West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on August 13, 2015.

Permit Number: **R30-00900002-2015**
Application Received: **November 29, 2018**
Plant Identification Number: **03-54-009-00002**
Permittee: **Mountain State Carbon, LLC**
Facility Name: **Follansbee Plant**
Mailing Address: **1851 Main Street, Follansbee, WV 26037**

Permit Action Number: *MM02* Revised: *April 30, 2019*

Physical Location:	Follansbee, Brooke County, West Virginia
UTM Coordinates:	533.41 km Easting • 4465.76 km Northing • Zone 17
Directions:	One mile north of Follansbee on West Virginia Route 2 along the eastern bank of the Ohio River

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Facility Description

The Mountain State Carbon, LLC (MSC) Follansbee Plant is a coke facility that produces metallurgical-grade coke and coke gas byproducts (light oil, ammonium sulfate, fuel gas, coal tar, sulfuric acid) from coal for use at off-site steel facilities and for commercial sales. This operation involves four coke oven batteries for coke production. In addition, the facility operates a by-product plant that recovers chemicals from the process and prepares the coke oven gas for use as fuel. The Follansbee plant also operates a material storage area located to the west. The maximum capacity of the coke plant is 174.9 tons per hour and 1,535,000 tons per year of coke output with 249.8 tons per hour and 2,190,000 tons per year of coal input. The facility has the potential to operate twenty-four (24) hours a day for seven (7) days per week. The facility operates under SIC code 3312 and NAICS code 324199.

This modification is for increasing the permitted throughput of crude coal tar loaded out from six million gallons to sixteen million gallons per year. These changes were approved under R13-1652B. On April 3, 2019, Mountain State Carbon LLC filed a request (through R13-1652C) to omit the term "rail cars" from the description on Emission Unit ID P021-22A, since this station may only accept tanker trucks. This change was also incorporated in this permit.

Emissions Summary

The change in potential emissions associated with the minor modification (MM02) is as follows:

Regulated Pollutants	Change in Emission from loading operations
Benzene	+0.80
Toluene	+0.18
Xylenes	+0.04
Indene	+0.03
Naphthalene	+0.07
Styrene	+0.02
Total HAPs	+1.14

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of Carbon Monoxide (CO), Nitrogen Oxides (NO_X), Particulate Matter (PM_{10}), Sulfur Dioxide (SO_2), and Volatile Organic Compounds (VOC) and over 10 tons per year of Benzene, Coke Oven Emissions, Cyanide Compounds, Toluene and Xylene. Due to this facility's potential to emit over100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Mountain State Carbon, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for Construction, Modification, Relocation and Operation of Stationary Sources
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

The following Permits/Consent Orders are affected by this modification:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
R13-1652C	April 8, 2019	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

❖ Changes from R13-1652B have been incorporated in the Title V permit. These changes include the following:

- The emission rates in Condition 8.1.1. were updated to reflect the increase of the temperature of the tar and increase in annual throughput.
- A change was made to condition 8.1.2. to increase the permitted throughput of coal tar from six (6) million gallons to sixteen (16) million gallons per year.
- The two loading racks are utilizing a common loading pump, which limits the facility to using one rack at any given time. To ensure that the short-term emissions do not increase, Condition 8.1.3. was established in the permit to limit the facility to using one rack at a time.
- To minimize fugitive VOC emissions, Condition 8.1.24. was established to require MSC to use a double valve configuration to seal off the open-ended line of the loading arm of each rack when not in use.

❖ On April 3, 2019, Mountain State Carbon LLC filed a request (through R13-1652C) to omit the term "rail cars" from the description on Emission Unit ID P021-22A, since this station may only accept tanker trucks. This change was also incorporated in the Emission Units Table of this permit. There is no change in emissions due to this modification.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

N/A

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

Point of Contact

All written comments should be addressed to the following individual and office:

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478
Beena.j.modi@wv.gov

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

The following request (through R13-1652C) was received via e-mail on April 3, 2019 from Mountain State Carbon LLC:

- Request # 1: Page 9 of the permit – Omit the term "rail cars" from the description on Emission Unit ID P021-22A, since this station may only accept tanker trucks.

  Answer #1: Corrected

In addition to this change, the contact information for EPA in condition 3.5.3 was also revised.