

# 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 June 18, 2019.

Permit Number: **R30-09300004-2019**  
Application Received: **09/17/2019**  
Plant Identification Number: **03-54-09300004**  
Permittee: **Kingsford Manufacturing Company**  
Facility Name: **Parsons Plant**  
Mailing Address: **P.O. Box 464 Parsons, WV 26287**

Permit Action Number: MM01      Revised: 04/21/2020

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Physical Location:                      Parsons, Tucker County, West Virginia  
UTM Coordinates:                      613.20 km Easting • 4,326.20 km Northing • Zone 17  
Directions:                                Take Route 219 North of Elkins. The plant is located about 2 miles South  
of Parsons on Route 219.

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### Facility Description

This modification is to replace the current control system of the two (2) retort char transfer bins (E-06-05). The particulate matter emissions from each of these bins was previously controlled via two bin vent filters (C-38). These two bin vent filters are being replaced by a single venturi scrubber (C-38) due to increased maintenance requirements on the bin vent filters. This change was approved under R13-1608K.

### Emissions Summary

The PM<sub>10</sub> emissions of the facility will increase by approximately 0.25 TPY due to this modification.

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 250.79 TPY of Nitrogen Oxides and 191.62 TPY of PM<sub>10</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Kingsford Manufacturing Company's Parsons Plant 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	Construction permit requirement
	45CSR30	Operating permit requirement.
	45CSR7	Particulate emissions from manufacturing operations
State Only:	N/A	

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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1608K	November 6, 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

The purpose of this modification is to replace the control devices on the two (2) Retort Char Transfer bins. The previous devices used were two (2) fabric filters, and the new control device is a single venturi scrubber (C-38).

- The Emission Units Table was updated with the new control device and manufacturer's specifications provided by Kingsford Manufacturing Company.
- Table 1.2 was updated, as R13-1608K issued on November 6, 2019 supersedes and replaces R13-1608J.
- Permit condition 3.1.14 was updated with the new R13 permit number.

### **Non-Applicability Determinations**

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

### **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: Not Applicable for minor modifications.

Ending Date: N/A

### **Point of Contact**

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

Nikki B. Moats  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 41282 • Fax: 304/926-0478  
Nikki.B.Moats@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)**

Not applicable.