

Consolidation Coal Co. seeks increase to double permitted limits for VOC just months after being deemed a “High Priority Violator” for exceeding current VOC limits. Let’s tell DEQ NO VOC Increase!

Virginia Department of Environmental Quality’s preliminary determination is that the proposed modification meets the standards for issuing the air permit

Permittee Name: Consolidation Coal Company
 Facility Name: Buchanan Preparation Plant
 Facility Location: State Route 632,
 Garden Creek, Buchanan County, Virginia
 Registration Number: 10945
 SIC Code: 1222 - Bituminous Coal
 Underground Mining

The facility cleans and dries coal prior to shipment by railcar or truck. The facility utilizes a coal-bed methane/coal fired thermal dryer to dry the coal that is cleaned by the wet process preparation plant, which includes froth flotation and vacuum filtration. A Prevention of Significant Deterioration (PSD) permit was issued on September 26, 2001, for the installation of an additional coal-fired thermal dryer and modification of the coal preparation plant. The facility is a Title V major source of PM-10, VOC, CO, SO2 and NOx. The facility is currently permitted under a PSD permit issued on May 16, 2002.

Download the current Title V permit and Statement of Basis issued Sept. 30, 2002 at <http://www.deq.state.va.us/air/permitting/t5issued.htm>

source: VA DEQ Title V air permit

Consolidation Coal Co - Buchanan Mine #1 Annual Permitted Limits¹ Volatile Organic Compounds (tons per year)

	Current Limits	Proposed Limits	Percentage increase
Dryer 1	175.6	362.7	+ 106.5 %
Dryer 2*	370.3	664.9	+ 79.6 %
Facility Total	545.9	1027.6	+ 88.2 %

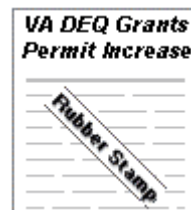
*Dryer 2 has not been constructed, yet Consolidated Coal is already seeking an increase in the permit.

Maybe the next time a state trooper catches you exceeding the speed limit you should ask the government to double the speed limit so that your illegal habit will become legal. Nevermind the health risks associated with violating the law.



You get a ticket with a fine.

Consolidated Coal gets to make its violation legal.



Public Participation Information

A copy of the public notice can be found at <http://www.deq.virginia.gov/air/permitting/pubnotice.htm>

June 1 Info Briefing

VA DEQ will hold an informational briefing in the Appellate Courtroom at the Appalachian School of Law in Grundy, Virginia, on June 1, 2004 at 7:00 p.m. This briefing will explain the activity for which the permit is sought and the DEQ’s rationale for its preliminary determination. Questions will be welcome at the briefing. Official public comments will not be taken during this briefing.

July 1 Public Hearing

VA DEQ will conduct a public hearing to receive written and oral comments concerning the application. The purpose of the public hearing is to obtain input that may not have been considered during the review process. This hearing will be held on July 1, 2004 at 7:00 p.m., in the Appellate Courtroom at the Appalachian School of Law in Grundy, VA. Persons desiring to make a statement at the hearing are requested to sign up on a sheet to be provided 15 minutes before the public hearing and are requested to furnish the office two copies of their testimony, along with the originals of any supporting documents or exhibits.

Public Comment Period

The public comment period will begin on June 2, 2004 and will extend through close of business day on July 16, 2004.

Written comments may be mailed or emailed to:

Thomas M. Derting
 Environmental Engineer Senior
 VA DEQ Southwest regional Office
 P.O. Box 1688
 Abingdon, Virginia 24212-1688
 (276) 676-4800
 Email: tmderting@deq.state.va.us

¹ Title V air permit and DEQ Public Notice for June 1, 2004 Public Briefing and July 1, 2004 Public Hearing

On April 5, 2004, Consolidated Coal Co. paid a \$5,300 Consent Order fine

Consolidated Coal Co. (CCC) was on the Fourth Quarter 2003 list for HIGH PRIORITY VIOLATORS (HPVs) which was presented to the Virginia State Air Pollution Control Board. DEQ issued a Notice of Violation on August 22, 2003 based on an exceedance of the VOC emissions limit contained in CCC's PSD and Title V permits. On June 17-18, 2003, CCC conducted emission tests on the existing thermal dryer stack. The results of the VOC tests indicated the dryer was not operating in compliance with the 0.29 lb/mmBtu limit as stated in CCC's May 16, 2002 PSD permit. A DEQ review of the stack tests conducted since 1995 indicate that non-methane VOC emissions have ranged anywhere between 10.8 lbs/hr and 78 lbs/hr. CCC is seeking to increase the allowable VOC emissions for both thermal dryers to 0.60 lb/mmBtu.

Consolidation Coal Co - Buchanan Mine #1 Actual Emissions² of Criteria Pollutants (tons per year)

Year	CO	NOx as NO2	Pb	PM-10	SO2	VOCs
2001	90.30	25.65	0.00	106.64	0.00	108.31
2000	114.33	26.30	0.00	125.93	0.00	115.42
1999	114.33	26.30	0.00	126.88	0.00	118.75
1998	114.32	26.29	0.00	130.90	0.00	84.35
1997	106.60	115.49	0.00	59.30	0.00	165.83
1996	92.30	100.00	0.00	53.91	0.00	143.58

Many VOCs can cause serious health problems, including cancer. VOCs also contribute to the formation of ozone. In addition, ozone and some VOCs harm plants.

"The major source of emissions from the final preparation phase is the thermal dryer exhaust. This emission stream contains coal particles entrained in the drying gases and volatile organic compounds (VOC) released from the coal, in addition to the standard products of coal combustion resulting from burning coal to generate the hot gases, including carbon monoxide (CO), carbon dioxide (CO₂), VOC, sulfur dioxide (SO₂), and nitrogen oxides (NO_x). A number of inorganic hazardous air pollutants are found in trace quantities in coal, including arsenic, beryllium, cadmium, chromium, copper, mercury, manganese, nickel, lead, thorium, and uranium. Although emissions of these substances from coal cleaning have not been quantified, it is likely that many of these are emitted in trace amounts from crushing, grinding, and drying operations."³ Various organic compounds from controlled coal combustion include: Acetaldehyde, Acetophenone, Acrolein, Benzene, Benzyl chloride, (DEHP), Bromoform, Carbon disulfide, 2-Chloroacetophenone, Chlorobenzene, Chloroform, Cumene, Cyanide, Dimethyl sulfate, Ethyl benzene, Ethyl chloride, Ethylene dichloride, Formaldehyde, Hexane, Isophorone, Methyl chloride, Methyl ethyl ketone, Methyl tert butyl ether, Methylene chloride, Phenol, Propionaldehyde, Tetrachloroethylene, Toluene, 1,1,1-Trichloroethane, Styrene, Xylenes, and Vinyl acetate.⁴

Consolidated Coal will become one of the leading emitters of VOCs in Virginia

2001 actual emissions

Rank	VOCs (tpy)	Facility	Location
1	2095.11	Alliant Ammunition & Powder Co.	Montgomery Co.
2	1973.00	Reynolds Metals Co.	Richmond
3	1919.07	GA Pacific Corp.	Bedford Co.
4	1597.53	St. Laurent Paper	King William Co.
5	1539.67	MeadWestvaco	Covington
6	1132.82	Giant Yorktown Refinery	York Co.
7	1080.24	International Paper Co.	Isle of Wight Co.
8*	1027.60	Consolidated Coal Co.	Buchanan Co.
9	902.78	Reynolds Metals Co.	Chesterfield Co.
10	773.04	CP Films Inc.	Henry Co.
11	714.24	Quebecor Printing	Henrico Co.
12	710.28	Honeywell International	Hopewell

*Based on proposed permit limits

BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE

www.BREDL.org ~ PO Box 88 Glendale Springs, North Carolina 28629 ~ Phone (336) 982-2691 ~ Fax (336) 982-2954 ~ BREDL@skybest.com
IN VIRGINIA: 1828 Brandon Ave. SW Roanoke, Virginia 24015 ~ Phone (540) 342-5580 mebarker@rev.net

² Virginia DEQ emissions inventory

³ U.S. EPA Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources, Chapter 11: Mineral Products Industry, 11.10 Coal Cleaning.

⁴ U.S. EPA Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources, Chapter 1 External Combustion Sources, 1.1 Bituminous and Subbituminous Coal Combustion.