

Fact Sheet



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

Permit Number: **R30-03300018-2022**

Application Received: **March 3, 2021**

Plant Identification Number: **033-00018**

Permittee: **Harrison County Coal Resources, Inc.**

Facility Name: **Harrison County Mine Preparation Plant**

Mailing Address: **46226 National Road W, St. Clairsville, OH 43950**

Physical Location: Shinnston, Harrison County, West Virginia
UTM Coordinates: 554.82 km Easting • 4,361.54 km Northing • Zone 17
Directions: From U.S. Route 19 in Shinnston, travel west on County Route 3 (Lucas Rd.) for approximately 2.7 miles until turning left on County Route 3/4. Proceed on Route 3/4 for approximately 0.9 miles to the plant site.

Facility Description

Harrison County Coal Company's facility operates a 2,800 tons per hour wet wash coal preparation plant. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year. SIC Code: 1222

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2020 Actual Emissions
Carbon Monoxide (CO)	-----	-----
Nitrogen Oxides (NO _x)	-----	-----
Particulate Matter (PM _{2.5})	38.9	9.87
Particulate Matter (PM ₁₀)	268.25	59.58
Total Particulate Matter (TSP)	724.44	129.48
Sulfur Dioxide (SO ₂)	-----	-----
Volatile Organic Compounds (VOC)	37.60	19.92

PM₁₀ is a component of TSP.

Title V Program Applicability Basis

This facility has the potential to emit 268.25 tons per year of PM₁₀. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Harrison County Coal Resources, Inc. 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.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permit for construction/modification
	45CSR16	New Source Performance Standards
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
State Only:	40 C.F.R. Part 60, Subpart Y	Requirements for coal preparation plant
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	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>)
R13-2306F	May 14, 2018	

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

- ❖ On page 1 on the permit cover page and in the page header, Harrison County Coal Company was changed to Harrison County Coal Resources, Inc. as a result of the change of ownership and transfer of permits acknowledged in a letter from the DAQ dated March 30, 2021. The facility name Harrison County Mine Preparation Plant was added.
- ❖ On page 2, the page numbering in the Table of Contents was updated.
- ❖ On pages 19-20 in Section 3.5.3., the USEPA contact information was updated to the current boilerplate.
- ❖ On page 36 in the title block of Appendix A, the company name and facility name were changed from Harrison County Coal Company and Harrison County Preparation Plant to Harrison County Coal Resources, Inc. and Harrison County Mine Preparation Plant, respectively.
- ❖ On page 37 in the title block of Appendix B, the company name and facility name were changed from Harrison County Coal Company and Harrison County Preparation Plant to Harrison County Coal Resources, Inc. and Harrison County Mine Preparation Plant.

Non-Applicability Determinations

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

40 CFR 64-Compliance Assurance Monitoring. This is the fourth permit renewal for this facility. The facility was found not to be subject to CAM at the time of the previous renewal. There were no new emission units or control devices added at the facility that would require a CAM applicability analysis. Therefore, a CAM determination is not required.

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: December 30, 2021
Ending Date: January 31, 2022

Point of Contact

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

Dan Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th 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)

EPA Comments

The following comments were received from Justin Leary of EPA Region 3 in an email sent on January 24, 2022 and further discussed in a Microsoft Teams Meeting on January 27, 2022:

1. Reference: Section 1.1 Emission Units table note 2: “FE - Full Enclosure; PE - Partial Enclosure; ST - Stacking Tube; WS - Water Sprays; N – None.”

Comment #1: I need some clarification about some of the acronyms used in the permit to assist my review. In section 1.1 the emissions Units table, some of the acronyms used in the control device column are defined in the second footnote. Could you please define the following acronyms that are also used in the same column as it is unclear to me: UC, WT, MC, EM, TC, and ES.

Response to Comment #1: UC - underground reclaim conveyor; WT - water truck; MC - moisture content; EM - enclosure and evacuation to mechanical collector; TC - telescoping chute; ES - enclosure and evacuation to a scrubber.

The DAQ agrees that these acronyms and their explanations should be included and so they were added to note 2.

2. Reference: Section 5.1.12

Comment #2: I would also like to find a time this week to discuss section 5.1.12 of the permit and the reason why 40 CFR 60.254(b)(2) was not included. Did the modification of the equipment in the refuse circuit in 2010 (increasing from 500 TPH to 800 TPH) have any effect on the emissions controlled by the operation of D040 (Exhaust Fan and Dust Collector 1; removes PM from prep plant), or D042 (Exhaust Fan 2 and Dust Collector 2; removes PM from transfer point).

Response to Comment #2: 40 CFR §60.254(b)(2) was not included because D040 and D042 are mechanical vents, but they are grand-fathered equipment because they were constructed in 1968 before the applicability date of October 24, 1974 for 40 CFR 60 Subpart Y and have not been modified since then. No particulate emissions from the refuse circuit are captured or collected by mechanical vents D040 and D042.

3. Reference: Section 1.1 Emission Units table.

Comment #3: For equipment 028, RB2 and RB3, the Design Capacity - TPY is listed as 4,380,000 with note 3 referenced. These references to note 3 are a typo and should be changed to reference note 4.

Response to comment #3: The note references are a typo.

For equipment 028, RB2 and RB3, the note reference under Design Capacity – TPY was changed from 3 to 4.