

Fact Sheet



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

Permit Number: **R30-04700017-2018**
Application Received: **June 5, 2017**
Plant Identification Number: **03-54-047-00017**
Permittee: **Buchanan Minerals, LLC**
Facility Name: **Amonate Preparation Plant**
Mailing Address: **P.O. Drawer L, Oakwood, VA 24631**

Physical Location:	Beech Fork, McDowell County, West Virginia
UTM Coordinates:	441.76 km Easting • 4118.34 km Northing • Zone 17
Directions:	Take I-77 South to Route 52N to 460W going into Virginia. At approximately 24 miles into Virginia, turn right (North) onto SR 637 near Maxwell, VA. Follow SR 637 to the intersection of SR 637 and SR 631. Turn right for about 0.2 miles then turn left onto SR 637 again. Travel for approximately 10 miles. Then turn left at bridge. Follow to facility, turn right.

Facility Description

The Buchanan Minerals, LLC's Amonate Preparation Plant, a wet-wash coal preparation plant with thermal dryer, has the ability to screen, break/size, wash, thermally dry, store and load out/in coal. The maximum capacity of the preparation plant is 658 tons per hour and 5,764,000 tons per year of raw coal input. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week. The Buchanan Minerals, LLC's Amonate Preparation Plant is covered by SIC Code 1221 and NAICS Code 212111.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2013 Actual Emissions ¹
Carbon Monoxide (CO)	709.68	0
Nitrogen Oxides (NO _x)	215.11	0
Particulate Matter (PM _{2.5})	<i>Not available</i>	0.67
Particulate Matter (PM ₁₀)	386.91	4.85
Total Particulate Matter (TSP)	812.54	10.07
Sulfur Dioxide (SO ₂)	832.2	0
Volatile Organic Compounds (VOC)	208.36	0.35
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2013 Actual Emissions ¹
Hydrochloric Acid Aerosols	4.8	0
Hydrofluoric Acid	3.8	0
Total HAPs	8.6	0
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

¹ The last emissions data available from the State and Local Emissions Inventory System (SLEIS) is for year 2013. There are no emissions data in SLEIS for years 2014 through 2016, and the 2017 reporting year status is “not started” and is therefore unavailable. The facility has been temporarily shut down since September of 2012 per 3/5/2018 technical correspondence.

Title V Program Applicability Basis

This facility has the potential to emit 709.68 TPY of Carbon Monoxide (CO), 215.11 TPY of Nitrogen Oxides (NO_x), 386.91 TPY of Particulate Matter (PM₁₀), 832.2 TPY of Sulfur Dioxide (SO₂), and 208.36 TPY of Volatile Organic Compounds (VOC). Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Buchanan Minerals, LLC's Amonate Preparation Plant 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	Operation of Coal Preparation Plants
	45CSR6	Open burning prohibited.
	45CSR10	Control of Sulfur Dioxide Emissions
	45CSR11	Standby plans for emergency episodes.

	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	45CSR16	Standards of Performance 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. Part 60 Subpart Y	Standards of Performance for Coal Preparation Plants
	40 C.F.R. Part 61 Subpart M	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>)
R13-0267A	January 7, 2003	

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 B," which may be downloaded from DAQ's website.

Determinations and Justifications

Since the current operating permit R30-04700017-2013 was issued there have been no changes to the Title V Permit. The Amonate Preparation Plant is currently idle due to economic conditions. The following updates have been made for the renewal permit:

1. **Permit Transfer and Permittee Name Change.** In his letter dated February 26, 2018, the Director acknowledged the transfer of the Title V permit previously issued to CONSOL Amonate Facility LLC, for the Amonate Prep Plant, to Buchanan Minerals, LLC. For the Title V permit renewal this necessitated the following changes:
 - a. The name on the permit cover and in the headers has been changed.
 - b. The former name “Consolidation Coal Company” occurs in permit conditions 4.1.5. and 4.2.4., which have been changed to “the permittee”.
 - c. The 45CSR10 Monitoring Plan (Appendix A) has been revised as follows based upon information submitted by the permittee in 3/5/2018 technical correspondence:
 - i. The name “Consolidation Coal Company” has been deleted on the Appendix A cover page, at the top of the first page of the plan, and in the footer following paragraph 1.j.
 - ii. The cover letter (dated November 21, 2011) for the plan submitted by CONSOL Energy Inc. has been deleted.
 - iii. The name “Consolidation Coal Company” has been replaced with “the permittee” in paragraphs 1., 1.a., and 1.h., in the body of the plan.
 - iv. Except for the header rows, the contents in the table on the last page of the plan have been deleted.
2. **Facility-wide Reporting Revisions.** The following changes involving electronic reporting have been made in the facility-wide requirements:
 - a. Condition 3.5.3. – The paragraph has been updated and the DAQ C&E e-mail address has been added.
 - b. Condition 3.5.5. (Compliance Certification) – The paragraph has been updated, and the DAQ and US EPA e-mail addresses have been added.
 - c. Condition 3.5.6. (Semi-annual monitoring reports) – The last statement in the paragraph and the DAQ e-mail address have been added.
3. **Visible Emissions Monitoring.** The language “(but no less than 1 minute)” has been added to the visible emissions monitoring requirements in permit conditions 3.2.1.b. and 4.4.3.b. utilizing the currently cited authority after each condition. This change has been made in other renewal permits so that the time requirement is specific.
4. **Review of Condition 4.3.1.** According to 3/5/2018 technical correspondence from the permittee, the last time the dryer was operated was September 2012. The permittee stated that the thermal dryer did not come back online for continuous operation during the current permit term. Consequently, no stack testing was performed per condition 4.3.1. during the current permit term. Based upon these facts the language in condition 4.3.1. remains valid for this renewal and no changes are required.

5. **Clarification in Condition 4.4.4.** The language “of this data” has been added at the end of the first sentence in permit condition 4.4.4. The currently cited authority provides for making this clarification.

Non-Applicability Determinations

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

45CSR§10-5.1	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.
40 C.F.R. 63 Subpart ZZZZ	The facility does not have any reciprocating internal combustion engines (RICE) according to technical correspondence received from the permittee on March 20, 2018; therefore, this subpart is not applicable.

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: March 23, 2018

Ending Date: April 23, 2018

Point of Contact

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

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@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)

No comments were received from either the public or U.S. EPA.