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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

4 NOV 1985

A-87-08
II-C-9

Mr. Claude D. Morgan, P.E.
Regional Manager
Engineering and Environmental Affairs
Consolidation Coal Company
Post Office Box 890
Bluefield, Virginia 24605

Dear Mr. Morgan:

As you know, the U. S. Environmental Protection Agency (EPA) is gathering background information on air pollutants and their control techniques for use in reviewing the new source performance standard (NSPS) for coal preparation plants. This standard was promulgated on January 15, 1976, and previously reviewed in 1981. The Clean Air Act Amendments of 1977 require the Administrator of the EPA to review and, if appropriate, revise established standards of performance for new stationary sources at least every 4 years. The objective of this review is to assess the need for revision to the NSPS on the basis of developments that may have occurred since the last review was performed. In order to review the NSPS, we need information on coal preparation plants and their emission control systems that are subject to the NSPS. Therefore, to use EPA and industry time efficiently in gathering data, the EPA is writing a number of companies which operate coal preparation facilities that are subject to the NSPS.

This letter is to request from Consolidation Coal Company information about the process equipment and associated emission control equipment subject to the NSPS at the following coal preparation plants operated by your company: (1) the Amonate coal preparation plant in McDowell County, West Virginia; and (2) the Buchanan Mine Mavisvale coal preparation plant in Richland, Virginia. The information requested is listed in Enclosure 1 to this letter. This information, along with analogous information from other companies, will be used to determine the need to revise the NSPS; to define the current status of emission control; and to assess the environmental, energy, and economic impacts associated with installation and operation of feasible emission control techniques. We wish to examine the experience you have had with the NSPS. This includes emission test results, costs of control, monitoring required by the NSPS, and maintenance of air pollution control devices. We are sensitive to the amount of labor required to respond to this request. We

CONCURRENCES

SYMBOL	SSS	SSS	TSB			3.3.6.7		
SURNAME	M.T.G.	Crowder	Crofton					
DATE	10-30-85	10-30-85	10/31/85					

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

GPO : 1983 O - 403-201

have tried to limit the request to features important to regulatory review and to minimize demands on your time. Furthermore, we are requesting only information you have available (e.g., we are not requesting that you conduct emission tests to obtain emission data).

The authority for EPA's information gathering is included in Section 114 of the Clean Air Act (42 U.S.C. 7414). Enclosure 2 contains a summary of this authority. If you believe that disclosure of information we request would reveal a trade secret, you should clearly identify such information as discussed in the enclosure. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice (40 CFR Part 2.203, September 1, 1976). All emission data will be available to the public. It will expedite the study and simplify problems if you would separate any data claimed to be confidential from the balance of the data.

Enclosure 3 summarizes Agency and Emission Standards and Engineering Division policies and procedures for handling privileged information and describes EPA commitments and procedures for use of confidential materials. It is EPA's policy that compliance by an authorized representative with the requirements detailed in Enclosure 3 provides sufficient protection for the rights of submitters of privileged information.

If you have any questions regarding this request or are unable to provide me with responses to the enclosed questions by December 6, 1985, please contact Mr. Naum Georgieff at (919) 541-5601.

Sincerely,

Jack R. Farmer
Director
Emission Standards and
Engineering Division

3 Enclosures

cc: Spencer Brady
Consolidation Coal Company

OAQPS:ESED:ISB:NTGEORGIEFF:mhinson:NCM:762:X5601:MD-13:FILE: _____
10/23/85:DISC: GEORGIEFF #2

Not subject to the requirements of Section 3507, Paperwork Reductton Act of 1980.

ENCLOSURE 1

INFORMATION REQUEST

Please respond to all questions which apply to your facility. The answers to these questions will greatly assist us in the review of the new source performance standard (NSPS) for coal preparation plants. If you are unable to respond to the question as it is stated, please provide any information that might be related. Also, you may respond "not applicable" to questions that do not apply to your plant. Your cooperation is greatly appreciated.

A. Plant Information

1. Name of plant: _____

2. Name of legal owner: _____

3. Name of respondent: _____

   Title: _____

   Telephone: _____

   Address: _____
   (No. and Street)

   _____
   (City) (State) (Zip)

   Location of Plant (if different) _____

4. Total number of employees at the plant: Currently _____ Normally _____

5. What type of coal is processed at your plant? _____

   _____

6. Maximum plant production capacity (tons/hour):

   raw coal _____ cleaned coal _____

7. The plant is normally operated: _____ (hrs/day)

   _____ (days/week) _____ (weeks/year)

B. Air Pollutant Emissions

1. What are the sources of air pollutants in the coal preparation plant that are subject to the NSPS (including process and fugitive emissions)? Indicate whether the emissions are from process or conveying equipment (including breakers and crushers), coal storage systems (silos, covered storage), or coal transfer/ feeders, conveyor transfer points, and loading points.

_____

_____

_____

2. Have NSPS performance tests been conducted? If so, please send a copy of the test report(s) or provide the name of a contact from whom the reports can be obtained.

_____

_____

3. Please provide information on the particle size distribution and the trace metal content of the particulate matter being emitted, if available.

_____

_____

4. Supply data on sulfur dioxide and nitrogen oxide emissions, if available.

_____

_____

5. If opacity or visible emissions readings were taken during NSPS compliance tests, please supply data recorded.

_____

_____

_____

6. Please provide the following information for any continuous opacity monitors that are in use:

   a. Manufacturer and model number _____

   b. Level of opacity the monitor reads when the control equipment is operating properly _____

   c. Problems encountered using a continuous opacity monitor.

   _____

   _____

   _____

C. Thermal Dryers

Please provide the following information for each piece of equipment indicated:

Thermal Dryers - Fuel Firing

Type Fuel	Firing Type	Fuel Rate (lb/hr)	Ash Content %	% Sulfur	Calorific Value (Btu/lb)

Thermal Dryers - Gas Cleaning Equipment Data

Kind of control (venturi scrubbers, impingement scrubbers, others) _____

Volume of gas treated _____

Scrubbing liquid (e.g., water, etc.) _____

Scrubbing liquid inlet pressure, PSI _____

Liquid-to-gas ratio _____

Pressure drop across control device _____

Temperature of gases Inlet _____°F

Outlet _____°F

Inlet loadings, gr/dscf _____

Outlet loadings, gr/dscf _____

Inlet gas composition (H_2O, SO_2, NO_x, etc.) _____

Outlet gas composition (H_2O, SO_2, NO_x, etc.) _____

Disposal of collected material _____

Stack height and diameter (ft) _____

D. Thermal Dryers - Pollution Control Equipment Cost Data

Please provide the following information for each piece of gas cleaning and related equipment (such as fans, motors, etc.).

1. Cost of the equipment: (please note what items are included in the purchase cost).

   a. Total purchase cost

      Control device _____

      Auxiliary equipment _____

      Instruments and controls _____

Taxes and Freight _____

TOTAL _____

Year purchased _____

b. Installation costs (state if this is a retrofit or grassroots installation).

Foundations and supports _____

Erection and handling _____

Electrical _____

Piping and ductwork _____

Insulation _____

Painting _____

Site preparation _____

Facilities and buildings _____

TOTAL _____

Total purchase and installation cost _____

2. Operating Costs

a. Unit prices:

Operating labor, $/hr _____

Maintenance labor, $/hr _____

Electricity, $/kWh _____

Water (purchased), $/1000 gal _____

Water (circulating) _____

Steam, $/1000 lbs _____

Fuel, $/million Btu _____

b. Annual costs, $/yr

Operating labor	_____
Maintenance Labor	_____
Electricity	_____
Water	_____
Steam	_____
Fuel	_____
Overhead	_____
Taxes and insurance	_____
Administration	_____
Total Annual Cost, $/yr	_____

E. Suppression of Dust

1. Please supply technical data on suppression techniques applied at your plant:

   a. Do you use water suppression or wetting agent suppression techniques?

   b. Is suppression applied for hooded or totally enclosed dust sources?

   c. Describe equipment used to apply suppressants.

2. Please supply capital and operating cost data (as detailed as possible) on suppression techniques.

F. Other Control Equipment

For applications of emission capture devices, such as hooding of conveyors, conveyor transfer points, feeders, chutes, and ductwork, provide technical data (i.e., size, shape, construction material and others).

Provide cost data on the above items, if available.

G. Monitoring of Control Equipment for Thermal Dryers and Other Parameters

1. Please indicate which parameters are continuously or periodically monitored, e.g., pressure drop, temperature, pump pressure, flow rate, coal level, or coal quantities. Indicate the operating range of parameters. For which parameters are records kept and for how long?

2. Specify any problems you have encountered in meeting the monitoring requirements of the NSPS.

3. Provide suggestions you may have for revised monitoring requirements of the NSPS.

H. Miscellaneous

1. For new facilities or expansion of existing facilities, is there a trend toward utilizing fabric filters in coal preparation plants?

2. What growth rate in coal handling is anticipated for your company?

3. Do you have any plans for expansion or modification of existing plant facilities within the next 5 years?

4. Have you modified the coal handling equipment within the last 4 years? (Please describe any changes to improve production, to improve emissions capture and control, and to improve operation and maintenance, etc.)

5. Please describe any problems encountered with retrofitting a baghouse and/or capture and control equipment in your plant for modified and reconstructed facilities.

_____

_____

6. Please describe precautions that must be taken against fires or explosions in dust capture and control equipment.

_____

_____

7. Please describe required winterizing of control devices, if any, that control coal dust emissions.

_____

_____

_____

8. Specify any problems you have encountered in meeting the requirements of the NSPS.

_____

_____

_____

9. Provide suggestions you may have for revision of the current NSPS for coal preparation plants.

_____

_____

_____

_____