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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-0308E
Plant ID No.:	047-00008
Applicant:	Second Sterling Corporation (SSC)
Facility Name:	Keystone #1 Coal Preparation Plant
Location:	McDowell County
NAICS Code:	212111
Application Type:	Modification
Received Date:	April 17, 2010
Engineer Assigned:	Dan Roberts (4/16/2010) Joe Kessler (8/12/2011)
Fee Amount:	$2,000
Date Received:	April 17, 2010
Complete Date:	March 2, 2012
Due Date:	May 31, 2012
Applicant Ad Date:	April 23, 2010
Newspaper:	*The Welch News*
UTM's:	Easting: 460.328 km Northing: 4,141.305 km Zone: 17
Description:	SSC is proposing to modify the Keystone #1 Coal Preparation Plant primarily by increasing the hourly raw coal input to the wet wash plant from 350 tons per hour (TPH) to 470 TPH without any increase in annual throughput. No hourly increase in clean coal produced was requested. A PSD applicability analysis was included in the permit application.

On June 16, 1977, Eastern Associated Coal Corporation was issued permit R13-0308 (one-page) for the construction of a thermal dryer at the Keystone #1 Coal Preparation Plant (which was constructed in 1952). The following is a brief discussion of substantive New Source Review (NSR) permitting actions involving the facility since that time:

- On December 12, 1989 Permit R13-1142 was issued to Second Sterling Corporation (SSC) - who had since gained ownership of the facility - for the addition of two (2) new storage bins at Keystone #1. This permit, which was applicable to the facility in conjunction with R13-0308, also included the requirement that "no open stockpiling of thermally dried coal shall take place."

- On August 27, 2002 Permit R13-0308A was issued to SSC to allow an increase in the sulfur content of the coal combusted in the thermal dryer. This permit was placed in the newer format used at that time but did not yet cover any other equipment.

- On December 1, 2003 Permit R13-0308B was issued to SSC to allow the addition of a synfuel storage and handling circuit and revision of thermal dryer emission rates. Additionally, this permit brought all facility equipment into the permit.

- On October 21, 2004 Class I Administrative Update R13-0308C was issued to SSC to correct a throughput typo.

- On July 14, 2006 Class I Administrative Update R13-0308D was issued to SSC pursuant to the requirements of Consent Order CO-R13-E-2003-21 mandating the pH set-point of the scrubber influent.

- On March 25, 2010 Consent Order CO-R30-E-2010-4 was entered into with SSC to address several violations found during an inspection on September 16, 2009. These violations included the open stockpiling of thermally dried coal prohibited by R13-1142, hourly throughput violations of the plant feed belt, and trucking refuse that was not addressed in any permit. Pursuant to ORDERS FOR COMPLIANCE (1), permit application R13-0308E was submitted on April 17, 2010.

DESCRIPTION OF PROCESS/MODIFICATIONS

The existing Keystone facility is a typical wet-wash coal preparation plant with raw coal, clean coal (utilizing thermal drying), and refuse circuits. The existing wet-wash plant has a capacity of 350 tons per hour (TPH) and 3,066,000 tons per year (TPY). Clean coal is loaded out in trucks and rail cars and refuse is deposited into an on-site refuse area via conveyer. As of the date of this evaluation, the plant has been idle since February 2011.

The proposed modifications evaluated herein are:

- Increasing the hourly raw coal input to the wet wash plant from 350 tons per hour (TPH) to 470 TPH without any increase in annual throughput. This involves the modification of belt conveyers CO8 through CO10 and the Pre-Wet Wash Plant Screen SZ04. There will be no associated increase in clean coal produced;

- Increasing the hourly refuse throughput of conveyers C20 and C26 from 200 TPH to 400 TPH and 300 TPH, respectively;

- The change in particulate matter control on SZ04 from a partial to a full enclosure;

- Addition of an emergency truck loadout refuse belt conveyer C35 and associated refuse haulroad to the permit;

- Removal of Eckman Loadout conveying system (C32 through C34) from the permit;

- Authorizing the open stockpiling of commingled coal (a mixture of thermally and non-thermally dried coal) in stockpile ST8 that was prohibited under R13-1142; and

- Addition of a raw coal overflow stockpile (ST21) to the permit that was previously added to the plant in 2007 but was not permitted.

It is important to note that while only the above modifications are proposed, the permit will cover the entire facility (incorporating the existing requirements where applicable from R13-0308D). The permit application contains a detailed process flow diagram (Attachment F) identifying the placement and relationship of all substantive pieces of equipment.

The following table lists maximum post-modification throughputs of the various processes of the plant:

Table 1: Key Plant Throughputs

Circuit/Process	TPH	TPY	Comment
Raw Coal Into the Plant	650	5,694,000	Aggregate Two Raw Coal Truck Dumps
Plant Feed	470(1)	3,066,000	Transfer Point T55
Thermal Dryer	358.7	2,216,280	Aggregate of Transfer Points T56 and T61
Clean Coal Loadout	290	2,001,000	Belt Conveyer C16
Refuse Circuit	400	1,752,000	Belt Conveyer C20

(1) Only throughput proposed for modification under R13-0308E.

SITE INSPECTION

On August 23, 2011 Mr. James Jarrett of the Compliance/Enforcement Section conducted an extensive and detailed site inspection of the Keystone #1 Preparation Plant. In the Inspection Report, signed on September 28, 2011, he noted that, with the exception of a raw coal stockpile and rail loadout, the facility had been idle since February, 2011. Due to items of the 2010 Consent Order that were not corrected, he placed the facility in Status Code 10 - out of compliance. Based on this recent site inspection and the idleness of facility, an additional site inspection was deemed not necessary by the author.

EMISSIONS CALCULATION METHODOLOGIES

In the permit application and subsequent revisions thereto, SSC supplied a new facility-wide post-modification potential-to-emit (PTE) - as defined under §45-13-2.19 and §45-14-2.58 - and

compared it with the existing PTE to determine the emissions associated with the modifications. Emissions were calculated using the appropriate sections of AP-42 (AP-42 is a database of emission factors maintained by USEPA) or well-known emission factors obtained from the Air Pollution Engineering Manual. Variables within the emission factor equations, including applicable particulate matter control devices, were based on guidance provided by DAQ or on reasonable values of anticipated inherent material properties. Maximum hourly and annual emission rates were based on the maximum hourly design and limited annual throughputs of the specific equipment, as applicable.

The following table details the source of the emission factors for each emissions source.

Table 2: Sources of Emission Factors for New/Modified Emission Units

Emission Source	Emission Factor(s)	Emission Factor Source	Comments
Material Handling Transfer Points	0.0002 - 0.0154 lb-PM/ton-coal (PM_{10} and $PM_{2.5}$ Emission Factors are based PM/2.1 and PM/14, respectively.)	AP-42, Section 13.2.4 (11/06)	Emission factor calculation includes material-specific moisture contents (1% - 20%) and average wind speed (10 mph).
Coal Screening	0.100 lb-PM/ton-screened (PM_{10} and $PM_{2.5}$ Emission Factors are based PM/2.1 and PM/14, respectively.)	WV G-10D General Permit Guidance	G-10D Guidance based on emission factor given in Air Pollution Engineering Manual © 1992 pp. 793 & References. Based on Secondary Screening Factor.
Primary Coal Crushing	0.200 lb-PM/ton-crushed (PM_{10} and $PM_{2.5}$ Emission Factors are based PM/2.1 and PM/14, respectively.)	WV G-10D General Permit Guidance	G-10D Guidance based on emission factor given in Air Pollution Engineering Manual © 1992 pp. 793 & References. Based on Secondary Screening Factor.
Secondary Coal Crushing	0.600 lb-PM/ton-crushed (PM_{10} and $PM_{2.5}$ Emission Factors are based PM/2.1 and PM/14, respectively.)	WV G-10D General Permit Guidance	G-10D Guidance based on emission factor given in Air Pollution Engineering Manual © 1992 pp. 793 & References. Based on Secondary Screening Factor.
Thermal Dryer	n/a	n/a	Emissions taken from Limits in R13-0308D.
Coal Stockpile Erosion	0.67 lb-PM/day/acre (PM_{10} and $PM_{2.5}$ Emission Factors are based PM/2.1 and PM/14, respectively.)	WV G-10D General Permit Guidance	G-10D Guidance based on emission factor given in Air Pollution Engineering Manual © 1992 pp. 136 & References. Includes material silt content (1%), number of precipitation days (157), and percent time wind speed exceeds 12 mph (10%).
Unpaved Haulroads & Mobile Work Areas	7.16 lb-PM/VMT (PM_{10} and $PM_{2.5}$ Emission Factors are based PM/3.27 and PM/32.67, respectively.)	AP-42 Section 13.2.2 (11/06)	Based on mean truck/endloader weights (41.625tons), percent silt in road surface (9%), and number of precipitation days (157).

Unless otherwise noted in the above table, the above emission factors represent uncontrolled emissions. For calculating controlled emissions, SSC applied, where applicable, control efficiencies to the uncontrolled emissions. The control efficiencies were generally taken from General Permit Reference Documents (list of efficiencies can be found in various general permits including Coal General Permit G10-D Reference Document pp. 17).

DAQ Review of Emission Calculation Methodologies

As part of the application review process, the SSC emissions calculation methodologies were reviewed to determine if the as-calculated potential emissions represented a reasonable site-specific PTE. To this end, it is noted that the use of specific material, roadway, and weather data by SSC in the material handling equations is considered reasonable for the purpose of estimating PTE for pre-construction permitting applicability purposes.

In conclusion, after review, the author accepts the SSC potential-to-emit calculations as reasonable and practically enforceable using the requirements contained in the proposed draft permit.

Emissions Summary

An emissions summary showing pre-modification, post-modification, and the change in PTE is included in this evaluation as Attachment A. It is important to note that the change in emissions in this table is not used to determine potential PSD applicability; that analysis is given below. Some changes in pre and post-modification emissions are the result of changes in emission calculation methodology and are not the result of any physical change at the plant or any change in the method of operation. An example of this is the application of the screening emission factor on a per-screen basis and not on a facility-wide basis that had been allowable in the past.

REGULATORY APPLICABILITY

The SSC facility is subject to substantive requirements in the following state and federal air quality rules and regulations: 45CSR5, 45CSR13, and 40 CFR 60 Subpart Y. Each applicable rule (and those that have questionable non-applicability but are determined not to be applicable), and SSC's compliance therewith, will be discussed in detail below with respect to the new/modified equipment. Note that, as the thermal dryer is not being modified as part of this permitting action, rule applicability and compliance of the thermal dryer is not discussed.

45CSR5: To Prevent and Control Air Pollution from Coal Preparation Plants, Coal Handling Operations, and Coal Refuse Disposal Operations

The coal handling operations at the proposed facility are defined as a "coal preparation plant" under §45-5-2.4 and are, therefore, subject to the applicable requirements of 45CSR5. The substantive requirements applicable are discussed below.

45CSR5 Emission of Particulate Matter - Section 3

Section 3 of 45CSR5 sets a twenty percent (20%) opacity limit on all stack and fugitive dust control systems. SSC's proposed use of partial enclosures and full enclosures on crushing and screening operations and the use of enclosures on all significant conveyer-conveyer transfer points should allow them to meet this requirement.

45CSR5 Fugitive Emissions - Section 6

Section 6 of 45CSR5 requires all facilities subject to the rule to minimize emissions through the use of a fugitive dust control system. SSC has proposed a fugitive dust control system of enclosures, water sprays, a water truck and inherent material moisture content. These methods are considered appropriate fugitive emissions minimization.

45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation

The proposed changes at Keystone #1, as limited by the draft permit, have the potential to increase particulate matter in excess of the 144 pound/day threshold under §45-13-2.17(a) that defines the changes as a "modification." Pursuant to §45-13-5.1, a permit is required for a modification to a stationary source.

As required under §45-13-8.3 ("Notice Level A"), SSC placed a Class I legal advertisement in a "newspaper of general circulation in the area where the source is . . . located." The ad ran on April 23, 2010 in *The Welch News*. The affidavit of publication for this legal advertisement was submitted on September 15, 2010.

45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration

Determination of Existing Major Source Status

The proposed SSC coal preparation plant is located in an area - McDowell County - classified as "in attainment" with all National Ambient Air Quality Standards (NAAQS) and, therefore, the major source status of the source is determined under 45CSR14.

The existing coal preparation plant includes a thermal dryer and is therefore a source listed under §45-14-2.43(a). The threshold for defining the existing source as a "major stationary source," pursuant to §45-14-2.43(a), is a potential-to-emit (PTE) of 100 TPY of any regulated pollutant. Additionally, pursuant to §45-14-2.43(e), a source listed under Section 2.43(a) must include fugitive emissions in "determining whether it is a major stationary source." The existing unmodified source has a PTE - including fugitive emissions and based on calculations provided by the applicant - of 607.37 TPY of total particulate matter. This PTE defines the source as an existing major stationary source under 45CSR14.

Determination of Major Modification

As SSC is proposing a "physical change in or change in the method of operation of a major stationary source," included in the permit application is an applicability analysis to determine if the proposed changes to the plant are defined as a "major modification" and subject to Prevention of Significant Deterioration (PSD) review under 45CSR14. A "major modification" is defined under section 2.40 of 45CSR14 as a:

> . . . physical change in or change in the method of operation of a major stationary source which results in: a significant emissions increase (as defined in subsection 2.75) of any regulated NSR pollutant (as defined in subsection 2.66); and a significant net emissions increase of that pollutant from the major stationary source. [. . .]

Section 3.4 of 45CSR14 provides guidance on the process of determining if proposed changes are a major modification. §45-14-3.4(a) states that:

> . . . consistent with the definition of major modification contained in subsection 2.40, a project is a major modification for a regulated NSR pollutant if it causes two types of emissions increases -- a significant emissions increase (as defined in subsection 2.75), and a significant net emissions increase (as defined in subsections 2.46 and 2.74). The proposed project is not a major modification if it does not cause a significant emissions increase. [. . .]

Therefore, for the proposed changes to meet the definition of a major modification, the changes themselves must result in a significant emissions increase. The methodology for calculating the emissions increase under the first step is given under Sections 3.4(b), 3.4(c), 3.4(d) and 3.4(f). The substantive language of each is given below:

> [§45-14-3.4(b)]
> The procedure for calculating (before beginning actual construction) whether a significant emissions increase (i.e., the first step of the process) will occur depends upon the type of emissions units being modified, according to subdivisions 3.4.c through 3.4.f.
>
> [§45-14-3.4(c)]
> Actual-to-projected-actual applicability test for projects that only involve existing emissions units. -- A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the projected actual emissions (as defined in subsection 2.63) and the baseline actual emissions (as defined in subdivisions 2.8.a and 2.8.b), for each existing emissions unit, equals or exceeds the significant amount for that pollutant (as defined in subsection 2.74).
>
> [§45-14-3.4(d)]
> Actual-to-potential test for projects that only involve construction of a new emissions unit(s). – A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the potential to emit (as defined in subsection 2.58) from each new emissions unit following completion of the project and the baseline actual emissions (as defined in subdivision 2.8.c) of these units before the project equals or exceeds the significant amount for that pollutant (as defined in subsection 2.74).
>
> [§45-14-3.4(f)]
> Hybrid test for projects that involve multiple types of emissions units. -- A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the emissions increases for each emissions unit, using the method specified in subdivisions 3.4.c through 3.4.d as applicable with respect to each emissions unit, for each type of emissions unit equals or exceeds the significant amount for that pollutant (as defined in subsection 2.74).

Further, under the definition of "projected actual emissions" - Section 2.63(a)(4), the applicant may use an emission unit's PTE in lieu of projecting actual emissions.

It is important to note that when any emissions decrease is claimed (including those associated with the proposed modification), the second step of the test is triggered - a determination if the project results in a "significant net emissions increase." This determination is defined under the definition of "net emissions increase" [§45-14-2.46] and must include "any other increases and decreases in actual emissions at the major source that are contemporaneous with the particular change and are otherwise creditable." A change is contemporaneous if it "occurs not more than five (5) years prior to the date on which construction on the particular change commences nor later than the date on which the increase from the particular change occurs."

SSC PSD Applicability Analysis

Based on the above, SSC included a PSD applicability analysis for the proposed new and modified sources as outlined in the Description of Process/Modifications above. The emission points associated with the changes are: Screen SZ04, Modified Transfer Points 18, 19, 23-27, 50, 55, and 62, New Transfer Point 86, Raw Coal Stockpile 21, and the new refuse haulroad. For the modified sources, "baseline actual emissions" were based - pursuant to the definition under §45-14-2.8 - on the annualized actual raw coal throughput from the calendar years 2007/2008. In lieu of projecting actual emissions, emission unit's PTE were used. The results of the determination of the emissions increase (the first step) is given in the following table:

Table 3: Step 1 - Determination of Emission Increase under 45CSR14(1)

Source	$PM_{2.5}$ (TPY)			PM_{10} (TPY)			PM (TPY)		
	PAE	**F-PTE**	**Δ**	**PAE**	**F-PTE**	**Δ**	**PAE**	**F-PTE**	**Δ**
Modified TPs	0.11	0.18	0.07	0.73	1.20	0.48	1.53	2.53	1.00
Stockpile ST21	0.00	0.01	0.01	0.00	0.01	0.01	0.00	0.01	0.01
New Refuse TP	0.00	0.01	0.01	0.00	0.04	0.04	0.00	0.08	0.08
Refuse Haulroad	0.00	1.21	1.21	0.00	12.08	12.08	0.00	40.94	40.94
Totals			*1.30*			*12.61*			*42.03*
Significant Level			10.00			15.00			25.00
Significant?			No			No			**Yes**

(1) Emissions calculated by applicant using same methodology as described above.
(2) PAE = Past Actual Emissions; F-PTE = Future Potential-to-Emit

"Significant" is defined for particulate matter under §45-14-2.74(a) as: $PM_{2.5}$ - 10 TPY, PM_{10} - 15 TPY, and PM - 25 TPY. As shown in Table 3, the change in emissions resulting from the proposed modifications/construction does not exceed the definition of "significant" for $PM_{2.5}$ or PM_{10} but does for PM. While SSC has claimed decreases as part of the project, they may only be included in the analysis as part of step 2 - the determination of a "significant net emissions increase."

The results of the significant net emissions increase analysis is given in Table 4 below. The only decrease is the result of the modification of the screen SZ04 that is a part of the proposed modifications evaluated herein. No other contemporaneous increases or decreases occurred at the facility.

Table 4: Step 2 - Determination of Net Emission Increase under 45CSR14[(1)]

Source	$PM_{2.5}$ (TPY)			PM_{10} (TPY)			PM (TPY)		
	PAE	F-PTE	Δ	PAE	F-PTE	Δ	PAE	F-PTE	Δ
Screen SZ04	3.53	2.19	-1.34	23.52	14.60	-8.92	49.40	30.66	-18.74
Modified TPs	0.11	0.18	0.07	0.73	1.20	0.48	1.53	2.53	1.00
Stockpile ST21	0.00	0.01	0.01	0.00	0.01	0.01	0.00	0.01	0.01
New Refuse TP	0.00	0.01	0.01	0.00	0.04	0.04	0.00	0.08	0.08
Refuse Haulroad	0.00	1.21	1.21	0.00	12.08	12.08	0.00	40.94	40.94
Totals			*-0.04*			*3.68*			*23.29*
Significant Level			10.00			15.00			25.00
Significant?			No			No			No

(1) Emissions calculated by applicant using same methodology as described above.
(2) PAE = Past Actual Emissions; F-PTE = Future Potential-to-Emit

With the decrease in particulate matter emissions from the addition of a full enclosure on the screen, the net emissions increase of PM falls below the significance level of 25 TPY. Therefore, the proposed modifications are not defined as a "major modification" and are not subject to PSD review.

45CSR30: Requirements for Operating Permits

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The Keystone #1 Coal Preparation Plant, defined under Title V as a "major source," was last issued a Title V permit on October 17, 2006. Proposed changes evaluated herein must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

40 CFR 60, Subpart Y: Standards of Performance for Coal Preparation and Processing Plants

Subpart Y contains requirements relating to the performance of coal preparation plants. Pursuant to §60.250, affected facilities under Subpart Y include "[t]hermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, transfer and loading systems, and open storage piles" located at "coal preparation and processing plants" that process greater than 200 tons per day. "Coal preparation and processing plants" is defined as "any facility (excluding underground mining operations) which

prepares coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying." SSC crushes, screens, cleans, and thermally dries coal at Keystone #1 Coal Preparation Plant and, therefore, all applicable "affected facilities" constructed, reconstructed, or modified after October 27, 1974 are subject to the applicable sections of Subpart Y. The rule requires different requirements for affected facilities depending on the year of construction, reconstruction, or modification.

On October 8, 2009 the USEPA promulgated final amendments to 40 CFR 60, Subpart Y that included new requirements for affected facilities that "commenced construction, reconstruction or modification after May 27, 2009." Under §60.2, "modification" is defined as "any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies." Under §60.14(b), "emission rate" is defined as the kg/hr (or lb/hr) of the affected facility. The post-May 2009 "affected facilities" under Subpart Y are defined as "[t]hermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, transfer and loading systems, and open storage piles." Therefore, the new and modified conveyers and the modified screen are subject to the post May 2009 standards. The new small overflow stockpile was added in 2007. Other non-modified equipment will continue to be subject/not subject to Subpart Y depending on the year of construction/reconstruction/modification as given in Table 1.0 of the proposed permit.

The only substantive standards under Subpart Y applicable to the proposed new/modified equipment is given in §60.254(b):

- A 10% opacity limit on all emission points associated with the conveyer belts and screen;

SSC's proposed use of enclosures on coal conveying and processing equipment (including the screen) and coal transfer and loading systems should allow them to meet the 10% opacity limit.

SSC will be required to comply with all applicable monitoring, testing, reporting, and record-keeping requirements in Subpart Y.

TOXICITY ANALYSIS OF NON-CRITERIA REGULATED POLLUTANTS

No increase in emissions of, or emissions of additional, non-criteria regulated pollutants shall occur due to the proposed changes.

AIR QUALITY IMPACT ANALYSIS

The estimated maximum emissions of the proposed changes are less than applicability thresholds that would define the proposed changes as a "major modification" under 45CSR14 and, therefore, no air quality impacts modeling analysis was required. Additionally, based on the nature of the proposed modifications, modeling was not required under 45CSR13, Section 7.

MONITORING, COMPLIANCE DEMONSTRATIONS, REPORTING, AND RECORDING OF OPERATIONS

The following substantive monitoring, compliance demonstration, and record-keeping requirements (MRR) shall be required for the new/modified equipment (the MRR requirements for the existing equipment will substantively remain the same as under R13-0308D):

- For the purposes of demonstrating continuous compliance with maximum throughput limitations set forth in the permit for the new/modified equipment, designed to practically and reasonably enforce the maximum potential-to-emit as calculated in the permit application, SSC shall be required to monitor and record the monthly and rolling twelve month throughput of each material specified under Table 4.1.3. of the draft permit. [*Requirement 4.2.1.*]

- For the purposes of determining compliance with water truck usage set forth in 4.1.5(b) specifically, the permittee shall monitor and record water truck activity on the refuse haulroad. At a minimum the permittee shall record the days the water truck was used on the refuse haulroad and, if the water truck is not used, the reason watering was not needed. [*Requirement 4.2.3.*]

- For the purpose of determining compliance with the opacity limits of 45CSR5 and 40 CFR 60 Subpart Y, the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit. [*Requirement 4.2.4.*]

- The permittee shall meet all other applicable monitoring, compliance demonstration, record-keeping and reporting requirements as given under 45CSR5 and 40 CFR 60, Subpart Y.

PERFORMANCE TESTING OF OPERATIONS

No additional performance testing is required for the proposed changes other than SSC shall be required to meet all applicable testing requirements as given under 45CSR5 and 40 CFR 60, Subpart Y for the applicable new/modified equipment.

CHANGES TO PERMIT R13-0308D

The proposed permit R13-0308E was placed in the new format and, therefore, the structure of the permit and boilerplate conditions are completely different from R13-0308D. However, the substantive requirements of R13-0308D concerning the thermal dryer and particulate matter control devices were transferred to the new permit and integrated with the new/modified equipment.

RECOMMENDATION TO DIRECTOR

The information provided in permit application R13-0308E indicates that compliance with all applicable regulations will be achieved. Therefore, I recommend to the Director the issuance of Permit Number R13-0308E to Second Sterling Corporation for the modification of the Keystone #1 Coal Preparation Plant located near Keystone, McDowell County, WV.

Joseph Kessler, PE
Engineer

Date