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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM:

DATE: June 9, 1980

SUBJECT: PSD Applicability, South Hospah Mine

FROM: Director
Division of Stationary Source Enforcement

TO: Allyn Davis, Director
Air & Hazardous Materials Division, Region VI

This is in response to your memo of May 6, 1980, in which you requested guidance regarding the accounting of fugitive emissions in determining potential to emit for surface coal mine and coal preparation facilities.

The September 5, 1979 proposed PSD regulations require the consideration of fugitive emissions in determining PSD applicability for sources regulated under Sections 111 and 112 of the Clean Air Act, as well as those source categories listed in the definition of major source under PSD. Facilities which prepare coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying are considered coal preparation plants subject to regulation by Section 111 NSPS, 40 CFR 60 Subpart Y.

A surface coal mine and coal preparation plant are located on a common site at the South Hospah Mine. The mine and preparation plant are considered one source under the September 5, 1979 proposal since they are located on contiguous or adjacent property and are owned or operated by the same person. What remains to be determined is: What type of source is this?

According to data received from your staff regarding this source, the coal preparation plant will have the potential to emit approximately 5.6 tons of controlled coal emissions per year. There are virtually no fugitive emissions from the plant since the major emitting equipment is basically enclosed. The 5.6 tons is far below the 250 tons/year potential to emit which is necessary for PSD review.

The main activity located at this site is the coal mine. In determining PSD applicability, this source would be considered a surface coal mine and, therefore, fugitive emissions would generally not be counted in the source's potential to emit. However, I would like to point out that while this interpretation excludes the mine's fugitive emissions when determining applicability of the PSD regulations, if the coal preparation plant, in combination with the non-fugitive emissions from the mining operation, had the potential to emit 250 tons per year of any pollutant regulated under the Act, the entire source would be subject to PSD review. BACT analysis would be required for all emissions, both fugitive and non-fugitive, at both the mine as well as at the coal preparation plant.

In view of the above decision, the following are responses to the questions you specifically raised in your memo regarding potential to emit as it applies to the circumstances at the South Hospah Mine:

1. Fugitive emissions from blasting removal of overburden and haul road traffic would not be included.

2. Fugitive emissions from blasting, loading, dumping and storage of coal would not be counted.
3. Process emissions both fugitive and non-fugitive would be counted at the coal preparation plant.

If you have any further questions regarding this matter, please contact Janet Littlejohn of my staff at 755-2564.

Edward E. Reich

cc: Jim Weigold (OAQPS)
Peter Wyckoff (OGC)

EN:341:jl/ncb:5/15/80:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Applicability Determinations for Source Complexes Consisting of Coal Preparation Facilities and Surface Coal Mines

FROM: Allyn Davis, Director
Air & Hazardous Materials Division, Region 6

TO: Edward Reich, Director
Division of Stationary Source Enforcement

In two phone conversations on April 28, 1980, and on May 2, 1980, we indicated a need for guidance as to whether fugitive emissions from mining operations (particularly, non-coal fugitives) should be included in determining potential emissions from a mine which has a coal preparation plant on site.

In another phone conversation on April 28, 1980, Bob Myers said that a facility as simple as a crusher or a breaker can be considered a coal preparation plant as defined in the applicable NSPS. The definition of "potential to emit" in the September 5, 1979, proposed PSD regulations indicates that fugitive emissions count with respect to any stationary source which is being regulated under section 111 (NSPS) of the Clean Air Act. Must fugitive emissions from the mining operations, including non-coal fugitives, be counted in determining potential emissions?

One example of the problem is the South Hospah Mine application. The mine will yield a maximum of 3.4 million tons of sub-bituminous coal annually and will include coal crushing, storage, and rail load-out facilities. The coal is hauled by truck to a preparation plant where it will undergo the primary and secondary crushing.

Emission rate calculations are based on 24,000 tons per day and 3.4 million tons per year of coal removal and preparation. The total controlled maximum emission rates from all sources of particulate matter (coal and non-coal emissions) will be 2,363 tons per year. Before the coal is removed and prepared, the overburden is blasted, drilled, and is removed by draglines and dozers. These operations, along with haul roads and surface wind erosion, are all sources of non-coal fugitive dust. The South Hospah Mine should generate 2,350 tons per year (after control) of these non-coal fugitives.

There are 13.3 tons per year of actual coal emissions (not overburden or native soil). The controlled coal emissions which are attributed to fugitives are 7.7 tons per year. These emissions come from such operations as coal blasting, loading, dumping, and storage. The controlled coal emissions which are derived from its preparation are 5.6 tons per year.

If only coal emissions are considered the South Hospah Mine is not a major source. If all sources of particulate emissions are considered, the South Hospah Mine will be required to receive a permit.

In determining the mine's potential to emit, must we include:

- (1) fugitive emissions from blasting and removal of overburden, and haul road dust;
- (2) fugitive emissions from blasting, removal, loading, dumping, and storage of coal; and
- (3) process emissions at the coal preparation plant?

We have several other similar applications whose applicability determinations are pending under the interim PSD provisions. We, therefore, urge you to respond as expeditiously as possible and no later than May 15, 1980. If you have any questions, please contact me or Jack Divita at 729-2742.

cc: Libby Scopino
Division of Stationary Source Enforcement