



COMMONWEALTH of VIRGINIA

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COMMONWEALTH OF VIRGINIA Department of Environmental Quality Southwest Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

McClure River Preparation Plant – Dickenson-Russell Coal Company, LLC
Big Caney Creek, Dickenson County, Virginia
Permit No. SWRO10804

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Dickenson-Russell Coal Company, LLC has applied for a Title V Operating Permit for its McClure River Preparation Plant facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Contact: E. Cliff Musick
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Date: 09/14/2015

Air Permit Manager: Rob Feagins
Rob Feagins

Date: 9/14/15

Regional Director: Allen J. Newman
Allen J. Newman, P.E.

Date: 9/14/15

FACILITY INFORMATION

Permittee

Dickenson-Russell Coal Company, LLC
P.O. Box 655
Norton, Virginia 24273

Facility

McClure River Preparation Plant
2079 Herndon Road
McClure, Virginia 24269

County-Plant Identification Number: 51-051-00019

SOURCE DESCRIPTION

NAICS Code: 212111 – Bituminous Coal Cleaning Plants

The facility cleans and dries bituminous coal prior to shipment by railcar and truck. The facility utilizes a thermal dryer to dry the coal cleaned by the wet preparation plant that includes froth flotation and vacuum filtration.

Air emissions from the facility include particulate matter (PM, includes PM-10) from all the dry processing units; volatile organic compounds (VOC) from the thermal dryer and wet coal processing; and nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO) and trace amounts of Hazardous Air Pollutants (HAP) from the thermal dryer.

The facility is a Title V major source of PM, particulate matter less than 10 microns (PM-10), SO₂, VOC and NO_x. It is an area source of HAP emissions. This source is located in an attainment area for all pollutants. Portions of the facility are permitted under a Minor New Source Review (NSR) Permit issued on January 30, 2015, under a Minor NSR permit issued to an adjacent mining activity referenced as Deep Mine 41 (Registration No: 11690) on May 9, 2011, and under a Prevention of Significant Deterioration (PSD) permit issued April 2, 1984. Copies of each permit are included as attachments.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
1	---	Mine Raw Belt	1500 TPH	Wet suppression or equivalent	----	PM/PM-10	----
2	---	Mid-Vol Breaker	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
2A	---	Rotary Breaker	1500 TPH	Wet suppression or equivalent	----	PM/PM-10	----
2D	---	Mine Rock Bin	200 TPH	Wet suppression or equivalent	----	PM/PM-10	----
2E	---	Sample Belt	25 TPH	Wet suppression or equivalent	----	PM/PM-10	----
3	---	Mine Raw Transfer Belt	2300 TPH	Wet suppression or equivalent	----	PM/PM-10	----
4	---	Shakeout/Truck Dump	1500 TPH	Wet suppression or equivalent	----	PM/PM-10	----
5	---	Foreign Belt	1500 TPH	Wet suppression or equivalent	----	PM/PM-10	----
6	---	Foreign Breaker Building	1500 TPH	Wet suppression or equivalent	----	PM/PM-10	----
6A	---	Foreign Rock Chute	200 TPH	Wet suppression or equivalent	----	PM/PM-10	----
6B	---	Foreign Rock Bin	200 TPH	Wet suppression or equivalent	----	PM/PM-10	----
7	---	Foreign Raw Belt	1500 TPH	Wet suppression or equivalent	----	PM/PM-10	----
8	---	Plant Feed Belt	1400 TPH	Wet suppression or equivalent	----	PM/PM-10	----
10	---	Preparation Building	1400 TPH	Wet suppression or equivalent	----	PM/PM-10	----
11	---	Silo 1 Feed (Midds Storage) Belt	400 TPH	Wet suppression or equivalent	----	PM/PM-10	----
12	---	Dryer Fed Belt	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
13	13-1	Thermal Dryer - ENI Coal #10	411.3 TPH	Cyclone Wet Scrubber Mist Eliminator	13-1 13-2 13-3	PM,PM-10, SO ₂	04/02/1984
13A	13-1	Thermal Dryer – Coal	130 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	13-1 13-2 13-3	PM,PM-10, SO ₂	04/02/1984

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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
13B	13-1	Thermal Dryer - Oil/Elect.	12 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	13-1 13-2 13-3	PM,PM-10, SO ₂	04/02/1984
14	---	Refuse Belt 1	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
16	---	Refuse Belt 2	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
16B	---	Refuse Bin	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
17	---	Silo 2 Feed Belt	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
18	---	Silo 1	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
19	---	Silo 2	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
20	---	Foreign Clean Belt In (Chute)	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
22	---	Loadout Belt	1200 TPH	Wet suppression or equivalent	----	PM/PM-10	----
23	---	Loadout	1200 TPH	Wet suppression or equivalent	----	PM/PM-10	----
24	---	Dryer Bypass Chute	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
27	---	Roads	----	Wet suppression	----	PM/PM-10	----
28	---	Mine Clean Belt	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
28A	---	Top of Silo Transfer Belt	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
28B	---	Clean Coal Transfer Belt	800 TPH	Wet suppression or equivalent	----	PM/PM-10	----
29	---	Midds Collection Belt	400 TPH	Wet suppression or equivalent	----	PM/PM-10	----
48	---	Raw Storage Pile	3800 TPH	Wet suppression	----	PM/PM-10	----
49	---	Clean Storage Pile	3800 TPH	Wet suppression	----	PM/PM-10	----
50	---	Refuse Pile	800 TPH	Wet suppression	----	PM/PM-10	----
DMTB-1	---	42" Conveyor	1,800 TPH	Partial enclosure with wet suppression or wet material	----	PM/PM10	05/09/11 for Reg. No. 11690
DMTB-2	---	42" Conveyor	1,800 TPH	Partial enclosure with wet suppression or wet material	----	PM/PM10	05/09/11 for Reg. No. 11690

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Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
DMTB-3	---	42" Conveyor	1,800 TPH	Partial enclosure with wet suppression or wet material	----	PM/PM10	05/09/11 for Reg. No. 11690
DMTB-4	---	42" Conveyor	1,800 TPH	Partial enclosure with wet suppression or wet material	----	PM/PM10	05/09/11 for Reg. No. 11690
DMTB-5	---	43" Conveyor	1,500 TPH	Partial enclosure with wet suppression or wet material	----	PM/PM10	05/09/11 for Reg. No. 11690
DMTB-6	---	42" Conveyor	1,800 TPH	Partial enclosure with wet suppression or wet material	----	PM/PM10	05/09/11 for Reg. No. 11690
DMSCR-1	---	8' x 20' Vibrating Screen	1,800 TPH	Partial enclosure with wet suppression or wet material	----	PM/PM10	05/09/11 for Reg. No. 11690
2F	---	Conveyor Belt	200 TPH	Wet suppression or full enclosure	----	PM/PM-10	01/30/15
2G	---	Steel Bin	200 TPH	Wet suppression	----	PM/PM-10	01/30/15
16A	---	Refuse Belt 3	800 TPH	Wet suppression or full enclosure	----	PM/PM-10	01/30/15
25	---	Dump Bin	800 TPH	Partial enclosure	----	PM/PM-10	01/30/15
26	---	48" Conveyor	800 TPH	Wet suppression or full enclosure	----	PM/PM-10	01/30/15
51	---	Midds Belt	300 TPH	Wet suppression or full enclosure	----	PM/PM-10	01/30/15
52	---	Midds Bin	300 TPH	Wet suppression	----	PM/PM-10	01/30/15
Misc	---	Miscellaneous (wet) coal processing equipment	----	Wet suppression	----	PM/PM-10	04/02/1984
RICE-2	---	Emergency SI RICE Office Mine Tracking Backup LPG	165 HP	---	---	---	---
RICE-3	---	Emergency SI RICE Hoist Backup, LPG-fired	183 HP	---	---	---	---

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
RICE-4	---	Portable Diesel Emergency CI RICE Mine Vent Generator (manufactured 1997; constructed September, 2014)	2695 HP	----	----	----	----
SBDM1	---	Spraddle Branch Raw Coal Truck Loading	1000 T/hr	Wet suppression	----	PM/PM-10	01/30/15
SBDM2	---	Spraddle Branch Raw Coal Storage Pile	1000 T/hr	Wet suppression	----	PM/PM-10	01/30/15
SBDM3	---	Spraddle Branch Mine Ventilation System	----	Enclosure and wet conditions	---	PM/PM-10	01/30/15
SBDM4	---	Spraddle Branch Generac Model 05524 propane-fired emergency generator	32 Hp	---	---	----	01/30/15

EMISSIONS INVENTORY

A copy of the 2013 permit application emission inventory is attached. Emissions are summarized in the following tables.

2013 Actual Emissions

	2013 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	66.0	2.7	27.2	17.1	101.0

Emissions of hazardous air pollutants (HAP) are negligible.

Coal Thermal Dryer Applicable Requirements - ENI Coal Flo #10 Dryer - ID# 13

Limitations

The thermal dryer commenced operation in 1980 after a state permit had been issued November 29, 1977 and a PSD permit was issued on July 9, 1979 by the United States Environmental Protection Agency (EPA). EPA subsequently modified the PSD permit on July 1, 1981. On April 2, 1984, the two permits were merged into a single permit and the Commonwealth of Virginia took over enforcement of the PSD permit conditions. There have not been any subsequent modifications to the thermal dryer.

The facility is subject to 40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants and 9 VAC 5-50-410 Subpart Y. The following limitations are BACT requirements from the consolidated PSD permit issued April 2, 1984. Please note that the condition numbers are from the 1984 PSD permit.

Specific Condition 4: Limit on hours of operation.

Specific Condition 5: Drying operations must comply with design specifications in the application.

Specific Condition 6: Emission limitations.

Specific Condition 7: Required control equipment for the thermal dryer.

Specific Condition 8: Scrubber must be maintained according to design specifications.

Specific Condition 9: Approved fuels.

Specific Condition 11 and General Condition 5: Continuous monitors.

Specific Condition 10 and General Condition 3: Emissions testing (completed upon construction).

Specific Condition 12: Visible emission limitation.

Specific Condition 13: Minimize fugitive dust.

Specific Condition 14: Requirement to restrict public access to areas where the concentration of sulfur dioxide and/or particulate matter was modeled to exceed the standard.

Specific Condition 15: Specifies minimum cyclone and mist eliminator control efficiencies. Note that this condition was established based on a June 22, 1976 permit application which presented the collection efficiencies as a description of the thermal dryer control system. Initial permit limitations were established using these presumed collection efficiencies, but the emission limits were later revised using actual stack test results. No current emission limits are established based on these efficiencies.

General Condition 1: Requires submission of quarterly progress reports (completed).

General Condition 2: Requires notification of construction and operation milestones and testing schedule (completed).

General Condition 4: The facility must be designed to permit emissions testing.

General Condition 8: Installation of monitoring devices

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-10 – 50 contain general requirements for proper operation, maintenance, recordkeeping, notification, and compliance.

9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions

9 VAC 5-50-90 and 300, New Source Standard for Fugitive Emissions

9 VAC 5-50-410, New Source Performance Standards for Coal Preparation and Processing Plants – Subpart Y

Monitoring

The monitoring and recordkeeping requirements in Specific Condition 11 and General Condition 5 of the consolidated PSD permit issued April 2, 1984 have been modified to meet Part 70 requirements. These conditions require the following monitoring efforts:

Continuous measurement of the thermal dryer exit gas temperature.

Continuous measurement of the venturi pressure loss.

Continuous measurement of the water supply pressure.

The Title V permit contains a requirement for visible emissions observations of the thermal dryer exhaust at least once each consecutive 14-day period to determine if the unit has any visible emissions (does not include condensed water vapor/steam). If visible emissions are observed during these required observations, visible emissions evaluations (VEE) in accordance with 40 CFR 60 Appendix A, Method 9, shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed 20% opacity, the VEE shall be conducted for a total of sixty (60) minutes. A Method 9 evaluation shall not be required if the visible emissions condition is corrected as expeditiously as possible such that no visible emissions exist; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. This will satisfy the periodic monitoring requirement for the visible emission limitation included in the permit.

The April 2, 1984 permit contains a condition identifying the control efficiency expectations for the thermal dryer cyclone and wet scrubber mist eliminator. These efficiencies were not used to develop the associated particulate matter emission limitations for the thermal dryer. Emissions testing was used to establish permit emission limits, which are believed to reflect an even greater degree of control by the cyclone and mist eliminator. Therefore, specific control efficiencies do not need to be further evaluated provided the emission limitations are met (verified through visible emissions observations and periodic stack testing). The permit contains the requirement for annual internal inspection of the cyclones and mist eliminator.

Based on results from stack testing conducted upon initial startup, the emissions from the facility are not likely to exceed the emission standards. Subsequent stack tests demonstrate compliance with the emission limits. The company is required to conduct such tests once each permit term. With proper operation of the equipment and associated controls, the thermal dryer will not exceed the emission limitations.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit.

The facility is a major source subject to Title V permitting and therefore subject to 40 CFR Part 64 – Compliance Assurance Monitoring (CAM). CAM applies if an emissions unit meets all of the following criteria on a pollutant-by-pollutant basis:

- a. Emits or has the potential to emit uncontrolled quantities of one or more regulated air pollutants at or above major source levels;
- b. Is subject to one or more emissions limitations for the regulated air pollutants for which it is major before control; and
- c. Uses an add-on control device to achieve compliance with the emissions limitations.

The thermal dryer uses a venturi scrubber to comply with the PM emission limit. Therefore, the thermal dryer meets the above criteria only when considering PM, and CAM is required only for PM. The applicant previously submitted CAM information as required by 40 CFR 64.5, Deadlines for Submittals. No changes to the CAM plan are being made in this renewal.

The Title V permit contains requirements from General Condition 5 (as specified in NSPS Subpart Y) of the April 2, 1984 permit for installation of the following continuous monitoring devices:

- a. A monitoring device for the temperature of the gas at the exit of the thermal dryer;
- b. A monitoring device for the measurement of the pressure loss through the venturi constriction of the control device; and
- c. A monitoring device for the measurement of the water supply pressure to the control equipment.

The permit contains requirements to monitor, operate, calibrate and maintain the above-listed devices according to the CAM plan proposed by the applicant and summarized in the following table:

Thermal Dryers (ID# 13) Compliance Assurance Monitoring Plan

	Indicator No. 1	Indicator No. 2	Indicator No. 3
I. Indicator	Exhaust Gas Temperature	Pressure Loss	Water Supply Pressure
A. Measurement Approach	Temperature measurement device	Differential pressure gauge	Pressure gauge
II. Indicator Range	An excursion is defined as an exhaust gas temperature exceeding 200°F	An excursion is defined as a pressure loss through the scrubber of less than 20 and greater than 50 inches water column	An excursion is defined as a water supply pressure of less than 15 pounds per square inch gauge
III. Performance Criteria			
A. Data Representativeness	The temperature measurement device monitors the temperature of the gas at the exit of the thermal dryer	The differential pressure gauge monitors the static pressures upstream and downstream of the scrubber's venturi throat	The water pressure gauge monitors water supply pressure to the scrubber. The gauge is to be located close to the water discharge point.
B. Verification of Operational Status	The monitoring device shall be installed and calibrated according to the manufacturer's recommendations prior to the initial performance tests	The monitoring device shall be installed and calibrated according to the manufacturer's recommendations prior to the initial performance tests	The monitoring device shall be installed and calibrated according to the manufacturer's recommendations prior to the initial performance tests
C. QA/QC Practices and Criteria	The device is to be certified by the manufacturer to be accurate within $\pm 3^\circ$ Fahrenheit and calibrated annually based on manufacturer's recommendations	The device is to be certified by the manufacturer to be accurate within ± 1 inch water gage and calibrated annually based on manufacturer's recommendations	The device is to be certified by the manufacturer to be accurate within $\pm 5\%$ of design water supply pressure and calibrated annually based on manufacturer's recommendations
D. Monitoring Frequency	Measure continuously	Measure continuously	Measure continuously
E. Data Collection Procedures	Record continuously on a chart recorder	Record continuously on a chart recorder	Record continuously on a chart recorder
F. Averaging Period	None	None	None

(9 VAC 5-80-110 and 40 CFR 64)

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- a. Annual consumption of coal by combustion in the thermal dryer.
- b. Monthly and annual production of dried coal.
- c. Monthly and annual hours and days of operation.
- d. Results of annual calibration of the measurement devices.
- e. Log of inspections of cyclones and the mist eliminator.
- f. Results of visible emissions observations.

Testing

The Title V permit requires that a stack test for PM, SO₂, and NO_x be conducted once every five years prior to submitting the renewal Title V application. This requirement was clarified by a Title V permit modification issued on May 25, 2010. The latest stack test was conducted in 2013, showing compliance with the emissions limits for all three pollutants. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

No specific reporting requirements have been included in the permit for the thermal dryer.

Streamlined Requirements

Since Specific Condition 12 the April 2, 1984 permit requires the thermal dryer to meet 20% opacity at all times, the less stringent requirements of 9 VAC 5-50-80 & 290, and 9 VAC 5-50-90 & 300 may be streamlined.

Specific Condition 10 and General Conditions 1, 2, 3, and 9, of the April 2, 1984 permit have not been included in the Title V permit. These conditions pertain to notifications of the progress of construction and operation, as well as stack testing requirements. The requirements contained in these conditions have been completed and are no longer applicable, and are appropriate for streamlining.

Emergency Engine Applicable Requirements - RICE-2, RICE-3, RICE-4 , SBDM4

Limitations

The following limitations are BACT requirements from a minor new source review permit issued on January 30, 2015:

- Condition 14: Specification that the generator SBDM4 be maintained and operated according to manufacturer's requirements.
- Condition 15: Specification that the generator SBDM4 be operated only in emergency circumstances and for maintenance checks.
- Condition 16: Specifies that the approved fuel for the generator SBDM4 is propane.
- Condition 18: Specifies that the emissions from the generator SBDM4 shall not exceed 27.3 lb/hr and 6.8 T/yr of CO.
- Condition 23: Specifies that the visible emissions from the generator SBDM4 shall not exceed 10% opacity, except for one six-minute period during an hour in which opacity shall not exceed 20% opacity.
- Condition 27: Specifies that the company maintains records of: annual hours of operation of generator SBDM4, calculated monthly; SBDM4 engine information; SBDM4 engine manufacturer's written operating procedures; and, reasons for operation of generator SBDM4.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-10 – 50 contain general requirements for proper operation, maintenance, recordkeeping, notification, and compliance.

9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions

The units were all manufactured and constructed after 1972, and may be subject to an opacity limit of 20%, except for one six-minute period in any one hour not to exceed 30%.

9 VAC 5-60-100, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, applies to stationary RICE units constructed after June 12, 2006 located at an area source.

- RICE-2 (165 hp) is fired by propane and was manufactured in 1997 and constructed on January 20, 2013.
- RICE-3 (183 hp) is fired by propane and was manufactured in March, 2007 and constructed in March, 2009.

- RICE-4 (2695 hp) is fired by diesel, and was manufactured in 1997 and constructed on September 20, 2014. This unit has not been onsite for 12 consecutive months, and is regarded as a nonroad engine (not stationary).
- SBDM4 (32 hp) is fired by propane and was constructed in March, 2010. The manufacturing date was November 1, 2009.

Units RICE-2, RICE-3, and SBDM4 are subject to MACT ZZZZ, and are considered new units. The requirements of the rule (40 CFR 63.6590(c)(1)) are that RICE units at area sources of HAP comply with the requirements of 40 CFR 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines or 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

According to Subpart JJJJ, requirements apply to owners of emergency units with maximum engine power greater than 25 HP, if they were constructed after June 12, 2006, but were manufactured after January 1, 2009. Because they were manufactured prior to 2009, neither RICE-2 nor RICE-3 is subject to NSPS Subpart JJJJ. Also, neither has any other requirements from MACT ZZZZ.

SBDM4, however, is subject to the requirements of NSPS Subpart JJJJ as follows:

40 CFR 60.4231(c) requires manufacturer certification to Phase 1 emission standards of 40 CFR 90.103 applicable to class II engines;

40 CFR 60.4233(c) requires the owner/operator to comply with the emission standards of 40 CFR 60.4231(c);

40 CFR 60.4237(c) requires that an engine of this size that does not meet non-emergency emission standards must install a non-resettable hour meter upon startup;

40 CFR 60.4234 requires that owners/operators meet the emission standards over the course of the life of the engine;

40 CFR 60.4243(a)(1) requires the owner/operator to maintain records of maintenance, and meet the requirements of 40 CFR 1068, Subparts A-D, as applicable;

40 CFR 60.4243(d) requires that operation of the engine be limited to 100 hours per year for maintenance testing and for non-emergency purposes, with non-emergency operation being limited to 50 hours per year. Exceptions are noted;

40 CFR 60.4245(a)-(b) requires that owners/operators keep records of notifications, maintenance, documentation regarding certification, and hours of operation in emergency and non-emergency service;

40 CFR 60.4246 Table 3 identifies requirements of 40 CFR 60, Subpart A, General Provisions.

RICE-4 is a portable engine (manufactured 1997, constructed 2014) that appears to qualify as a nonroad engine defined by 40 CFR 1068.30. It is transportable and has been on location less than 12 months. According to MACT ZZZZ, a nonroad engine is not a stationary RICE, and is not subject to any requirements of the rule. Likewise, 40 CFR 60, Subpart IIII does not apply to nonroad engines. RICE-4 appears to be exempt from federal requirements. According to 40 CFR 1068.30, if it remains on-site for 12 consecutive months, it then becomes a stationary unit and will become subject to 40 CFR 63, Subpart ZZZZ.

Although the unit is subject to opacity requirements of 9 VAC 5-50-80, it is used in an emergency capacity for backup power, is fired by diesel fuel, and will have limited opportunities in which to operate. Therefore, no periodic visible emissions checks will be required.

9 VAC 5-80-710 - 720, Insignificant Activities – The company does not regard RICE-2 or RICE-3 as insignificant emission units since they are subject to 40 CFR 60, Subpart JJJJ (although they have no requirements). RICE-4 does not appear to meet the criteria for insignificant emissions units. Emissions data from the company indicate that uncontrolled emissions from RICE-4 exceed the thresholds in 9 VAC 5-80-720 B. Therefore, the unit is not insignificant.

Monitoring

Although the engines are subject to an opacity limitation under 9 VAC 5-50-80, because units RICE-2, RICE-3, and SBDM4 are fired with propane, no opacity is expected under normal operation. Therefore, no visible emissions checks are recommended to demonstrate compliance.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include documentation of malfunctions, notifications, performance tests, hours of operation, and documentation for meeting emission standards.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The company is required to provide notification for malfunctions of processing or control equipment that may cause excess emissions for more than one hour. An annual compliance certification is required of all Title V permit holders.

Streamlined Requirements

There are no streamlining proposals for this operation.

Coal Processing Requirements For Ref. Nos. 2F, 2G, 16A, 25, 26, 51, 52, SBDM-1, SBDM-2, and SBDM-3

Limitations

The following limitations are BACT requirements from a minor new source review permit issued on January 30, 2015:

- Condition 2: Specification of particulate emissions control for the truck dump bin (25).
- Condition 3: Specification of particulate emissions control for coal transfer.
- Condition 4: Specification of particulate emissions control for steel bin (2G) and belt conveyor (2F).
- Condition 5: Specification of particulate emissions control for Spraddle Branch Deep Mine raw coal open storage pile (SBDM2) and Spraddle Branch Deep Mine truck loading operation (SBDM1).
- Condition 6: Specification of fugitive emissions control.
- Condition 8: Limit on yearly coal throughput for truck dump bin (25) and truck dump conveyor (26).
- Condition 9: Limit on yearly coal throughput for middlings coal conveyor (51) and middlings coal bin (52).
- Condition 10: Limit on yearly coal throughput for steel bin (2G) and belt conveyor (2F).
- Condition 12: Limit on raw coal to Spraddle Branch Deep Mine raw coal open storage pile (SBDM2) and Spraddle Branch Deep Mine truck loading operation (SBDM1).
- Condition 13: Limit on mine safety dust consumption at Spraddle Branch Deep Mine facility.
- Condition 17: Emission limitations for truck dump bin (25), truck dump conveyor (26), middlings coal bin, (52) middlings coal conveyor (51), steel bin (2G), and belt conveyor (2F).
- Condition 19: Emission limitations for Spraddle Branch Deep Mine ventilation system exhaust (SBDM3).
- Condition 20: Visible emission limitations for steel bin (2G) and belt coal conveyor (2F).

Condition 21: Visible emission limitations for Spraddle Branch Deep Mine raw coal open storage pile (SBDM2) and truck loading operation (SBDM1).

Condition 22: Visible emission limitation for Spraddle Branch Deep Mine ventilation system exhaust (SBDM3).

Condition 24: Visible emission limitations for other coal handling and processing equipment (16A, 25, 26, 51, and 52).

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-10 – 50 contain general requirements for proper operation, maintenance, recordkeeping, notification, and compliance.

9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions – 20% opacity not to exceed 30% for 6 minutes in any one hour.

9 VAC 5-50-90 and 300, New Source Standard for Fugitive Emissions – take reasonable precautions to reduce dust from fugitive sources.

9 VAC 5-50-410, New Source Performance Standards for Coal Preparation and Processing Plants – Subpart Y.

Monitoring and Recordkeeping

The monitoring and recordkeeping requirements in Conditions 27 and 32 of the NSR permit issued on January 30, 2015 have been modified to meet Part 70 requirements.

Condition 27: Records of annual raw coal throughput to Spraddle Branch Deep Mine open storage pile (SBDM2) and truck loading operation (SBDM1); records of annual mine safety dust consumption at Spraddle Branch Deep Mine; records of coal throughput to truck dump bin (25), truck dump conveyor belt (26), middlings coal conveyor belt (51), middlings coal bin (52), coal storage bin (2G), and belt conveyor (2F); and results of visible emissions evaluations.

Condition 32: Maintain a logbook for affected units subject to NSPS Subpart Y after May 27, 2009. This pertains to the coal storage bin (2G), and belt conveyor (2F). The logbook must contain maintenance procedures, visual observations, monthly coal processing records, and monthly certifications of dust suppression systems.

Testing

The testing requirements in Condition 31 of the NSR permit issued on January 30, 2015 have been modified to meet Part 70 requirements.

Condition 31: Periodic visible emissions performance tests of the coal storage bin (2G), and the belt conveyor (2F).

The Title V permit contains requirements for the company to conduct quarterly visible emission checks on the Spraddle Branch Deep Mine (SBDM3) ventilation system exhaust points.

40 CFR 60.255 requires on-going visible emissions evaluations or alternative testing (post-04/28/2008 equipment).

The company is required to conduct weekly visible emission checks on the coal processing activities at the plant – see Facility-wide requirements.

40 CFR 60.255(b) requires on-going visible emissions evaluations on equipment constructed after April 28, 2008 (2G and 2F). Likewise, 40 CFR 60.255(f) and (g) contain alternative procedures that the company may elect to follow.

Reporting

The monitoring and recordkeeping requirements in Condition 33 of the minor NSR permit issued on January 30, 2015 have been modified to meet Part 70 requirements.

Condition 33: Reports of semiannual excess emissions and performance test results for the coal storage bin (2G) and belt conveyor (2F).

The reporting requirements of 40 CFR 60.258(b) & (c) are included in the aforementioned requirement.

Streamlined Requirements

9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions requires a minimum 20% opacity for sources of visible emissions. However, Ref. Nos. 2F & 2G are subject to a more stringent requirement of 10% opacity (Condition #20 of minor new source review permit dated January 30, 2015). These regulatory requirements will therefore be streamlined for those units.

Conditions of the January 30, 2015 minor NSR permit relating to the Reedy Ridge Deep Mine stacker belt (RRSB-1) and the Reedy Ridge open storage pile (RRRC-1) expired because construction of the units did not commence within 18 months of the applicable permit date (July 26, 2013). These requirements no longer apply.

**Coal Processing Requirements For Deep Mine 41 - Ref. Nos. DMTB1 - DMTB6, and
DMSCR-1**

Limitations

The following limitations are BACT requirements from a May 9, 2011, minor new source review permit issued to Paramount Coal Company Virginia, LLC (Registration No. 11690) on May 9, 2011 regarding Deep Mine 41:

- Condition 2: Specification of particulate emissions control for conveyor belts DMTB1-6 and screen DMSCR-1.
- Condition 3: Specification of fugitive emissions control.
- Condition 4: Limit on yearly coal throughput to conveyor belt DMTB1.
- Condition 5: Emission limitations for the screen DMSCR-1 and conveyors DMTB1 - DMTB6.
- Condition 6: Visible emission limitations for conveyor belts DMTB1 - DMTB6.
- Condition 7: Visible emission limitations for the screen DMSCR-1.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-10 – 50 contain general requirements for proper operation, maintenance, recordkeeping, notification, and compliance.

9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions – 20% opacity not to exceed 30% for 6 minutes in any one hour.

9 VAC 5-50-90 and 300, New Source Standard for Fugitive Emissions – take reasonable precautions to reduce dust from fugitive sources.

9 VAC 5-50-410, New Source Performance Standards for Coal Preparation and Processing Plants – Subpart Y.

Monitoring and Recordkeeping

The monitoring and recordkeeping requirements in Condition 12 of the NSR permit issued on May 9, 2011 have been modified to meet Part 70 requirements.

Maintain records of coal throughput and results of visible emissions evaluations.

Maintain a logbook for affected units subject to NSPS Subpart Y after May 27, 2009 containing maintenance procedures, visual observations, monthly coal processing records, and monthly certifications of dust suppression systems.

Testing

The testing requirements in Conditions 10 and 11 of the NSR permit issued on May 9, 2011 have been modified to meet Part 70 requirements.

Condition 10: Initial visible emission evaluations of the conveyor belts DMTB1 - DMTB6 and screen DMSCR-1. This condition has been fulfilled, and will be streamlined.

Condition 11: Periodic visible emission evaluations of the screen DMSCR-1.

40 CFR 60.255(f) and (g) contain alternative testing procedures that the company may elect to follow.

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The monitoring and recordkeeping requirements in Conditions 9, 10, and 13 of the NSR permit issued on May 9, 2011 have been modified to meet Part 70 requirements.

Condition 9: Semiannual reports of excess visible emissions evaluations, and submit visible emissions evaluation results to EPA within 60 days of completion.

Condition 10: Initial visible emission evaluations of the conveyor belts and screen. This condition has been fulfilled, and will be streamlined.

Condition 13: Providing initial notifications of the construction and startup of the equipment. These notifications were provided, and this requirement will be streamlined.

Streamlined Requirements

9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions requires a minimum 20% opacity for sources of visible emissions. However, the screen is subject to a more stringent requirement of 10% opacity (Condition #7 of minor new source review permit dated May 9, 2011). This regulatory requirement will therefore be streamlined for this unit.

Conditions 10 of the NSR permit issued on May 9, 2011 involves the performance of initial visible emissions evaluations. This requirement was completed by the company, and will not be included in the Title V permit.

Condition 13 of the NSR permit issued on May 9, 2011 involves providing initial notifications of the construction and startup of the equipment. These notifications were provided, and this requirement will not be included in the Title V permit.

Greenhouse Gas Applicable Requirements

On June 23, 2014, the United States Supreme Court issued a decision to vacate an EPA requirement for issuing a Title V permit for sources emitting more than 100,000 tons per year of CO₂e. Although the company submitted a separate Title V permit application providing CO₂e emissions estimates from the underground mining operation, the permit application was withdrawn subsequent to the US Supreme Court decision. These emissions will not be considered in this analysis.

Underground coal mines that liberate 36,500,000 cubic feet or more of methane per year are subject to greenhouse gas reporting requirements of 40 CFR 98, Subpart FF. The company estimates that over 259 million cubic feet of methane was liberated in 2011. The company is required to report these emissions to EPA, but the reporting requirements of 40 CFR Part 98 are not applicable requirements in 40 CFR Parts 70 and 71, and such requirements will not appear in the Title V permit.

UNDERGROUND COAL MINE APPLICABLE REQUIREMENTS – Emission Unit ID: Deep Mine 41

Deep Mine 41 (Registration No: 11690) is located on property contiguous to and under common ownership with the McClure River coal preparation plant, and is now included with the preparation plant in the Title V operating permit. According to the original permit for the coal processing equipment (minor new source review permit issued on May 9, 2011), the capacity of the mine belt is 4,400 tons/hr.

Limitations

The provisions of 9 VAC 5-50-10.D indicate that in the absence of more restrictive permit conditions or specific requirements from 9 VAC 5 Chapter 50, the provisions of 9 VAC 5 Chapter 40 shall apply. A review of 9 VAC 5 Chapter 40 indicates the following emissions standards in 9 VAC 5-40 Article 4 – Emission Standards for General Process Operations apply to the underground coal mine:

9 VAC 5-40-260.D: Standard for particulate matter for process weight rates in excess of 60,000 pounds per hour using the following equation:

$$E = 55.0P^{0.11} - 40,$$

Where: E = emission rate in lb/hr, and
P = process weight in tons/hr.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable to Deep Mine 41 vent shaft exhausts:

9 VAC 5-50-80, Standard for Visible Emissions – 20% opacity not to exceed 30% for 6 minutes in any one hour.

Vent shaft exhausts are not specifically identified in the Title V permit since ventilation of underground coal mining is a dynamic process, with new shafts frequently constructed to vent active, constantly moving underground mining areas and old inactive shafts are closed.

Monitoring

The maximum allowable PM emission rate calculated in accordance with the equation indicated in 9 VAC 5-40-260 D is based on the process weight rate of the affected process. Therefore, recordkeeping demonstrating the process weight rate of the mine can be used to demonstrate compliance with the PM emission standard and satisfies the periodic monitoring requirement.

Compliance with the PM and opacity standards is monitored by visible emission observations performed on each active exhaust vent of the underground coal mine. The permittee is required to conduct quarterly visual observations of each active coal mine exhaust vent. If visible emissions appear to exceed 10% opacity during these quarterly visual observations, a six-minute visible emission evaluation (VEE) in accordance with 40 CFR 60, Appendix A, Method 9, must be performed. If during the six minutes, any readings above 20% opacity are noted, a one-hour VEE will be required. A Method 9 evaluation will not be required if the visible emissions condition is corrected as expeditiously as possible such that no visible emissions exceed 10% opacity; the mine is operating at normal conditions; and, the cause and corrective measures taken are recorded.

Recordkeeping

The Title V permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

The production rate of raw coal in tons per hour from the underground coal mine, calculated monthly as the sum of each consecutive 12-month period; and

Results of visible emission observations and evaluations.

Testing

The permit does not require specific tests of the underground coal mine. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

There are no specific reporting requirements for the underground coal mine.

Facility-Wide Requirements

Limitations

The permit includes the coal processing and cleaning equipment as the facility-wide equipment.

The following limitations are state BACT requirements from the minor New Source Review (NSR) permit issued to Registration No. 10804 on January 30, 2015, and the minor NSR permit issued to Registration No. 11690 on May 9, 2011. Please note that the specific condition numbers are from the minor NSR permit unless otherwise noted.

Condition 6 of the January 30, 2015 permit and Condition 3 of the May 9, 2011 permit:
Requires the company to use reasonable precautions to control fugitive dust emissions from coal processing, handling, and traffic at the facility.

Condition 26 of the January 30, 2015 permit and Condition 8 of the May 9, 2011 permit:
Requires compliance with New Source Performance Standards, Subpart Y, Standards of Performance for Coal Preparation Plants.

Condition 38 of the January 30, 2015 permit and Condition 16 of the May 9, 2011 permit:
The permittee shall have available written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum.

The coal processing and cleaning equipment is subject to 40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants. The coal processing and cleaning equipment is also subject to 9 VAC 5, Chapter 40, Article 15, Emission Standards for Coal Preparation Plants. 9 VAC 5, Chapter 40, Article 15, which does not indicate any emission limits for the coal processing equipment, only references the existing rules for visible emissions, fugitive emissions and others. Since the visible emissions limitation from 40 CFR 60, Subpart Y is more stringent, that limitation will be used. 40 CFR 60.254 establishes a 20% opacity requirement for applicable equipment constructed prior to April 28, 2008.

Monitoring

The monitoring requirements included in the permit meet Part 70 requirements.

The permit contains a requirement for all coal processing, conveying, storage, transfer and loading systems, excluding the thermal dryer and underground coal mine exhausts, to be visually observed at least once each calendar week to determine which operating emissions units have visible emissions (does not include condensed water vapor/steam). If visible emissions are observed during these weekly observations, visible emissions evaluations in accordance with 40 CFR 60, Appendix A, Method 9 will be conducted on those units with visible emissions. The VEE will be conducted for a minimum of six (6) minutes. If any of the observations exceed 20% opacity, the VEE will be conducted for a total of sixty (60) minutes. A Method 9 evaluation will not be required if the visible emission condition is corrected as expeditiously as possible such that no visible emissions exist; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. This satisfies the periodic monitoring requirement for the visible emission limitation included in the permit.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records are identified in the unit-specific requirements identified in other sections of the permit.

Testing

The permit does not require source tests for any equipment not already specified. The Department and EPA have authority to require testing not included in this permit, if necessary, to determine compliance with an emission limit or standard.

Reporting

Facility-wide reporting requirements are discussed in the General Conditions sections below.

Streamlined Requirements

There are no streamlined requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE ONLY APPLICABLE REQUIREMENTS

The company did not identify state-only enforceable requirements, and none were included in the permit.

FUTURE APPLICABLE REQUIREMENTS

The company did not identify any future applicable requirements. DEQ is unaware of any future requirements.

INAPPLICABLE REQUIREMENTS

The company did not identify inapplicable requirements. The company was authorized to install coal storage and handling equipment (Reedy Ridge units RRSB-1 and RRRC-1) which would have been subject to the post-05/27/2009 requirements of NSPS Subpart Y (40 CFR 60.254(c)). This equipment was not installed, and the NSPS requirements are now inapplicable. Also, Conditions 7, 11, 17, 27, 28, 32, 33, and 34 of the minor NSR permit issued January 30, 2015 contain expired requirements related to this equipment.

COMPLIANCE PLAN

Since the facility is currently in compliance with all applicable requirements, no compliance plan is included in the permit.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation ¹ (9 VAC 5-80-720 A.)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
30	Tank MR-1A (diesel)		VOC	
31	Tank MR-1B (motor oil)		VOC	
32	Tank MR-1C (hydraulic oil)		VOC	
33	Tank MR-1D (gear oil)		VOC	
36	Tank MR-2C (kerosene)		VOC	
37	Tank MR-3A (alcohol)		VOC	
38	Tank MR-3B (gasoline)		VOC	
40	Tank MR-4A (diesel)		VOC	
41	Tank MR-4 (kerosene)		VOC	
42	Tank MR-5A (hydraulic oil)		VOC	
43	Tank MR-5B (motor oil)		VOC	

Emission Unit No.	Emission Unit Description	Citation ¹ (9 VAC 5-80-720 A.)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
44	Tank MR-5C (diesel)		VOC	
47	Wastewater Treatment Plant		VOC	
48	Parts Washer		VOC	
54	Tank #1 Loadout (salt)		VOC	
55	Tank #2 Loadout (salt)		VOC	
56	Tank #3 Loadout (glycol)		VOC	
57	Tank #4 Loadout (salt)		VOC	
58	Tank #5 Loadout (salt)		VOC	
DB-1	Rock Dust Bin		PM10	

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

These units were all insignificant based on uncontrolled emission rates being less than those thresholds specified in 9 VAC 5-80-720 B.

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit was placed on public notice in *The Dickenson Star* newspaper in Clintwood, Virginia on July 29, 2015. The public comment period extended from July 30, 2015 to August 28, 2015. No comments were received from the public.

EPA's review extended an additional 15 days through September 12, 2015. EPA submitted comments on August 25, 2015, and the comments and responses are included in the documentation for the permit. The comments and changes are summarized below:

- EPA noted that control systems associated with equipment in the table do not always match those described in conditions in the permit. DEQ corrected this.

- EPA noted that the CAM plan for the thermal dryer does not contain a temperature range for the thermal dryer exhaust gases. DEQ added a temperature range <200°F.
- EPA commented that the cyclones and mist eliminator associated with the thermal dryer and scrubber did not have monitoring requirements. DEQ added a requirement for annual internal inspection of the mist eliminator.
- EPA noted a discrepancy of the frequency of the visible emission evaluation for the underground mine vent exhausts between what is required in the permit (Condition #65) and what is stated in the Statement of Basis. DEQ changed the language in the Statement of Basis to "quarterly" evaluations as stated in the permit.
- EPA asked that permit Condition #20 include the number of days of operation. DEQ added this requirement.
- EPA requested that Conditions #52 and #62 be clarified to make a connection between paragraphs (a), (b), and (c) and 40 CFR 60.255 (f)(1), (f)(2), and (g). DEQ did this.
- EPA asked that the table of insignificant emissions units be clarified in the Statement of Basis in order to emphasize that the units are exempt by emissions potential. DEQ added this clarification to the Statement of Basis.

In addition to the abovementioned changes, minor grammatical and structural changes were made to the final version of the documents.

Attachment

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Commonwealth of Virginia
Department of Environmental Quality

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Registration Number: 10804

County - Plant ID: 051-00019

Plant Name: Dickenson-Russell Coal Co/McClure River Prep Plant

POLLUTANT EMISSIONS REPORT (PLANT) (Tons/Year)

Parameter List

Pollutant Type: All Pollutants

Years: 2013-2013

	<u>CO</u>	<u>NO2</u>	<u>PM</u>	<u>PM 10</u>	<u>PM 2.5</u>	<u>SO2</u>	<u>VOC</u>
2013	2.735	101.041	34.510	16.642	0.000	27.226	65.957