

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Southwest Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Moss 3 Preparation Plant – Dickenson-Russell Coal Company, LLC
State Route 615, Russell County, Virginia
Permit No. SWRO10235

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 renewal of the Title V Operating Permit for its Moss 3 Preparation Plant facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Permit Contact: _____
R. A. Lowe
(276) 676-4863

Date: _____

Air Permit Manager: _____
Rob Feagins

Date: _____

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

Date: _____

FACILITY INFORMATION

Permittee

Dickenson-Russell Coal Company, LLC
7546 Gravel Lick Road
Cleveland, VA 24225

Facility location

Moss 3 Preparation Plant
Route 615
Russell County, Virginia

County Plant ID No. 51-167-00006

SOURCE DESCRIPTION

SIC Code: 1221 - Coal preparation

The facility cleans and dries coal prior to shipment by railcar and truck. The facility utilizes two coal fired thermal dryers 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 dryers and wet coal processing; and nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO), greenhouse gases (GHGs), and trace amounts of hazardous air pollutants (HAP) from the thermal dryers.

The facility is a Title V major source of PM, PM-10, VOC, greenhouse gases (GHGs), and NO_x. 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 December 2, 2008, and a State Operating Permit (SOP) issued on October 3, 2003. A copy of each permit is included as an attachment.

COMPLIANCE STATUS

The facility is inspected at least once per year when operating. The facility is currently temporarily shutdown and has not operated since November 2010. Inspections prior to the November 2010 shutdown found the facility to be in compliance. According to the application, the facility is in compliance with all applicable requirements.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
01	----	Railroad Car Thaw Pit Burners	72.8 MMBtu/hr	Partial Enclosure	D001	PM/PM-10	----
02A	02-1	ENI Coal Flo #7.5 Dryer – Coal	100 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	02-1 02-2 02-3	PM/PM-10, SO ₂	----
02B	02-2	ENI Coal Flo #7.5 Dryer – Natural Gas	12 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	02-1 02-2 02-3	PM/PM-10, SO ₂	----
02C	02-2	ENI Coal Flo #7.5 Dryer – Propane	12 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	02-1 02-2 02-3	PM/PM-10, SO ₂	10/3/03
02D	02-2	ENI Coal Flo #7.5 Dryer – Distillate Oil	12 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	02-1 02-2 02-3	PM/PM-10, SO ₂	10/3/03
03A	03-1	ENI Coal Flo #10 Dryer – Coal	135 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	03-1 03-2 03-3	PM/PM-10, SO ₂	----
03B	03-2	ENI Coal Flo #10 Dryer - Natural Gas	12 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	03-1 03-2 03-3	PM/PM-10, SO ₂	----
03C	03-2	ENI Coal Flo #10 Dryer – Propane	12 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	03-1 03-2 03-3	PM/PM-10, SO ₂	10/3/03
03D	03-2	ENI Coal Flo #10 Dryer – Distillate Oil	12 MMBtu/hr	Cyclone Wet Scrubber Mist Eliminator	03-1 03-2 03-3	PM/PM-10, SO ₂	10/3/03
04	----	Crusher Feed Belt	1500 TPH	Wet Suppression and/or enclosure	----	PM/PM-10	----

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
05	-----	Impact Belt	1500 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
06	-----	Raw Coal Crusher	1500 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
07	-----	Stockpile Reclaim Belt	1400 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	8/18/03
08	-----	Silo Belt	1500 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
09	-----	Plant Feed Belt	1200 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
10	-----	Met Collecting Belt	850 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
11	-----	Midds Collecting Belt	100 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	12/02/08
12	-----	Met Dryer Feed Belt	550 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
13	-----	Midds Dryer Feed Belt	400 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
14	-----	Met Product Belt	920 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
15	-----	Track 5 Loadout Belt	850 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----
16	-----	Midds Loadout Belt	850 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
17	-----	Midds Stockpile Belt	617 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
18	-----	Silo	1500 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
19	-----	Met Stockpile Belt	850 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
20	-----	Met Reclaim Belt #1	460 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
21	-----	Met Reclaim Belt #2	460 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
22	-----	Stockpile (destock) Transfer Belt	350 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
23	-----	Refuse Belt 1	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
24	-----	Refuse Collecting Belt	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
25	-----	Rotary Car Dump	1500 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
29	-----	AFB Transfer Belt	650 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
30	-----	Gammamatrix Belt 1	25 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
31	-----	Gammamatrix Belt 2	25 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
32	-----	Met Product Loadout Belt	920 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
33	-----	Refuse Belt 2	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
34	-----	Refuse Belt 3	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
35	-----	Refuse Belt 4	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
36	-----	Refuse Belt 5	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
37	-----	Alt. Refuse Belt 4	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
38	-----	Alt. Refuse Belt 5	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	-----
39	-----	Refuse Belt 6	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
40	-----	Refuse Belt 7	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
41	-----	Refuse Belt 8	600 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
44	Z01	Raw Coal Stockpile	1500 TPH	Wet suppression	-----	PM/PM-10	-----
45	Z01	Clean Coal Stockpile	1250 TPH	Wet suppression	-----	PM/PM-10	-----
46	Z01	Roads	90,000 miles/yr	Wet suppression	-----	PM/PM-10	-----
47	Z01	Refuse Pile	600 TPH	Wet suppression	-----	PM/PM-10	-----
81	-----	Truck Dump	400 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
82	-----	42" Crusher Belt	400 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
83	-----	Screen	400 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	8/18/03
84	-----	Crusher	400 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	8/18/03
85	-----	Feeder	400 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	8/18/03
86	-----	Loadout Belt	800 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	8/18/03

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device Description (PCD)	PCD ID	Pollutant(s) Controlled	Applicable Permit Date
87	-----	150-Ton Loadout Bin	800 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	8/18/03
88	-----	48" Reclaim Belt	460 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	8/18/03
90	-----	Met Coal Vacuum Filter	800 TPH	Wet suppression and/or enclosure	-----	PM/PM-10	8/18/03
91	-----	Ponds fines reclaim belt	160 TPH	Wet Suppression and/or enclosure	-----	PM/PM-10	-----

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the permit application emission inventory is included in the application. Emissions are summarized in the following table:

2009 Actual Emissions	Criteria Pollutant Emission in Tons/Year*						
	VOC	GHGs	SO ₂	PM	PM10	NO _x	CO
Total	62.7	7578.5	26.2	44.8	30.9	98.6	2.8

The emission of HAPs is considered negligible.
 *The facility has not operated since November 2010.

EMISSION UNIT APPLICABLE REQUIREMENTS

Thermal Dryers

ENI Coal Flo #7.5 Dryer - 02A/B/C/D
ENI Coal Flo #10 Dryer - 03A/B/C/D

The thermal dryers commenced operation in March 1981. The startup burners currently installed on each thermal dryer were modified for propane combustion. Additional startup burners for distillate oil combustion were installed on each thermal dryer.

The facility is subject to 40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants. The following limitation from Subpart Y applies to each thermal dryer:

Limit on particulate emissions of 0.031 gr/dscf.

The following opacity limitation is a requirement from 40 CFR 60, Subpart Y, and a State Best Available Control Technology (BACT) requirement from Condition 15 of the minor New Source Review (NSR) permit that was issued on December 2, 2008:

Visible emission limit of less than 20%.

PM concentrations can be correlated to opacity readings. Opacity is used as a surrogate for PM emissions and provides qualitative information on the operation and maintenance of particulate control equipment. Although it is not possible to quantitatively relate opacity readings in a relativistic manner to a corresponding mass emission rate of particulate matter, establishing a correlative relationship is valid and beneficial when judging whether a process might be performing appropriately during the intervening periods between direct measurement observations. Because opacity observations and mass emission rate direct tests are conducted simultaneously and there exists a correlative relationship between the two, there is reasonable

assurance that for the operational periods where opacity is found to be within the specified indicator range, particulate emission rates would also be appropriate, especially when any other related parameters (pressure drop, temperature, etc.) were monitored to be within acceptable ranges. Therefore, compliance with a primary parameter is presumed when a relationally correlated parameter is determined to be in compliance.

Condition 3 of the SOP limits approved fuels for the thermal dryers' start-up burners to natural gas, propane, and distillate oil.

Condition 4 of the SOP requires the distillate oil to meet ASTM specifications for numbers 1 and 2 fuel oil with a maximum sulfur content of 0.5 weight percent.

Condition 6 of the SOP limits throughput to each thermal dryer start-up burners to a total of no more than 193,450 gallons of propane per year and 124,465 gallons of distillate oil per year.

Condition 7 of the SOP requires emissions from each thermal dryer start-up burner to not exceed the following:

Sulfur Dioxide	6.11 lbs/hr	4.42 tons/yr
Nitrogen Oxides	4.25 lbs/hr	3.08 tons/yr
Carbon Monoxide	0.86 lbs/hr	0.62 ton/yr

Condition 8 of the SOP limits visible emissions from the thermal dryers when the start-up burners are in use to no more than 20% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A) except during one six-minute period in any one hour in which visible emissions shall not exceed 30 % opacity. This condition applies at all times except during startup, shutdown, and malfunction.

The following Virginia Administrative Code that has specific emission requirements has been determined to be applicable to Thermal Dryers 2A and 3A, utilizing coal as fuel:

Article 8, Rule 4-8, 9 VAC 5-40-930, Standard for Sulfur Dioxide for Fuel Burning Equipment for Existing Stationary Sources.

$S = 2.64K$ where

S = allowable emissions of sulfur dioxide in lb/hr, and

K = actual heat input at total capacity in MMBtu/hr.

S lbs/hr of sulfur dioxide must not exceed $2.64 \times$ (maximum rated dryer heat input capacity in MMBtu/hr)

Compliance with this condition shall be by approved methods arranged with the Director,

Southwest Regional Office.

Monitoring, Compliance Assurance Monitoring and Recordkeeping

40 CFR 60, Subpart Y requires monitoring as specified below:

Continuous measurement of the thermal dryer exit gas temperature;

Continuous measurement of the venturi pressure drop; and

Continuous measurement of the water supply pressure.

Based on results from stack testing conducted upon initial 1981 startup, the emissions from the facility are not anticipated to exceed the emission standards listed above. With proper operation of the equipment and associated controls, the thermal dryers will not exceed the emission limitations.

Based on Administrative Code 9 VAC 5-40-930 applicability for Thermal Dryers 2A and 3A, perform monthly analysis of a representative coal sample for sulfur content, specifying the method used in the analysis. Details of the analysis shall be arranged with the Director, Southwest Regional Office. These results are to be retained for the most recent five (5) years.

The permit includes requirements for maintaining records of all monitoring and testing required by the permit (Conditions 5 and 6 of SOP dated 10/03/03 and Conditions 4 and 16 of NSR permit dated 12/02/08). These records include:

Annual consumption of coal, natural gas, distillate oil and propane for each thermal dryer, calculated monthly as the sum of each consecutive 12-month period; and,

A log of annual cyclone inspections.

Hourly consumption of coal for Thermal Dryers 2A and 3A. The hourly consumption shall be calculated as the total coal consumed each month per dryer divided by the total operating hours per month per dryer for that month.

Fuel certification requirements from the supplier for each shipment of distillate oil received.

Monthly analyses of the coal sampled, including the method used for analysis; and calculations to show the sulfur dioxide emissions.

The facility is a major source subject to Title V permitting and therefore subject to 40 CFR Part 64 – Compliance Assurance Monitoring (CAM). An emission unit is subject to CAM if it 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 dryers use a venturi scrubber to comply with the PM emission limit, therefore, the thermal dryer meets the above criteria only when considering PM, CAM is required only for PM. The applicant submitted CAM information as required by 40 CFR 64.5, Deadlines for Submittals.

The permit contains requirements for installation of the following (for each control device):

- 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.

Monitoring of the exhaust gas temperature (at the thermal dryer exit), pressure drop across the scrubber, and the water supply pressure are used to determine compliance with the PM emission limit for the thermal dryer. Although it is not possible to quantitatively relate pressure drop readings in a relativistic manner to a corresponding mass emission rate of particulate matter, establishing a correlative relationship is valid and beneficial when judging whether a process might be performing appropriately during the intervening periods between direct measurement observations. There is reasonable assurance that for the operational periods where pressure drop is found to be within the specified indicator range, particulate emission rates would also be within limits, especially when any other related parameters (temperature, water pressure, etc.) were monitored to be within acceptable ranges. Therefore, compliance with a primary parameter is presumed when a relationally correlated parameter is determined to be in compliance.

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 (2A-2D and 3A-3D) 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	130°F - 160°F excluding startup and shutdown	An excursion is defined as a pressure loss through the scrubber of less than 28 inches water column	An excursion is defined as a water supply pressure of less than 25 pounds per square inch gage
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)

Testing

The permit requires that a stack test be conducted once every five years and conducted prior to submitting the renewal Title V application. Test methods have been referenced in the permit if additional testing is performed. 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 dryers.

Streamlined Requirements

There are no streamlined requirements.

Facility-Wide Requirements

Limitations

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

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 to the normal 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.

The following limitations are requirements from the Minor New Source Review permit issued on December 2, 2008:

- Condition 2: Requirements for fugitive dust and fugitive emission controls;
- Condition 3: Limit of yearly raw coal throughput to the ponds fines reclaim belt, Ref.#91;
- Condition 4: Limit of yearly coal throughput to the clean coal transfer belt, Ref.#11;
- Condition 5: Limit of yearly coal throughput to the raw coal transfer belt, Ref.#1-2, and 1-5;
- Condition 6: Limit of yearly coal throughput to the clean coal stacker belt, Ref.#1A-8;
- Condition 7: Limit of yearly raw coal throughput in receiving/blending/loadout facility;
- Condition 8: Limit raw coal throughput to preparation plant;

- Condition 9: Limit clean coal production from preparation plant;
- Condition 10: Limit on yearly processing of coal on Ref. #29 transfer belt;
- Condition 11: Limit on yearly processing of coal on Ref. #22 stockpile transfer belt;
- Condition 13: Limit on PM-10 emissions from the operation of the Ref. #91 pond fines reclaim belt;
- Condition 14: Limit on PM-10 emissions from the operation of the raw and clean coal transfer equipment (Ref. Nos. 1-2 through 1-5, 1A-8, 08-1, and 08-2);
- Condition 15: Visible emission limit of less than 20%;
- Condition 12: Except where the permit is more restrictive than the applicable requirement, equipment subject to NSPS must be operated in compliance with the requirements of 40 CFR 60, Subpart Y; and,
- Condition 25: Requirements for the development of maintenance schedules, spare parts inventory, written operating procedures and operator training in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which effect such emissions.

Monitoring

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

The permit contains a requirement for each emissions unit with a visible emissions limit contained in the permit to be visually observed at least once each calendar week during periods of operation 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 twenty percent (20%), 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 include:

Annual throughput of reclaimed pond fines to the pond fines reclaim belt (Ref. #91);

Annual throughput of coal to the thermal dryers from the clean coal transfer belt (Ref. #11);

Annual throughput of raw coal to the raw coal transfer belt (Ref. #1-2) and the raw coal reclaim belt (Ref. #1-5);

Annual throughput of clean coal to the clean coal stacker belt (Ref. #1A-8);

Annual amount of raw coal processed by the receiving/blending/loadout facility;

Annual throughput of raw coal to the preparation plant;

Annual production of clean coal from the coal preparation plant;

Annual amount of coal processed by the transfer belt (Ref. #29);

Annual amount of coal processed by the stockpile transfer belt (Ref. #22);

Log of dates of operation of the sweeper truck and other water applications for control of fugitive emissions;

Log of weekly visual observations and results of all VEEs; and

Training and maintenance schedule.

Testing

Condition 42 of the Title V permit requires VEE tests for the pond fines reclaim belt and apron feeder. 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

The less than 20% opacity limit specified in Subpart Y of the NSPS was used in lieu of the Chapter 50 (9 VAC 5-50-80) visible emission limit, since that limit allowed one six-minute period per hour of 30%.

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 permit 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, including those caused by upsets, within one business day.

STATE-ONLY APPLICABLE REQUIREMENTS

Dickenson-Russell Coal Company, LLC identified odor and the toxics regulation as applicable in their application which are state-only requirements since they were not included in NSR permit. All the requirements contained in the minor NSR permit are federally enforceable. No state-only applicable requirements have been included in the permit.

FUTURE APPLICABLE REQUIREMENTS

Dickenson-Russell Coal Company, LLC did not identify any future applicable requirements in their application, and DEQ is unaware of any future requirements that may apply during the life of the Title V permit. Therefore, no future applicable requirements have been included in the permit.

INAPPLICABLE REQUIREMENTS

Dickenson-Russell Coal Company, LLC did not identify any inapplicable requirements in their application. Therefore, no inapplicable requirements are included in the permit.

COMPLIANCE PLAN

Dickenson-Russell Coal Company, LLC is currently in compliance with all applicable requirements. No compliance plan was required in the application.

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)	Pollutant Emitted (5-80-720 B.)	Rated Capacity (5-80-720 C.)
49-74	Storage Tanks	5-80-720 B.2.	VOC	N/A
80	Wastewater Treatment Plant	5-80-720 B.2.	VOC	N/A
77	Moss 3 Plant Building	5-80-720 B.2.	PM-10	N/A
77-A	Steam Vents (2)	5-80-720 A.98	N/A	N/A
30	Gammamatrix Belt 1	5-80-720 B.2.	PM-10	25 TPH
31	Gammamatrix Belt 2	5-80-720 B.2.	PM-10	25 TPH

¹The citation criteria for insignificant activities are as follows:
 9 VAC 5-80-720 B - Insignificant due to emission levels
 9 VAC 5-80-720 A. 98 – categorically exempt

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

A public notice regarding the draft permit was placed in the *Lebanon News* newspaper in Lebanon, Virginia on February 4, 2015. EPA was sent a copy of the draft permit and notified of the public notice. The affected states, including West Virginia, Kentucky, North Carolina and Tennessee were sent a copy of the public notice by letter or e-mail. There will be a 30-day public comment period followed by a 45-day EPA review period. During the public notice period, comments were received from two (2) individuals. DEQ responded to these comments on March 20, 2015, and made no changes to the permit. No comments were received from the EPA on the proposed permit within their 45-day review period.