

TO Air Quality Permit File: OP-30-00219
Emerald Coal Resources, L.P. / Emerald Mine and Coal Preparation Plant

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DATE May 11, 2014

RE Review of Application for Title V Operating Permit
Emerald Coal Resources, L.P. / Emerald Mine and Coal Preparation Plant
Franklin Township, Greene County
APS #811265; AUTH #975008; PF# 764465

Background:

The Emerald Mine and Coal Preparation Plant is located in Franklin Township, Greene County. It contains equipment for mining, conveying, unloading, breaking, screening, chemical froth flotation, sizing, storing, and loading coal. Raw coal is extracted from the mine and transferred to the coal preparation plant by conveyer belt. Material is shipped from the coal preparation plant by both railcar and truck. Throughput of raw coal in the facility is limited to 10,000,000 tons per year.

The Department issued State Only Operating Permit, SOOP-30-00087 for the Emerald Mine to Cypress Emerald Resources, previous owner of the mine, on September 16, 1997 with an expiration date of September 16, 2002. It should be noted that while this facility was named the Emerald Mine, the SOOP actually authorized the operation of only the coal preparation plant and did not include the mine itself. This was the first facility-wide operating permit covering the coal preparation plant. Before that time, specific processes at the facility had operated under permits 30-305-013 and 30-305-013A.

The Department issued Plan Approval PA-30-087A to the company on November 1, 1999. The plan approval allowed an increase in production in the coal preparation plant from 6.5 million to 10 million tons of coal per year. As part of the production increase, Emerald increased the speed of several conveyors, increased the size of several stockpiles, and added equipment to the wet wash circuit.

The Operating Permit OP-30-00087 was renewed on November 17, 2006, with an expiration date of November 17, 2011. The permit was issued to Emerald Coal Resources, L.P. Prior to

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that time, ownership of the Emerald Mine had changed from Cypress Emerald Resources to RAG Emerald Resources to Emerald Coal Resources. The July 31, 2009 merger of Foundation Coal, which was the parent company for the mine, into Alpha Natural Resources, made Alpha the current parent company.

On October 21, 2008, the operating permit, OP-30-00087, was amended to change the name of the Responsible Official from Douglas Conklin to John Dzurino.

On May 17, 2011, Emerald Coal Resources, L.P. (Emerald) submitted an application to renew the state only Operating Permit (SOOP) for their Emerald Mine in Franklin Township, Greene County. No changes to the equipment authorized in the initial SOOP had been made since its issuance, with the exception of the addition of a rock crusher. The rock crusher was considered to be a portion of the Rotary Breaker process (Source ID #102) and defined as such in the renewed SOOP. This SOOP was issued on September 27, 2011, with an expiration date of September 27, 2016.

On July 2, 2012, the Department received an application for a Title V Operating Permit from Emerald Coal Resources, for the combined Emerald Mine and Coal Preparation Plant. This application was assigned the identification TVOP-30-00219, changing the Department's number for the operating permit, as well as its type. The application contained a letter stating "The filing of this Title V application, therefore, should not be construed as an admission by Alpha NR that any of its coal mines are a major source of greenhouse gas or other emissions." The basis for this contention is that the air emissions from the mine should be considered fugitive emissions and therefore should not be considered in the determination of source status for the facility. The letter was signed by Terry L. Dayton, Director Environmental Affairs, Pennsylvania Land Holdings Company, LLC., an affiliate of Alpha Natural Resources, Inc.

A Full Compliance Evaluation of the facility was last conducted on April 4, 2013, by Richard Kilpatrick, Air Quality Specialist of PA DEP and the facility was found to comply with all requirements of the current SOOP. No source at facility is subject to periodic stack testing requirements.

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Emissions and Control:

The facility now includes both the Emerald Coal Mine and the coal preparation plant with a breaker and screens, which are used to process coal to a required maximum size. The coal preparation plant also contains a chemical froth flotation system to clean the coal. The preparation plant processes newly mined coal, fed by a belt conveyer from the adjoining Emerald Mine.

Fugitive and particulate emissions are limited, in accordance with the standards in Chapter 123. The existing operating permit limits annual throughput of coal into the coal preparation plant to 60,000 tons per day and 10,000,000 tons per year. The sources and controls at the Emerald Mine and Coal Preparation Plant are shown in Table 1:

**Table 1
 Emission Sources at Facility
 Emerald Resources, LP, Emerald Mine and Coal Preparation Plant (OP-30-00219)**

ID	Source Name	Emission Control	Installed
101	Transfer Operations	Covered conveyers	1977
102	Rotary Breaker	Baghouse	November 1, 1999
103	Raw Coal Vibrating Screens	Baghouse	1977
104	Chemical Coal Screening		November 1, 1999
105	Coal Storage Operations	Water spray	1977
106	Plant Roadways	Water and dust suppressants	1977
108	Emerald Coal Mine		1977

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Emissions of criteria pollutants from the combined Emerald Mine and Coal Preparation Plant are shown in Table 2:

Table 2
Emerald Resources, LP, Emerald Mine and Coal Preparation Plant (OP-30-00219)
Potential to Emit Criteria Emissions

Source	Process Rate	PM ₁₀ Emissions Lb/Hr	PM ₁₀ Emissions Ton/Yr	VOC Emissions Lb/Hr	VOC Emissions Ton/Yr
101 Transfer Operations	10.0 MM Tons/Year	0.71 ¹	3.12 ¹		
102 Rotary Breaker	10.0 MM Tons/Year	0.22 ¹	0.96 ¹		
103 Vibrating Raw Coal Screens	10.0 MM Tons/Year	0.08 ¹	0.35 ¹		
104 Coal Chemical Cleaning	10.0 MM Tons/Year	0.00	0.00	7.27 ²	31.84 ²
105 Coal Storage Operations	15.9 Acres	0.25 ¹	1.08 ¹		
106 Plant Roadways	14.5 M Miles/Year	0.53 ¹	2.32 ¹	0.01 ¹	0.05 ¹
108 Emerald Coal Mine	10.0 MM Tons/Year	10.67 ³	46.75 ³		
Total		12.47	54.58	7.28	31.89

¹ Emission estimate based on AP-42.

² Emission estimate based on mass balance.

³ Emission estimate based on expected concentration of PM₁₀ in ambient air. Since this source has not been previously permitted, testing will be conducted during the first effective year of the permit to refine these values.

All air emissions from the Emerald Mine itself are carried and exhausted in the ventilation air. This air flow is necessary to provide respirable air to the workers in mine. The estimate of PM₁₀ emissions from the mine assumes that the dust loading of the air drawn into the mine is equal to the dust loading of the air exhausted from the mine. On this basis, the ventilation air does not pick up dust generated in the mine and also, the mine does not collect dust in the ventilation air. Testing will be required within 12-months of issuance of the permit to refine these values for emissions of PM₁₀.

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Emissions of Greenhouse Gas (GHG) emissions from the combined Emerald Mine and Coal Preparation Plant are shown in Table 3:

Table 3
Emerald Resources, LP, Emerald Mine and Coal Preparation Plant (OP-30-00219)
Potential to Emit Greenhouse Gases

Source	Greenhouse Gas							
	CO ₂		CH ₄		N ₂ O		Total CO ₂ e	
	Lb/Hr	Ton/Yr	Lb/Hr	Ton/Yr	Lb/Hr	Ton/Yr	Lb/Hr	Ton/Yr
101 Transfer Operations								
102 Rotary Breaker								
103 Vibrating Raw Coal Screens								
104 Coal Chemical Cleaning								
105 Coal Storage Operations								
106 Plant Roadways	5.3	23	0.29	1.29	0.13	0.59		232
108 Emerald Coal Mine			3,651	15,991			76,671	335,811
Total	5.3	23	3,651	15,992	0.13	0.59	76,671	336,043

Emission estimates for sources that are not specified otherwise are based on AP-42.
 All emissions are based on AP-42. (1 Ton CH₄ = 21 Tons CO₂e and 1 Ton N₂O = 310 Tons CO₂e)

Emissions of GHG from the Plant Roadways (Source ID 106) result from the combustion of diesel fuel in trucks at the facility. Emission of methane from the Emerald Coal Mine results from freeing of methane trapped in coal and waste coal seams. The methane is released from exposed coal surfaces created by mining. This includes both mining faces in the mine and the

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surfaces of the mined coal. Both of these evolve methane which is picked up by the ventilation air. The ventilation air conveys the methane into the atmosphere through exhaust shafts in the mine. 30 CFR § 75.323 specifies the O₂ concentration must be at least 19.5% in all work and travel areas. Even though inhalation of methane is not considered toxic, the Lower Explosion Limit (LEL) for methane in air is 5% volume concentration. A federal health and safety requirement to protect against explosion, 30 CFR § 75.323, limits the methane concentration in mine working areas to a maximum of 1%. Therefore, the ventilation air flow rate must be sufficient to limit the risk of explosion, as well as provide oxygen to the miners.

Regulatory Analysis:

A facility is major if the potential to emit (PTE) exceeds 100 tons of PM_{2.5}, 100 tons of NO_x, or 50 tons of VOC per year. Additionally for GHG, the major source threshold for PSD requires potential emissions of 100,000 TPY on a CO₂ equivalent (CO_{2e}) basis. The Title V major source criteria for Hazardous Air Pollutants (HAPs) is an emission potential of 10 TPY of a single HAP or 25 TPY of the sum of all emitted HAPs. Facilities with PTEs that do not exceed major source thresholds for HAPs are known as area sources.

The Emerald Mine and Coal Preparation Plant became an existing major Title V source as of July 1, 2011, through Step 2 of EPA's Greenhouse Gas Tailoring Rule. The Emerald Mine and Coal Preparation Gas Plant has a GHG emission PTE in excess of 100,000 tons per year on a CO₂ equivalent (CO_{2e}) basis.

The company made the statement in the permit application that methane emissions from the Emerald Mine (Source ID 108) should not be included in the determination of source status for the purposes of permitting. Coal mines and coal cleaning plants without thermal dryers are not listed within the 26 categories of sources listed in the definition of Title V facility in 25 Pa. Code § 121.1 and the definition of Major stationary source in 40 CFR § 51.165. Both of these definitions state that fugitive emissions should not be included in the determination of permit status of the facility, if it is not listed within the 26 categories.

However, in 40 CFR Part 70 State Operating Programs, § 70.3(d) states "Fugitive emissions. Fugitive emissions from a part 70 source shall be included in the permit application and the part 70 permit in the same manner as stack emissions, regardless of whether the source category in question is included in the list of sources contained in the definition of major source."

While methane evolved from the coal is combined with ventilation air at the time of its release in the mine, the Department does not consider this methane to be fugitive. Ventilation air in the mine is always confined in the ducts, tunnels, or shafts of the mine. Methane emissions from the mine can be determined by EPA test methods at the location of it exhausts into the atmosphere in the ventilation air exhaust duct.

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The emission rates from the sources classify the plant as a Title V facility on the basis of GHG. The facility is subject to emission restrictions from 25 Pa. Code Chapter 123 and 40 CFR, Part 60, Subpart Y - Standards of Performance for Coal Preparation and Processing Plants.

New Source Performance Standards

As a coal preparation plant that processes more than 200 tons per day, installed after October 27, 1974 and before April 28, 2008, the facility is subject to the requirements of 40 CFR Part 60, Subpart Y, Standards of Performance for Coal Preparation Plants. Subpart Y limits the opacity of gases from coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems to less than 20 percent opacity. Subpart Y does not specify monitoring, reporting, or record keeping requirements for coal prep plants without thermal dryers. However, the facility is subject to reporting and record keeping requirements in the General Provisions in Subpart A, most notably 40 CFR § 60.4 and 60.7. The first requires submittal of documents generated by Subpart Y to EPA and the Department. The latter requires notification to EPA and the Department of construction and initial startup and records of startup, shutdown, or malfunction. The monitoring and record keeping conditions that demonstrate compliance with the Chapter 123 restrictions and the malfunction reporting condition shall ensure compliance with all NSPS requirements.

In accordance with 40 CFR § § 60.254 and 60.255 of Subpart Y, certain standards and tests become effective either on the date when performance testing is completed, or when performance testing is required to have been completed. Demonstration of compliance with the opacity standard for coal processing and conveying equipment at the Emerald Mine would require use of EPA Method 9 for Visual Observation of Opacity, with the procedure modified as described in 40 CFR § 60.257. However, PA DEP may grant a waiver of testing, providing the sources at the facility are demonstrated to comply with 25 Pa. Code § 123.1. Therefore, sources at Emerald have not been and are not subject to performance testing under the Subpart, provided compliance with § 123.1 is demonstrated. The Department will send a notification to EPA that a performance test waiver has been granted to the operators of the Emerald Mine.

Other Federal Air Programs

40 CFR Part 98, Compliance Assurance Monitoring (CAM) - The Compliance Assurance Monitoring (CAM) requirements are contained in 40 CFR §§ 64.1-64.10. The CAM rule was promulgated by EPA in 1997 and it is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act (CAA) for each pollutant-specific emission unit (PSEU) that:

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- Is located at a major source subject to a Title V permit, and
- Is subject to an emission limitation and a control device is used to meet that limit,
- Has pre-controlled emissions greater than the major source threshold (at a single PSEU), and
- Pollutant is not otherwise monitored by a continuous compliance determination method as that term is defined on 40 CFR § 64.1.

The Emerald Coal Mine and Preparation Plant is a major source. It does have control devices and emissions limitations. Emission limits at the facility limit particulate emission from certain processes at the facility. The control devices at the facility consist of baghouses which collect particulate emitted from certain emission units in the coal preparation plant. Multiple emission units may exhaust to an individual baghouse. Particulate emissions from the baghouses are not continuously monitored. Individual emission units that exhaust to baghouses are:

Table 4
Emerald Resources, LP, Emerald Mine and Coal Preparation Plant (OP-30-00219)
PM Emissions from Controlled Emission Units

Controlled Emission Unit	Uncontrolled Emissions PM	Controlled Emissions PM
	Ton/Yr	Ton/Yr
Screen #1	4.5	0.05
Screen #2	4.5	0.05
Rotary Breaker	9.0	0.09
Rock Crusher	9.0	0.09

However, no single PSEU has uncontrolled emissions that are greater than major source levels. The major source level for PM₁₀ is 100 tons per year. PM₁₀ is only a portion of particulate matter (PM) which is a maximum of 9 tons per year from a single PSEU. Therefore, CAM is not applicable to any source at the Emerald Mine and Coal Preparation Plant.

a. **40 CFR Part 98, Mandatory Greenhouse Gas Reporting** - This part was promulgated on October 30, 2009. Per 40 CFR Section 98.2(a), the Greenhouse Gas (GHG) reporting requirements and related monitoring, recordkeeping, and reporting requirements of this part apply to the owners and operators of any facility that is located in the United States and that meets the requirements of either paragraph (a)(1), (a)(2), or (a)(3) of this section. Underground coal mines with emissions of 36,500,000 actual cubic feet of CH₄ or more per year are subject to this part under (a)(1) of this section. The Emerald Mine meets this criteria and the facility is subject to this part. Therefore, the mine is subject to 40 CFR Part 98 Subpart FF for the calendar

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year 2010 and later years. This makes the Emerald Mine subject to the specific requirements of Subpart FF-Underground Coal Mines of Part 98.

However, public comments to the Greenhouse Gas Mandatory Reporting Rule (GHG MRR) questioned the requirements of this rule to meet current definitions of “applicable requirement” at 40 CFR 70.2 and 71.2. The commentators requested that USEPA confirm their interpretation of the regulations. The EPA provided the following response: “As currently written, the definition of “applicable requirement” in 40 CFR 70.2 and 71.2 does not include a monitoring rule such as today’s action, which is promulgated under CAA sections 114(a)(1) and 208.” The preamble of the final version of the GHG MRR, located at 74 Fed. Reg. 209, pp. 56287-56288, states that the GHG MRR is not considered an “applicable requirement” under the Title V Operating Permit program. Therefore this Subpart, while an obligation for the facility, is not considered an applicable requirement for this Title V Operating Permit.

b. 40 CFR § 51.166 and 40 CFR § 52.21 - 22, Greenhouse Gas Tailoring Rule - The Greenhouse Gas Tailoring Rule was issued in May 2010. This rule establishes a process for conducting Prevention of Significant Deterioration (PSD) reviews, including Best Available Control Technology (BACT) determinations for control of greenhouse gases (GHG) when a new source or a modification to an existing source results in emissions of GHGs in excess of certain thresholds. Since May, 2010, there have not been any modifications to the Emerald Mine and Coal Preparation Plant that triggered a GHG PSD review.

Pennsylvania Code Title 25

Chapter 123 emission standards and appropriate methods of compliance are included in the site level permit conditions. The objective of the majority of permit conditions is to limit fugitive dust emissions at the plant in accordance with 25 Pa. Code §123.1 and §123.2. The requirements include work practice standards related to coal storage, conveying, crushing and screening, loading and unloading, and roadways.

The existing operating permit limits the coal preparation plant’s 12-month total throughput to 10 million tons per year (tpy) of coal. The proposed operating permit also has this process restriction. In addition, the proposed operating permit also contains a short term process throughput limitation of 60,000 tons of raw coal per day to the coal preparation plant. Other permit conditions include requirements to cover conveyors.

The Pennsylvania Department of Environmental Protection (PADEP) is authorized to enforce rules for the control of air pollution. The following State Air Pollution Control regulations were evaluated for their applicability to the proposed operating permit:

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a. 25 Pa Code 121.7 (Prohibition of Air Pollution) - The operation of this facility has applicable emission generating activities which are limited under this regulation. This regulation was not included in the current SOOP, but since it is applicable to the facility, it has been added to the proposed TVOP.

b. 25 Pa Code 123.1 (Prohibition of Certain Fugitive Emissions) - The operation of this facility has applicable emission generating activities which are limited under this regulation.

c. 25 Pa Code 123.2 (Fugitive Particulate Matter) - The operation of this facility has applicable emission generating activities which are limited under this regulation.

d. 25 Pa Code 123.13 (Processes) – This section limits particulate process emissions. Three of the emission processes at Emerald have process emissions and two of these processes emit particulate in gas concentrations that are regulated by this section.

e. 25 Pa Code 123.31 (Odor Emissions) – The facility is subject to this regulation.

f. 25 Pa Code 123.41 (Limitations — Visible Emissions) - This will be met by daily visual inspections of the facility and meeting the requirements of 40 CFR Part 60, Subpart Y.

g. 25 Pa Code 123.42 (Exceptions — Visible Emissions) - These exceptions are applicable to the limitations in paragraph 123.41.

h. 25 Pa Code 123.43 (Measuring Techniques - Visible Emissions) - These measuring techniques are applicable to the limitations in paragraph 123.41 and other opacity limitations. These techniques are valid for all visible emissions.

i. 25 Pa Code 124 (National Emission Standards for Hazardous Air Pollutants) - The Emerald Mine and Coal Preparation Plant has no applicable requirements under 40 CFR Part 63.

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j. 25 Pa Code Chapter 127.441 (Operating permit terms and conditions) – Emerald Resources will fulfill the following requirements:

A. The permittee shall maintain comprehensive, accurate records which, at a minimum, shall include:

- a. The number of hours per month that each piece of equipment operated.**
- b. The amount of fuel used per month in each piece of equipment.**

B. The owner/operator shall keep daily records of all product delivery. These records shall be kept on site for a period of five years and be made available to the Department upon request.

a. The owner/operator shall observe and record the existence of, or lack thereof, of fugitive emissions, malodors, or visible emissions once per day when the coal preparation plant is in operation.

k. 25 Pa Code 129.14 (Open Burning Operations) The facility is not located in an air basin and is allowed to conduct open burning, subject to the restrictions of this condition.

l. 25 Pa Code Chapter 135.5 (Recordkeeping) – Emerald Resources will fulfill the following requirements:

A. The permittee shall maintain comprehensive, accurate records which, at a minimum, shall include:

- a. The number of hours per month that each piece of equipment operated.**
- b. The amount of fuel used per month in each piece of equipment.**

m. The owner/operator shall keep daily records of all product delivery. These records shall be kept on site for a period of five years and be made available to the Department upon request.

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Changes to previous State Only Operating Permit SOOP-30-00219

The requirements in the existing SOOP were carried forward into the proposed TVOP, with some exceptions. The changes were:

1. Because emissions of methane from the Coal Mine and Coal Preparation Plant exceed 100,000 tons per year of CO₂e, the facility is now classified as a Major Source on the basis of emission of GHG. The classification of this facility, for the purpose of permitting, was changed from State Only to Title V.
2. The Emerald Coal Mine (Source ID 108) was added as a source in the proposed TVOP.
3. Condition #001, Section C (New), which contains a general prohibition of air pollution, was added to the proposed TVOP.
4. Condition #001, Section C (Old), which contains restrictions on fugitive emissions, had its repetitive portions removed.
5. Condition #005 Section C (New), related to opacity limits, was added to the proposed TVOP.
6. Condition #006, Section C (Old), Section E, Source Group G01, Condition #010 (New), related to opacity, was moved.
7. Condition #007, Section C (Old), Section C, Condition #008 and Section E, Source Group G01, Condition #001 (New), limiting process material throughput, was moved and a condition for clarification only was left in its place.
8. Conditions #008, #011, and #012, Section C (Old), Section G, Source Group G01, Conditions #002, #003, and #004 (New), related to the coal preparation plant only, were moved.
9. Condition #012, Section C, requiring semi-annual reporting, was added.
10. Condition #014 Section C (Old), requiring reporting of malfunctions, was deleted since it was repeated in Condition #015.
11. Conditions #020 and #021, Section C (Old), Section E, Source Group G01, Conditions #005 and #006 (New), related to work practices, were moved.

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- 12. Conditions #029, #030, and #031, Section C, Section E (Old), Source Group G01, Conditions #008, #009, and #012 (New), related to Subpart K, were moved.**
- 13. Conditions #013, #014, and #015, Section C (New), relating to requirements of Title V sources was added.**
- 14. Condition #001, Section D, Source ID 108 (New), requiring stack testing to determine emission of PM₁₀ from the mine, was added.**
- 15. Condition #026, Section C (New), stating the applicability of Subpart K to this facility, was added.**
- 16. A disclaimer was added to Section H Miscellaneous stating that the information contained in that Section is for informational purposes only, and are not requirements.**

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Conclusions and Recommendations:

Larry Werner of KU Resources, consultant for Emerald Resources, as well as Matthew McClure, Environmental Compliance Manager, of Emerald Resources, L.P., and Richard Kilpatrick, Air Quality Inspector of PA DEP have reviewed a copy of the draft permit.

Emerald Resources, L.P. has proposed, in this application, to operate an underground coal mine and processing plant in Franklin Township, Greene County. I recommend the issuance of a renewed Operating Permit for this application, subject to the conditions in the proposed TVOP.

Permit Authorized by this Authorization					
Quantity	Facility Name			PF ID:	764465
1	Emerald Resources, LP, Emerald Mine and Coal Preparation Plant (TVOP-30-00219)				
		APS ID:	811265	Auth. ID:	975008
Short Descr.	Operating Permit for a coal preparation plant				
Permits Inactivated by this Authorization					
Permit #				PF ID:	518575
OP-30-00087	Emerald Resources, LP, Emerald Mine(SOOP-30-0087)				
		APS ID:	879199	Auth. ID	879199