

Fact Sheet



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

Permit Number: **R30-10900006-2022**
Application Received: **August 31, 2021**
Plant Identification Number: **03-054-10900006**
Permittee: **Pinn MC Wind Down Co, LLC**
Facility Name: **Pinnacle Preparation Plant**
Mailing Address: **302 South Jefferson Street, Roanoke, VA 24011**

Physical Location: Pineville, Wyoming County, West Virginia
UTM Coordinates: 456.10 km Easting • 4,155.40 km Northing • Zone 17
Directions: At Pineville, take Route 10 South approximately one mile, turn right onto Route 16 South, travel approximately one mile before turning left onto Pinnacle Creek Road and the facility will be located on the right side of the road.

Facility Description

The facility is a coal preparation plant which processes raw coal from an underground bituminous coal mine plus other raw coal sources. The preparation process involves separating the higher ash reject and pyrite from the rest of the material, leaving a low ash, low sulfur coal product. Operations at the plant include breaking, crushing, handling, screening, washing, and drying. The facility is characterized by SIC code 1222.

Emissions Summary

| Plantwide Emissions Summary [Tons per Year] | | |
|---|---------------------|------------------------------------|
| Regulated Pollutants | Potential Emissions | 2020 Actual Emissions ¹ |
| Carbon Monoxide (CO) | 178 | 0.00 |
| Nitrogen Oxides (NO _x) | 333 | 0.00 |
| Particulate Matter (PM _{2.5}) | 168 | 1.61 |
| Particulate Matter (PM ₁₀) | 355 | 9.88 |
| Total Particulate Matter (TSP) | 744 | 26.44 |
| Sulfur Dioxide (SO ₂) | 178 | 0.00 |
| Volatile Organic Compounds (VOC) | 186 | 0.00 |
| Hazardous Air Pollutants | Potential Emissions | 2020 Actual Emissions ¹ |
| Benzene | 2.33 | 0.00 |
| Hexane | 4.66 | 0.00 |
| Hydrochloric acid | 8.01 | 0.00 |
| Aggregate HAPs ² | 17.62 | <0.01 |

¹ The 2020 actual emissions are from the State and Local Emissions Inventory System (SLEIS). Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash preparation plant and thermal dryer were shut down and have not operated since 2017. The actual emissions from 2020 are from coal being trucked to the facility and then transferred to the railcar loadout for shipment.

² The actual aggregate HAPs is the sum of the specific HAPs listed in the 2020 SLEIS report.

Title V Program Applicability Basis

This facility has the potential to emit 178 tpy of CO, 333 tpy of NO_x, 355 tpy of PM₁₀, 178 tpy of SO₂, and 186 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Pinn MC Wind Down Co, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

| | | |
|--------------------|---------|--|
| Federal and State: | 45CSR5 | Coal Preparation and Handling Operations |
| | 45CSR6 | Open burning prohibited. |
| | 45CSR10 | Emission of Sulfur Oxides |
| | 45CSR11 | Standby plans for emergency episodes. |
| | 45CSR13 | Permits for Construction/Modification |
| | 45CSR16 | NSPS pursuant to 40 C.F.R. Part 60 |

| | | |
|-------------|------------------------------|--|
| | WV Code § 22-5-4 (a) (14) | The Secretary can request any pertinent information such as annual emission inventory reporting. |
| | 45CSR30 | Operating permit requirement. |
| | 40 C.F.R. Part 60, Subpart Y | Coal Preparation Plants |
| | 40 C.F.R. Part 61 | Asbestos inspection and removal |
| | 40 C.F.R. Part 64 | Compliance Assurance Monitoring |
| | 40 C.F.R. Part 82, Subpart F | Ozone depleting substances |
| State Only: | 45CSR4 | No objectionable odors. |

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

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

Active Permits/Consent Orders

| Permit or Consent Order Number | Date of Issuance | Permit Determinations or Amendments That Affect the Permit (<i>if any</i>) |
|--------------------------------|------------------|--|
| R13-2183K | April 28, 2008 | |

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

Determinations and Justifications

1. In Section 1.1. Emission Units table under Trucked Coal and Coal Fines Circuit, the design capacity for ST-16 was added as 120,000 tons and the Year Installed/Modified for DHRC-4 was added as I-2002 and M-2008.
2. **Title V Boiler Plate Changes.** In Section 2.11.4., the reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.

In Section 2.22.1., the reference notation was changed to delete 45CSR38 because it has been repealed.

In Section 3.5.3., the contact information for EPA was updated.
3. **Miscellaneous Revision.** In Section 3.7.3. in the third row titled 40 C.F.R. Part 64, the first sentence under Rationale was updated because this is now the fourth renewal for this facility and the third sentence was updated because no changes have been made since the third renewal.
4. **Particulate Matter Stack Testing of Thermal Dryer.** Condition 4.3.5. of the current Title V permit required PM stack testing of the thermal dryer TD1 no later than September 26, 2017. Due to geological problems in the deep mine which feeds coal to this facility, the deep mine, wet wash

preparation plant and thermal dryer were shut down and the permittee requested and was granted an extension of the particulate matter stack testing requirement deadline by the DAQ. Since the thermal dryer has yet to be restarted, the permittee shall conduct particulate matter stack testing as soon as practicable, but no later than 60 days after achieving the maximum production rate at which the thermal dryer will be operated and no later than 180 days after restart of such facility.

5. **Miscellaneous Revision.** In the Example Data Form Attachments, the Title V permit number suffix has been updated from 2017 to 2022 in Attachments A through D.

Non-Applicability Determinations

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

| Regulation | Rationale |
|------------------------------|--|
| 45CSR10 | To Prevent and Control Air Pollution from the Emission of Sulfur Oxides. The thermal dryer is not part of a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted. Therefore, 45CSR§10-5.1 does not apply to the thermal dryer. |
| 40 C.F.R. Part 60, Subpart Y | Standards of Performance for Coal Preparation and Processing Plants. Several units (Thermal dryer, C11-1, C11-2, Rotary Breakers 13-1 &13-2, ST-3, ST-4, C37, C45, Rock Bin, Rock Crusher #6, C8, C125, C128-1, C128-2, C100, Horizontal Axis Mixer No. 120, and C119) were installed prior to October 27, 1974. Therefore, this subpart does not apply to these units per 40 C.F.R. §60.250(b). Also, this subpart does not apply to all coal, refuse, and fines open storage piles because they were installed prior to May 27, 2009. |
| 40 C.F.R. Part 64 | <p>This is the fourth permit renewal for this facility. At the time of the first renewal, a CAM applicability review was conducted, and CAM requirements were added. No changes have been made at this facility since the third renewal that would require additional CAM permit conditions.</p> <p>The prior CAM review is as follows: Cyclones (001-01A & 001-01B) – These two cyclones pre-clean the thermal dryer exhaust gas before it enters the exhaust fan that pushes it through two (2) parallel venturi scrubbers (Control Device IDs 001-2A, 001-2B). Finer dried coal from the thermal dryer exhaust is removed by the cyclones. This dried coal reporting to the cyclones is used as fuel in the thermal dryer furnace because it is finer and thus requires less processing by the pulverized coal feed system. Because the cyclones are a critical part of the product recovery and furnace fuel system, they are deemed <i>inherent process equipment</i> in accordance with the definition in 40 C.F.R. §64.1, and therefore the cyclones do not require a CAM Plan.</p> <p>Mixer Scrubber (004) – This scrubber controls PM emissions from transfer points T16 (horizontal axis mixer), T17, and T18. According to the permittee’s calculations in the application, the aggregate pre-control PTE for these three transfer points is 785 lb/yr + 7,513 lb/yr + 7,513 lb/yr = 15,811 lb/yr = 7.91 ton/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Mixer Scrubber 004 is not subject to 40 C.F.R. 64.</p> <p>Clean Coal Scrubber (0011) – This scrubber controls PM emissions from transfer points T20 and T21. According to the permittee’s calculations in the application, the aggregate pre-control PTE for this transfer point is 2,254 lb/yr. This is less than 100 ton/yr, and therefore is not a pre-control “major source”. Therefore, the Clean Coal Scrubber 0011 is not subject to 40 C.F.R. 64.</p> |

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

Beginning Date: June 10, 2022
Ending Date: July 11, 2022

Point of Contact

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

Daniel P. Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41902
Daniel.p.roberts@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

Public Comments

No comments were received from the public, which includes the permittee.

U.S. EPA Comments

In an e-mail dated July 6, 2022, Mr. Justin Leary stated that EPA has reviewed the permit, and did not have any significant comments to offer on the draft/proposed Title V. However, one administrative edit needed to be made because EPA's Region 3 office moved, so the address listed in Section 3.5.3 of the permit was changed to:

United States Environmental Protection Agency
Region III, Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Due to the administrative nature of this comment, the permit was allowed to proceed in concurrent review.

Other Changes

Before issuance of this permit, the permittee submitted a request for a name change on August 31, 2022. The name change was approved and the permittee's name was changed from Pinnacle Mining Company, LLC to Pinn MC Wind Down, LLC.