vent emissions.
☒	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☒	6.	Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
☐	7.	Blacksmith forges.
☐	8.	Boiler water treatment operations, not including cooling towers.
☒	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☒	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☒	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☐	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☐	14.	Demineralized water tanks and demineralizer vents.
☐	15.	Drop hammers or hydraulic presses for forging or metalworking.
☐	16.	Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
☐	17.	Emergency (backup) electrical generators at residential locations.
☒	18.	Emergency road flares.
☐	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: <u>Storage tanks (< 0.01 lb/hr and <0.1 tpy of VOC)</u> _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)		
☐	20.	Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27. Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis: _____ _____ _____ _____ _____
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☒	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	23.	Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.
☒	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☐	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☒	26.	Fire suppression systems.
☒	27.	Firefighting equipment and the equipment used to train firefighters.
☒	28.	Flares used solely to indicate danger to the public.
☒	29.	Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
☐	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☒	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☒	34.	Indoor or outdoor kerosene heaters.
☒	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☒	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☐	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.
☒	41.	Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

24. Insignificant Activities (Check all that apply)		
		owners/operators must still get a permit if otherwise requested.)
☒	42.	Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
☒	43.	Process water filtration systems and demineralizers.
☒	44.	Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
☒	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☒	46.	Routine calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☒	50.	Space heaters operating by direct heat transfer.
☒	51.	Steam cleaning operations.
☐	52.	Steam leaks.
☐	53.	Steam sterilizers.
☐	54.	Steam vents and safety relief valves.
☒	55.	Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
☐	56.	Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
☒	57.	Such other sources or activities as the Director may determine.
☒	58.	Tobacco smoking rooms and areas.
☒	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table

Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D**.

26. Emission Units

For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E**.

For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F**.

27. Control Devices

For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G**.

28. Compliance Assurance Monitoring

For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H**.

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. 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.

Responsible official (type or print)

Name: Kimberly Betcher	Title: Manager of Permitting

Responsible official's signature:

Signature: _____ Signature Date: 7/9/2018
(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:	
☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☒	ATTACHMENT D: Equipment Table
☒	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☒	ATTACHMENT G: Air Pollution Control Device Form(s)
☒	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

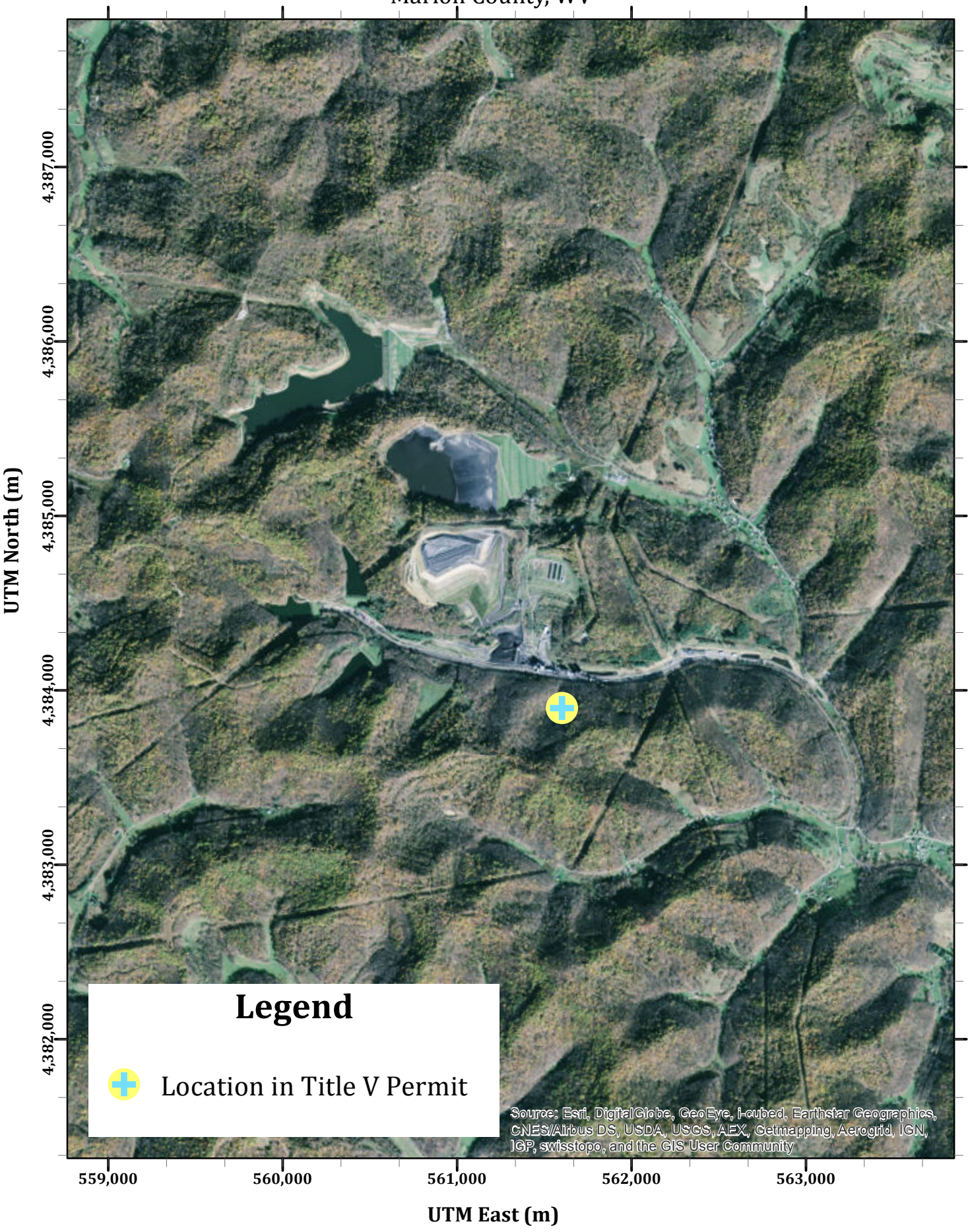
All of the required forms and additional information can be found and downloaded from, the DEP website at www.dep.wv.gov/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

ATTACHEMNT A: AREA MAP

Attachment A - Area Map

Marion County Preparation Plant - Marion County Coal Company

Marion County, WV



ATTACHMENT B: PLOT PLAN

W.E.
1167.2

W.E.
1266.1

W.E.
1059.5

Thermal Dryer

Thermal Dryer

INSET (Marion County Thermal Dryer)

INSET (Marion County Thermal Dryer)
Scale: 1" = 40'

40' 80' 160'

100' 200' 400'

N

No.	Revision/Draftsman	Date

The Marion County Coal Company

40026 National Road
St. Clairsville, Ohio 43950

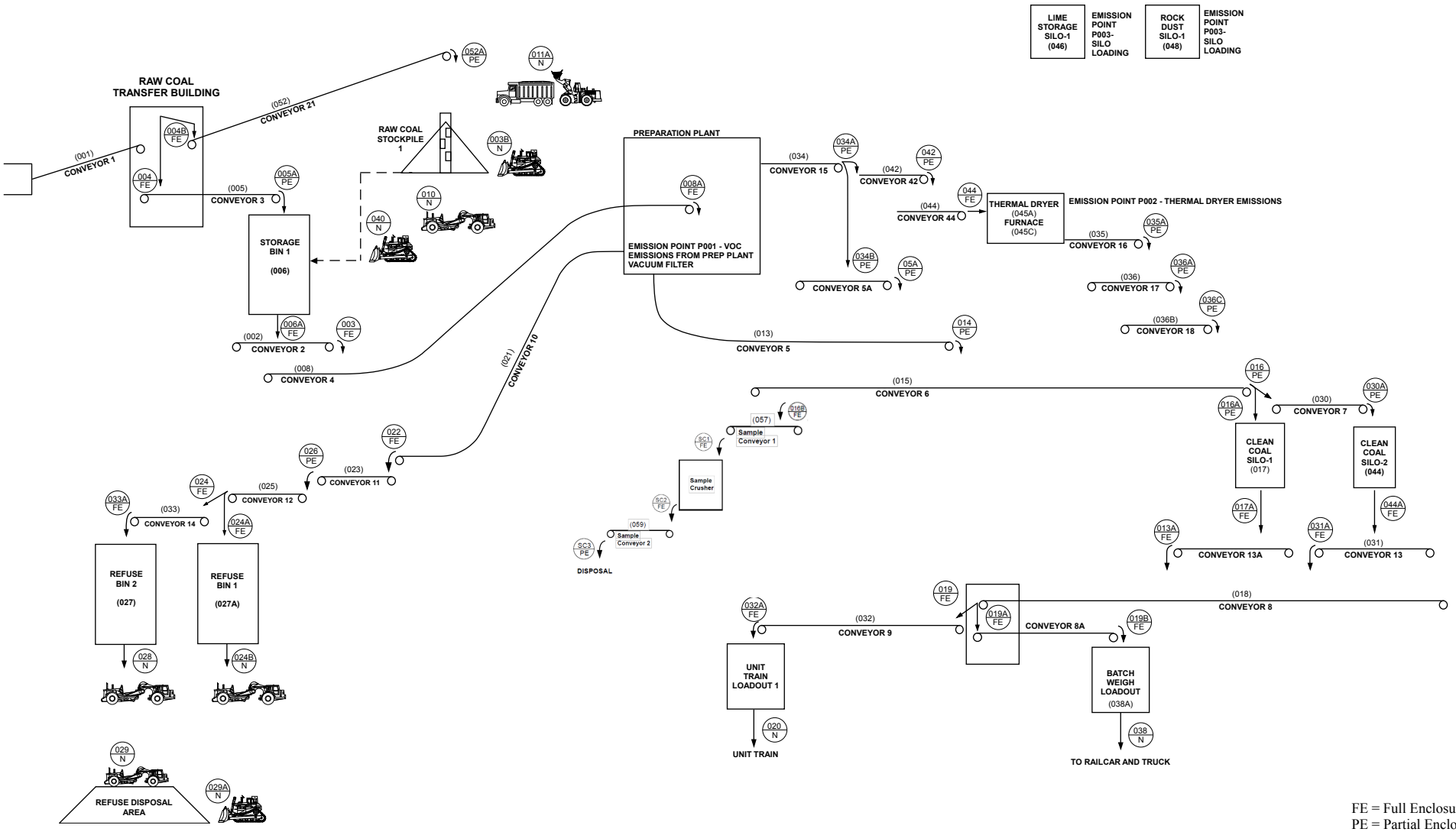
Phone: 740.338.3100 Fax: 740.338.3416

Plot Plan

Marion County Mine
Preparation Plant and Refuse Area

March 7, 2016	Contour Interval: 20'
1" = 100'	Drawn By: JEE

ATTACHMENT C: PROCESS FLOW DIAGRAM



FE = Full Enclosure
PE = Partial Enclosure
N = No Enclosure

Revised 7-21-14	SRK

LOVERIDGE PREPARATION PLANT
CONSOLIDATION COAL COMPANY

PROCESS FLOW DIAGRAM

NOT TO SCALE

ATTACHMENT D – TITLE V EQUIPMENT TABLE

ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
Raw Coal Circuit					
Z01	FE	001	**Conveyor 1** – Mine slope belt to Raw Coal Transfer Building	3,000 tph 13,140,000 tpy	Pre 1974
Z01	FE	005	**Conveyor 3** – Belt from Raw Coal Transfer Building to Raw Coal Storage Bin 1	3,000 tph 13,140,000 tpy	Pre 1974
Z01	FE	006	**Storage Bin 1** – Raw Coal storage silo from Conveyor 3 and transfers to Conveyor 2; Storage capacity is 15,000 tons	1,500 tph 13,140,000 tpy	Pre 1974
Z01	FE	008	**Conveyor 4** – Belt from Conveyor 2 to Prep Plant	4401,500 tph 13,140,000 tpy	Pre 1974
Z01	FE	002	**Conveyor 2** – Belt from Raw Coal Storage Bin 1 to Conveyor 4	1,500 tph 13,140,000 tpy	1989
Z01	ST	003A	**Raw Coal Stockpile 1** – Stockpile equipped with Stacking Tube 1; Stockpile footprint is 20.5 acres with a storage capacity of 450,000 tons	3000 tph 13,140,000 tpy	2005
Z01	FE	052	**Conveyor 21** – Belt from Raw Coal Transfer Building to Raw Coal Stockpile	3,000 tph 13,140,000 tpy	2005
Miscellaneous Storage Circuit					
P003	None	046	**Lime Storage Silo 1**	N/A	Pre 1974
P004	None	048	**Rock Dust Silo 1**	N/A	Pre 1974
Clean Coal Thermal Drying Circuit					
Z01	FE	034	**Conveyor 15** – Belt from Prep Plant to Thermal Dryer 1	600 tph 3,219,300 tpy	1985
Z01	FE	054	**Conveyor 42** – Belt from conveyor 15 to conveyor 44	600 tph 3,219,300 tpy	1985
Z01	FE	055	**Conveyor 44** – Belt from conveyor 42 to thermal dryer	600 tph 3,219,300 tpy	1985
P002	SCR1/ CYC1	045A/ 045C	**Thermal Dryer** – ENI Eng. Co. Fluidized Bed Dryer rated at 130 MMBTU/hr Heat Input	600 tph 3,219,300 tpy	1985
Z01	FE	035	**Conveyor 16** – Belt from Thermal Dryer to Conveyor 17	600 tph 3,219,300 tpy	1985
Z01	FE	036	**Conveyor 17** – Belt from Conveyor 16 to Conveyor 18	600 tph 3,219,300 tpy	1985

Z01	FE	036B	**Conveyor 18** – Belt from Conveyor 17 to Conveyor 6	600 tph 3,219,300 tpy	1985
Clean Coal Circuit					
Z01	FE	013	**Conveyor 5** – Belt from Prep Plant to Conveyor 6	1,200 tph 5,978,700 tpy	Pre 1974
Z01	FE	056	**Conveyor 5a** – Belt from Conveyor 15 to Conveyor 5	600 tph 3,219,300 tpy	Pre 1974
Z01	FE	015	**Conveyor 6** – Belt from Conveyor 5 and Conveyor 18 to Conveyor 7 or Sample Conveyor 1	1,200 tph 9,198,000 tpy	Pre 1974
Z01	FE	057	**Sample Conveyor 1 -** Belt from Conveyor 6 to Sample Crusher	0.20 tph 1,752 tpy	2014
Z01	FE	058	**Sample Crusher**	0.20 tph 1,752 tpy	2014
Z01	FE	059	**Sample Conveyor 2**	0.20 tph 1,752 tpy	2014
Clean Coal Storage					
Z01	FE	017	**Clean Coal Silo 1** – Clean Coal storage silo from Conveyor 7 and transfers to Conveyor 13A; Storage capacity is 10,500 tons	3,500 tph 9,198,000 tpy	Pre 1974
Z01	FE	030	**Conveyor 7** – Belt from Conveyor 6 to Clean Coal Silo 2	1,200 tph 9,198,000 tpy	1981
Z01	FE	044	**Clean Coal Silo 2** – Clean Coal storage silo from Conveyor 6 and transfers to Conveyor 8; Storage capacity is 10,500 tons	3,500 tph 9,198,000 tpy	1981
Z01	FE	031	**Conveyor 13** – Belt from Clean Coal Silo 2 to Conveyor 8	3,500 tph 9,198,000 tpy	1981
Z01	FE	031A	**Conveyor 13A** – Belt from Clean Coal Silo 1 to Conveyor 8	3,500 tph 9,198,000 tpy	2006
Clean Coal Shipping by Truck and Railcar					
Z01	FE	018	**Conveyor 8** – Belt from Conveyor 13 and Conveyor 13A to Conveyor 8A or Conveyor 9	3,500 tph 9,198,000 tpy	Pre 1974/2006
Z01	PE	018A	**Conveyor 8a** – Belt from Conveyor 8 to Batch Weigh Loudout	3,500 tph 9,198,000 tpy	2014
Z01	FE	038B	**Batch Weight Loadout Bin (BWL)** –220 tons capacity	3,500 tph 9,198,000 tpy	2014
Z01	FE	032	**Conveyor 9** – Belt from Conveyor 8 to Unit Train Loadout 1	3,500 tph 9,198,000 tpy	Pre 1974 /2006/2014
Refuse Circuit					

Z01	FE	021	**Conveyor 10** – Course refuse belt from Prep Plant to Conveyor 11	500 tph 3,942,000 tpy	Pre 1974
Z01	FE	023	**Conveyor 11** – Course refuse belt from Conveyor 10 to Conveyor 12	500 tph 3,942,000 tpy	Pre 1974
Z01	FE	027A	**Refuse Bin 2** – Course refuse bin from Conveyor 14 to Pan Truck Loading	500 tph 3,942,000 tpy	Pre 1974
Z01	FE	025	**Conveyor 12** – Course refuse belt from Conveyor 11 to Conveyor 14 or Refuse Bin 1	500 tph 3,942,000 tpy	Pre 1974
Z01	FE	033	**Conveyor 14** – Course refuse belt from Conveyor 12 to Refuse Bin 2	500 tph 3,942,000 tpy	1983
Z01	FE	027	**Refuse Bin 1** – Course refuse belt from Conveyor 12 to Pan Truck Loading	500 tph 3,942,000 tpy	1983
Z01	MC	RSP-1	**Refuse Disposal Area (RDA)**	500 tph 3,942,000 tpy	Pre 1974
Haulroads					
Z01	WT	049A	Unpaved Haulroad	N/A	Pre 1974
Z01	WT	049B	Unpaved Haulroad	N/A	Pre 1974
Z01	WT	049C	Unpaved Haulroad	N/A	Pre 1974
Z01	WT	049D	Unpaved Haulroad	N/A	Pre 1974
Z01	WT	049E	Unpaved Haulroad	N/A	Pre 1974
Z01	WT	049F	Unpaved Haulroad	N/A	Pre 1974
Z01	WT	049G	Unpaved Haulroad	N/A	1993
Z01	WT	049H	Unpaved Haulroad	N/A	1993
VOC Emission Sources					
Z01	None	009B	Froth Floatation Cell	N/A	1985
P001	None	009	Vacuum Filter	N/A	1985
Z01	None	047	Thickener	N/A	1985
Z01	None	038A	Railcar Anti-Freeze Spray	N/A	Pre 1974
Z01	None	051C	Stoker Coal Anti-Freeze Spray	N/A	Pre 1974
Z01	None	S050A	No. 2 Diesel Fuel Storage Tank 1	5,000 Gallons	1985

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
Z01	None	**S050B**	No. 2 Diesel Fuel Storage Tank 2	3,000 Gallons	1985
Z01	None	**S050C**	No. 2 Diesel Fuel Storage Tank 3	3,000 Gallons	1985

Z01	None	**S050D**	No. 2 Diesel Fuel Storage Tank 4	1,000 Gallons	1985
Z01	None	**S050E**	Froth Flotation Agent Storage Tank 1	5,000 Gallons1	1985
Z01	None	**S050F**	Anionic Flocculant Storage Tank 1	1,000 Gallons	1985
Z01	None	**S050G**	Antifreeze Storage Tank 1	8,000 Gallons	1985
Z01	None	**S050H**	Antifreeze Storage Tank 2	8,000 Gallons	1985
Z01	None	**S050I**	Dustrol Storage Tank 1	1,600 Gallons	1985
Z01	None	**S050J**	Dustrol Storage Tank 2	1,600 Gallons	1985
Z01	None	**S050K**	30 wt. Motor Oil Storage Tank 1	580 Gallons	1985
Z01	None	**S050L**	30 wt. Motor Oil Storage Tank 2	580 Gallons	1985

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

[2]FE – Full Enclosure; PE – Partial Enclosure; WT – Water Truck; MC – Moisture Content; N – None.

ATTACHMENT E - Emission Unit Form

Emission Unit Description CLEAN COAL CIRCUIT

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
034;054;055;035;036;036B;013; 056;015;017;030;044;031;031A ;018;018A;038B;032, 057, 058, 059	Conveyor 15; Conveyor 42; Conveyor 44; Conveyor 16; Conveyor 17; Conveyor 18; Conveyor 5; Conveyor 5A; Conveyor 6; Clean Coal Silo 1; Conveyor 7; Clean Coal Silo 2; Conveyor 13; Conveyor13A; Conveyor 8; Conveyor 8A; Batch Weigh Loadout; Conveyor 9, Sample Conveyor 1, Sample Crusher, Sample Conveyor 2	See Attachment D

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Equipment used to transfer clean coal from the preparation plant to loadout.

Manufacturer:	**Model number:**	**Serial number:**
NA	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8760

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	Refer to facility-wide emissions summary	Refer to facility-wide emissions summary
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Not Applicable		
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See facility-wide emissions summary.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

___X_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description MISCELLANEOUS

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
046; 048; 009B; 009; 047; 38A; 051C; S050A-L	Lime Storage Silo 1; Rock Dust Silo 1; VOC- Froth flotation Cell; Vacuum Filter; Thickener; Railcar Anti-Freeze Spray; Stoker Coal Anti-Freeze Spray; Misc. Storage Tanks	See Attachment D

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Miscellaneous sources

Manufacturer:	**Model number:**	**Serial number:**
NA	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	Not Applicable

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8,760 hrs/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions

	PPH	TPY
Carbon Monoxide (CO)	See facility-wide emissions summary	See facility-wide emissions summary
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)		
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

___X_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all applicable requirements for this emission unit? <u>X</u> Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description RAW COAL CIRCUIT

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
001;005;006;008;002;052	Conveyor 1; Conveyor 3; Storage Bin 1; Conveyor 4; Conveyor 2; Conveyor 21	FE/PE – See Attachment D

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Transfer of raw coal from the mine to the preparation plant

Manufacturer:	**Model number:**	**Serial number:**
NA	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
NA	NA	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8760

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions

	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	See facility-wide emissions summary	See facility-wide emissions summary
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Not Applicable		
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See facility-wide emissions summary.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description REFUSE CIRCUIT

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
021;023;027A;025;033;027	Conveyor 10; Conveyor 11; Refuse Bin 2; Conveyor 12; Conveyor 14; Refuse Bin 1	FE/PE – See Attachment D

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Transfer of coal refuse

Manufacturer:	**Model number:**	**Serial number:**
NA	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
NA	See Attachment D	See Attachment D

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): See Attachment D

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	8760

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions

	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	See facility-wide emissions summary	See facility-wide emissions summary
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Not Applicable		
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See facility-wide emissions summary

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description Raw Coal Stockpile

Emission unit ID number: 003A	**Emission unit name:** Raw Coal Stockpile 1	**List any control devices associated with this emission unit.** See Attachment D
Provide a description of the emission unit (type, method of operation, design parameters, etc.): Raw coal stockpile		
Manufacturer: NA	**Model number:** NA	**Serial number:** NA
Construction date: 2005	**Installation date:** 2005	**Modification date(s):** Not Applicable
Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 450,000 tons		
Maximum Hourly Throughput: 3000	**Maximum Annual Throughput:** 13,140,000	**Maximum Operating Schedule:** 8,760 hrs/year.

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __Yes X No	**If yes, is it?** ___ Indirect Fired __Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	See facility-wide emissions summary	See facility-wide emissions summary
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Not Applicable		

Regulated Pollutants other than Criteria and HAP	Potential Emissions			
	Source	PPH	Source	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See facility-wide emission summary.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

_X_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description THERMAL DRYER

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
045A/045C	Thermal Dryer	Cyclones; Scrubber

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Coal fired fluidized bed thermal dryer at a coal preparation plant.

Manufacturer:	**Model number:**	**Serial number:**
ENI Engineering, Inc.	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
1985	1985	Not Applicable

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): 130 MMBtu/hr

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
See Attachment D	See Attachment D	See Attachment D

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? X Yes ___ No	**If yes, is it?** _X_ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: 130 MMBtu/hr	**Type and Btu/hr rating of burners:** Bigelow-Liptak 130 MMBtu/hr

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Coal: 4.35 tons/hr, 26,100 tons/yr
Coal Bed Methane: 130,000 cf/hr, 1,139 x 10^6 cf/yr
Propane: 500 gal/hr, 4.28 x 10^6 gallons/yr

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Coal	3.9% daily average 3.40% rolling 365 daily weighted average	8.64%	13,208 Btu/lb

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	57.6	172.8
Nitrogen Oxides (NO_X)	63.6	172.8
Lead (Pb)	1.94E-03	5.48E-03
Particulate Matter ($PM_{2.5}$)	40.0	120.0
Particulate Matter (PM_{10})	40.0	120.0
Total Particulate Matter (TSP)	40.0	120.0
Sulfur Dioxide (SO_2)	195.0	586.0
Volatile Organic Compounds (VOC)	135.6	406.8
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.). See facility-wide emissions summary		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or <u>construction permit</u> with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT E - Emission Unit Form

Emission Unit Description HAUL ROADS

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit:**
049A-H	Paved and ~~U~~unpaved haul roads	Water Truck Sprays

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
Unpaved haul roads

Manufacturer:	**Model number:**	**Serial number:**
NA	NA	NA

Construction date:	**Installation date:**	**Modification date(s):**
See Attachment D	See Attachment D	Not Applicable

Design Capacity (examples: furnaces - tons/hr, tanks - gallons): NA

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
NA	NA	8,760 hrs/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes X No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter ($PM_{2.5}$)	See facility-wide emissions summary	See facility-wide emissions summary
Particulate Matter (PM_{10})		
Total Particulate Matter (TSP)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Not Applicable		
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

See facility-wide emissions summary

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (*Note: Title V permit condition numbers alone are not the underlying applicable requirements*). If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Refer to the proposed Title V permit language in Attachment I for MCCC's suggested emission-unit specific applicable requirements and proposed compliance demonstration methods.

Are you in compliance with all applicable requirements for this emission unit? X Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F**.

ATTACHMENT G: AIR POLLUTION CONTROL DEVICE FORMS

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: NA	**List all emission units associated with this control device.** 045A/045C	
Manufacturer: NA	**Model number:** NA	**Installation date:** MM/DD/YYYY

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	X__ Other (describe) Caustic addition
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
Sulfur Dioxide	NA	NA

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Caustic is added to the wet coal which feeds the fluidizing bed of the thermal dryer.

Is this device subject to the CAM requirements of 40 C.F.R. 64? _ Yes _X__ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

N/A, caustic is applied when required as specified by the permit/

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: CYC1	**List all emission units associated with this control device.** 045A/C Thermal Dryer	
Manufacturer: NA	**Model number:** NA	**Installation date:** 1985

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter ___ Venturi Scrubber X__ Multiclone

___ Carbon Bed Adsorber ___ Packed Tower Scrubber ___ Single Cyclone

___ Carbon Drum(s) ___ Other Wet Scrubber ___ Cyclone Bank

___ Catalytic Incinerator ___ Condenser ___ Settling Chamber

___ Thermal Incinerator ___ Flare ___ Other (describe) _____

___ Wet Plate Electrostatic Precipitator ___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100	

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

NA

Is this device subject to the CAM requirements of 40 C.F.R. 64? _ Yes _X__ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

N/A

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: SCR1	**List all emission units associated with this control device.** 045A/C Thermal Dryer	
Manufacturer: NA	**Model number:** NA	**Installation date:** 1984

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	X__ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	___ Other (describe) _____
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
Particulate Matter	100	

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Is this device subject to the CAM requirements of 40 C.F.R. 64? X__ Yes ___ No

If Yes, **Complete ATTACHMENT H**

If No**, Provide justification.**

Describe the parameters monitored and/or methods used to indicate performance of this control device.
Refer to the suggested Title V permit language and the attached CAM plan.

ATTACHMENT H – COMPLIANCE ASSURANCE MONITORING FORM

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☐ YES ☒ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☐ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.

3) [a] BACKGROUND DATA AND INFORMATION					
Complete the following table for **all** PSEUs that need to be addressed in this CAM plan submittal. This section is to be used to provide background data and information for each PSEU In order to supplement the submittal requirements specified in 40 CFR §64.4. If additional space is needed, attach and label accordingly.					
PSEU DESIGNATION	DESCRIPTION	POLLUTANT	CONTROL DEVICE	[b] EMISSION LIMITATION or STANDARD	[c] MONITORING REQUIREMENT
N/A, an approved CAM plan is already in place for 045A/045C					
EXAMPLE Boiler No. 1	Wood-Fired Boiler	PM	Multiclone	45CSR§2-4.1.c.; 9.0 lb/hr	Monitor pressure drop across multiclone: Weekly inspection of multiclone

[a] If a control device is common to more than one PSEU, one monitoring plan may be submitted for the control device with the affected PSEUs identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a). If a single PSEU is controlled by more than one control device similar in design and operation, one monitoring plan for the applicable control devices may be submitted with the applicable control devices identified and any conditions that must be maintained or monitored in accordance with 40 CFR §64.3(a).

[b] Indicate the emission limitation or standard for any applicable requirement that constitutes an emission limitation, emission standard, or standard of performance (as defined in 40 CFR §64.1).

[c] Indicate the monitoring requirements for the PSEU that are required by an applicable regulation or permit condition.

CAM MONITORING APPROACH CRITERIA			
Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide monitoring data and information for EACH indicator selected for EACH PSEU in order to meet the monitoring design criteria specified in 40 CFR §64.3 and §64.4. if more than two indicators are being selected for a PSEU or if additional space is needed, attach and label accordingly with the appropriate PSEU designation, pollutant, and indicator numbers.			
4a) PSEU Designation:	**4b) Pollutant:**	**4c) [a] Indicator No. 1:**	**4d) [a] Indicator No. 2:**
5a) GENERAL CRITERIA Describe the MONITORING APPROACH used to measure the indicators:			
[b] Establish the appropriate INDICATOR RANGE or the procedures for establishing the indicator range which provides a reasonable assurance of compliance:			
5b) PERFORMANCE CRITERIA Provide the SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA, such as detector location, installation specifications, and minimum acceptable accuracy:			
[c] For new or modified monitoring equipment, provide VERIFICATION PROCEDURES, including manufacturer's recommendations, TO CONFIRM THE OPERATIONAL STATUS of the monitoring:			
Provide QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES that are adequate to ensure the continuing validity of the data, (i.e., daily calibrations, visual inspections, routine maintenance, RATA, etc.):			
[d] Provide the MONITORING FREQUENCY:			
Provide the DATA COLLECTION PROCEDURES that will be used:			
Provide the DATA AVERAGING PERIOD for the purpose of determining whether an excursion or exceedance has occurred:			

[a] Describe all indicators to be monitored which satisfies 40 CFR §64.3(a). Indicators of emission control performance for the control device and associated capture system may include measured or predicted emissions (including visible emissions or opacity), process and control device operating parameters that affect control device (and capture system) efficiency or emission rates, or recorded findings of inspection and maintenance activities.

[b] Indicator Ranges may be based on a single maximum or minimum value or at multiple levels that are relevant to distinctly different operating conditions, expressed as a function of process variables, expressed as maintaining the applicable indicator in a particular operational status or designated condition, or established as interdependent between more than one indicator. For CEMS, COMS, or PEMS, include the most recent certification test for the monitor.

[c] The verification for operational status should include procedures for installation, calibration, and operation of the monitoring equipment, conducted in accordance with the manufacturer's recommendations, necessary to confirm the monitoring equipment is operational prior to the commencement of the required monitoring.

[d] Emission units with post-control PTE ≥ 100 percent of the amount classifying the source as a major source (i.e., Large PSEU) must collect four or more values per hour to be averaged. A reduced data collection frequency may be approved in limited circumstances. Other emission units must collect data at least once per 24 hour period.

RATIONALE AND JUSTIFICATION

Complete this section for **EACH** PSEU that needs to be addressed in this CAM plan submittal. This section may be copied as needed for each PSEU. This section is to be used to provide rationale and justification for the selection of EACH indicator and monitoring approach and EACH indicator range in order to meet the submittal requirements specified in 40 CFR §64.4.

6a) PSEU Designation:	6b) Regulated Air Pollutant:

7) **INDICATORS AND THE MONITORING APPROACH**: Provide the rationale and justification for the selection of the indicators and the monitoring approach used to measure the indicators. Also provide any data supporting the rationale and justification. Explain the reasons for any differences between the verification of operational status or the quality assurance and control practices proposed, and the manufacturer's recommendations. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

8) **INDICATOR RANGES**: Provide the rationale and justification for the selection of the indicator ranges. The rationale and justification shall indicate how **EACH** indicator range was selected by either a COMPLIANCE OR PERFORMANCE TEST, a TEST PLAN AND SCHEDULE, or by ENGINEERING ASSESSMENTS. Depending on which method is being used for each indicator range, include the specific information required below for that specific indicator range. (If additional space is needed, attach and label accordingly with the appropriate PSEU designation and pollutant):

- COMPLIANCE OR PERFORMANCE TEST (Indicator ranges determined from control device operating parameter data obtained during a compliance or performance test conducted under regulatory specified conditions or under conditions representative of maximum potential emissions under anticipated operating conditions. Such data may be supplemented by engineering assessments and manufacturer's recommendations). The rationale and justification shall INCLUDE a summary of the compliance or performance test results that were used to determine the indicator range, and documentation indicating that no changes have taken place that could result in a significant change in the control system performance or the selected indicator ranges since the compliance or performance test was conducted.

- TEST PLAN AND SCHEDULE (Indicator ranges will be determined from a proposed implementation plan and schedule for installing, testing, and performing any other appropriate activities prior to use of the monitoring). The rationale and justification shall INCLUDE the proposed implementation plan and schedule that will provide for use of the monitoring as expeditiously as practicable after approval of this CAM plan, except that in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval.

- ENGINEERING ASSESSMENTS (Indicator Ranges or the procedures for establishing indicator ranges are determined from engineering assessments and other data, such as manufacturers' design criteria and historical monitoring data, because factors specific to the type of monitoring, control device, or PSEU make compliance or performance testing unnecessary). The rationale and justification shall INCLUDE documentation demonstrating that compliance testing is not required to establish the indicator range.

RATIONALE AND JUSTIFICATION:

ATTACHMENT I – SUGGESTED TITLE V TERMS

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified[1]	Maximum Design Capacity	Control Device[2]
		Raw Coal ~~Circuit~~			
001	Z01	**Conveyor 1** – Mine slope belt to Raw Coal Transfer Building	Pre 1974	3,000 tph 13,140,000 tpy~~3,000 TPH 26,280,000 TPY~~	FE
005	Z01	**Conveyor 3** – Belt from Raw Coal Transfer Building to Raw Coal Storage Bin 1	Pre 1974	3,000 tph 13,140,000 tpy~~3,000 TPH 26,280,000 TPY~~	FE
006	Z01	**Storage Bin 1** – Raw Coal storage silo from Conveyor 3 and transfers to Conveyor 42; Storage capacity is 15,000 tons	Pre 1974	1,500 tph 13,140,000 tpy~~2,000 TPH 17,520,000 TPY~~	FE
008	Z01	**Conveyor 4** – Belt ~~from Raw Coal Storage Bin 1~~Conveyor 2 to Prep Plant	Pre 1974	1,500 tph 13,140,000 tpy~~2,000 TPH 12,000,000 TPY~~	FE
002	Z01	**Conveyor 2** – Belt from Raw Coal Storage Bin 1 to ~~Prep Plant~~Conveyor 4	1989	1,500 tph 13,140,000 tpy~~3,000 TPH 900,000 TPY~~	FE
003A	Z01	**Raw Coal Stockpile 1** – Stockpile equipped with Stacking Tube 1~~ and Stacking Tube 2~~; Stockpile footprint is 20.5~~9.55~~ acres with a storage capacity of 450,000 tons	2005	3000 tph 26,280,000 tpy~~3,000 TPH 26,280,000~~	ST
052	Z01	**Conveyor 21** – Belt from Raw Coal Transfer Building to Raw Coal Stockpile 1~~ Stacking Tube 2~~	2005	3,000 tph 13,140,000 tpy~~3,000 TPH 12,000,000 TPY~~	FE
~~053~~	~~Z01~~	~~**Conveyor 22** – Belt from Raw Coal Stockpile 1 to Conveyor 4~~	~~2005~~	~~3,000 TPH 12,000,000 TPY~~	~~FE~~
~~007~~	~~Z01~~	~~**Raw Coal Stockpile 2** – Stockpile footprint is 3.8 acres with a storage capacity of 70,000 tons~~	~~1993~~	~~1,800 TPH 210,000 TPY~~	~~MC~~

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified[1]	Maximum Design Capacity	Control Device[2]
		~~**Stoker Coal Circuit**~~			
~~037~~	~~Z01~~	~~**Conveyor 19** – Belt from Prep Plant to Stoker Coal Truck Loadout~~	~~Pre 1974~~	~~300 TPH 1,800,000 TPY~~	~~FE~~
~~051A~~	~~Z01~~	~~**Conveyor 20** – Belt from Prep Plant to Stoker Coal Railcar Loadout~~	~~Pre 1974~~	~~300 TPH 1,800,000 TPY~~	~~FE~~
~~046~~	~~P003~~	~~**Lime Storage Silo 1**~~	~~Pre 1974~~	~~NA~~	~~None~~
~~048~~	~~P004~~	~~**Rock Dust Silo 1**~~	~~Pre 1974~~	~~NA~~	~~None~~
		Clean Coal ~~Thermal Dryer Circuit~~			
034	Z01	**Conveyor 15** – Belt from Prep Plant to Thermal Dryer 1	1985	600 tph 3,219,300 tpy~~600 TPH 3,600,000 TPY~~	FE
045A/045C	P002	**Thermal Dryer** – ENI Eng. Co. Fluidized Bed Dryer rated at 130 MMBTU/hr Heat Input	1985	600 tph 3,219,300 tpy~~Max. 600 TPH Normal 450 TPH 3,600,000 TPY~~	Horizontal Venturi Scrubber (SCR1)/ Cyclones (CYC1)
035	Z01	**Conveyor 16** – Belt from Thermal Dryer to Conveyor 17	1985	600 tph 3,219,300 tpy~~600 TPH 3,600,000 TPY~~	FE
036	Z01	**Conveyor 17** – Belt from Conveyor 16 to Conveyor 18	1985	600 tph 3,219,300 tpy~~600 TPH 3,600,000 TPY~~	FE
036B	Z01	**Conveyor 18** – Belt from Conveyor 17 to Conveyor 6	1985	600 tph 3,219,300 tpy~~600 TPH 3,600,000 TPY~~	FE
		~~**Clean Coal Circuit**~~			
013	Z01	**Conveyor 5** – Belt from Prep Plant to Conveyor 6	Pre 1974	1,200 tph 5,978,700 tpy~~1,800 TPH 10,800,000 TPY~~	FE

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified[1]	Maximum Design Capacity	Control Device[2]
056	Z01	**Conveyor 5A** – Belt from Conveyor 15 to Conveyor 5	1991	600 tph 3,219,300 tpy	FE
015	Z01	**Conveyor 6** – Belt from Conveyor 5 and Conveyor 18 to ~~Clean Coal Silo 1 or~~ Conveyor 7 or Sample Conveyor 1	Pre 1974	1,200 tph 9,198,000 tpy~~1,800 TPH 10,800,000 TPY~~	FE
057	Z01	**Sample Conveyor 1** – Belt from Conveyor 6 to Sample Crusher	2014	0.20 tph 1,752 tpy	FE
058	Z01	**Sample Crusher**	2014	0.20 tph 1,752 tpy	FE
059	Z01	**Sample Conveyor 2** – Belt from Sample Crusher to disposal	2014	0.20 tph 1,752 tpy	FE
054	Z01	**Conveyor 42** – Belt from conveyor 15 to conveyor 44	1985	600 tph 3,219,300 tpy	FE
055	Z01	**Conveyor 44** – Belt from conveyor 42 to thermal dryer	1985	600 tph 3,219,300 tpy	FE
		~~**Clean Coal Storage**~~			
017	Z01	**Clean Coal Silo 1** – Clean Coal storage silo from Conveyor 7~~6~~ and transfers to Conveyor 13A~~8~~; Storage capacity is 10,500 tons	Pre 1974	3,500 tph 9,198,000 tpy~~3,000 TPH 18,000,000 TPY~~	FE
030	Z01	**Conveyor 7** – Belt from Conveyor 6 to Clean Coal Silo 2 ~~or Conveyor 7A~~	1981	1,200 tph 9,198,000 tpy~~1,800 TPH 10,800,000 TPY~~	FE
044	Z01	**Clean Coal Silo 2** – Clean Coal storage silo from Conveyor 6 and transfers to Conveyor 8; Storage capacity is 10,500 tons	1981	3,500 tph 9,198,000 tpy~~3,000 TPH 18,000,000 TPY~~	FE
031	Z01	**Conveyor 13** – Belt from Clean Coal Silo 2 to Conveyor 8	1981	3,500 tph 9,198,000 tpy~~3,000 TPH 18,000,000 TPY~~	FE
~~030A~~	~~Z01~~	~~**Conveyor 7A** – Belt from Conveyor 7 to Clean Coal Silo 3~~	~~2006~~	~~1,800 TPH 10,800,000 TPY~~	~~FE~~

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified[1]	Maximum Design Capacity	Control Device[2]
~~044A~~	~~Z01~~	~~**Clean Coal Silo 3** – Clean Coal storage silo from Conveyor 6 and transfers to Conveyor 8; Storage capacity is 10,500 tons~~	~~2006~~	~~1,800 TPH in 3,000 TPH out 10,800,000 TPY~~	~~FE~~
031A	Z01	**Conveyor 13A** – Belt from Clean Coal Silo ~~3~~1 to Conveyor 8	2006	3,500 tph 9,198,000 tpy~~3,000 TPH 18,000,000 TPY~~	FE
		Clean Coal Shipping by Truck and Railcar			
018	Z01	**Conveyor 8** – Belt from Conveyor 13 and Conveyor 13A to Conveyor 8A or Conveyor 9~~Belt from Clean Coal Silo 1, Conveyor 13 and Conveyor 13A to Conveyor 8A or Conveyor 9~~	Pre 1974/ 2006	3,500 tph 9,198,000 tpy~~3,000 TPH 18,000,000 TPY~~	FE
018A	Z01	**Conveyor 8A** – Belt from Conveyor 8 to Batch Weigh Loadout	2014	3,500TPH 9,198,000 TPY	PE
038B	Z01	**Batch Weigh Loadout Bin(BWL)-** 220 tons capacity	2014	3,500TPH 9,198,000 TPY	FE
032	Z01	**Conveyor 9** – Belt from Conveyor 8 to Unit Train Loadout 1	Pre 1974/ 2006 Modified 2014	3, 500 TPH 9,198,000 TPY~~18,000,000 TPY~~	FE
		Refuse Circuit			
020	Z01	**Transfer Point 020** – Clean Coal Unit Train Loadout	Pre 1974	3,000 TPH 9,198,000 ~~18,000,000~~ TPY	PE
021	Z01	**Conveyor 10** – Coarse refuse belt from Prep Plant to Conveyor 11	Pre 1974	500 tph 3,942,000 tpy~~400 TPH 2,400,000 TPY~~	FE
023	Z01	**Conveyor 11-** Coarse refuse belt from Conveyor 10 to ~~Refuse Bin 2~~Conveyor 12	Pre 1974	500 tph 3,942,000 tpy~~400 TPH 2,400,000 TPY~~	FE

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified[1]	Maximum Design Capacity	Control Device[2]
027A	Z01	**Refuse Bin 2** – Coarse refuse bin from Conveyor 14~~1~~ to Pan Truck Loading	Pre 1974	500 tph 3,942,000 tpy~~400 TPH 2,400,000 TPY~~	FE
025	Z01	**Conveyor 12** – Coarse refuse belt from Conveyor 11 to Conveyor 14 or Refuse Bin 1	Pre 1974	500 tph 3,942,000 tpy~~400 TPH 2,400,000 TPY~~	FE
033	Z01	**Conveyor 14** – Coarse refuse belt from Conveyor 12 to Refuse Bin 2~~1~~	1983	500 tph 3,942,000 tpy~~400 TPH 2,400,000 TPY~~	FE
027	Z01	**Refuse Bin 1** – Coarse refuse belt from Conveyor 14~~2~~ to Pan Truck Loading	1983	500 tph 3,942,000 tpy~~400 TPH 2,400,000 TPY~~	FE
012	Z01	**Refuse Disposal Area (RDA)**	Pre 1974	500 tph 3,942,000 tpy~~400 TPH 2,400,000 TPY~~	MC
		Haulroads			
049A	Z01	Unpaved Haulroad	Pre 1974	NA	WT
049B	Z01	Unpaved Haulroad	Pre 1974	NA	WT
049C	Z01	Unpaved Haulroad	Pre 1974	NA	WT
049D	Z01	Unpaved Haulroad	Pre 1974	NA	WT
049E	Z01	Unpaved Haulroad	Pre 1974	NA	WT
049F	Z01	Unpaved Haulroad	Pre 1974	NA	WT
049G	Z01	Unpaved Haulroad	1993	NA	WT
049H	Z01	Unpaved Haulroad	1993	NA	WT
		VOC Emission Sources			
009B	Z01	Froth Floatation Cell	1985	NA	None
009	P001	Vacuum Filter	1985	NA	None
047	Z01	Thickener	1985	NA	None
038A	Z01	Railcar Anti-Freeze Spray	Pre 1974	NA	None
051C	Z01	Stoker Coal Anti-Freeze Spray	Pre 1974	NA	None

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/ Modified[1]	Maximum Design Capacity	Control Device[2]
S050A	Z01	No. 2 Diesel Fuel Storage Tank 1	1985	5,000 Gallons	None
S050B	Z01	No. 2 Diesel Fuel Storage Tank 2	1985	3,000 Gallons	None
S050C	Z01	No. 2 Diesel Fuel Storage Tank 3	1985	3,000 Gallons	None
S050D	Z01	No. 2 Diesel Fuel Storage Tank 4	1985	1,000 Gallons	None
S050E	Z01	Froth Flotation Agent Storage Tank 1	1985	5,000 Gallons	None
S050F	Z01	Anionic Flocculant Storage Tank 1	1985	1,000 Gallons	None
S050G	Z01	Antifreeze Storage Tank 1	1985	8,000 Gallons	None
S050H	Z01	Antifreeze Storage Tank 2	1985	8,000 Gallons	None
S050I	Z01	Dustrol Storage Tank 1	1985	1,600 Gallons	None
S050J	Z01	Dustrol Storage Tank 2	1985	1,600 Gallons	None
S050K	Z01	30 wt. Motor Oil Storage Tank 1	1985	580 Gallons	None
S050L	Z01	30 wt. Motor Oil Storage Tank 2	1985	580 Gallons	None
		Miscellaneous			
046	Z01	**Lime Storage Silo 1**	Pre 1974	N/A	None
048	Z01	**Rock Dust Silo 1**	Pre 1974	N/A	None
~~NA~~	~~None~~		~~Underground Mine~~	~~NA~~	~~Pre 1974~~

1 In accordance with 40 CFR 60 Subpart Y: all emissions from thermal dryers constructed, re-constructed or modified on or before April 28, 2008 shall be less than 20% opacity; coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems constructed, reconstructed, or modified on or before April 28, 2008 shall not discharge gases which exhibit 20 percent opacity or greater; and coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems constructed, reconstructed, or modified after April 28, 2008 shall not discharge gases which exhibit 10 percent opacity or greater.

2 PE – Partial Enclosure, FE – Full Enclosure, ST – Stacking Tube, WT – Water Truck, MC – Moisture Content.

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-0760H	April 7, 2017

2.0 General Conditions

2.1. Definitions

2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.

2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.

2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

2.2. Acronyms

CAAA	Clean Air Act Amendments	**NSPS**	New Source Performance Standards
CBI	Confidential Business Information	**PM**	Particulate Matter
CEM	Continuous Emission Monitor	**PM_{10}**	Particulate Matter less than 10μm in diameter
CES	Certified Emission Statement	**pph**	Pounds per Hour
C.F.R. *or* CFR	Code of Federal Regulations	**ppm**	Parts per Million
CO	Carbon Monoxide	**PSD**	Prevention of Significant Deterioration
C.S.R. *or* CSR	Codes of State Rules	**psi**	Pounds per Square Inch
DAQ	Division of Air Quality	**SIC**	Standard Industrial Classification
DEP	Department of Environmental Protection	**SIP**	State Implementation Plan
FOIA	Freedom of Information Act	**SO_2**	Sulfur Dioxide
HAP	Hazardous Air Pollutant	**TAP**	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	**TPY**	Tons per Year
HP	Horsepower	**TRS**	Total Reduced Sulfur
lbs/hr *or* lb/hr	Pounds per Hour	**TSP**	Total Suspended Particulate
LDAR	Leak Detection and Repair	**USEPA**	United States Environmental Protection Agency
m	Thousand	**UTM**	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	**VEE**	Visual Emissions Evaluation
mm	Million	**VOC**	Volatile Organic Compounds
mmBtu/hr	Million British Thermal Units per Hour		
$mmft^3$/hr *or* mmcf/hr	Million Cubic Feet Burned per Hour		
NA *or* N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9.]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.
[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.
[45CSR§30-5.8.a.]

2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
[45CSR§30-2.39]

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.
[45CSR§30-5.1.f.2.]

2.17. Emergency

2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
[45CSR§30-5.7.a.]

2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]

2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. The permitted facility was at the time being properly operated;

c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as “State-enforceable only” shall become “Federally-enforceable” requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0 Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person is prohibited except as noted in 45CSR§6-3.1. **[45CSR§6-3.1.]**

3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause or allow any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]

3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40 C.F.R. §61.145(b) and 45CSR34]

3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]

3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.2. Monitoring Requirements

3.2.1. None

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.

b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.

c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language.

2. The result of the test for each permit or rule condition.

3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code §§ 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:

a. The date, place as defined in this permit and time of sampling or measurements;

b. The date(s) analyses were performed;

c. The company or entity that performed the analyses;

d. The analytical techniques or methods used;

e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

[45CSR§30-5.1.c.2.A.; 45CSR13, R13-0760, 4.4.1]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]

3.5. Reporting Requirements

3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
[45CSR§§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
[45CSR§30-5.1.c.3.E.]

3.5.3. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, all notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Air Enforcement and Compliance Assistance (3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.
[45CSR§30-8.]

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.
[45CSR§30-5.3.e.]

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.
[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.
[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. None

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

a. None

4.0 Source-Specific Requirements

4.1. Limitations and Standards

4.1.1. The permittee shall not exceed the maximum hourly and annual throughput rates and other criteria outlined in the table in Section 1.0 Emission Units.
[45CSR13, R13-0760, 4.1.1]

4.1.2. Compliance with all hourly and annual throughput limits shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the amount of material received, processed, and/or shipped at any given time during the previous twelve (12) consecutive calendar months.
[45CSR13, R13-0760, 4.1.2]

4.1.3. Any and all records, such as throughput, hours of operation of the thermal dryer, SO_2 data, etc., shall be completed, certified and kept on site for a period of no less than five (5) years. Such records shall be made available to the Director or his or her duly authorized representative upon request.
[45CSR13, R13-0760, 4.1.3]

4.1.4. Emissions from the permitted fluidized bed coal dryer stack shall not exceed the following rates:

Pollutant	pounds/hour	tons/year
Particulate Matter (PM)[(1)]	40.0	120.0
Sulfur Dioxide (SO_2)	235.0	586.0
Nitrogen Oxides (NO_x)	63.6	190.8
Volatile Organic Compounds (VOC)	135.6	406.8
Carbon Monoxide (CO)	57.6	172.8

[(1)]All PM emissions are assumed to be $PM_{2.5}$ or smaller.

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

4.1.5. Operation of the thermal dryer shall be in accordance with the following requirements:

a. The furnace shall be limited to a maximum combustion rate of 4.35 tons-coal/hour and 26,100 tons-coal/year (rolling twelve month basis);

b. The furnace shall be limited to a maximum combustion rate of 130,000 cubic feet-coal bed methane or natural gas/hour and 1,139 x 10^6 cubic feet-coal bed methane or natural gas/year (rolling twelve month basis);

c. The furnace shall be limited to a maximum combustion rate of 500 gallons of propane per hour and 4.38 x 10^6 gallons of propane per year (rolling twelve month total).

d. The sulfur content of the coal fired in the furnace shall not exceed 3.90% by weight as based on a composite daily sample or a rolling 365 daily weighted average of 3.40% by weight as determined under 4.2.2.;

e. Coal combustion shall be limited to providing 120 MMBtu/hr heat input into the furnace.;

f. At all times coal combustion is providing over 90 MMBtu/hr heat input into the furnace a 20% solution of sodium hydroxide (NaOH) shall be sprayed downstream of the venturi scrubber to provide for additional SO_2 control;

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

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

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

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

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

a. Contain particulate matter in excess of 0.070 g/dscm (0.031 gr/dscf).

b. Exhibit 20 percent opacity or greater.

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

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

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

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

4.1.10. On and after the date on which the performance test is conducted or required to be completed under §60.8, whichever date comes first, an owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified on or before April 28, 2008, gases which exhibit 20 percent opacity or greater~~The permittee shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit 20 percent opacity or greater. The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard~~. *(002,*

052~~, 053~~, 034, 035, 036, 036B, 030, 054, 055, 031, ~~030A,~~ 044~~A~~, 031A, 018~~, 033, 027~~) **[40 C.F.R. §60.254(a); 45CSR13, R13-0760, ~~4.1.8 and~~ 4.1.18; 45CSR16; ~~40 C.F.R. §60.254(a); 45CSR§5-3.4~~]**

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

The spraybar shall be equipped with commercially available spray nozzles, of sufficient size and number, so as to provide adequate coverage to the area being treated. The pump delivering the water, or solution, shall be of sufficient size and capacity so as to be capable of delivering to the spray nozzle(s) an adequate quantity of water, or solution, and at a sufficient pressure, so as to assure that the treatment process will minimize the atmospheric entrainment of fugitive particulate emissions generated from the haulroads and work areas where mobile equipment is used.

The permittee shall properly install, operate and maintain designed winterization systems for all water trucks and/or water sprays in a manner that all such fugitive dust control systems remain functional during winter months and cold weather.
[45CSR13, R13-0760, 4.1.7]

4.1.12. **Opacity Limit.** 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. *(001, 002, 052, 034, 054, 055, 056, 057, 058, 059, 005, 006, 008~~, 037, 051A~~, 035, 036, 036B, ~~046, 048,~~ 013, 015, 017, 030, 044, 031, 031A, 018, 018A, 038B, 032, ~~020,~~ 021, 023, 027A, 025, 033,027)* **[45CSR13, R13-0760, 4.1.8; 45CSR§5-3.4]**

4.1.13. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. **[45CSR16; 40 C.F.R. §60.11d; 45CSR13, R13-0760, 4.1.16]**

4.1.14. In order to prevent and control air pollution from coal refuse disposal areas, the operation of coal refuse disposal areas shall be conducted in accordance with the standards established by the following:

a. Coal refuse is not to be deposited on any coal refuse disposal area unless the coal refuse is deposited in such a manner as to minimize the possibility of ignition of the coal refuse.

b. Coal refuse disposal areas shall not be so located with respect to mine openings, tipples or other mine buildings, unprotected coal outcrops or steam lines,that these external factors will contribute to the ignition of the coal refuse on such coal refuse disposal areas.

c. Vegetation and combustible materials shall not be left on the ground at the site where a coal refuse pile is to be established, unless it is rendered inert before coal refuse is deposited on such site.

d. Coal refuse shall not be dumped or deposited on a coal refuse pile known to be burning, except for the purpose of controlling the fire or where the additional coal refuse will not tend to ignite or where such dumping will not result in statutory air pollution.

e. Materials with low ignition points used in the production or preparation of coal, including, but not limited to, wood, brattice cloth, waste paper, rags, oil and grease, shall not be deposited on any coal refuse disposal area or in such proximity as will reasonably contribute to the ignition of a coal refuse disposal area.

f. Garbage, trash, household refuse and like materials shall not be deposited on or near any coal refuse disposal area.

g. The deliberate ignition of a coal refuse disposal area or the ignition of any materials on such an area by any person or persons is prohibited.

(012) **[45CSR§§5-7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8]**

4.1.15. Each burning coal refuse disposal area which allegedly causes air pollution shall be investigated by the Director in accordance with the following:

a. Each coal refuse disposal area which causes air pollution shall be considered on an individual basis by the Director. Consistent with the declaration of policy and purpose set forth in W. Va. Code §22-5-1, as well as the established facts and circumstances of the particular case, the Director shall determine and may order after a proper hearing the effectuation of those air pollution control measures which are adequate for each such coal refuse disposal area.

b. With respect to all burning coal refuse disposal areas, the person responsible for such coal refuse disposal areas or the land on which such coal refuse disposal areas are located shall use due diligence to control air pollution from such coal refuse disposal areas. Consistent with the declaration of policy and purpose set forth in W. Va. Code §22-5-1, as amended, the Director shall determine what constitutes due diligence with respect to each such burning coal refuse disposal area. When a study of any burning coal refuse disposal area by the Director establishes that air pollution exists or may be created, the person responsible for such coal refuse disposal area or the land on which such coal refuse disposal area is located shall submit to the Director a report setting forth satisfactory methods and procedures to eliminate, prevent, or reduce such air pollution. The report shall be submitted within such time as the Director shall specify. The report for the elimination, prevent or reduction of air pollution shall contain sufficient information, including completion dates, to establish that such program can be executed with due diligence. If approved by the Director, the corrective measures and completion dates shall be embodied in a consent order issued pursuant to W. Va. Code §§22-5-1 et seq. If such report is not submitted as requested or if the Director determines that the methods and procedures set forth in such report are not adequate to reasonably control such air pollution, then a hearing will be held pursuant to the procedures established by W. Va. Code §22-5.

(012) **[45CSR§§5-8.1, 8.2, 8.3]**

4.1.16 **Fugitive Dust Control System.** No person shall cause, suffer, allow or permit a coal preparation plant or handling operation to operate that is not equipped with a fugitive dust control system. This system shall be

operated and maintained in such a manner as to minimize the emission of particulate matter into the open air. All fugitive dust control systems shall remain functional year-round, to the maximum extent practicable, including winter months and cold weather. **[45CSR§5-6.1; 45CSR§30-12.7, 45CSR13, R13-0760, 4.1.9]**

4.1.17. **Dust Control.** The owner or operator of a coal preparation plant or handling operation shall maintain dust control of the premises and owned, leased or controlled access roads by paving, or other suitable measures. Good operating practices shall be observed in relation to stockpiling, car loading, breaking, screening and general maintenance to minimize dust generation and atmospheric entrainment. **[45CSR§5-6.2, 45CSR13, R13-0760, 4.2.10]**

4.1.18. No person shall construct, modify or relocate any coal preparation plant or coal handling operation without first obtaining a permit in accordance with the provisions of W. Va. Code §22-5-1 et seq. and the Director's rules for review and permitting of new or modified sources.
[45CSR§5-10.1, 45CSR13, R13-0760, 4.2.11]

4.1.19. **Operation and Maintenance of Air Pollution Control Equipment**. The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11, 45CSR13, R13-0760, 4.1.12]

4.1.20. At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Secretary thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Secretary may specify shall be conducted to determine compliance.
[45CSR§13-6.1, 45CSR13, R13-0760, 4.1.13]

4.1.21. The Secretary may suspend or revoke a permit or general permit registration if, after six (6) months from the date of issuance, the holder of the permit cannot provide the Secretary, at the Secretary's request, with written proof of a good faith effort that construction, modification, or relocation, if applicable, has commenced. Such proof shall be provided not later than thirty (30) days after the Secretary's request. If construction or modification of a stationary source is discontinued for a period of eighteen (18) months or longer, the Secretary may suspend or revoke the permit or general permit registration.
[45CSR§13-10.2, 45CSR13, R13-0760, 4.1.14]

4.1.22. The Secretary may suspend or revoke a permit or general permit registration if the plans and specifications upon which the approval was based or the conditions established in the permit are not adhered to. Upon notice of the Secretary's intent to suspend, modify or revoke a permit, the permit holder may request a conference with the Secretary in accordance with the provisions of W.Va Code § 22-5-5 to show cause why the permit or general permit registration should not be suspended, modified or revoked.
[45CSR§13-10.3, 45CSR13, R13-0760, 4.1.15]

4.1.23. **Standards for Particulate Matter.** On and after the date on which the performance test is conducted or required to be completed under §60.8, whichever date comes first, an owner or operator shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal constructed, reconstructed, or modified after April 28, 2008, must meet the requirements in paragraphs (b)(1) through (3) of this section. *[~~Conveyor CB8A(018A), Conveyor C9(032) and Batch Weigh Loadout Bin~~018A, 032, 038B, 057, 058, 059]*
[40CFR§60.254(b)]

(1) Except as provided in paragraph (b)(3) of this section, the owner or operator must not cause to be discharged into the atmosphere from the affected facility any gases which exhibit 10 percent opacity or greater.
[40CFR§60.254(b)(1)]

(2) The owner or operator must not cause to be discharged into the atmosphere from any mechanical vent on an affected facility gases which contain particulate matter in excess of 0.023 g/dscm (0.010 gr/dscf).
[40CFR§60.254(b)(2)]

(3) Equipment used in the loading, unloading, and conveying operations of open storage piles are not subject to the opacity limitations of paragraph (b)(1) of this section.
[40CFR§60.254(b)(3)]

Compliance with the 10 percent opacity limit of 40CFR§60.254(b)(1) shall demonstrate compliance with the less stringent opacity limit of 45CSR§5-3.4.

[45CSR13, R13-0760, 4.1.19 and 4.1.8; 45CSR16; 45CSR§5-3.4]

4.2. Monitoring Requirements

4.2.1. For the purposes of demonstrating compliance with maximum coal, coal bed methane, natural gas and propane usage limits set forth in 4.1.5.a, 4.1.5.b, and 4.1.5.c, the permittee shall maintain daily, monthly and rolling twelve month records of the amount of coal, coal bed methane, natural gas, and propane usage that is consumed by the furnace. An example form is supplied as Appendix B.
[45CSR13, R13-0760, 4.2.1]

4.2.2. For the purposes of demonstrating continuing compliance with the coal sulfur content limits given under 4.1.5.c, the permittee shall daily obtain a composite sample of coal to be combusted in the thermal dryer furnace. This sample shall be tested according to the appropriate test methods as approved in a protocol submitted pursuant to 3.3.1.c to determine the sulfur content of the coal. The annual sulfur content shall be calculated by using a weighted average of the daily sulfur content readings of the preceding 365 days. **[45CSR13, R13-0760, 4.2.2; 45CSR§10-8.2.c]**

4.2.3. The permittee shall install, evaluate, operate, and maintain instrumentation to measure the heat input into the furnace. **[45CSR13, R13-0760, 4.2.3]**

4.2.4. Instruments will be installed for continuously measuring the pH of the scrubber inlet water and effluent water and pH monitors will be installed in the operating room so that the dryer operator can maintain the necessary influent pH to attain the required minimum SO_2 removal efficiency. The pH monitoring devices shall be certified by the manufacturer to be accurate within 0.1 pH units. The pH of the scrubber inlet water and effluent water shall be maintained above 3.4. An excursion shall be defined as when the pH values of the scrubber inlet water and/or effluent water are below 3.4. When an excursion occurs, the permittee shall conduct an inspection of the scrubber and corrective action shall be taken to return the pH values to the operating range established during the performance testing. The instruments used to monitor the pH shall be recalibrated quarterly in accordance with the manufacturer's recommendations. **[45CSR13, R13-0760, 4.2.4; 45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(c), and 64.7(d)]**

4.2.5. [Reserved]

4.2.6. For the purpose of determining compliance with the opacity limits of 45CSR5 and 40 C.F.R. 60, Subpart Y, the permittee shall conduct visible emission checks and/or opacity monitoring for all emissions units subject to an opacity standard [*Except for the following: ~~Conveyor CB8A (~~018A~~)~~, ~~Conveyor C9 (~~032~~,)~~ ~~and Batch Weigh Loadout Bin BWL (~~018A, 032, 038B, 057, 058, 059~~038B)~~, which are subject to the certification of compliance requirements in 40 CFR§60.255(b) found in Section 4.3.6. of this permit*]:

a. An initial visible emissions evaluation in accordance with 40 CFR 60 Appendix A-4, Method 9 shall be performed within ninety (90) days of permit issuance for each emission unit with an opacity~~visible emissions~~ requirement in this permit unless such evaluation was performed within the consecutive 12-month period preceding permit issuance. This initial evaluation shall consist of three 6-minute averages during one consecutive 60 minute period. The initial evaluation shall be conducted at each emissions unit during the period of maximum expected visible emissions under normal unit and facility operations.

b. The permittee shall perform a visible emissions check on ~~E~~each emissions unit with an opacity requirement ~~visible emissions limit contained~~ in this permit ~~shall be observed visually~~ at least once each calendar week during periods of normal facility operation for a sufficient time interval to determine the presence of absence of visible emissions. ~~–~~ ~~–~~ ~~–~~At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 C.F.R. 60, Appendix A-7, Method 22 or from the lecture portion of the 40 C.F.R. 60, Appendix A-4, Method 9 certification course.

If visible emissions from any of the emissions units are observed during these weekly ~~observations~~checks, or at any other time, that appear to exceed 50 percent of the allowable ~~visible emission~~opacity requirement for the emission unit, a visible emissions evaluations in accordance with 40 CFR 60 Appendix A-4, Method 9 shall be conducted as soon as practicable, but no later than seventy-two (72) hours from the time of the observation. A Method 9 evaluation shall not be required if the visible emissions condition is corrected as expeditiously as possible, but no later than twenty-four (24) hours from the time of the ~~observation~~visible emissions check; the emissions unit is operating at normal operating conditions; and, the dates and times, causes and corrective measures taken are recorded.

c. If ~~the initial, or any subsequent, visible emissions evaluation~~a Method 9 evaluation is required and it indicates ~~visible emissions~~opacity in excess of 50 percent of the allowable visible emissions requirement for a given emission unit, ~~a visible emissions~~subsequent evaluations in accordance with 40 CFR 60 Appendix A-4, Method 9 shall be performed for that unit at least once every consecutive 14-day period. If the subsequent visible emissions evaluations indicate visible emissions less than or equal to 50 percent of the allowable visible emissions requirement for the emission unit for 3 consecutive evaluation periods, the ~~emission unit~~permittee may ~~comply with the visible emissions testing requirements in Section 4.2.6.b. of this permit in lieu of those established in this condition~~revert to weekly checks for that emission unit.

~~d. A visual emissions evaluation shall be conducted on all process and control equipment at least once each calendar month. If any deficiencies are observed, the necessary maintenance must be performed as expeditiously as possible.~~

e. A visible emissions evaluation shall be conducted for each emission unit at least once every consecutive 12-month period in accordance with 40 CFR 60 Appendix A-4, Method 9. This annual evaluation shall consist of a minimum of 24 consecutive observations for each emission unit.

f. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 22 or Method 9, whichever is appropriate. The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.

[45CSR13, R13-0760, 4.2.6; 45CSR§5-12.4]

4.2.7. The permittee shall install, calibrate, maintain, and continuously operate monitoring devices as follows [Note: The continuous monitoring required by this section shall be performed in accordance with 40 C.F.R. 60, Subpart A]:

a. ~~a.~~ A monitoring device for the measurement of the temperature of the gas stream at the exit of the thermal dryer on a continuous basis. The monitoring device is to be certified by the manufacturer to be accurate within ± 1.7 °C (± 3 °F).
[40 C.F.R § 60.256(a); 45CSR16; 40 C.F.R. §§64.6(c), 64.7(c) and 64.7(d)] [045A/C]

1. During normal operations, the temperature of the gas stream at the exit of the thermal dryer is maintained between 120 and 220 °F. A three-hour average temperature outside of this range shall be defined as an excursion. When an excursion occurs, the permittee shall conduct an inspection of the thermal dryer and corrective action shall be taken to return the temperature to an operating range of less than 220 °F and greater than 120 °F.
[40 C.F.R. § 64.6(c), 64.7(c) and 64.7(d)] [045A/C]

~~b. b. For affected facilities that use venturi scrubber emission control equipment:~~

~~c.~~

b. ~~(1)~~ A monitoring device for the continuous measurement of the pressure loss through the venturi constriction of the control equipment. The monitoring device is to be certified by the manufacturer to be accurate within ± 1 inch water gauge.
[40 C.F.R § 60.256(a); 45CSR16; 40 C.F.R. §§64.6(c), 64.7(c) and 64.7(d)] [045A/C]

1. During normal operations, the pressure loss through the venturi constriction of the scrubber is maintained between 26 and 40 inches of H2O. A three-hour average pressure loss outside of this range shall be defined as an excursion. When an excursion occurs, the permittee shall conduct an inspection of the venturi scrubber and corrective action shall be taken to return the pressure loss to an operating range of greater than 26 inches of H2O and less than 40 inches of H2O.
[40 C.F.R. § 64.6(c), 64.7(c) and 64.7(d)] [045A/C]

c. ~~(2)~~ A monitoring device for the continuous measurement of the water supply pressure to the control equipment. The monitoring device is to be certified by the manufacturer to be accurate within ± 5 percent of the design water supply pressure. The pressure sensor or tap must be located close to the water discharge point. The Administrator may be consulted for approval of alternative locations.
[40 C.F.R § 60.256(a); 45CSR16; 40 C.F.R. §§64.6(c), 64.7(c) and 64.7(d)] [045A/C]

1. During normal operations, the water pressure to the scrubber is maintained between 15 and 25 psi. A three-hour average water pressure outside of this range shall be defined as an excursion. When an excursion occurs, the permittee shall conduct an inspection of the venturi scrubber and corrective action shall be taken to return the water pressure to an operating range of greater than 15 psi and less than 25 psi.
[40 C.F.R. § 64.6(c), 64.7(c) and 64.7(d)] [045A/C]

[45CSR13, R13-0760, 4.2.7(1); 45CSR16; 40 C.F.R. §60.256(a)(1); 45CSR§30-5.1.c; 40 C.F.R. §§64.6(c), 64.7(c), and 64.7(d)]

4.2.8. All monitoring devices under 4.2.7 are to be recalibrated annually in accordance with procedures in 40 C.F.R. §60.13(b). **[45CSR13, R13-0760, 4.2.7(2); 45CSR16; 40 C.F.R. §60.256(a)(2)]**

4.2.9. **Proper maintenance (CAM).** At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **[45CSR§30-5.1.c. and 40C.F.R. §64.7(b)]** *(SCR1)*

4.2.10. **Continued operation (CAM).** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
[45CSR§30-5.1.c. and 40C.F.R. §64.7(c)] *(SCR1)*

4.2.11. **Response to excursions or exceedances (CAM).**

(1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[45CSR§30-5.1.c. and 40 C.F.R. §64.7(d)] *(SCR1)*

4.2.12 **Documentation of need for improved monitoring (CAM).** After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
[45CSR§30-5.1.c. and 40 C.F.R. §64.7(e)] *(SCR1)*

4.2.13. **Documentation of need for improved monitoring (CAM).** (a) After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(b) Elements of a QIP:

(1) The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

(2) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

(i) Improved preventive maintenance practices.

(ii) Process operation changes.

(iii) Appropriate improvements to control methods.

(iv) Other steps appropriate to correct control performance.

(v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (b)(2)(i) through (iv) of this section).

(c) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(d) Following implementation of a QIP, upon any subsequent determination pursuant to § 64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(e) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

[45CSR§30-5.1.c. and 40 C.F.R. §64.8] *(SCR1)*

4.3. Testing Requirements

4.3.1. [Reserved]

~~Within 60 days of permit issuance, the permittee shall conduct, or have conducted, in accordance with a protocol submitted pursuant to 3.3.1(e), a performance test on the thermal dryer to determine compliance with the emission limits as given under Table 4.1.4. The performance tests will be performed in accordance with the following:~~

~~a. The performance test shall be in accordance with a methodology proposed by the permittee in the protocol so that the test shall take place during firing conditions as close as possible to the maximum permitted furnace parameters as given under 4.1.5;~~

~~b. The permittee shall propose in the protocol a methodology for, if needed, scaling the performance test results to be valid for determining compliance with the emission limits given under Table 4.1.4. so as to account for firing conditions not reasonably close the maximum permitted furnace parameters as given under 4.1.5.; and~~

~~c. During any required compliance testing, the permittee shall install flow straightening devices in the stack of the fluidized bed thermal dryer to insure that cyclonic flow does not occur.~~

~~*"Note: MCCC performed stack testing on September 6 and 7, 2016 in accordance with the requirements of R13-0760F. This test satisfies the initial testing requirements in 4.3.1 of this permit."*~~

~~**[45CSR13, R13-0760, 4.3.1]**~~

4.3.2. -[Reserved]

4.3.3. For the purpose of demonstrating compliance with the particulate matter emission limits of 4.1.4 and 4.1.6 for the Thermal Dryer (045A/045C), the permittee shall conduct stack testing. All tests to determine compliance with exhaust gas dust concentrations and particulate matter mass emission rates shall be conducted in accordance with Methods 1-5 of 40 C.F.R. 60, Appendix A, provided that all compliance tests must consist of not less than three (3) test runs, and the sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf). Sampling shall begin no less than 30 minutes after startup and shall terminate before shutdown procedures begin.

Parameter indicator ranges shall be established for the exit temperature of the thermal dryer, water supply pressure to the control equipment, and the pressure loss through the venturi constriction of the scrubber. The permittee shall establish these indicator ranges and operate within these ranges to provide a reasonable assurance that the thermal dryer unit is in compliance with opacity and particulate loading limits. The permittee shall take immediate corrective action when a parameter falls outside the indicator range established for that parameter and shall record the cause and corrective measures taken. The permittee shall also record the following parameters during each testing:

a. Opacity readings on the exhaust stack following the procedures of Method 9;
b. Amount of coal burned and the amount of coal dried;
c. Coal drying temperature and residence time in the dryer;
d. Temperature of the gas stream at the exit of the thermal dryer;
e. Flow rate through the dryer and converted to dry standard cubic feet;
f. Water pressure to the control equipment; and
g. Pressure loss of the inlet air flow to the scrubber. The pressure drop will be measured between the inlet airflow to the scrubber and outlet airflow of the scrubber, which is atmospheric loss through the venturi constriction of the control equipment.

Subsequent testing to determine compliance with the particulate loading limitations of 4.1.4 and 4.1.6 shall be conducted in accordance with the schedule set forth in the following table:

Test	Test Results	Testing Frequency
Annual	If annual testing is required, after two successive tests indicate mass emission rates between 50 % and 90% of particulate loading limit	Once/3 years
Annual	If annual testing is required, after three successive tests indicate mass emission rates ≤ 50 % of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years, after two successive tests indicate mass emission rates ≤ 50 % of particulate loading limit	Once/5 years
Once/3 years	If testing is required once/3 years and any test indicates a mass emission rate ≥ 90 % of particulate loading limit	Annual
Once/5 years	If testing is required once/5 years and any test indicates mass emission rates between 50 % and 90 % of particulate loading limit	Once/3 years
Once/5 years	If testing is required once/5years and any test indicates a mass emission rate ≥ 90 % of particulate loading limit	Annual

These records shall be maintained on site.

Note: In the last stack testing performed on September 6-7, 2016, the average particulate matter emission rates were 19.36lb/hr and 0.013gr/dscf, which are less than 50 % of the 4.1.4 hourly particulate matter emission limit of 40 lb/hr and the 4.1.6 40 C.F.R. 60, Subpart Y limit of 0.031gr/dscf. Therefore, subsequent stack testing for the Thermal Dryer (045A/045C) must be conducted on or before September 7, 2021.

The current parameter indicator ranges are as follows:

a. Temperature of the gas stream at the exit of the Thermal Dryer: 120 - 220 °F.
b. Pressure loss through the venturi constriction of the Scrubber: 26 – 40 inches of H_2O.
c. Water supply pressure to the Scrubber: 15 - 25 psi.

[45CSR§5-12.1; 45CSR16; 40 C.F.R. §60.257(b); 45CSR§30-5.1.c]

4.3.4. To demonstrate compliance with the emission limits of 4.1.4 for the Thermal Dryer (045A/045C), the permittee shall conduct performance test(s) for SO_2, NO_x, VOC, and CO at least once every 5 years. Testing shall be conducted in accordance with 3.3.1. **[45CSR§30-5.1.c; 45CSR§5-12.2; 45CSR§§10-8.1.a and 8.1.b]**

4.3.5 **Performance Tests and Other Compliance Requirements-NSPS Subpart Y.** An owner or operator of each affected facility that commenced construction, reconstruction, or modification on or before April 28, 2008, must conduct performance tests required by § 60.8 to demonstrate compliance with the applicable emission standards using the methods identified in § 60.257.
[40 CFR§ 60.255(a), 45CSR16, 45CSR13, R13-0760, 4.3.4]

4.3.6. **Performance Tests and Other Compliance Requirements-NSPS Subpart Y.** An owner or operator of each affected facility that commenced construction, reconstruction, or modification after April 28, 2008 [*018A, 032, 038B, 057, 058, 059*~~CB8A (018A), Conveyor C9 (032) and Batch Weigh Loadout Bin~~], must conduct performance tests according to the requirements of §60.8 and the methods identified in §60.257 to demonstrate compliance with the applicable emission standards in Subpart Y as specified in paragraphs (b)(1) and (b)(2) of this section.
[40CFR§60.255(b)]

(1) For each affected facility subject to a PM, SO_2, or combined NO_X and CO emissions standard, an initial performance test must be performed. Thereafter, a new performance test must be conducted according the requirements in paragraphs (b)(1)(i) through (iii) of this section, as applicable.
[40CFR§60.255(b)(1)]

(i) If the results of the most recent performance test demonstrate that emissions from the affected facility are greater than 50 percent of the applicable emissions standard, a new performance test must be conducted within 12 calendar months of the date that the previous performance test was required to be completed.
[40CFR§60.255(b)(1)(i)]

(ii) If the results of the most recent performance test demonstrate that emissions from the affected facility are 50 percent or less of the applicable emissions standard, a new performance test must be conducted within 24 calendar months of the date that the previous performance test was required to be completed.

[40CFR§60.255(b)(1)(ii)]

(iii) An owner or operator of an affected facility that has not operated for the 60 calendar days prior to the due date of a performance test is not required to perform the subsequent performance test until 30 calendar days after the next operating day.
[40CFR§60.255(b)(1)(iii)]

(2) For each affected facility subject to an opacity standard, an initial performance test must be performed. Thereafter, a new performance test must be conducted according to the requirements in paragraphs (b)(2)(i) through (iii) of this section, as applicable, except as provided for in paragraphs (e) and (f) of this section. Performance test and other compliance requirements for coal truck dump operations are specified in paragraph (h) of this section.
[40CFR§60.255(b)(2)]

(i) If any 6-minute average opacity reading in the most recent performance test exceeds half the applicable opacity limit, a new performance test must be conducted within 90 operating days of the date that the previous performance test was required to be completed.
[40CFR§60.255(b)(2)(i)]

(ii) If all 6-minute average opacity readings in the most recent performance are equal to or less than half the applicable opacity limit, a new performance test must be conducted within 12 calendar months of the date that the previous performance test was required to be completed.
[40CFR§60.255(b)(2)(ii)]
[45CSR13, R13-0760, 4.3.5, 45CSR16]

4.3.7. **Performance Tests and Other Compliance Requirements for Subpart Y.** If any affected coal processing and conveying equipment (e.g., breakers, crushers, screens, conveying systems), coal storage systems, or other coal transfer and loading systems that commenced construction, reconstruction, or modification after April 28, 2008, are enclosed in a building and emissions from the building do not exceed any of the standards in §60.254 that apply to the affected facility, then the facility shall be deemed to be in compliance with such standards.
[40CFR§60.255(c), 45CSR16, 45CSR13, R13-0760, 4.3.6]

4.3.8. Reserved

4.3.9. Reserved

4.3.10. **Performance Tests and Other Compliance Requirements for Subpart Y - Monitoring Visible Emissions or Digital Opacity Compliance System.** As an alternative to meeting the requirements in paragraph (b)(2) of this section *[see permit condition 4.3.6. above]*, an owner or operator of an affected facility that commenced construction, reconstruction, or modification after April 28, 2008, may elect to comply with the requirements in paragraph (f)(1) or (f)(2) of this section.
[40CFR§60.255(f)]

(1) Monitor visible emissions from each affected facility according to the requirements in paragraphs (f)(1)(i) through (iii) of this section.
[40CFR§60.255(f)(1)]

(i) Conduct one daily 15-second observation each operating day for each affected facility (during normal operation) when the coal preparation and processing plant is in operation. Each observation must be recorded as either visible emissions observed or no visible emissions observed. Each observer determining the presence of visible emissions must meet the training

requirements specified in §2.3 of Method 22 of appendix A-7 of this part. If visible emissions are observed during any 15-second observation, the owner or operator must adjust the operation of the affected facility and demonstrate within 24 hours that no visible emissions are observed from the affected facility. If visible emissions are observed, a Method 9, of appendix A-4 of this part, performance test must be conducted within 45 operating days.
[40CFR§60.255(f)(1)(i)]

(ii) Conduct monthly visual observations of all processes and control equipment. If any deficiencies are observed, the necessary maintenance must be performed as expeditiously as possible.
[40CFR§60.255(f)(1)(ii)]

(iii) Conduct a performance test using Method 9 of Appendix A-4 of this part at least once every 5 calendar years for each affected facility.
[40CFR§60.255(f)(1)(iii)]

(2) Prepare a written site-specific monitoring plan for a digital opacity compliance system for approval by the Administration or delegated authority. The plan shall require observations of at least one digital image every 15 seconds for 10-minute periods (during normal operation) every operating day. An approvable monitoring plan must include a demonstration that the occurrences of visible emissions are not in excess of 5 percent of the observation period. For reference purposes in preparing the monitoring plan, *see* OAQPS "Determination of Visible Emission Opacity from Stationary Sources Using Computer-Based Photographic Analysis Systems." This document is available from the U.S. Environmental Protection Agency (U.S. EPA); Office of Air Quality and Planning Standards; Sector Policies and Programs Division; Measurement Group (D243-02), Research Triangle Park, NC 27711. This document is also available on the Technology Transfer Network (TTN) under Emission Measurement Center Preliminary Methods. The monitoring plan approved by the Administrator delegated authority shall be implemented by the owner or operator.
[40CFR§60.255(f)(2)]
[45CSR13, R13-0760, 4.3.7, 45CSR16]

4.3.11. **Performance Tests and Other Compliance Requirements for Subpart Y - COMS.** As an alternative to meeting the requirements in paragraph (b)(2) of this section *[see permit condition 4.3.6. above]*, an owner or operator of an affected facility that commenced construction, reconstruction, or modification after April 28, 2008, subject to a visible emissions standard under this subpart may install, operate, and maintain a continuous opacity monitoring system (COMS). Each COMS used to comply with provisions of this subpart must be installed, calibrated, maintained, and continuously operated according to the requirements in paragraphs (g)(1) and (2) of this section.
[40CFR§60.255(g), 45CSR13, 45CSR16, R13-0760, 4.3.8]

4.3.12. **Coal Truck Dump Operations.** The owner or operator of each affected coal truck dump operation that commenced construction, reconstruction, or modification after April 28, 2008, must meet the requirements specified in paragraphs (h)(1) through (3) of this section.
[40CFR§60.255(h)]

(1) Conduct an initial performance test using Method 9 of appendix A–4 of this part according to the requirements in paragraphs (h)(1)(i) and(ii).
[40CFR§60.255(h)(1)]

(i) Opacity readings shall be taken during the duration of three separate truck dump events. Each truck dump event commences when the truck bed begins to elevate and concludes when the truck bed returns to a horizontal position.
[40CFR§60.255(h)(1)(i)]

(ii) Compliance with the applicable opacity limit is determined by averaging all 15-second opacity readings made during the duration of three separate truck dump events.
[40CFR§60.255(h)(1)(ii)]

(2) Conduct monthly visual observations of all process and control equipment. If any deficiencies are observed, the necessary maintenance must be performed as expeditiously as possible.
[40CFR§60.255(h)(2)]

(3) Conduct a performance test using Method 9 of appendix A–4 of this part at least once every 5 calendar years for each affected facility.
[40CFR§60.255(h)(3)]
[45CSR13, R13-0760, 4.3.9, 45CSR16]

4.3.13 **Test Methods and Procedures for Subpart Y.** The owner or operator must determine compliance with the applicable opacity standards as specified in paragraphs (a)(1) through (3) of this section.
[40CFR§60.257(a)]

(1) Method 9 of appendix A-4 of this part and the procedures in § 60.11 must be used to determine opacity, with the exceptions specified in paragraphs (a)(1)(i) and (ii).

[40CFR§60.257(a)(1)]

(i) The duration of the Method 9 of appendix A-4 of this part performance test shall be 1 hour (ten 6-minute averages).

[40CFR§60.257(a)(1)(i)]

(ii) If, during the initial 30 minutes of the observation of a Method 9 of appendix A-4 of this part performance test, all of the 6-minute average opacity readings are less than or equal to half the applicable opacity limit, then the observation period may be reduced from 1 hour to 30 minutes.
[40CFR§60.257(a)(1)(ii)]

(2) To determine opacity for fugitive coal dust emissions sources, the additional requirements specified in paragraphs (a)(2)(i) through (iii) must be used.

[40CFR§60.257(a)(2)]

(i) The minimum distance between the observer and the emission source shall be 5.0 meters (16 feet), and the sun shall be oriented in the 140-degree sector of the back.

[40CFR§60.257(a)(2)(i)]

(ii) The observer shall select a position that minimizes interference from other fugitive coal dust emissions sources and make observations such that the line of vision is approximately perpendicular to the plume and wind direction.

[40CFR§60.257(a)(2)(ii)]

(iii) The observer shall make opacity observations at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. Water vapor is not considered a visible emission. **[40CFR§60.257(a)(2)(iii)]**

(3) A visible emissions observer may conduct visible emission observations for up to three fugitive, stack, or vent emission points within a 15-second interval if the following conditions specified in paragraphs (a)(3)(i) through (iii) of this section are met.

[40CFR§60.257(a)(3)]

(i) No more than three emissions points may be read concurrently.
[40CFR§60.257(a)(3)(i)]

(ii) All three emissions points must be within a 70 degree viewing sector or angle in front of the observer such that the proper sun position can be maintained for all three points.

[40CFR§60.257(a)(3)(ii)]

(iii) If an opacity reading for any one of the three emissions points is within 5 percent opacity from the applicable standard (excluding readings of zero opacity), then the observer must stop taking readings for the other two points and continue reading just that single point.

[40CFR§60.257(a)(3)(iii)]

[45CSR13, R13-0760, 4.3.10, 45CSR16]

4.3.14. **Test Methods and Procedures for Subpart Y.** The owner or operator must conduct all performance tests required by §60.8 to demonstrate compliance with the applicable emissions standards specified in §60.252 according to the requirements in §60.8 using the applicable test methods and procedures in paragraphs (b)(1) through (8) of this section.
[40CFR§60.257(b), 45CSR13, R13-0760, 4.3.11, 45CSR16]

4.3.15 Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, or at such other times specified by this part, the owner or operator of such facility shall conduct performance test(s) and furnish a written report of the results of such performance test(s).
[40CFR§60.8(a), 45CSR16, 45CSR13, R13-0760, 4.3.3]

4.4. Recordkeeping Requirements

4.4.1. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0 of this permit, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures. **[45CSR13, R13-0760, 4.4.2]**

4.4.2. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0 of this permit, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

a. The equipment involved.

b. Steps taken to minimize emissions during the event.

c. The duration of the event.

d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

e. The cause of the malfunction.

f. Steps taken to correct the malfunction.

g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

[45CSR13, R13-0760, 4.4.3]

4.4.3. The permittee shall maintain records of all monitoring data required by Section 4.2.6 of this permit by documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80 ºF, 6-10 mph NE wind) during the visual emission check(s). An example form is supplied as Appendix A. Should a visible emission observation be required to be performed per the requirements specified in Method 9, the data records of each observation shall be maintained per the requirements of Method 9. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent. **[45CSR13, R13-0760, 4.4.4]**

~~4.4.4. The temperature of the gas stream at the exit of the thermal dryer shall be continuously recorded on a chart recorder and manually recorded at least once every 12 hours. Records shall be maintained in accordance with 3.4.1. In addition to records of the gas stream temperature, the permittee shall document and maintain records of all periods when the temperature falls outside the range specified in 4.2.7.a and any corrective actions taken during these periods. Maintenance and malfunction records for the thermal dryer and venturi scrubber shall be maintained in accordance with 4.4.1 and 4.4.2. *(045A/045C)* **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**~~

~~4.4.5. The pressure loss through the venturi constriction of the scrubber shall be continuously recorded on a chart recorder and manually recorded at least once every 12 hours. Records shall be maintained in accordance with 3.4.1. In addition to records of the pressure loss, the permittee shall document and maintain records of all periods when the pressure loss through the venturi constriction of the scrubber falls outside the range~~

~~specified in 4.2.7.b(1) and any corrective actions taken during these periods. Maintenance and malfunction records for the venturi scrubber shall be maintained in accordance with 4.4.1 and 4.4.2. *(045A/045C)* **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**~~

~~4.4.6. The water supply pressure to the scrubber shall be continuously recorded on a chart recorder and manually recorded at least once every 12 hours. Records shall be maintained in accordance with 3.4.1. In addition to records of the water supply pressure to the scrubber, the permittee shall document and maintain records of all periods when the water supply pressure falls outside the range specified in 4.2.7.b(2) and any corrective actions taken during these periods. Maintenance and malfunction records for the venturi scrubber shall be maintained in accordance with 4.4.1 and 4.4.2. *(045A/045C)* **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**~~

4.4.7. The pH of the scrubber inlet water and effluent water shall be continuously recorded ~~on a chart recorder and manually recorded at least once every 12 hours~~using the digital data logger. Records shall be maintained in accordance with 3.4.1. In addition to records of the pH of the scrubber inlet water and effluent water, the permittee shall document and maintain records of all periods when the pH of the scrubber inlet water and effluent water falls outside the range established in 4.2.4 and any corrective actions taken during these periods. Maintenance and malfunction records for the venturi scrubber shall be maintained in accordance with 4.4.1 and 4.4.2. *(045A/045C)* **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**

4.4.8. For Compliance Assurance Monitoring (CAM), the owner or operator shall comply with the recordkeeping requirements of permit conditions 3.4.1 and 3.4.2. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. 64 (such as data used to document the adequacy of monitoring, or records of monitoring, maintenance, or corrective actions). *(045A/045C)* **[45CSR§30-5.1.c; 40 C.F.R. §64.9(b)]**

4.4.9. The permittee shall maintain a record of all monitoring data used to prepare the quarterly "Monitoring Summary, Excursion and Monitoring Plan Performance Report" required under Condition 4.5.4. Such records shall be maintained in accordance with 4.4.1 and 4.4.2. **[45CSR§10-8.3.a]**

4.4.10. The permittee shall inspect all fugitive dust control systems weekly to ensure that they are operated and maintained in conformance with their designs. The permittee shall maintain records of such inspections and of all scheduled and non-scheduled maintenance. Records shall be maintained stating any maintenance or corrective actions taken as a result of the weekly inspections, and the times the fugitive dust control system(s) are inoperable and any corrective actions taken. **[45CSR§30-5.1.c]**

4.4.11. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility. **[45CSR§30-5.1.c]**

4.5. Reporting Requirements

4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observation using 40 C.F.R. 60, Appendix A, Method 9 must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of

emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned. **[45CSR13, R13-0760, 4.5.1]**

4.5.2. For CAM, monitoring reports shall be submitted to the director and at a minimum shall include and be in accordance with information in permit conditions 3.5.6 and 3.5.8, as applicable. Also, at a minimum, the following information, as applicable, shall be included:

a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

c. A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(045A/045C) **[40 C.F.R. §64.9(a); 45CSR§30-5.1.c]**

4.5.3. On a quarterly basis, the permittee shall prepare and submit a report titled "Monitoring Summary, Excursion and Monitoring Plan Performance Report" detailing the status of compliance with the 2,000 ppm_v sulfur dioxide emission limit in Condition 4.1.9. The report shall provide the volumetric flow rate of the thermal dryer's exhaust fan (SCFM), the hours of operation of the thermal dryer (hours/month), the total coal burned (tons/month and tons/hour), the percent sulfur in the coal (%S as determined by Condition 4.2.2), calculated SO_2 emissions (lb/hr and ppm_v), shall state whether the source was in compliance with the 2,000 ppm_v limit for the month, and shall indicate any excursions which occurred during each month. **[45CSR§30-5.1.c; 45CSR§10-8.3.b]**

4.5.4. Any violation(s) of the allowable SO_2 requirements in Section 4.1.4 of this permit and recorded in Appendix B~~A~~ must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days, of the occurrence and shall include, at a minimum, the following information: the results of the testing, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
[45CSR13, R13-0760, 4.5.2]

4.5.5. With regard to any testing required by the Director, the permittee shall submit to the Director of Air Quality and the Associate Director - Office of Enforcement and Permit Review (3AP12) of the U.S. EPA a test protocol detailing the proposed test methods, the date, and the time the proposed testing is to take place, as well as identifying the sampling locations and other relevant information. The test protocol must be received by the Director and the Associate Director no less than thirty (30) days prior to the date the testing is to take place. Test results shall be submitted to the Director and the Associate Director no more than sixty (60) days after the date the testing takes place.
[45CSR13, R13-0760, 4.5.3]

4.5.6. **Notification and Record Keeping.** Any owner or operator subject to the provisions of this part shall

furnish written notification as follows:
[40CFR§60.7(a)]

(1) A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date.
[40CFR§60.7(a)(1)]

(3) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
[40CFR§60.7(a)(3)]

[45CSR13, R13-0760, 4.5.4, 45CSR16]

4.5.7. The owner or operator of a coal preparation and processing plant that commenced construction, reconstruction, or modification after April 28, 2008, shall maintain in a logbook (written or electronic) on-site and make it available upon request. The logbook shall record the following:
[40CFR§60.258(a)]

(2) The date and time of periodic coal preparation and processing plant visual observations, noting those sources with visible emissions along with corrective actions taken to reduce visible emissions. Results from the actions shall be noted.
[40CFR§60.258(a)(2)]

(3) The amount and type of coal processed each calendar month.
[40CFR§60.258(a)(3)]
[45CSR13, R13-0760, 4.5.5, 45CSR16]

4.5.8 (b) For the purpose of reports required under section 60.7(c), any owner operator subject to the provisions of this subpart also shall report semiannually periods of excess emissions as follow:

[40CFR§60.258(b)]

(3) All 6-minute average opacities that exceed the applicable standard.

[40CFR§60.258(b)(3)]

[45CSR13, R13-0760, 4.5.6, 45CSR16]

4.5.9 **Reporting for Subpart Y - Results of Initial Performance Tests.** The owner or operator of an affected facility shall submit the results of initial performance tests to the Administrator or delegated authority, consistent with the provisions of section 60.8. The owner or operator who elects to comply with the reduced performance testing provisions of sections 60.255(c) or (d) shall include in the performance test report identification of each affected facility that will be subject to the reduced testing. The owner or operator electing to comply with section 60.255(d) shall also include information which demonstrates that the control devices are identical.
[40CFR§60.258(c), 45CSR16, 45CSR13, R13-0760, 4.5.7]

4.5.10 **Reporting for Subpart Y - WebFIRE Data Base.** After July 11, 2011, within 60 days after the date of completing each performance evaluation conducted to demonstrate compliance with this subpart, the owner or operator of the affected facility must submit the test date to EPA by successfully entering the data

electronically into EPA's WebFIRE data base available at http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main. For performance tests that cannot be entered into WebFIRE (i.e. Method 9 of appendix A-4 of this part opacity performance tests) the owner or operator of the affected facility must mail a summary copy to United States Environmental Protection Agency; Energy Strategies Group; 109 TW Alexander DR; mail code D243-01; RTP, NC 27711.
[40CFR§60.258(d), 45CSR16, 45CSR13, R13-0760, 4.5.8]

4.6. Compliance Plan

Appendix A
Weekly Opacity Record

The Marion County Coal Company
Marion County Preparation Plant
Company ID No. 049-00019
Permit No. R13-0760G

Date of Observation:
Datea Entered by:
Reviewed by:
Date Reviewed:
Describe the General Weather Conditions:

Stack ID/Vent ID/ Emission Point ID	Stack/Vent/Emission Point Description	Time of Observation	Visible Emissions? Yes/No	Consecutive weeks of Visual Emissions	Comments

Appendix B[1]

Certified Daily and Monthly Amount of Coal, Coal Bed Methane, Natural Gas, and Propane Burned in the Thermal Dryer

Month: Year:

Day of Month	Coal			Coal Bed Methane		Natural Gas		Propane		Initials
	tons	hours	% Sulfur Content	scf	hours	scf	hours	scf	hours	
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
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19										
20										
21										
22										
23										
24										
25										
26										
27										
28										
29										
30										
31										
Monthly total			XXXXX							
12 Month Rolling Total[2]			XXXXX							

(1) The CERTIFICATION OF DATA ACCURACY statement appearing on the reverse side shall be completed within fifteen (15) days of the end of the reporting period. All records shall be kept on site for no less than five (5) years and shall be made available to the Secretary or his or her duly authorized representative upon request.

(2) The 12 Month Rolling Total shall mean, for example, the sum of coal burned by the thermal dryer at any given time during the previous twelve (12) consecutive calendar months. The maximum permitted 12 Month Rolling totals are as follows: Coal – 26,100 tons; Coal Bed Methane – 1,139 x 10^6 scf; Natural Gas – 1,139 x 10^6 scf; and Propane – 4.38 x10^6 gallons.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature[1] _____ _____
(please use blue ink)

Name and Title _____ _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

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[1] This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:

   (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding $25 million (in second quarter 1980 dollars), or

   (ii) the delegation of authority to such representative is approved in advance by the Director;

b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;

c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or

d. The designated representative delegated with such authority and approved in advance by the Director.

APPENDIX 1 – POTENTIAL EMISSIONS CALCULATIONS

Table 1. Facility Emissions Summary

POTENTIAL EMISSIONS

	PM (tpy)	PM_{10} (tpy)	$PM_{2.5}$ (tpy)	VOC (tpy)	SO_2 (tpy)	NO_X (tpy)	CO (tpy)	HAPs (tpy)	CO_2 (tpy)	CH_4 (tpy)	N_2O (tpy)	CO_2e (tpy)
Transfers	66.4	31.4	4.8	--	--	--	--	--	--	--	--	--
Roads	258.7	74.7	7.5	--	--	--	--	--	--	--	--	--
Piles	11.3	5.7	5.7	--	--	--	--	--	--	--	--	--
Misc	--	--	--	187.2	--	--	--	--	--	--	--	--
Thermal Dryer	120.0	120.0	120.0	406.8	586.0	190.8	172.8	6.9	79,490	8.7	1.3	80,092
Facility Wide PTE (w/o roads)	**197.7**	**157.1**	**130.4**	**594.0**	**586.0**	**190.8**	**172.8**	**6.9**	**79,490**	**9**	**1.3**	**80,092**
Facility Wide PTE	**456.4**	**231.8**	**137.9**	**594.0**	**586.0**	**190.8**	**172.8**	**6.9**	**79,490**	**9**	**1.3**	**80,092**

Table 2. Transfer Points

EMISSIONS CALCULATIONS

Sources : Transfer Points

Flow Diagram ID	Emission Source Description	Design Capacity (tph)	Potential Throughput (tpy)	PM Emission Factor[a,b] (lb/ton)	Contr. Effic.c (%)	Moist. Content (%)	Potential to Emit PM (lb/hr) Controlled	Potential to Emit PM (lb/hr) Uncontrolled	Potential to Emit PM (tpy) Controlled	Potential to Emit PM (tpy) Uncontrolled
Raw Coal										
004	conveyor 1 to conveyor 3	3,000	13,140,000	0.0010	80	5.5	0.58	2.92	1.28	6.39
005A	conveyor 3 to storage bin 1	3,000	13,140,000	0.0010	80	5.5	0.58	2.92	1.28	6.39
006A	storage bin 1 to conveyor 2	1,500	13,140,000	0.0010	80	5.5	0.29	1.46	1.28	6.39
003	conveyor 2 to conveyor 4	1,500	13,140,000	0.0010	80	5.5	0.29	1.46	1.28	6.39
004B	conveyor 1 to conveyor 21	3,000	13,140,000	0.0010	80	5.5	0.58	2.92	1.28	6.39
008A	conveyor 4 to prep plant	1,500	13,140,000	0.0010	80	5.5	0.29	1.46	1.28	6.39
052A	conveyor 21 to raw coal stockpile	3,000	13,140,000	0.0010	50	5.5	1.46	2.92	3.20	6.39
003B	grading of raw coal stockpile	3,000	13,140,000	0.0010	0	5.5	2.92	2.92	6.39	6.39
040	bulldozer to storage bin 1	360	2,160,000	0.0010	0	5.5	0.35	0.35	1.05	1.05
010	pan to raw coal stockpile	1,800	210,000	0.0010	0	5.5	1.75	1.75	0.10	0.10
011A	endloader to truck	1,800	210,000	0.0010	0	5.5	1.75	1.75	0.10	0.10
Refuse										
022	conveyor 10 to conveyor 11	500	3,942,000	0.0009	80	6.0	0.09	0.43	0.34	1.70
026	conveyor 11 to conveyor 12	500	3,942,000	0.0009	50	6.0	0.22	0.43	0.85	1.70
024A	conveyor 12 to refuse bin 1	500	3,942,000	0.0009	80	6.0	0.09	0.43	0.34	1.70
024	conveyor 12 to conveyor 14	500	3,942,000	0.0009	80	6.0	0.09	0.43	0.34	1.70
033A	conveyor 14 to refuse bin 2	500	3,942,000	0.0009	80	6.0	0.09	0.43	0.34	1.70
028	refuse bin 2 to pan	500	3,942,000	0.0013	0	4.5	0.64	0.64	2.54	2.54
024B	refuse bin 1 to pan	500	3,942,000	0.0009	0	6.0	0.43	0.43	1.70	1.70
029	pan to refuse disposal area	500	3,942,000	0.0009	0	6.0	0.43	0.43	1.70	1.70
029A	grading of refuse disposal area	500	3,942,000	0.0009	0	6.0	0.43	0.43	1.70	1.70
Clean Coal - Thermal Dryer										
034A	conveyor 15 to conveyor 42	600	3,219,300	0.0003	50	12.8	0.09	0.18	0.24	0.48
042	conveyor 42 to conveyor 44	600	3,219,300	0.0003	50	12.8	0.09	0.18	0.24	0.48
044	conveyor 44 to thermal dryer furnace	600	3,219,300	0.0003	80	12.8	0.04	0.18	0.10	0.48
035A	conveyor 16 to conveyor 17	600	3,219,300	0.0020	50	3.3	0.60	1.19	1.60	3.20
036A	conveyor 17 to conveyor 18	600	3,219,300	0.0020	50	3.3	0.60	1.19	1.60	3.20
036C	conveyor 18 to conveyor 6	600	3,219,300	0.0020	50	3.3	0.60	1.19	1.60	3.20
016B	conveyor 6 to sample conveyor 1	0.20	1,752	0.0020	50	3.3	1.99E-04	3.98E-04	8.72E-04	1.74E-03
SC1	sample conveyor 1 to sample crusher	0.20	1,752	0.0020	50	3.3	1.99E-04	3.98E-04	8.72E-04	1.74E-03
SC	sample crusher	0.20	1,752	0.0004	80	3.3	1.60E-05	8.00E-05	7.01E-05	3.50E-04
SC2	sample crusher to sample conveyor 2	0.20	1,752	0.0020	50	3.3	1.99E-04	3.98E-04	8.72E-04	1.74E-03
SC3	sample conveyor 2 to dumpster	0.20	1,752	0.0020	50	3.3	1.99E-04	3.98E-04	8.72E-04	1.74E-03

Table 2. Transfer Points

EMISSIONS CALCULATIONS

Sources : Transfer Points

Flow Diagram ID	Emission Source Description	Design Capacity (tph)	Potential Throughput (tpy)	PM Emission Factor[a,b] (lb/ton)	Contr. Effic.c (%)	Moist. Content (%)	Potential to Emit PM (lb/hr) Controlled	PM (lb/hr) Uncontrolled	PM (tpy) Controlled	PM (tpy) Uncontrolled
Coarse Clean Coal										
034B	conveyor 15 to conveyor 5A	600	3,219,300	0.0003	50	12.8	0.09	0.18	0.24	0.48
05A	conveyor 5A to conveyor 5	600	3,219,300	0.0003	50	12.8	0.09	0.18	0.24	0.48
014	conveyor 5 to conveyor 6	1,200	5,978,700	0.0013	50	4.5	0.77	1.55	1.93	3.85
016	conveyor 6 to conveyor 7	1,200	9,198,000	0.0013	50	4.5	0.77	1.55	2.96	5.93
030A	conveyor 7 to clean coal silo 2	1,200	9,198,000	0.0013	50	4.5	0.77	1.55	2.96	5.93
044A	clean coal silo 2 to conveyor 13	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
031A	conveyor 13 to conveyor 8	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
016A	conveyor 6 to clean coal silo 1	1,200	9,198,000	0.0013	50	4.5	0.77	1.55	2.96	5.93
017A	clean coal silo 1 to conveyor 13A	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
013A	conveyor 13A to conveyor 8	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
019A	conveyor 8 to conveyor 8a	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
019B	conveyor 8 to railcar and truck loadout	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
019	conveyor 8 to conveyor 9	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
032A	conveyor 9 to unit train loadout 1	3,500	9,198,000	0.0013	80	4.5	0.90	4.51	1.19	5.93
038	batch weigh loadout bin to railcar/truck	3,500	9,198,000	0.0013	0	4.5	4.51	4.51	5.93	5.93
020	unit train loadout to unit train	3,500	9,198,000	0.0013	0	4.5	4.51	4.51	5.93	5.93
				Total PM			**34.88**	**82.70**	**66.39**	**161.47**
				Total PM_{10}[d]			**16.50**	**39.12**	**31.40**	**76.37**
				Total $PM_{2.5}$[e]			**2.50**	**5.92**	**4.75**	**11.56**

EMISSION FACTORS AND ASSUMPTIONS *

a. Transfer Points (batch and continuous drop op; AP42, Section 13.2.4.3

Particulate (lb/ton) = $k*(0.0032)*(U/5)^{1.3} / (M/2)^{1.4}$ where: k = particle size multiplier (0.74 for TSP; 0.35 for PM10; 0.053 for PM2.5)
U = mean wind speed (@ 7.5 mph for all sources)
M = material moisture content (%)

b. Crushing emission factor based on a source specific test conducted at the Monongalia County Preparation Plant during January 2000.

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

d. Total PM_{10} Emissions = Total PM Emissions * (k_{PM10}/k_{PM})

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

Table 3. Haulroads

$E = k\ (s/12)^a (W/3)^b\ (365-P)/365$	*AP-42 Section 13.2.2, Equation 2 (November 2006), Unpaved Roadways*
$E = [k*(sL)^{0.91}*(W)^{1.02}]*(1-P/4N)$	*AP-42 Section 13.2.1, Equation 2 (January 2011), Paved Roadways*

DIMENSIONAL ANALYSIS

Time Conversion	8760	hr/yr	
Mass Conversion	2,000	lb/ton	*NIST SP1038*

POTENTIAL VEHICLE PARAMETERS

Path	Roadway Length - Round Trip (miles/trip)	Vehicle Traffic (trips/year)	Mean Vehicle Weight (tons)	Vehicle Capacity (tons)	Potential Throughput (tons)
Clean Coal Trucked Out (Unpaved)	1.60	95,813	50	83	2,299,500
Refuse Trucked to Pile (Unpaved)	0.87	99,337	86	77	3,942,000
Raw Coal to/from Main Stockpile (Paved)	1.50	3,500	125	77	210,000
Raw Coal to Storage Bin Via Dozer (Unpaved)	0.11	47,059	173	80	2,160,000

OPERATING PARAMETERS

Potential VMT - Clean Coal Trucked Out (Unpaved)	153,300	miles/yr	*= Roadway Length (miles/trip) * Vehicle Traffic (trips/year)*
Potential VMT - Refuse Trucked to Pile (Unpaved)	86,543	miles/yr	*= Roadway Length (miles/vehicle) * Vehicle Traffic (trips/year)*
Potential VMT - Raw Coal to/from Main Stockpile (Paved)	5,250	miles/yr	*= Roadway Length (miles/vehicle) * Vehicle Traffic (trips/year)*
Potential VMT - Raw Coal to Storage Bin Via Dozer (Unpaved)	5,176	miles/yr	*= Roadway Length (miles/vehicle) * Vehicle Traffic (trips/year)*
Silt Content	9.0	%	
Silt Loading	0.6	g/m^2	
Number of Days w/ at least 0.01" of Precipitation (P)	170	days	
Control Efficiency	75%		*Control efficiency of 75% is taken due to type of water spray bar used.*

EMISSION FACTORS

Unpaved Roadways

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)*

Table 3. Haulroads

$E = k\ (s/12)^a (W/3)^b\ (365-P)/365$	*AP-42 Section 13.2.2, Equation 2 (November 2006), Unpaved Roadways*
$E = [k*(sL)^{0.91}*(W)^{1.02}]*(1-P/4N)$	*AP-42 Section 13.2.1, Equation 2 (January 2011), Paved Roadways*

Unpaved Roadway Emission Factors [a]

	PM Emission Factor (lb/VMT)	PM_{10} Emission Factor (lb/VMT)	$PM_{2.5}$ Emission Factor (lb/VMT)
Clean Coal Trucked Out (Unpaved)	7.56	2.18	0.22
Refuse Trucked to Pile (Unpaved)	9.68	2.80	0.28
Raw Coal to Storage Bin Via Dozer (Unpaved)	13.28	3.84	0.38

[a] *AP-42 Section 13.2.2, Equation 2 (November 2006), Unpaved Roadways*

Paved Roadways

Particle Size Multiplier - PM (k)	0.011	lb/VMT	*AP-42 Section 13.2.1, Table 13.2.1-1 (1/11)*
Particle Size Multiplier - PM10 (k)	0.0022	lb/VMT	*AP-42 Section 13.2.1, Table 13.2.1-1 (1/11)*
Particle Size Multiplier - PM2.5 (k)	0.00054	lb/VMT	*AP-42 Section 13.2.1, Table 13.2.1-1 (1/11)*

Paved Roadway Emission Factors [a]

	PM Emission Factor (lb/VMT)	PM_{10} Emission Factor (lb/VMT)	$PM_{2.5}$ Emission Factor (lb/VMT)
Raw Coal to/from Main Stockpile (Paved)	0.8406	0.1681	0.0413

[a] *AP-42 Section 13.2.1, Equation 2 (January 2011), Paved Roadways*

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]
Clean Coal Trucked Out (Unpaved)	132.25	579.24	38.22	167.40	3.82	16.74
Refuse Trucked to Pile (Unpaved)	95.65	418.96	27.64	121.08	2.76	12.11
Raw Coal to/from Main Stockpile (Paved)	0.50	2.21	0.10	0.44	0.02	0.11
Raw Coal to Storage Bin Via Dozer (Unpaved)	7.85	34.37	2.27	9.93	0.23	0.99
TOTAL	**236.25**	**1034.78**	**68.23**	**298.86**	**6.84**	**29.95**

[a] *Potential uncontrolled Pollutant Emissions (lb/hr) = Potential uncontrolled Pollutant Emissions (tpy) x 2000 (lb/ton) / 8760 (hr/yr)*

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

Table 3. Haulroads

$E = k\ (s/12)^{a}(W/3)^{b}\ (365-P)/365$	*AP-42 Section 13.2.2, Equation 2 (November 2006), Unpaved Roadways*
$E = [k*(sL)^{0.91}*(W)^{1.02}]*(1-P/4N)$	*AP-42 Section 13.2.1, Equation 2 (January 2011), Paved Roadways*

Controlled

	Potential Emissions - PM		***Potential Emissions - PM $_{10}$***		***Potential Emissions - PM $_{2.5}$***	
Path	***lb/hr***	***tpy***	***lb/hr***	***tpy***	***lb/hr***	***tpy***
Clean Coal Trucked Out (Unpaved)	*33.06*	*144.81*	*9.56*	*41.85*	*0.96*	*4.19*
Refuse Trucked to Pile (Unpaved)	*23.91*	*104.74*	*6.91*	*30.27*	*0.69*	*3.03*
Raw Coal to/from Main Stockpile (Paved)	*0.13*	*0.55*	*0.03*	*0.11*	*0.01*	*0.03*
Raw Coal to Storage Bin Via Dozer (Unpaved)	*1.96*	*8.59*	*0.57*	*2.48*	*0.06*	*0.25*
TOTAL	**59.06**	**258.69**	**17.06**	**74.72**	**1.71**	**7.49**

[a] *Potential uncontrolled Pollutant Emissions (lb/hr) = Potential uncontrolled Pollutant Emissions (tpy) x 2000 (lb/ton) / 8760 (hr/yr)*

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

[c] *Potential controlled Pollutant Emissions = Potential uncontrolled Pollutant Emissions x (1 - Control Efficiency)*

Table 4. Stockpiles

POTENTIAL PROCESS DATA

Raw Coal Stockpile	20.5	acres
Refuse Disposal Area	39	acres

DIMENSIONAL ANALYSIS

Mass Conversion	2,000	lb/ton	*NIST SP1038*
Time Conversion	8,760	hrs/yr	
Time Conversion	24	hrs/day	

EMISSION FACTORS

PM Emission Factor	760	lb/yr/acre	*AP-42, 11.9 (7/98) Table 11.9-4 for Wind Erosion of Exposed Areas: [0.38 (tons/acre-yr) x 2,000 (lb/ton)]*
PM_{10} Emission Factor	380	lb/yr/acre	*PM_{10} EF scaled using FIRE Database, 09/2004-Source Classification Code 30501049*
$PM_{2.5}$ Emission Factor	380	lb/yr/acre	*$PM_{2.5}$ EF assumed to equal PM10 (due to absence of published PM2.5 EF)*
Clean Coal Stockpile Control Factor	50%		*Due to moisture content of stored material, assumed consistent with calculations for similar facilities*

EMISSIONS CALCULATIONS

Uncontrolled

	Potential Emissions - PM		***Potential Emissions - PM_{10}***		***Potential Emissions - $PM_{2.5}$***	
Pile	***lb/hr*** [a]	***tpy*** [b]	***lb/hr*** [a]	***tpy*** [b]	***lb/hr*** [a]	***tpy*** [b]
Raw Coal Stockpile	1.78	7.79	0.89	3.90	0.89	3.90
Refuse Disposal Area	3.38	14.82	1.69	7.41	1.69	7.41
TOTAL	**5.16**	**22.61**	**2.58**	**11.31**	**2.58**	**11.31**

[a] *Pollutant Emissions (lb/hr) = Pile Size (acres) * Pollutant Emission Factor (lb/yr/acre) / 8760 (hrs/yr)*

[b] *Pollutant Emissions (tpy) = Pile Size (acres) * Pollutant Emission Factor (lb/yr/acre) / 2,000 (lbs/ton)*

Controlled

	Potential Emissions - PM		***Potential Emissions - PM_{10}***		***Potential Emissions - $PM_{2.5}$***	
Pile	***lb/hr*** [a]	***tpy*** [b]	***lb/hr*** [a]	***tpy*** [b]	***lb/hr*** [a]	***tpy*** [b]
Raw Coal Stockpile	0.89	3.90	0.44	1.95	0.44	1.95
Refuse Disposal Area	1.69	7.41	0.85	3.71	0.85	3.71
TOTAL	**2.58**	**11.31**	**1.29**	**5.65**	**1.29**	**5.65**

[a] *Pollutant Emissions (lb/hr) = Pile Size (acres) * Pollutant Emission Factor (lb/yr/acre) / 8,760 (hours/yr) * (1-Pile Control Efficiency (%))*

[b] *Pollutant Emissions (tpy) = Pile Size (acres) * Pollutant Emission Factor (lb/yr/acre) * / 2,000 (lbs/ton) * (1-Pile Control Efficiency (%))*

Table 5. Miscellaneous VOC Emissions

POTENTIAL PROCESS DATA

Process	*Reagent Density* [b]	*VOC Volatility* [c]	*Amount of VOC Retained by Solids*	*Potential Usage*
	(lb/gal)	*(%)*	*(%)*	*(gal/yr)*
Thickener - anionic flocculant	8.9	45%	95%	34,387
Freeze treat1 - diethylene glycol	8.5	0%	0%	753,708
Dust Control	8.5	42%	0%	39,097
- Fine Coal Froth Flotation (Frother Reagent-Tetra944)[a]	7.7	12%	10%	20,404
- Fine Coal Froth Flotation (Diesel Fuel Reagent)[a]	7.3	9%	10%	353,812

[a] *Fine coal froth flotation VOC emission calculations assume 90% of the volatile VOC content of the froth and diesel fuel reagents are released into the atmosphere. The remaining VOC is bound to the coal. Potential release locations include: the vacuum filtration exhaust vents, the plant roof vents, and the water treatment thickener. These values yield actual emissions consistent with measurements made on a Pennsylvania coal preparation plant which indicated that approximately 5% of the total frother and diesel fuel usage in pounds were emitted.*

[b] *Reagent densities are taken from the manufacturer's material safety data sheet.*

[c] *Diesel fuel VOC content is estimated using a modified Reference Method 24A; others are based on material safety data sheets.*

DIMENSIONAL ANALYSIS

Mass Conversion	2,000 lb/ton	*NIST SP1038*

EMISSIONS CALCULATIONS

Emission Point	*Potential Emissions - VOC (Uncontrolled)*	
	lb/hr [a]	*tpy* [b]
Storage tanks - working/breathing losses[c]	0.11	0.50
Thickener - anionic flocculant (047)	0.79	3.44
Freeze treat1 - diethylene glycol (038A & 051C)	0.00	0.00
Dust Control (038A & 051C)	15.93	69.79
Froth Cell (009B)[d]	12.95	56.74
Vacuum Filter (009)[e]	6.48	28.37
Thickener (047)[f]	6.48	28.37
TOTAL	**42.74**	**187.21**

[a] *Pollutant Emissions (lb/hr) = Pollutant Emissions (tpy) * 2000 (lb/ton) / 8,760 (hr/yr)*

[b] *Pollutant Emissions (tpy) = Potential Usage (gal/yr) * Reagent Density (lb/gal) * VOC Volatility (%) * (1 - Amount of VOC Retained by Solids (%)) / 2,000 (lbs/ton)*

[c] *Storage tank losses are calculated using USEPA TANKS software.*

[d] *Assumes froth cell releases 50% of Frother VOCs and 50% of Diesel Fuel VOCs*

[e] *Assumes vacuum filter releases 50% of Frother VOCs and 50% of Diesel Fuel VOCs*

[f] *Assumes thickener releases 50% of Frother VOCs and 50% of Diesel Fuel VOCs*

Table 6. Thermal Dryer Potential Emissions

PROCESS DATA

Heat Input (MMBtu/hr)	182	MMBtu/hr	
Effective Capacity Factor	66.67	%	
Primary Fuel:	Bituminous Coal		
Coal Heat Input[1]:	120	MMBtu/hr	
Coal HHV[2]:	26.0	MMBtu/ton	
Coal Consumption[1]:	4.35	tons/hr	
Coal Consumption[1]:	26,100	tons/yr	
Potential Annual Hours of Operation on Primary Fuel:	5,655	hrs/yr	
Secondary Fuel	Propane		
Propane HHV:	91.500	MMBtu/1,000 gal	*AP-42, Section 1.5, Table 1.5-1, footnote a*
Propane Consumption[1]:	500	gal/hr	*Permit Limit*
Propane Hours:	3,105	hrs/yr	*Conservatively assumes dryer runs 8,760*
Propane Heat Input:	142,054	MMBtu/yr	

1. Permit Limit 4.1.2
2. AP-42 Section 1.1.5

POTENTIAL EMISSIONS

Pollutant	*Emission Factor (lb/ton-coal)*	*(kg/MMBtu)*	*(lb/hr)*	*(tpy)*
NO_x[a]			63.6	190.8
CO[a]			57.6	172.8
SO_2[a]			195.0	586.0
PM[a]			40.0	120.0
PM_{10}[a]			40.0	120.0
$PM_{2.5}$[a]			40.0	120.0
Condensable PM[f]	0.0478		0.2	0.6
VOC[a]			135.6	406.8
Lead[b]	0.00042		1.94E-03	5.48E-03
CO_2[c] (Bituminous Coal Firing)		93.4	24,709.4	69,866
CH_4[d] (Bituminous Coal Firing)		0.011	2.91	8.23
N_2O[d] (Bituminous Coal Firing)		0.0016	0.42	1.20
CO_2[c] (Natural Gas Firing)		61.46		9,623.87
CH_4[d] (Natural Gas Firing)		3.00E-03		4.70E-01
N_2O[d] (Natural Gas Firing)		6.00E-04		9.40E-02
CO_2e[e] (Total)				80,092

a. Permit limit 4.1.1
b. AP-42 Table 1.1-18 EFs for Trace Metals from Controlled Coal Combustion
c. Table C-1 of 40 CFR 98
d. Table C-2 of 40 CFR 99
e. CO_2e is the sum of the products of greenhouse gases and their global warming potential, per Table A-1 of 40 CFR 98.
f. AP-42 Table 11.10-1 EFs for Coal Cleaning. Sum of organic and inorganic condensable PM.