

# Fact Sheet



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

Permit Number: **R30-04700008-2022**  
Application Received: **February 16, 2022**  
Plant Identification Number: **03-54-047-00008**  
Permittee: **Second Sterling Corporation**  
Facility Name: **Keystone No. 1 Preparation Plant**  
Mailing Address: **302 South Jefferson Street, Roanoke, VA 24011**

---

Physical Location: Keystone, McDowell County, West Virginia  
UTM Coordinates: 460.328 km Easting • 4141.305 km Northing • Zone 17  
Directions: From Charleston, take I-77 South towards Princeton, WV and then take Exit 9. Proceed west on U.S. Route 460 to U.S. Route 52. Take U.S. Route 52 northwest to Keystone. At Keystone, turn right onto Bluestone Bridge Road, cross the railroad tracks and turn right on the gravel entrance road towards the plant.

---

### Facility Description

The Keystone No. 1 Preparation Plant (SIC 1221 and NAICS 212111), a wet-wash coal preparation plant with thermal dryer, has the ability to screen, crush/size, wash, thermally dry, store and load out/in coal. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2020* Actual Emissions</b>
Carbon Monoxide (CO)	43.50	0.0
Nitrogen Oxides (NO <sub>x</sub> )	140.10	0.0
Particulate Matter (PM <sub>2.5</sub> )	40.62	0.0
Particulate Matter (PM <sub>10</sub> )	270.77	0.0
Total Particulate Matter (TSP)	568.62	0.0
Sulfur Dioxide (SO <sub>2</sub> )	44.1	0.0
Volatile Organic Compounds (VOC)	103.50	0.0
<i>PM<sub>10</sub> is a component of TSP.</i>		
<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2020* Actual Emissions</b>
Total HAPs	0.06	0.0

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

*\* Keystone No. 1 Coal Preparation Plant has been temporarily shut down since 2014.*

### Title V Program Applicability Basis

This facility has the potential to emit 270.77 tons per year of PM<sub>10</sub>, 140.10 tons per year of NO<sub>x</sub>, and 103.50 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Second Sterling Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR5	Control of particulate matter from coal preparation plants
	45CSR6	Open burning prohibited.
	45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
	45CSR16	Standards of performance for new stationary sources pursuant to 40 CFR part 60

	WV Code § 22-5-4 (a) (14)	The Secretary Can Request Any Pertinent Information Such As Annual Emission Inventory Reporting.
	45CSR30	Operating Permit Requirement.
	40 C.F.R. 60, Subpart Y	Requirements for coal preparation plants
	40 C.F.R. Part 61	Asbestos Inspection and Removal
	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> )
R13-0308F	03/13/2013	

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

### Determinations and Justifications

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

1. **Company Information.** Updated the facility name to match the application and R13 permits, mailing address, telephone number and UTM coordinates.
2. **Title V Boiler Plate Changes.** The reference notation for Section 2.11.4. was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.

The reference notation for Section 2.22.1. was changed to delete 45CSR38 because it has been repealed.

3. **Condition 3.5.3.** Updated the US EPA contact information and address.
4. **Subsection 4.6.** Fixed the numbering and formatting.

### **Non-Applicability Determinations**

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

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

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

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

### **Comment Period**

Beginning Date: November 9, 2022  
Ending Date: December 9, 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 57<sup>th</sup> Street SE  
Charleston, WV 25304  
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)**

On December 7, 2022, Justin Leary of the EPA sent an email stating that EPA has reviewed the draft permit and fact sheet and has no comments.

There were no comments received from the company or the public.