

Fact Sheet



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

Permit Number: **R30-04900019-2020**
Application Received: **July 11, 2018**
Plant Identification Number: **03-54-04900019**
Permittee: **The Marion County Coal Company**
Facility Name: **Marion County Preparation Plant**
Mailing Address: **P. O. Box 100, Osage, WV 26543**

Physical Location: Fairview, Marion County, West Virginia
UTM Coordinates: 561.6 km Easting • 4,383.9 km Northing • Zone 17
Directions: Approximately 1-mile NW of Fairview on State Route 17. Turn left on Sugar Run Road.

Facility Description

The Marion County Coal Company's (MCCC) Marion County Preparation Plant consists of a coal mining operation and a preparation plant with a thermal dryer.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2018 Actual Emissions
Carbon Monoxide (CO)	172.8	116.6
Nitrogen Oxides (NO _x)	190.8	131.4
Lead (Pb)	< 0.01	0.0
Particulate Matter (PM _{2.5})	137.9	28.47
Particulate Matter (PM ₁₀)	231.8	75.73

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2018 Actual Emissions
Total Particulate Matter (TSP)	456.4	173.42
Sulfur Dioxide (SO ₂)	586.0	279.0
Volatile Organic Compounds (VOC)	594.0	202.65
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2018 Actual Emissions
Total HAPs	6.9	2.49

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

Title V Program Applicability Basis

This facility has the potential to emit 172.8 tons per year of CO, 190.8 tons per year of NO_x, 231.8 tons per year of PM₁₀, 586.0 tons per year of SO₂, and 594.0 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, The Marion County Coal Company 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 Emissions from Coal Preparation Plants, Coal Handling Operations and Coal Refuse Disposal Areas
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur dioxide limits.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for minor sources.
	45CSR16	Emission Standards for New Stationary Sources 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. 60, Subpart Y	New Source Performance Standards 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>)
R13-0760I	November 26, 2019	
CO-R30-E-2019-2	March 11, 2019	

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

This is the third Title V renewal and is combined with minor modification R30-04900019-2014(MM05) which incorporates changes made with the issuance of R13-0760I.

The Class II Administrative Update R13-0760I and Minor Modification R30-04900019-2014(MM05) were submitted as part of the compliance with Consent Order CO-R30-E-2019-2 issued March 11, 2019. Application R13-0760I and R30-04900019-2014(MM05) were submitted on December 19, 2018 in order to delete emission units that were currently listed in the permits that do not exist or are inactive; add emissions units that are on site, but are not currently listed in the permits; and revise the equipment descriptions and operating parameters of several emission units which don't actually reflect their current method of operation. R13-0760I was issued on November 26, 2019.

1.0 Emission Units

- To better reflect the maximum throughput for each piece of equipment based on the operational limitations of the preparation plant, the maximum throughputs for the following units were revised: 001, 052, 003A, 005, 006, 002, 008, 034, 045A/045C, 035, 036, 036B, 013, 015, 017, 030, 044, 031, 031A, 018, 032, 021, 023, 025, 027A, 033, and 027.
- The emission unit descriptions of the following units were changed to reflect the general process flow as provided in the R13-0760I and R30-04900019-2014(MM05) Application's process flow diagram: 052, 003A, 006, 002, 008, 0034, 015, 017, 030, 044, 031, 031A, 018, 023, 025, 027A, 033, and 027.
- The following emission units were removed because either they have been removed from the facility or are no longer in operation: 053, 007, 037, 051A, 030A, 044A, and 020.
- The following equipment was added with R13-0760I: 05A, 042, 043, 057, 058, and 059.
- Footnote 1 was updated to reflect changes made in R13-0760I.

4.0 Source Specific Requirements

- Since the last Title V Renewal, there have been no changes to the applicable State or Federal Requirements of Section 4.0. The only changes of content during this renewal are those made as part of Minor Modification R30-04900019-2014(MM05). However, the Title V permit conditions were rearranged to better align with permit R13-0760I.
- Condition 4.1.2 was updated to include compliance with hourly throughput limits to reflect changes made in R13-0760I.
- In condition 4.1.4 the SO₂ emission limit of the fluidized bed coal dryer stack was changed from 235.0 lb/hr to 195.0 lb/hr to reflect changes made in R13-0760I.
- In condition 4.1.19 the list of emission unit ID's subject to the Subpart Y requirements was updated to reflect changes made in R13-0760I.
- Condition 4.1.20 (Fugitive Coal Dust Emissions Control Plan for Subpart Y) was added to the Title V permit since it was included in R13-0760I.
- In condition 4.2.5 (previous condition 4.2.6) the list of emission unit ID's not subject to the visible emission checks and/or opacity monitoring was updated to not include those units subject to ongoing opacity monitoring under Subpart Y. Also, previous sub-condition 4.2.6.a was deleted to reflect changes made in R13-0760I.
- Removed old Title V condition 4.3.1. The condition was an R13 permit condition for initial testing that was removed with the issuance of permit R13-0760I.
- In condition 4.3.3 (previous condition 4.3.6) the list of emission unit ID's subject to the Subpart Y requirements was updated to reflect changes made in R13-0760I.
- Updated condition 4.5.3 (previous condition 4.5.5) to reflect changes made in R13-0760I.
- Added condition 4.5.5.c (40CFR§60.258(a)(6)) since it was added with the issuance of R13-0760I.

40 C.F.R. 60 Subpart Y - Standards of Performance for Coal Preparation and Processing Plants

40 C.F.R. 60 Subpart Y has three categories of applicability based on when equipment was constructed, reconstructed, or modified. Below, the facilities equipment is sorted by emission unit ID into the categories for applicability.

Pre October 27, 1974 and not subject to 40 C.F.R. 60 Subpart Y: 001, 005, 013, and 015.

Between October 27, 1974 and April 28, 2008: 034, 05A, 042, 043, 045A, 045C, 035, 036, 036B, and 030.

Between April 28, 2008 and May 27, 2009: None.

After May 27, 2009: 052, 003A, 006, 002, 008, 057, 058, 059, 017, 044, 031, 031A, 018, 018A, 038A, 032, 021, 023, 027A, 025, 033, and 027.

Non-Applicability Determinations

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

None.

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: January 17, 2020
Ending Date: February 18, 2020

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478
Robert.A.Mullins@wv.gov

Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

Not applicable.