## **Division of Air Quality Permit Application Submittal**

Please find attached a permit application for :

### [Company Name; Facility Location]

- DAQ Facility ID (for existing facilities only):
- Current 45CSR13 and 45CSR30 (Title V) permits associated with this process (for existing facilities only):
- Type of NSR Application (check all that apply):
  - $\circ$  Construction
  - $\circ$  Modification
  - Class I Administrative Update
  - Class II Administrative Update
  - $\circ$  Relocation
  - Temporary
  - Permit Determination

- Type of 45CSR30 (TITLE V) Revision (if any)\*\*:
  - Title V Initial
  - Title V Renewal
  - Administrative Update
  - $\circ \quad \textbf{Minor Modification}$
  - Significant Modification
  - Off Permit Change

\*\*If any box above is checked, include the Title V revision information as ATTACHMENT S to this application.

- Payment Type:
  - Credit Card (Instructions to pay by credit card will be sent in the Application Status email.)
  - Check (Make checks payable to: WVDEP Division of Air Quality) Mail checks to: WVDEP – DAQ – Permitting Attn: NSR Permitting Secretary 601 57<sup>th</sup> Street, SE Charleston, WV 25304

Please wait until DAQ emails you the Facility ID Number and Permit Application Number. Please add these identifiers to your check or cover letter with your check.

- If the permit writer has any questions, please contact (all that apply):
  - Responsible Official/Authorized Representative
    - Name:
    - Email:
    - Phone Number:
    - **Company Contact** 
      - Name:
      - Email:
      - Phone Number:
  - Consultant

 $\bigcirc$ 

- Name:
- Email:
- Phone Number:

## <u>Table of Contents</u> REO Processing Air Permit Applica**ti**on – Modi**fi**ca**ti**on March 2024

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# APPLICATION

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF AIR QUALITY 601 57 <sup>th</sup> Street, SE Charleston, WV 25304 (304) 926-0475 www.dep.wv.gov/dag		PLICATION FOR NSR PERMIT AND ITLE V PERMIT REVISION (OPTIONAL)	
PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN CONSTRUCTION MODIFICATION RELOCATION CLASS I ADMINISTRATIVE UPDATE TEMPORARY CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT	ADMINISTRA     SIGNIFICANT     IF ANY BOX ABC     INFORMATION A	K TYPE OF <b>45CSR30 (TITLE V)</b> REVISION (IF AN ATIVE AMENDMENT IMINOR MODIFICATI T MODIFICATION OVE IS CHECKED, INCLUDE TITLE V REVISION AS ATTACHMENT S TO THIS APPLICATION	
FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revi (Appendix A, "Title V Permit Revision Flowchart") and abilit			
Section	n I. General	r	
<ol> <li>Name of applicant (as registered with the WV Secretary of REO Processing Inc.</li> </ol>	State's Office):	2. Federal Employer ID No. <i>(FEIN):</i> 81-4277734	
3. Name of facility (if different from above):		4. The applicant is the: $\Box$ <b>OWNER</b> $\Box$ <b>OPERATOR</b> $\boxtimes$ <b>BOTH</b>	
5A. Applicant's mailing address: 221 Industrial Park Rd, Parkersburg, WV, 26104		sent physical address: on, WV 25703	
221 Industrial Park Rd, Parkersburg, WV, 26104       20 26 <sup>th</sup> St, Huntington, WV 25703         6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia?       X YES □ NO         -       If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A.         -       If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A.			
7. If applicant is a subsidiary corporation, please provide the n	ame of parent corpo	oration:	
<ul> <li>8. Does the applicant own, lease, have an option to buy or otherwise have control of the <i>proposed site</i>? XES NO</li> <li>If YES, please explain: Own</li> <li>If NO, you are not eligible for a permit for this source.</li> </ul>			
<ul> <li>9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Modification to permit 13-3614 to include Dust Control Plan, truck loading process changes (hood, massager, and vibrator), and fan filters.</li> <li>10. North American Industry Classification System (NAICS) code for the facility: 493110</li> </ul>			
11A. DAQ Plant ID No. (for existing facilities only):       11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):         0 1 1 - 0 0 2 4 1       11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only):			
All of the required forms and additional information can be found	l under the Permitting	ng Section of DAQ's website, or requested by pho	one.

12A.

127.		
<ul> <li>For Modifications, Administrative Updates or Te present location of the facility from the nearest state</li> </ul>		please provide directions to the
<ul> <li>For Construction or Relocation permits, please provide directions to the proposed new site location from the nearest state road. Include a MAP as Attachment B.</li> </ul>		
Located approximately 530 feet south of the Ohio River, on the east side of 26 <sup>th</sup> Street and north of Guyan Avenue.		
12.B. New site address (if applicable):	12C. Nearest city or town:	12D. County:
	Huntington	Cabell
12.E. UTM Northing (KM): 4253322.1343248	12F. UTM Easting (KM): 373842.353341909	12G. UTM Zone: 17
13. Briefly describe the proposed change(s) at the facilit	y:	
To Permit the repackaging of Activated Carbon. Permit r and fan filters.	nodification will include Dust Control Pla	n, truck loading process changes,
14A. Provide the date of anticipated installation or chan	ge: 04/11/2024	14B. Date of anticipated Start-Up
<ul> <li>If this is an After-The-Fact permit application, prov change did happen: / /</li> </ul>	ide the date upon which the proposed	if a permit is granted: 04/11 /2024
14C. Provide a <b>Schedule</b> of the planned <b>Installation</b> of/ application as <b>Attachment C</b> (if more than one uni		units proposed in this permit
15. Provide maximum projected <b>Operating Schedule</b> o Hours Per Day 12 Days Per Week 6	f activity/activities outlined in this applica Weeks Per Year 52	ation:
16. Is demolition or physical renovation at an existing fa	cility involved? 🗌 YES 🛛 🕅 NO	
17. Risk Management Plans. If this facility is subject to	112(r) of the 1990 CAAA, or will becom	ne subject due to proposed
changes (for applicability help see www.epa.gov/cepp	oo), submit your <b>Risk Management Pla</b>	n (RMP) to U. S. EPA Region III.
18. Regulatory Discussion. List all Federal and State a	air pollution control regulations that you	believe are applicable to the
proposed process (if known). A list of possible application	able requirements is also included in Att	achment S of this application
(Title V Permit Revision Information). Discuss applica	bility and proposed demonstration(s) of	compliance (if known). Provide this
information as Attachment D.		
Section II. Additional att	achments and supporting d	ocuments.
19. Include a check payable to WVDEP – Division of Air	Quality with the appropriate application	n fee (per 45CSR22 and
45CSR13).		
20. Include a <b>Table of Contents</b> as the first page of your application package.		
21. Provide a <b>Plot Plan</b> , e.g. scaled map(s) and/or sketter source(s) is or is to be located as <b>Attachment E</b> (Ref. 1997).	efer to Plot Plan Guidance) .	
<ul> <li>Indicate the location of the nearest occupied structure</li> </ul>		
22. Provide a <b>Detailed Process Flow Diagram(s)</b> show device as <b>Attachment F.</b>	ving each proposed or modified emissio	ns unit, emission point and control
23. Provide a <b>Process Description</b> as <b>Attachment G.</b>		
<ul> <li>Also describe and quantify to the extent possible and quantify to the extent possible and quantify to the extent possible and quantify the second seco</li></ul>		
All of the required forms and additional information can be	e tound under the Permitting Section of DA	AQ's website, or requested by phone.

24. Provide Material Safety Data Sheets (MSDS) for all materials processed, used or produced as Attachment H.			
- For chemical processes, provide a MSD	S for each compound emitted	to the air.	
25. Fill out the Emission Units Table and	25. Fill out the Emission Units Table and provide it as Attachment I.		
26. Fill out the Emission Points Data Summary Sheet (Table 1 and Table 2) and provide it as Attachment J.			
27. Fill out the Fugitive Emissions Data Summary Sheet and provide it as Attachment K.			
28. Check all applicable Emissions Unit Data Sheets listed below:			
Bulk Liquid Transfer Operations	🛛 Haul Road Emissions	Quarry	
Chemical Processes	Hot Mix Asphalt Plant	Solid Materials Sizing, Handling and Storage	
Concrete Batch Plant	Incinerator	Facilities	
Grey Iron and Steel Foundry	Indirect Heat Exchanger	Storage Tanks	
General Emission Unit, specify Bulk true loading, and other fugitives	x loading, Unloading, Bagging	Station, railcar loading/unloading, open dump truck	
Fill out and provide the Emissions Unit Da	ata Sheet(s) as Attachment L.		
29. Check all applicable Air Pollution Co	ntrol Device Sheets listed belo	DW:	
Absorption Systems	🛛 Baghouse	Flare	
Adsorption Systems	Condenser	Mechanical Collector	
Afterburner	Electrostatic Precipita	ator 🗌 Wet Collecting System	
Other Collectors, specify Fan Filters			
Fill out and provide the Air Pollution Cont	rol Device Sheet(s) as Attach	ment M.	
30. Provide all <b>Supporting Emissions Ca</b> Items 28 through 31.	Ilculations as Attachment N,	or attach the calculations directly to the forms listed in	
	compliance with the proposed e	n proposed monitoring, recordkeeping, reporting and missions limits and operating parameters in this permit	
	not be able to accept all meas	ther or not the applicant chooses to propose such ures proposed by the applicant. If none of these plans ide them in the permit.	
32. Public Notice. At the time that the ap	plication is submitted, place a	Class I Legal Advertisement in a newspaper of general	
circulation in the area where the sourc	e is or will be located (See 45C	SR§13-8.3 through 45CSR§13-8.5 and <i>Example Legal</i>	
Advertisement for details). Please su	ubmit the Affidavit of Publicati	on as Attachment P immediately upon receipt.	
33. Business Confidentiality Claims. Does this application include confidential information (per 45CSR31)?			
	⊠ NO		
If YES, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's " <i>Precautionary Notice – Claims of Confidentiality</i> " guidance found in the <i>General Instructions</i> as Attachment Q.			
Section III. Certification of Information			
34. Authority/Delegation of Authority. Check applicable Authority Form below		ther than the responsible official signs the application.	
Authority of Corporation or Other Busine	ess Entity	Authority of Partnership	
Authority of Governmental Agency		Authority of Limited Partnership	
Submit completed and signed Authority F		· · ·	
		Permitting Section of DAQ's website, or requested by phone.	

35A. Certification of Information. To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

#### Certification of Truth, Accuracy, and Completeness

I, the undersigned 🖾 **Responsible Official** / 🗋 **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

#### **Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE		ATE: <u>3/28/2024</u> (Please use blue ink) 35C. Title: President
35D. E-mail: 36E. Phone: 937-545-8521 gregg.frazier@reoprocessing.com		36F. FAX:
36A. Printed name of contact person (if different from above):		36B. Title:
36C. E-mail:	36D. Phone:	36E. FAX:

🛛 Attachment A: Business Certificate	Attachment K: Fugitive Emissions Data Summary Sheet
🛛 Attachment B: Map(s)	Attachment L: Emissions Unit Data Sheet(s)
Attachment C: Installation and Start Up Schedule	Attachment M: Air Pollution Control Device Sheet(s)
Attachment D: Regulatory Discussion	Attachment N: Supporting Emissions Calculations
⊠ Attachment E: Plot Plan ⊠ Attachment F: Detailed Process Flow Diagram(s)	Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans Attachment P: Public Notice
Attachment F: Detailed Process Flow Diagram(s)	Attachment Q: Business Confidential Claims
Attachment H: Material Safety Data Sheets (MSDS)	Attachment R: Authority Forms
Attachment I: Emission Units Table	Attachment S: Title V Permit Revision Information
Attachment J: Emission Points Data Summary Sheet	Application Fee
Please mail an original and three (3) copies of the complete address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:	permit application with the signature(s) to the DAQ, Permitting Section, at the sapplication. Please DO NOT fax permit applications.
address listed on the first page of thi	s application. Please DO NOT fax permit applications.
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments:	s application. Please DO NOT fax permit applications. g Group and:
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit writer	s application. Please DO NOT fax permit applications.
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit wri For Title V Minor Modifications:	s application. Please DO NOT fax permit applications. g Group and: ter of draft permit,
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit wri For Title V Minor Modifications: Title V permit writer should send appropriate noti	s application. Please DO NOT fax permit applications. g Group and: ter of draft permit, fication to EPA and affected states within 5 days of receipt,
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit writer For Title V Minor Modifications: Title V permit writer should send appropriate noti NSR permit writer should notify Title V permit writer sh	s application. Please DO NOT fax permit applications. g Group and: ter of draft permit, fication to EPA and affected states within 5 days of receipt, ter of draft permit.
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit writer For Title V Minor Modifications: Title V permit writer should send appropriate noti NSR permit writer should notify Title V permit writer For Title V Significant Modifications processed in paralle	s application. Please DO NOT fax permit applications. g Group and: ter of draft permit, fication to EPA and affected states within 5 days of receipt, ter of draft permit. I with NSR Permit revision:
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit writer For Title V Minor Modifications: Title V permit writer should send appropriate noti NSR permit writer should notify Title V permit writer For Title V Significant Modifications processed in paralle NSR permit writer should notify a Title V permit writer	s application. Please DO NOT fax permit applications. g Group and: ter of draft permit, fication to EPA and affected states within 5 days of receipt, ter of draft permit. I with NSR Permit revision: rriter of draft permit,
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit writer For Title V Minor Modifications: Title V permit writer should send appropriate noti NSR permit writer should notify Title V permit writer For Title V Significant Modifications processed in paralle NSR permit writer should notify a Title V permit writer Public notice should reference both 45CSR13 and	s application. Please DO NOT fax permit applications. g Group and: ter of draft permit, fication to EPA and affected states within 5 days of receipt, ter of draft permit. I with NSR Permit revision: rriter of draft permit,
address listed on the first page of thi FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permittin For Title V Administrative Amendments: NSR permit writer should notify Title V permit writer should notify Title V permit writer should send appropriate noti NSR permit writer should notify Title V permit writer should notify a Title V permit	s application. Please DO NOT fax permit applications. g Group and: ter of draft permit, fication to EPA and affected states within 5 days of receipt, ter of draft permit. I with NSR Permit revision: rriter of draft permit,

Page 4 of 4

NSR/Title V Permit Revision Application Form (Revision form.doc) Revised - 05/2010

# ATTACHMENT A



As Secretary of State of the State of West Virginia, I hereby certify that

by the provisions of the West Virginia Code, Articles of Merger were received and filed,

Merging REO PROCESSING WEST VIRGINIA, INC. a West Virginia Corporation, REO PROCESSING LOUISIANA, INC., a West Virginia Corporation, REO PROCESSING TEXAS, INC. a West Virginia Corporation, ALLIED PROCESSING SERVICES, INC. a West Virginia Corporation, ALLIED LOGISTICS COMPANY a West Virginia Corporation with and into, REO PROCESSING, INC. a West Virginia Corporation, the survivor, with future effective date of December 31, 2018.

Therefore, I hereby issue this

## **CERTIFICATE OF MERGER**



Given under my hand and the Great Seal of the State of West Virginia on this day of

Mac Warner

Secretary of State

# FILED

DEC 28 2018

IN THE OFFICE OF SECRETARY OF STATE

481834

#### ARTICLES OF MERGER OF REO PROCESSING WEST VIRGINIA, INC., REO PROCESSING LOUISIANA, INC., REO PROCESSING TEXAS, INC., ALLIED PROCESSING SERVICES, INC. and ALLIED LOGISTICS COMPANY with and Into REO PROCESSING, INC.

Pursuant to the provisions of West Virginia Code § 31D-11-1106, the undersigned entities (the "Parties") hereby adopt the following Articles of Merger for the purpose of merging REO PROCESSING WEST VIRGINIA, a West Virginia corporation, REO PROCESSING LOUISIANA, INC., a West Virginia corporation, REO PROCESSING TEXAS, INC., a West Virginia corporation, ALLIED PROCESSING SERVICES, INC., a West Virginia corporation, and ALLIED PROCESSING SERVICES, INC., a West Virginia corporation, and ALLIED LOGISTICS COMPANY, a West Virginia corporation, with and into REO PROCESSING, INC., a West Virginia corporation (the "Surviving Corporation"), which shall be the surviving entity in the merger (the "Merger").

1. Names and Jurisdiction. The names and jurisdiction of incorporation of each of the Parties to the Merger are REO PROCESSING WEST VIRGINIA, INC., a West Virginia corporation; REO PROCESSING LOUISIANA, INC., a West Virginia corporation; REO PROCESSING TEXAS, INC., a West Virginia corporation; ALLIED PROCESSING SERVICES, INC., a West Virginia corporation; ALLIED LOGISTICS COMPANY, a West Virginia corporation; and REO PROCESSING, INC., a West Virginia corporation. For clarification purposes, REO PROCESSING WEST VIRGINIA, INC., REO PROCESSING LOUISIANA, INC. and REO PROCESSING TEXAS, INC. are wholly owned subsidiaries of the Surviving Corporation.

2. <u>Effective Date</u>. The effective date and time of the Merger for tax and accounting purposes only shall be December 31, 2018 at 11:59 p.m. EST.

3. <u>Approval of Plan of Merger</u>. The Parties hereby certify that on December 18, 2018, the Plan of Merger, attached hereto as <u>Exhibit A</u>, and the performance of its terms as set forth therein, were approved and adopted by each of the Parties' respective shareholders upon the recommendation of the Parties' respective board of directors, in accordance with the terms of the Plan of Merger, W.Va. Code § 31D-11-1104 and by each of the Parties' Articles of Incorporation or other organizational or governing documents.

4. <u>Name and Address of Surviving Corporation</u>. The name and address of the Surviving Corporation is REO PROCESSING, INC., a West Virginia corporation, whose principal office address is 20 26th St., Huntington, WV 25703.

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DocuSign Envelope ID: 2C1C2EE8-CABE-4F21-907C-F69FECC36543

#### PLAN OF MERGER

THIS PLAN OF MERGER (the "Plan") is by and among REO PROCESSING WEST VIRGINIA, a West Virginia corporation ("RPW"), REO PROCESSING LOUISIANA, INC., a West Virginia corporation ("RPL"), REO PROCESSING TEXAS, INC., a West Virginia corporation ("RPT"), ALLIED PROCESSING SERVICES, INC., a West Virginia corporation ("APS"), ALLIED LOGISTICS COMPANY, a West Virginia corporation ("ALC"), and REO PROCESSING, INC., a West Virginia corporation ("RPP" and together with RPW, RPL, PRT, APS, and ALC, the "Parties").

WHEREAS, RPW, RPL and RPT are wholly owned subsidiaries of RPI.

WHEREAS, the board of directors of RPI, APS and ALC believe that the merger of RPW, RPL, RPT, APS and ALC with and into RPI would be in the best interests of the parties and its shareholders.

WHEREAS, the board of directors of RPI, APS and ALC desire to recommend that the shareholders of RPI, APS and ALC approve the Plan in accordance with the terms set forth herein.

WHEREAS, the board of directors of RPI, APS and ALC conditioned its submission of the Plan to its shareholders on the basis that the Plan's approval and the consummation of the proposed merger is contingent on none of the shareholders of APS and ALC properly dissenting to the Merger under West Virginia law.

NOW, THEREFORE, in consideration of the premises contained herein, the Plan shall be as follows:

1. <u>Merger</u>. Upon the terms and subject to the conditions set forth herein, RPW, RPL, RPT, APS and ALC shall be merged with and into RPI in accordance with the terms of and subject to the conditions set forth herein and West Virginia law (the "Merger"). Following the Merger, RPI shall continue as the surviving corporation in the Merger and the separate corporate existence of RPW, RPL, RPT, APS and ALC shall terminate.

2. <u>No Dissenting Shareholders</u>. The parties' obligation to consummate the Merger is subject to the condition that no shareholders of APS and ALC shall have properly dissented to the Merger under West Virginia law,

3. <u>Consent of Lender</u>. The parties' obligation to consummate the Merger is subject to the condition that the Parties obtain the consent of their lender, Branch Banking and Trust Company, to the Merger.

4. <u>Articles of Merger</u>. As part of the Merger, the officers of each corporation shall cause properly executed Articles of Merger meeting the requirements of applicable West Virginia law (the "*Articles of Merger*") to be filed with the Office of the West Virginia Secretary of State in accordance with West Virginia law.

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5. <u>Closing</u>. The closing of the transaction contemplated herein (the "Closing") shall occur on or before December 31, 2018. The effective date and time of the Merger for tax and accounting purposes shall be December 31, 2018 at 11:59 p.m. EST.

6. <u>Effects of the Merger</u>. In addition to the effects of the Merger provided by applicable state law, upon filing the Articles of Merger, all property, rights, privileges, immunities, powers and franchises of RPW, RPL, RPT, APS and ALC shall vest in RPI, and all debts, liabilities, obligations and duties of RPW, RPL, RPT, APS and ALC shall become the debts, liabilities, obligations and duties of RPI. Pursuant to applicable state law, RPW, RPL, RPT, APS and ALC shall become the debts, liabilities, obligations and duties of RPI. Pursuant to applicable state law, RPW, RPL, RPT, APS and ALC shall cease to exist. The Articles of Incorporation and Bylaws of RPI, as they exist on the date of Closing, shall continue unaltered as the Articles of Incorporation and Bylaws of RPI.

7. <u>Cancellation of Subsidiary Shares</u>. As of the Closing, all issued and outstanding capital stock of RPW, RPL and RPT immediately prior to Closing shall no longer be outstanding and shall automatically be cancelled and shall cease to exist.

8. <u>Conversion of APS and ALC Shares</u>. As of the Closing, all issued and outstanding capital stock of APS and ALC immediately prior to Closing shall no longer be outstanding and shall automatically be converted into shares of RPI in the following manner;

(a) Each share of common stock of APS and ALC outstanding on the effective date of the Merger shall thereupon, without further action, be converted into the number of shares of common stock of RPI in accordance with the conversion schedule attached hereto at <u>Exhibit A</u>.

(b) On or after the effective date of the Merger, the holders of outstanding stock certificates representing stock of APS and ALC shall be surrendered to the officers of RPI and RPI will cause to be issued new stock certificates to such holders representing the appropriate shares of common stock of RPI vested in such holders.

9. Consideration. No consideration will be paid.

10. <u>Governing Law</u>. This Agreement is executed and delivered in, and shall be governed by and construed in accordance with, the laws of the State of West Virginia without giving effect to any conflict of law rule or principle that might require the application of the laws of another jurisdiction.

11. Entire Agreement. This Agreement embodies the entire agreement and understanding of the Parties hereto with respect to the subject matter herein contained, and supersedes all prior agreements, correspondence, arrangements and understandings relating to the subject matter hereof. This Agreement may be amended, modified, superseded or canceled only by a written instrument signed by all of the Parties hereto, and any of the terms, provisions and conditions hereof may be waived only by a written instrument signed by the waiving Party.

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# ATTACHMENT B

# Attachment B



<u>Address:</u> 20 26<sup>th</sup> ST Huntington WV, 25703

Direc**ti**ons:

WV-2 to the east becomes Highway 60/3<sup>rd</sup> Ave. Turn right on 26<sup>th</sup> St. Facility is 0.3 mile on right.

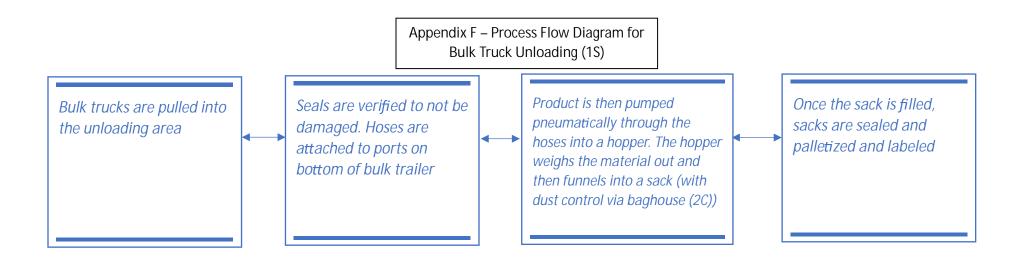
# ATTACHMENT E

Attachment E – Plot Plan REO Processing 20 26<sup>th</sup> St Huntington, WV 25703



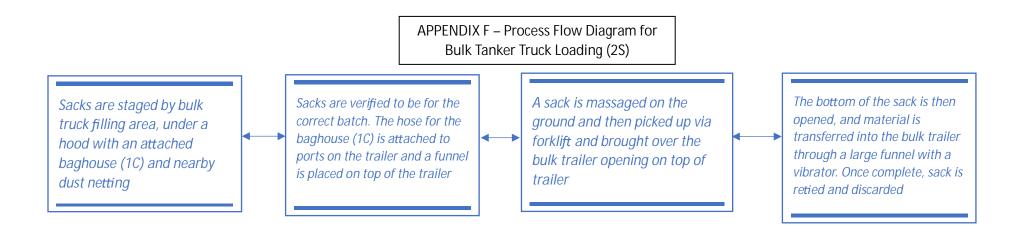
UTM-Northing (KM): 4253322.1343248 UTM-Easting (KM): 373842.353341909 Elevation: 550-580 feet

# ATTACHMENT F, G



Appendix G - Process Description for Bulk Truck Unloading (1S)

The size of the customer order will depend on how much material is available for unloading. The trailer is positioned to access the ports with pneumatic pumps. Seals are verified, hoses are attached, and the pumps are activated. The material is pulled from inside the bulk truck to a funnel shaped hopper just inside the building. The machine weighs the material to a designated weight and then releases the material into the super sack that is attached to the neck of the funnel hopper. Once the sack is filled, the operator seals the sack, labels it, and sets it aside until to order is complete. The filled sacks are then warehoused until the customer requests them. Dust collection is in place at the sack fill station via baghouse (2C).



APPENDIX G - Process Description for Bulk Tanker Truck Loading (2S)

The size of the customer order will depend on how much material is staged for loading. This can be in 1,000 or 2,000-lb sacks. Sacks are verified to be used for the correct batches in the bulk truck filling area, under a hood with an attached baghouse and nearby dust netting. A funnel is placed on the bulk truck trailer filling ports on top of the trailer. The hose for the baghouse dust collector (1C) is attached to a cover that is sealed to the hatch on top of the trailer.

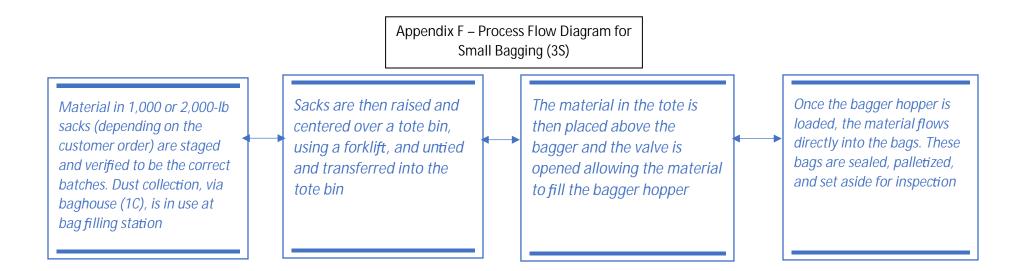
Once sacks are verified as correct for the correct batch, the sacks are massaged on the ground with a bag massager and then picked up with a forklift by the lifting ears and brought over and centered above the funnel placed on top of the trailer.

Once centered correctly, an employee then opens the bottom of the sack to allow the material to empty into the bulk trailer through the funnel with a vibrator to assist with flow.

Once the bag is opened and material is flowing, the bottom of the sack is lowered down into the funnel to reduce dust escaping. Once the sack is empty, the spout is then re-tied to prevent carbon from coming out of the sack when removing from the funnel. The forklift driver then returns, and the employee removes the empty sack to discard. The forklift driver repeats until all sacks are emptied into the trailer.

Once all is completed, the funnel is removed, and the trailer fill ports are closed, and the truck is verified for cleanliness.

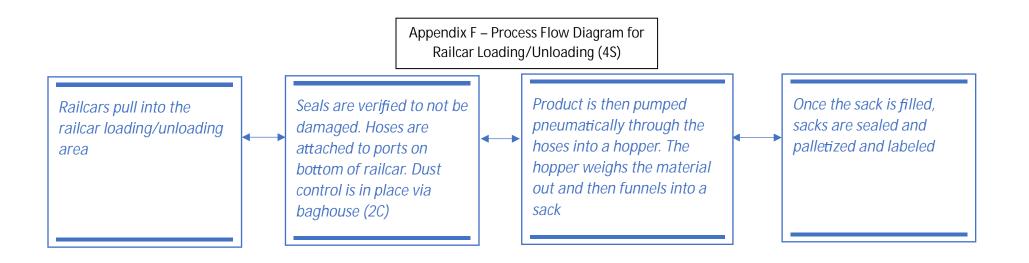
This process is performed outdoors, under a hood connected to a baghouse (1C) to prevent emissions. Dust netting is also installed in the breezeway between buildings to prevent dust from escaping the area.



Appendix G - Process Description for Small Bagging (3S)

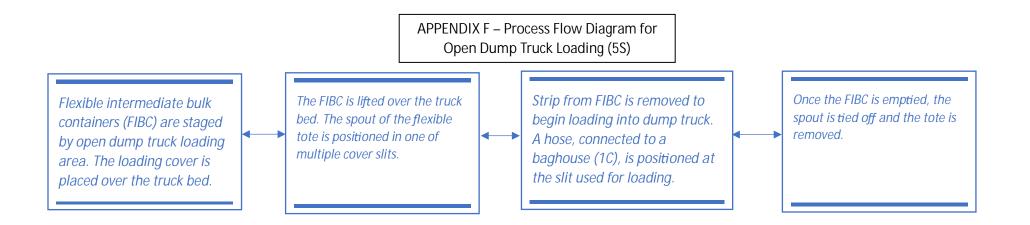
Material is staged and verified to be correct. Once verified, the 1,000 or 2,000-lb sacks (depending on customer order) are then transferred into a tote bin. Once tote is loaded, the tote is then raised above the bagger and placed on a stand. The operator will then open the valve on the bottom of the tote and the material will flow into the bagger hopper.

When the bagger hopper is loaded the operator then places a bag over the spout and actuates the filler. The machine fills the bags to the correct weight and then the bags are sealed and palletized. Once a full pallet is completed, the pallet is set aside for inspection. Dust collection is in use at the bag filling station via baghouse (1C).



Appendix G - Process Description for Railcar Loading/Unloading (4S)

The size of the customer order will depend on how much material is available for unloading. The rail car is positioned to access the ports with pneumatic pumps. Seals are verified, hoses are attached, and the pumps are activated. The material is pulled from inside the railcar to a funnel shaped hopper just inside the building. The machine weighs the material to a designated weight and then releases the material into the super sack that is attached to the neck of the funnel hopper. Once the sack is filled, the operator seals the sack, labels it, and sets it aside until to order is complete. The filled sacks are then warehoused until the customer requests them. Dust collection is in place at the sack fill station via baghouse (2C).



APPENDIX G - Process Description for Open Dump Truck Loading (5S)

The size of the material loaded into the dump trucks will depend on how much material is staged for loading. This can be in 1,000 or 2,000-lb flexible intermediate bulk container (FIBC). Prior to loading, a cover is placed over the dump truck bed with multiple slits for loading.

The flexible tote is picked up with a forklift, brought over, and centered above one of the four slits in the cover. The flexible tote spout is lowered into the slit. The strip from the flexible tote is removed to begin loading into the dump truck through the cover slit. A hose, connected to a baghouse (1C), is positoned at the slit during loading.

Once the flexible tote is empty, the spout is then re-tied to prevent carbon from coming out of the tote when removing from the cover. The forklift driver then returns, and the employee removes the empty tote to discard. The forklift driver repeats until all totes are emptied into the dump truck.

# ATTACHMENT H



# CPG LF12X40

Safety Data Sheet

lssued: 10/20/2020 Supersedes: 03/02/2020 Version: 4.0

	Substance/Mixture and of the Company/Undertaki	שיי
1.1. Product identifier Product name	: CPG LF 12X40	
Product form	: Substance	
CAS No	: 7440-44-0	
Product code	: 11800	
Synonyms	: Activated carbon; Steam activated carbon	
1.2. Relevant identified uses of the s	substance or mixture and uses advised against	
Jse of the substance/mixture	: Adsorbent	
<b>1.3.</b> Details of the supplier of the sat Calgon Carbon Corporation P.O. Box 717 Pittsburgh, PA 15230 412-787-6700	fety data sheet	
1.4. Emergency telephone number		
Emergency number	: CHEMTREC (24 HRS): 1-800-424-9300	
SECTION 2: Hazards Identificatio	n	
2.1. Classification of the substance	or mixture	
GHS-US classification Combustible Dust		
	uct does not displace oxygen in the ambient atmosphere, but slowl	
GHS-US labeling	· Warning	
GHS-US labeling Signal word (GHS-US) Hazard statements (GHS-US)	<ul><li>Warning</li><li>May form combustible dust concentrations in air.</li></ul>	
GHS-US labeling Signal word (GHS-US) Hazard statements (GHS-US) 2.3. Other hazards	: May form combustible dust concentrations in air.	
GHS-US labelingSignal word (GHS-US)Hazard statements (GHS-US)2.3. Other hazardsOther hazards not contributing to the		
GHS-US labeling Signal word (GHS-US) Hazard statements (GHS-US) 2.3. Other hazards Other hazards not contributing to the classification	<ul> <li>May form combustible dust concentrations in air.</li> <li>Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficie</li> </ul>	
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3.       Other hazards         Dther hazards not contributing to the classification         2.4.       Unknown acute toxicity (GHS-U)	<ul> <li>May form combustible dust concentrations in air.</li> <li>Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficie</li> </ul>	
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Dther hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-U)         No data available	<ul> <li>May form combustible dust concentrations in air.</li> <li>Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficiency.</li> <li>S)</li> </ul>	
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Dther hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-UN)         No data available         SECTION 3: Composition/Information	<ul> <li>May form combustible dust concentrations in air.</li> <li>Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficiency.</li> <li>S)</li> </ul>	
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Dther hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-UN)         No data available         SECTION 3: Composition/Information	<ul> <li>May form combustible dust concentrations in air.</li> <li>Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficiency.</li> <li>S)</li> </ul>	
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Dther hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-U)         No data available         SECTION 3: Composition/Information         3.1. Substance	<ul> <li>May form combustible dust concentrations in air.</li> <li>Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficiency.</li> <li>S)</li> </ul>	ent environment should be followed
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Dther hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-U)         No data available         SECTION 3: Composition/Information         3.1. Substance         Name         Activated carbon	May form combustible dust concentrations in air.     Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficiency  s) ation on Ingredients Product identifier	ent environment should be followed
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Dther hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-U)         No data available         SECTION 3: Composition/Information         3.1. Substance         Name         Activated carbon         3.2. Mixture	May form combustible dust concentrations in air.     Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficiency  s) ation on Ingredients Product identifier	ent environment should be followed
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Other hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-U)         No data available         SECTION 3: Composition/Information         3.1. Substance         Name         Activated carbon         3.2. Mixture         Not applicable	May form combustible dust concentrations in air.     Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficiency  s) ation on Ingredients Product identifier	ent environment should be followed
GHS-US labeling Signal word (GHS-US) Hazard statements (GHS-US) 2.3. Other hazards Other hazards not contributing to the classification 2.4. Unknown acute toxicity (GHS-U No data available SECTION 3: Composition/Informa 3.1. Substance Name Activated carbon 3.2. Mixture Not applicable SECTION 4: First Aid Measures	May form combustible dust concentrations in air.     Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficience      So      Product identifier      (CAS No) 7440-44-0	ent environment should be followed
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Other hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-U)         No data available         SECTION 3: Composition/Information         3.1. Substance         Name         Activated carbon         3.2. Mixture         Not applicable         SECTION 4: First Aid Measures         4.1. Description of first aid measure	May form combustible dust concentrations in air.     Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficience      So      Product identifier      (CAS No) 7440-44-0	ent environment should be followed %        %       < 100
GHS-US labeling         Signal word (GHS-US)         Hazard statements (GHS-US)         2.3. Other hazards         Other hazards not contributing to the classification         2.4. Unknown acute toxicity (GHS-U)         No data available         SECTION 3: Composition/Information         3.1. Substance         Name         Activated carbon         3.2. Mixture         Not applicable         SECTION 4: First Aid Measures         4.1. Description of first aid measure         First-aid measures general	May form combustible dust concentrations in air.     Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficience      Product identifier     (CAS No) 7440-44-0       If exposed or concerned, get medical attention/advice. Sho doctor in attendance. Wash contaminated clothing before to	ent environment should be followed % < 100 ow this safety data sheet to the re-use. Never give anything to an
GHS-US labeling Signal word (GHS-US) Hazard statements (GHS-US) 2.3. Other hazards Other hazards not contributing to the classification 2.4. Unknown acute toxicity (GHS-U No data available SECTION 3: Composition/Informa 3.1. Substance Name Activated carbon 3.2. Mixture Not applicable SECTION 4: First Aid Measures	May form combustible dust concentrations in air.     Wet activated carbon can deplete oxygen from air in enclo space is required, procedures for work in an oxygen deficience      Product identifier     (CAS No) 7440-44-0      If exposed or concerned, get medical attention/advice. Sho doctor in attendance. Wash contaminated clothing before r unconscious person.	ent environment should be followed % < 100 ow this safety data sheet to the re-use. Never give anything to an mfortable position for breathing.

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First-aid measures after ingestion	: IF SWALLOWED: Rinse mouth thoroughly. Do not induce vomiting without advice from poison control center or medical professional. Get medical attention if you feel unwell.
4.2. Most important symptoms and	effects, both acute and delayed
Symptoms/injuries after inhalation	: Not expected to present a significant hazard under anticipated conditions of normal use. Dust may cause irritation to the respiratory system.
Symptoms/injuries after skin contact	: Dust may cause irritation.
Symptoms/injuries after eye contact	: Dust may cause irritation and redness.
Symptoms/injuries after ingestion	: Not expected to present a significant hazard under anticipated conditions of normal use.
10 Indiantian of any immediate mark	

### 4.3. Indication of any immediate medical attention and special treatment needed

No additional information available.

SECT	ION 5: Firefighting Meas	ures
5.1.	Extinguishing media	
Suitable	e extinguishing media	: Water spray. Carbon dioxide. Dry chemical. Foam. Sand.
Unsuita	ble extinguishing media	: None known.
5.2.	Special hazards arising from	the substance or mixture
Fire ha	zard	: Dust may be combustible under specific conditions. May be ignited by heat, sparks or flames.
Explosi	on hazard	: Dust may form explosive mixture in air.
Reactiv	ity	: No dangerous reactions known under normal conditions of use. Carbon oxides may be emitted upon combustion of material.
5.3.	Advice for firefighters	
Firefigh	ting instructions	: Wear NIOSH-approved self-contained breathing apparatus suitable for the surrounding fire. Use water spray or fog for cooling exposed containers. Evacuate area.

#### **SECTION 6: Accidental Release Measures**

#### 6.1. Personal precautions, protective equipment and emergency procedures

General measures

: Evacuate area. Keep upwind. Ventilate area. Spill should be handled by trained clean-up crews properly equipped with respiratory equipment and full chemical protective gear (see Section 8).

#### 6.1.1. For non-emergency personnel

No additional information available.

#### 6.1.2. For emergency responders

No additional information available.

#### 6.2. Environmental precautions

Prevent entry to sewers and public waters. Avoid release to the environment. Product is not soluble, but can cause particulate emission if discharged into waterways. Dike all entrances to sewers and drains to avoid introducing material to waterways. Notify authorities if product enters sewers or public waters.

6.3.	Methods and material for containment and cleaning up	
For conta	ainment	: Sweep or shovel spills into appropriate container for disposal. Minimize generation of dust.
Methods	for cleaning up	: Sweep or shovel spills into appropriate container for disposal. Minimize generation of dust. Dispose of material in compliance with local, state, and federal regulations.

#### 6.4. Reference to other sections

No additional information available.

#### **SECTION 7: Handling and Storage**

7.1.	Precautions for safe handling	
Precaut	tions for safe handling	Avoid dust formation. Avoid contact with skin, eyes and clothing. Do not handle until all safety precautions have been read and understood. Wash hands and other exposed areas with mild soap and water before eating, drinking or smoking and when leaving work. Keep away from sources of ignition - No smoking.
7.2.	Conditions for safe storage, includ	ing any incompatibilities

#### 7.2. Conditions for safe storage, including any incompatibilities Storage conditions : Keep container tightly

: Keep container tightly closed in a cool, dry, and well-ventilated place. Keep away from ignition sources.

# **CPG LF 12X40**

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SECTION 8: Exposure Controls/Personal Protection				
8.1. C	control parameters			
Activated	carbon (7440-44-0)*			
OSHA PEL	_ (TWA) (mg/m³)	≤ 5 (Respirable Fraction)		
		≤ 15 (Total Dust)		
*Exposure lin	nits are for inert or nuisance dust.	No specific exposure limits have been established for this activated carbon product by OSHA or ACGIH.		
8.2. E	xposure controls			
Appropriate engineering controls : Provide adequate general and local exhaust ventilation. Use process enclosures, local exhaust ventilation. Use process enclosures, local exhaust ventilation, or other engineering controls to control airborne levels below recommended exposure limits. Use explosion-proof equipment with flammable materials. Ensure adequate ventilation, especially in confined areas. Wet activated carbon can deplete oxygen from air in enclosed spaces. If use in an enclosed space is required, procedures for work in an oxygen deficient environment should be followed.				
Personal protective equipment		: Gloves. Safety glasses. Protective clothing. Under insufficient ventilation conditions wear respiratory protection.		

Hand protection	: Gloves should be classified under Standard EN 374 or ASTM F1296. Suggested glove materials are: Neoprene, Nitrile/butadiene rubber, Polyethylene, Ethyl vinyl alcohol laminate, PVC or vinyl. Suitable gloves for this specific application can be recommended by the glove supplier.
Eye protection	: Use eye protection suitable to the environment. Avoid direct contact with eyes.
Skin and body protection	: Wear long sleeves, and chemically impervious PPE/coveralls to minimize bodily exposure.
Respiratory protection	: Use NIOSH-approved dust/particulate respirator. Where vapor, mist, or dust exceed PELs or other applicable OELs, use NIOSH-approved respiratory protective equipment.

#### **SECTION 9: Physical and Chemical Properties**

0.4 Information on bools about all and	
9.1. Information on basic physical and	• •
Physical state	: Solid
Appearance	: Granular, powder, or pelletized substance
Color	: Black
Odor	: Odorless
Odor threshold	: No data available
рН	: No data available
Relative evaporation rate (butylacetate=1)	: Not applicable
Melting point	: Not applicable
Freezing point	: Not applicable
Boiling point	: Not applicable
Flash point	: No data available
Auto-ignition temperature	: > 325 °C
Decomposition temperature	: No data available
Flammability (solid, gas)	: > 325 °C
Vapor pressure	: Not applicable
Relative vapor density at 20 °C	: Not applicable
Apparent density	: 0.3 - 0.75 g/cc
Solubility	: Insoluble
Log Pow	: Not applicable
Log Kow	: Not applicable
Viscosity, kinematic	: Not applicable
Viscosity, dynamic	: Not applicable
Explosive properties	: No data available
Oxidising properties	: No data available
Explosive limits	: No data available
9.2 Other information	

## **CPG LF 12X40**

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Safety Data Sheet

#### **SECTION 10: Stability and Reactivity**

#### 10.1. Reactivity

No dangerous reactions known under normal conditions of use.

#### 10.2. Chemical stability

Stable under use and storage conditions as recommended in section 7.

#### 10.3. Possibility of hazardous reactions

None known.

#### 10.4. Conditions to avoid

Avoid dust formation. Heat. Ignition sources. Exposure to high concentrations of organic compounds may cause bed temperature to rise.

#### 10.5. Incompatible materials

Alkali metals. Strong oxidizing agents.

#### 10.6. Hazardous decomposition products

Carbon monoxide (CO), carbon dioxide (CO<sub>2</sub>).

#### \_\_\_\_\_

## SECTION 11: Toxicological Information

#### 11.1. Information on toxicological effects

Acute toxicity	: Not classified		
Activated carbon (7440-44-0)			
LD <sub>50</sub> oral rat	> 2000 mg/kg		
Skin corrosion/irritation	: Not classified		
Serious eye damage/irritation	: Not classified		
Respiratory or skin sensitisation	: Not classified		
Germ cell mutagenicity	: Not classified		
Carcinogenicity	: Not classified		
Silica: crystalline, quartz (14808-60-7)			

 IARC group
 1 - Carcinogenic to humans

 The International Agency for Research on Cancer (IARC) has classified "silica dust, crystalline, in the form of quartz or cristobalite" as carcinogenic to humans (group 1). However these warnings refer to crystalline silica dusts and do not apply to solid activated carbon containing crystalline silica as a naturally occuring, bound impurity. As such, we have not classified this product as a carcinogen in accordance with the US OSHA Hazard Communication Standard (29 CFR §1910.1200) but recommmend that users avoid inhalation of product in a dust form.

Reproductive toxicity Specific target organ toxicity (single exposure)	: Not classified : Not classified
Specific target organ toxicity (repeated exposure)	: Not classified
Aspiration hazard	: Not classified
Symptoms/injuries after inhalation	: Not expected to present a significant hazard under anticipated conditions of normal use.
Symptoms/injuries after skin contact	: Dust may cause irritation of the skin.
Symptoms/injuries after eye contact	: Dust may cause irritation and redness.
Symptoms/injuries after ingestion	: Not expected to present a significant hazard under anticipated conditions of normal use.

#### **SECTION 12: Ecological Information**

#### 12.1. Toxicity

No additional information available.

#### 12.2. Persistence and degradability

#### No additional information available.

#### 12.3. Bioaccumulative potential

No additional information available.

#### 12.4. Mobility in soil

No additional information available.

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Product Code: 11800

### Safety Data Sheet

#### 12.5. Other adverse effects

No additional information available.

SECTION 13: Disposal Consideratio	ns				
13.1. Waste treatment methods					
Waste treatment and disposal methods	: Vacuum or shovel material into a closed container. Dispose in a safe manner in accordance with local/national regulations. Do not allow the product to be released into the environment.				
Additional information	: Activated carbon is an adsorbent media; hazard classification is generally determined by the adsorbate. Consult U.S. EPA guidelines listed in 40 CFR 261.3 for more information on hazardous waste disposal.				
<b>SECTION 14: Transport Information</b>					
14.1. In accordance with DOT					
Not classified as hazardous for domestic land tra	ansport.				
UN-No.(DOT)	: None on finished product				
DOT NA no.	: None on finished product				
Proper Shipping Name (DOT)	: Not regulated				
Department of Transportation (DOT) Hazard Classes	: None on finished product				
Hazard labels (DOT)	: None on finished product				
Packing group (DOT)	: None on finished product				
DOT Quantity Limitations Passenger aircraft/rail (49 CFR 173.27)	: None on finished product				
14.2. Transport by sea					
Not classified as hazardous for water transport.					

Not classified as hazardous for water transport.	
IMO / IMDG	
UN/NA Identification Number	: None on finished product
UN- Proper Shipping Name	: Not regulated
Transport Hazard Class	: None on finished product

#### 14.3. Air transport

Not classified as hazardous for air transport.	
ICAO / IATA	
UN/NA No	: None on finished product
UN- Proper Shipping Name	: Not regulated
Transport Hazard Class	: None on finished product
Packing Group	: None on finished product
Marine Pollutant	: None on finished product

#### 14.4. Additional information

Other information

: Under the UN classification for activated carbon, all activated carbons have been identified as a class 4.2 product. However, this product type or an equivalent has been tested according to the <u>United Nations Transport of Dangerous Goods</u> test protocol for a "self-heating substance" (United Nations Transportation of Dangerous Goods, Manual of Tests and Criteria, Part III, Test N.4 - Test Method for Self Heating Substances) and it has been specifically determined that this product type or an equivalent does not meet the definition of a self-heating substance (class 4.2). This information is applicable to the steam activated carbon product described in this document.

#### **SECTION 15: Regulatory Information**

#### 15.1. US Federal regulations

CPG LF 12X40
All chemical substances in this product are listed as "Active" in the EPA (Environmental Protection Agency) "TSCA Inventory Notification (Active-
Inactive) Requirements Rule" ("the Final Rule"). as of February 2019 or are otherwise exempt.

SARA Section 311/312 Hazard Classes	Physical hazard - Combustible dust
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# **CPG LF 12X40**

## Product Code: 11800

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Cobalt (7440-48-4)		
Listed on the United States TSCA (Toxic Substances Control Act) inventory Listed on United States SARA Section 313		
SARA Section 313 - Emission Reporting 0.1 %		

#### 15.2. International regulations

No additional information available.

#### 15.3. US State regulations

**California Proposition 65** 

**M**WARNING:

**NG:** This product can expose you to chemicals including Silica: crystalline, quartz, which are known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov.

Component	Carcinogenicity	Developmental toxicity	Reproductive toxicity male	Reproductive toxicity female	No significant risk level (NSRL)	Maximum allowable dose level (MADL)
Silica: crystalline, quartz (14808-60-7)	Х					
Titanium dioxide (13463-67-7)	Х				Not available	
Cobalt (7440-48-4)	Х					

Component	State or local regulations
Aluminum oxide (1344-28-1)	U.S New Jersey - Right to Know Hazardous Substance List U.S Massachusetts - Right To Know List U.S Pennsylvania - RTK (Right to Know) - Environmental Hazard List
Calcium sulfate (7778-18-9)	U.S New Jersey - Right to Know Hazardous Substance List U.S Pennsylvania - RTK (Right to Know) List U.S Massachusetts - Right To Know List
Silica: crystalline, quartz (14808-60-7)	U.S New Jersey - Right to Know Hazardous Substance List U.S Pennsylvania - RTK (Right to Know) List U.S Massachusetts - Right To Know List
Titanium dioxide (13463-67-7)	U.S New Jersey - Right to Know Hazardous Substance List U.S Pennsylvania - RTK (Right to Know) List U.S Massachusetts - Right To Know List
Cobalt (7440-48-4)	U.S New Jersey - Right to Know Hazardous Substance List U.S Pennsylvania - RTK (Right to Know) List U.S Pennsylvania - RTK (Right to Know) - Environmental Hazard List U.S Massachusetts - Right To Know List

gulations
gulations
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gulations
vould offer no hazard
on can occur.
exposure conditions,
e Pr

HMIS III Rating		
Health	:	0
Flammability	:	1
Physical	:	0

#### Personal Protection

This information is based on our current knowledge and is intended to describe the product for the purposes of health, safety and environmental requirements only. It should not therefore be construed as guaranteeing any specific property of the product. The information is this document applies to this specific material as supplied. It may not be valid if product is used in combination with other materials. It is the user's responsibility to determine the suitability and completeness of this information for their particular use. While the information and recommendations set forth herein are believed to be accurate as of the date hereof, Calgon Carbon Corporation makes no warranty with respect to the same, and disclaims all liability for reliance thereon.

1

# ATTACHMENT I

### Attachment I

### **Emission Units Table**

### (includes all emission units and air pollution control devices

### that will be part of this permit application review, regardless of permitting status)

Emission Unit ID <sup>1</sup> Emission Point ID <sup>2</sup>		Emission Unit Description	Year Installed/ Modified	Design Capacity	Type <sup>3</sup> and Date of Change	Control Device <sup>4</sup>	
1 <b>S</b>	2E	Bulk Truck Unloading	Unknown	10.7 TPH	Unknown	2C	
2S	1E	Bulk Truck Loading	2017	10.7 TPH	Installed 2017	1C	
3S	1E	Small Bagging	2017	0.75 TPH	Installed 2017	1C	
4S	2E	Pneumatic Rail Car Loading/Unloading	Unknown	10.7 TPH	Unknown	2C	
55	1E	Open Dump Truck Loading	2017	40 TPH	Installed 2017	1C	
<sup>2</sup> For <u>E</u> missic <sup>3</sup> New, modif	on Points use t ication, remov	burces) use the following numbering system the following numbering system:1E, 2E, 3E al the following numbering system: 1C, 2C, 30	, or other appropriate	designation.	nation.		

# ATTACHMENT J

### Attachment J EMISSION POINTS DATA SUMMARY SHEET

	Table 1: Emissions Data														
Emission Point ID No. (Must match Emission Units Table & Plot Plan)	Emission Point Type <sup>1</sup>	Emission Unit Vented Through This Point (Must match Emission Units Table & Plot Plan)		Air Pollution Control Device (Must match Emission Units Table & Plot Plan)		Vent Time for Emission Unit (chemical processes only)		All Regulated Pollutants - Chemical Name/CAS <sup>3</sup> (Speciate VOCs & HAPS)	Maximum Potential Uncontrolled Emissions <sup>4</sup>		Maximum Potential Controlled Emissions <sup>5</sup>		Emission Form or Phase (At exit conditions, Solid, Liquid or	Est. Method Used <sup>6</sup>	Emission Concentration <sup>7</sup> (ppmv or mg/m <sup>3</sup> )
		ID No.	Source	ID No.	Device Type	Short Term <sup>2</sup>	Max (hr/yr)		lb/hr	ton/yr	lb/hr	ton/yr	Gas/Vapor)		
1E	Downward Vertical Stack	2S, 3S, 5S		1C	Baghouse			PM	2965. 20	1694. 84	29.6 5	16.95	Solid	AP	Ррти
2E	Downward Vertical Stack	1S, 4S		2C	Baghouse			РМ	1198.40	832.72	11.98	8.33	Solid	АР	Ppmv

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

<sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

<sup>2</sup> Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

<sup>3</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. **DO NOT LIST** H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.

<sup>4</sup> Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>5</sup> Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>6</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

<sup>7</sup> Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric)

use units of milligram per dry cubic meter (mg/m<sup>3</sup>) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO<sub>2</sub>, use units of ppmv (See 45CSR10).

#### Table 2: Release Parameter Data UTM Coordinates (km) Emission Point Elevation (ft) Emission Inner Exit Gas Point ID Diameter Volumetric Flow <sup>1</sup> Velocity Stack Height <sup>2</sup> Northing Easting No. (ft.) Temp. Ground Level (acfm) (Height above (Release height of (Must match (°F) (fps) emissions above Emission at operating conditions mean sea level) Units Table) ground level) 1E 15' Ambient 6000 215 570.57 4FT Horizontal 4253322.1343248 373842.353341909 2E 8.375' Ambient 2700 117 570.57 4FT Horizontal 4253322.1343248 373842.353341909

### Attachment J EMISSION POINTS DATA SUMMARY SHEET

<sup>1</sup> Give at operating conditions. Include inerts.

<sup>2</sup> Release height of emissions above ground level.

# ATTACHMENT K

## Attachment K

## FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process emissions are not typically considered to be fugitive, and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET.

Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions).

	APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS					
1.)	Will there be haul road activities?					
	Yes INO					
	If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.					
2.)	Will there be Storage Piles?					
	□ Yes					
	☐ If YES, complete Table 1 of the NONMETALLIC MINERALS PROCESSING EMISSIONS UNIT DATA SHEET.					
3.)	Will there be Liquid Loading/Unloading Operations?					
	□ Yes					
	☐ If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.					
4.)	Will there be emissions of air pollutants from Wastewater Treatment Evaporation?					
	□ Yes					
	If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.					
5.)	Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)?					
	□ Yes					
	☐ If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.					
6.)	Will there be General Clean-up VOC Operations?					
	□ Yes					
	If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.					
7.)	Will there be any other activities that generate fugitive emissions?					
	Yes No					
	If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.					
	If you answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions Summary."					

FUGITIVE EMISSIONS SUMMARY	All Regulated Pollutants <sup>-</sup> Chemical Name/CAS <sup>1</sup>	Maximum Potential Uncontrolled Emissions <sup>2</sup>		Maximum Potential Controlled Emissions <sup>3</sup>		Est. Method
		lb/hr	ton/yr	lb/hr	ton/yr	Used <sup>4</sup>
Haul Road/Road Dust Emissions Paved Haul Roads						
Unpaved Haul Roads	Activated Carbon CAS 7440- 44-0	0.265	1.160	0.265	1.160	EE
Storage Pile Emissions						
Loading/Unloading Operations						
Wastewater Treatment Evaporation & Operations						
Equipment Leaks						
General Clean-up VOC Emissions						
Other	Activated Carbon CAS 7440- 44-0	2.5	3.25	1.1	1.43	EE

<sup>1</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. DO NOT LIST H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.

<sup>2</sup> Give rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>3</sup> Give rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>4</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

## ATTACHMENT L

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on Equipment List Form): 1S

1. Name or type and model of proposed affected source:
Bulk truck unloading
<ol> <li>On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</li> </ol>
3. Name(s) and maximum amount of proposed process material(s) charged per hour:
10.70 TPH Carbon (This is the amount of Carbon Material being unloaded from the bulk Trailers)
4. Name(s) and maximum amount of proposed material(s) produced per hour:
5.99 PPH Carbon
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:
N/A

6.	6. Combustion Data (if applicable):							
	(a) Type and amount in appropriate units of fuel(s) to be burned:							
N	N/A							
	(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfu and ash:							
	(c)	Theoretical combu	ustion air requirer	nent (ACF/unit o	of fuel):			
		Q	D	°F a	nd	psia.		
	(d)	Percent excess ai	r:					
	(e)	Type and BTU/hr	of burners and al	l other firing equ	uipment planned to	be used:		
	(f)	If coal is proposed coal as it will be find	l as a source of fu red:	iel, identify supp	blier and seams ar	nd give sizing of the		
	(g) Proposed maximum design heat input: × 10 <sup>6</sup> BTU/hr.							
7.	7. Projected operating schedule:							
Ho	ours/	<b>Day</b> 10	Days/Week	5	Weeks/Year	52		

8.	8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:						
@	@ °F and psia						
a.	NO <sub>X</sub>	lb/hr	grains/ACF				
b.	SO <sub>2</sub>	lb/hr	grains/ACF				
c.	со	lb/hr	grains/ACF				
d.	PM <sub>10</sub>	lb/hr	grains/ACF				
e.	Hydrocarbons	lb/hr	grains/ACF				
f.	VOCs	lb/hr	grains/ACF				
g.	Pb	lb/hr	grains/ACF				
h.	Specify other(s)						
	РМ	599 lb/hr	grains/ACF				
		lb/hr	grains/ACF				
		lb/hr	grains/ACF				
		lb/hr	grains/ACF				

- NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.
  - (2) Complete the Emission Points Data Sheet.

<ol> <li>Proposed Monitoring, Recordkeeping, Reporting, and Testing Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.</li> </ol>					
MONITORING RECORDKEEPING					
REPORTING	TESTING				
MONITORING. PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS					

PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE. **RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE

MONITORING. **REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

The Bulk Truck Unloading process will occur with an associated baghouse.

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on Equipment List Form): 2S

1. Name or type and model of proposed affected source:
Bulk truck loading
<ol> <li>On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</li> </ol>
3. Name(s) and maximum amount of proposed process material(s) charged per hour:
10.70 TPH Carbon (This is the amount of Carbon Material being loaded into the bulk Trailers)
4. Name(s) and maximum amount of proposed material(s) produced per hour:
5.99 PPH Carbon
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:
N/A

6.	Combustion Data (if applicable):								
	(a) Type and amount in appropriate units of fuel(s) to be burned:								
N/2	A								
	4.5								
		<ul> <li>b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:</li> </ul>							
N/2	A								
	(c)	Theoretical co	mbustion	air requirement (	ACF/unit of fu	el):			
	. ,	N/A	@	N/A	°F and	, N/A	naio		
		IN/A	<u>w</u>	N/A	r anu	IN/A	psia.		
	(d)	Percent exces	ss air: N	J/A					
	(e)	Type and BTL	J/hr of bu	rners and all other	firing equipm	ent planned to	be used:		
N/2	A								
	(f)	If coal is prop	osed as a	source of fuel, ide	ntify supplier	and seams and	give sizing of the		
		coal as it will I	be fired:						
N/2	A								
	(g) Proposed maximum design heat input: × 10 <sup>6</sup> BTU/hr.								
7.	7. Projected operating schedule:								
Hou	ırs/I	Day 1	0	Days/Week	5	Weeks/Year	52		

8.	8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:						
@	@ °F and psia						
a.	NO <sub>X</sub>	lb/hr	grains/ACF				
b.	SO <sub>2</sub>	lb/hr	grains/ACF				
c.	СО	lb/hr	grains/ACF				
d.	PM <sub>10</sub>	lb/hr	grains/ACF				
e.	Hydrocarbons	lb/hr	grains/ACF				
f.	VOCs	lb/hr	grains/ACF				
g.	Pb	lb/hr	grains/ACF				
h.	Specify other(s)						
	РМ	599 lb/hr	grains/ACF				
		lb/hr	grains/ACF				
		lb/hr	grains/ACF				
		lb/hr	grains/ACF				

- NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.
  - (2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.					
MONITORING		RECORDKEEPING			
REPORTING		TESTING			
MONITORING					

**MONITORING.** PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

The Bulk Tanker Truck Loading process will occur with the assistance of a bag massager before the bag is then loaded into the tanker truck with the assistance of a vibrator and under a hood connected to a baghouse.

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on Equipment List Form): 3S

1. Name or type and model of proposed affected source:
Activated Carbon Bagging
<ol> <li>On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</li> </ol>
3. Name(s) and maximum amount of proposed process material(s) charged per hour:
0.75 TPH
4. Name(s) and maximum amount of proposed material(s) produced per hour:
1.26 PPH
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:
N/A

6. C	Combustion Data (if applicable):							
(a	a) Type and amount in appropriate units of fuel(s) to be burned:							
N/A								
()				appaged fuel(a) av				
(L		Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulfur and ash:						
NT/A								
N/A								
(c	c) The	eoretical co	ombustion	air requirement (	ACF/unit of fue	el):		
	N/	A	@	N/A	°F and	N/A	psia.	
(c	d) Pei	cent exce	ss air: N	J/A				
(6	a) Tvr	e and BTI	U/hr of bu	rners and all other	firina equipme	ent planned to I	oe used:	
(0	-) ' JF				ning oquipine			
N/A								
(f	) If c	oal is prop	osed as a	source of fuel, ide	ntify supplier a	and seams and	give sizing of the	
	COS	l as it will	be fired:					
N/A								
(g	(g) Proposed maximum design heat input: $N/A$ × 10 <sup>6</sup> BTU/hr.							
7. P	roject	ed operati	ng schedu	lle:				
Hours	s/Day		8	Days/Week	5	Weeks/Year	52	

8.	8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:							
@		°F and	psia					
a.	NO <sub>X</sub>	lb/hr	grains/ACF					
b.	SO <sub>2</sub>	lb/hr	grains/ACF					
c.	со	lb/hr	grains/ACF					
d.	PM <sub>10</sub>	lb/hr	grains/ACF					
e.	Hydrocarbons	lb/hr	grains/ACF					
f.	VOCs	lb/hr	grains/ACF					
g.	Pb	lb/hr	grains/ACF					
h.	Specify other(s)							
	РМ	126 lb/hr	grains/ACF					
		lb/hr	grains/ACF					
		lb/hr	grains/ACF					
		lb/hr	grains/ACF					

- NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.
  - (2) Complete the Emission Points Data Sheet.

<ol> <li>Proposed Monitoring, Recordkeeping, Reporting, and Testing Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.</li> </ol>							
MONITORING	RECORDKEEPING						
REPORTING	TESTING						

**MONITORING.** PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

Small bagging occurs indoors with an associated baghouse.

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on Equipment List Form): 4S

1. Name or type and model of proposed affected source:
Pneumatic Railcar Loading/Unloading
<ol> <li>On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</li> </ol>
3. Name(s) and maximum amount of proposed process material(s) charged per hour:
10.70 TPH Carbon (This is the amount of Carbon Material being loaded/unloaded from the railcars)
4. Name(s) and maximum amount of proposed material(s) produced per hour:
5.99 PPH Carbon
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:
N/A

6.	Со	mbustion Da	ta (if applic	able):						
	(a) Type and amount in appropriate units of fuel(s) to be burned:									
	(h)	Chamical or		anagad fugl(g)		including mayin				
	(b) Chemical analysis of proposed fuel(s), excluding coal, including maximum percent sulful and ash:									
	(c)	Theoretical	combustion	air requirement	ACF/unit of fu	uel):				
			@		°F and		psia.			
	(d)	Percent exc	ess air:							
	(e)	Type and B	TU/hr of bu	rners and all othe	r firing equipr	nent planned to	be used:			
	(f)	If anal in pro			antifu quantia	and acama and	d aive sizing of the			
	(f)	coal as it wi		Source of fuel, lu	entity supplie	and seams and	d give sizing of the			
	(g)	Proposed m	naximum de	sign heat input:			× 10 <sup>6</sup> BTU/hr.			
7.	Pro	jected opera	ating schedu	ıle:						
Но	ours/l	Day	10	Days/Week	5	Weeks/Year	52			

8.	8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:							
@		°F and	psia					
a.	NO <sub>X</sub>	lb/hr	grains/ACF					
b.	SO <sub>2</sub>	lb/hr	grains/ACF					
c.	СО	lb/hr	grains/ACF					
d.	PM <sub>10</sub>	lb/hr	grains/ACF					
e.	Hydrocarbons	lb/hr	grains/ACF					
f.	VOCs	lb/hr	grains/ACF					
g.	Pb	lb/hr	grains/ACF					
h.	Specify other(s)	l						
	РМ	599 lb/hr	grains/ACF					
		lb/hr	grains/ACF					
		lb/hr	grains/ACF					
		lb/hr	grains/ACF					

- NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.
  - (2) Complete the Emission Points Data Sheet.

	and reporting in order to demonstrate compliance Please propose testing in order to demonstrate
REPORTING MONITORING. PLEASE LIST AND DESCRIBE TH	TESTING

**MONITORING.** PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

Pneumatic railcar loading/unloading occurs with an associated baghouse.

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on Equipment List Form): 5S

1. Name or type and model of proposed affected source:
Open Dump Truck Loading
<ol> <li>On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</li> </ol>
3. Name(s) and maximum amount of proposed process material(s) charged per hour:
40 TPH Carbon (This is the amount of Carbon Material being loaded into the dump trucks)
4. Name(s) and maximum amount of proposed material(s) produced per hour:
22.4 PPH Carbon
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:
N/A

6.	Combustion Data (if applicable):						
	(a)	a) Type and amount in appropriate units of fuel(s) to be burned:					
N/.	A						
		Chemical anal and ash:	ysis of pr	oposed fuel(s), exc	cluding coal, i	ncluding maxim	um percent sulfur
N/.	A						
	(c)	Theoretical co	mbustion	air requirement (A	CE/unit of fu		
	(0)						
		N/A	@	N/A	°F and	N/A	psia.
	(d)	Percent exces	s air: N	J/A			
	(e)	Type and BTL	J/hr of bu	rners and all other	firing equipm	ent planned to	be used:
	( )	, , , , , , , , , , , , , , , , , , ,			0 1 1		
N/.	A						
	(f)	If coal is prope	nsed as a	source of fuel, ide	ntify supplier	and seams and	give sizing of the
	(')	coal as it will b	be fired:				
N/.	A						
				• • • •			
	(g)	Proposed max	kimum de	sign heat input:			× 10 <sup>6</sup> BTU/hr.
7.	Pro	jected operatir	ng schedu	lle:			
Hou	urs/[	Day 1	0	Days/Week	5	Weeks/Year	52

8.	8. Projected amount of pollutants that would be emitted from this affected source if no control devices were used:							
@		°F and	psia					
a.	NO <sub>X</sub>	lb/hr	grains/ACF					
b.	SO <sub>2</sub>	lb/hr	grains/ACF					
c.	со	lb/hr	grains/ACF					
d.	PM <sub>10</sub>	lb/hr	grains/ACF					
e.	Hydrocarbons	lb/hr	grains/ACF					
f.	VOCs	lb/hr	grains/ACF					
g.	Pb	lb/hr	grains/ACF					
h.	Specify other(s)							
	РМ	2240 lb/hr	grains/ACF					
		lb/hr	grains/ACF					
		lb/hr	grains/ACF					
		lb/hr	grains/ACF					

- NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.
  - (2) Complete the Emission Points Data Sheet.

<ol> <li>Proposed Monitoring, Recordkeeping, Reporting, and Testing Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.</li> </ol>							
MONITORING	RECORDKEEPING						
REPORTING	TESTING						

**MONITORING.** PLEASE LIST AND DESCRIBE THE PROCESS PARAMETERS AND RANGES THAT ARE PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THIS PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

The Open Dump Truck Loading process will occur with the assistance of a cover over the dump truck bed. A flexi ble tote will be lifted over the truck, the spout from the tote will be placed into one of multiple cut slits in the cover, then the tote will be opened. A hose, connected to the nearby baghouse, will be positioned by the slit that the tote is loading into, to catch particulates.

#### Attachment L FUGITIVE EMISSIONS FROM UNPAVED HAULROADS

UNPAVED HAULROADS (including all equipment traffic involved in process, haul trucks, endloaders, etc.)

		5			ŗ	PM			PM-1	0
k =	Particle size multiplier					0.80			0.36	
s =	Silt content of road surface	material (%)								
p =	Number of days per year wi	th precipitati	on >0.01	in.						
Item Numbe	r Description	Number of Wheels	Mean Vehicle Weight (tons)	Mean Vehicle Speed (mph)	Miles per Trip	Maximum Trips per Hour	Maxii Trips Ye	s per	Control Device ID Number	Control Efficiency (%)
1	N/A									
2										
3										
4										
5										
6										
7										
8										

Source: AP-42 Fifth Edition - 13.2.2 Unpaved Roads

 $E = k \times 5.9 \times (s \div 12) \times (S \div 30) \times (W \div 3)^{0.7} \times (w \div 4)^{0.5} \times ((365 - p) \div 365) =$  lb/Vehicle Mile Traveled (VMT) Where:

		PM	PM-10
k =	Particle size multiplier	0.80	0.36
s =	Silt content of road surface material (%)		
S =	Mean vehicle speed (mph)		
W =	Mean vehicle weight (tons)		
w =	Mean number of wheels per vehicle		
p =	Number of days per year with precipitation >0.01 in.		

For lb/hr:  $[lb \div VMT] \times [VMT \div trip] \times [Trips \div Hour] = lb/hr$ 

For TPY: [lb ÷ VMT] × [VMT ÷ trip] × [Trips ÷ Hour] × [Ton ÷ 2000 lb] = Tons/year

#### SUMMARY OF UNPAVED HAULROAD EMISSIONS

		Р	М			PM	-10	
Item No.	Uncon	trolled	Cont	rolled	Uncor	trolled	Cont	rolled
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
1								
2								
3								
4								
5								
6								
7								
8								
TOTALS								

#### FUGITIVE EMISSIONS FROM PAVED HAULROADS

l =	Industrial augmentation factor	·					
n =	Number of traffic lanes				1		
s =	Surface material silt content (9	%)				7.1	
L =	Surface dust loading (lb/mile)				13.3	x 10^-3	
Item Numbe	r Description	Mean Vehicle Weight (tons)	Miles per Trip	Maximum Trips per Hour	Maximum Trips per Year	Control Device ID Number	Control Efficiency (%)
1	Tractor-FTV	20	0.13	4	3000	N/A	N/A
2	Tractor- Bulk Tanker	20	0.13	4	3000	N/A	N/A
3	Tractor- Dump Truck	20	0.13	4	2000	N/A	N/A
4							
5							
6							
7							
8							

INDUSTRIAL PAVED HAULROADS (including all equipment traffic involved in process, haul trucks, endloaders, etc.)

Source: AP-42 Fifth Edition – 11.2.6 Industrial Paved Roads

$$E = 0.077 \times I \times (4 \div n) \times (s \div 10) \times (L \div 1000) \times (W \div 3)^{0.7} =$$

lb/Vehicle Mile Traveled (VMT)

Where:

l =	Industrial augmentation factor (dimensionless)	
n =	Number of traffic lanes	1
s =	Surface meterial silt content (%)	7.1
L =	Surface dust loading (lb/mile)	13.3 x 10^-3
W =	Average vehicle weight (tons)	20

For lb/hr:  $[lb \div VMT] \times [VMT \div trip] \times [Trips \div Hour] = lb/hr$ 

For TPY: [lb ÷ VMT] × [VMT ÷ trip] × [Trips ÷ Hour] × [Ton ÷ 2000 lb] = Tons/year

SUMMARY OF PAVED HAULROAD EMISSIONS

	Uncon	trolled	Conti	olled
Item No.	lb/hr	TPY	lb/hr	TPY
1	0.099	0.435	0.099	0.435
2	0.099	0.435	0.099	0.435
3	0.066	0.290	0.066	0.290
4				
5				
6				
7				
8				
TOTALS	0.265	1.160	0.265	1.160

To be used for affected sources other than asphalt plants, foundries, incinerators, indirect heat exchangers, and quarries.

Identification Number (as assigned on Equipment List Form): Other fugitive emissions

1. Name or type and model of proposed affected source:
Other fugitive emissions from carbon loading and unloading.
2. On a concrete chaot(a) furnish a skatch(ca) of this offected course. If a modification is to be
<ol> <li>On a separate sheet(s), furnish a sketch(es) of this affected source. If a modification is to be made to this source, clearly indicated the change(s). Provide a narrative description of all features of the affected source which may affect the production of air pollutants.</li> </ol>
3. Name(s) and maximum amount of proposed process material(s) charged per hour:
2.5 PPH
4. Name(s) and maximum amount of proposed material(s) produced per hour:
N/A
5. Give chemical reactions, if applicable, that will be involved in the generation of air pollutants:
N/A
N/A

6.	6. Combustion Data (if applicable):					
	(a)	Type and amount in ap	propriate units of fu	iel(s) to be bu	irned:	
	T / A					
N	[/A					
	(b)	Chemical analysis of pr and ash:	oposed fuel(s), exc	luding coal, in	cluding maxim	um percent sulfur
	(c)	Theoretical combustion	air requirement (A	CF/unit of fue	el):	
		@		°F and		psia.
	(d)	Percent excess air:				
	(e)	Type and BTU/hr of bu	rners and all other f	iring equipme	ent planned to	be used:
	(f)	If coal is proposed as a coal as it will be fired:	source of fuel, ider	ntify supplier a	and seams and	give sizing of the
	(g) Proposed maximum design heat input: × 10 <sup>6</sup> BTU/hr.					× 10 <sup>6</sup> BTU/hr.
7.	Pro	pjected operating schedu	ıle:			
Ho	ours/	Day 10	Days/Week	5	Weeks/Year	52

8.	<ol> <li>Projected amount of pollutants that would be emitted from this affected source if no control devices were used:</li> </ol>					
@	°F and psia					
a.	NO <sub>X</sub>	lb/hr	grains/ACF			
b.	SO <sub>2</sub>	lb/hr	grains/ACF			
c.	со	lb/hr	grains/ACF			
d.	PM <sub>10</sub>	lb/hr	grains/ACF			
e.	Hydrocarbons	lb/hr	grains/ACF			
f.	VOCs	lb/hr	grains/ACF			
g.	Pb	lb/hr	grains/ACF			
h.	Specify other(s)					
	РМ	2.5 lb/hr	grains/ACF			
		lb/hr	grains/ACF			
		lb/hr	grains/ACF			
		lb/hr	grains/ACF			

- NOTE: (1) An Air Pollution Control Device Sheet must be completed for any air pollution device(s) used to control emissions from this affected source.
  - (2) Complete the Emission Points Data Sheet.

9. Proposed Monitoring, Recordkeeping, Reporting, and Testing Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate			
compliance with the proposed emissions lim	RECORDKEEPING		
REPORTING	TESTING		
	E PROCESS PARAMETERS AND RANGES THAT ARE ISTRATE COMPLIANCE WITH THE OPERATION OF THIS		

PROPOSED TO BE MONITORED IN ORDER TO DEMONSTRATE COMPLIANCE WITH THE OPERATION OF THE PROCESS EQUIPMENT OPERATION/AIR POLLUTION CONTROL DEVICE.

**RECORDKEEPING.** PLEASE DESCRIBE THE PROPOSED RECORDKEEPING THAT WILL ACCOMPANY THE MONITORING.

**REPORTING.** PLEASE DESCRIBE THE PROPOSED FREQUENCY OF REPORTING OF THE RECORDKEEPING.

**TESTING.** PLEASE DESCRIBE ANY PROPOSED EMISSIONS TESTING FOR THIS PROCESS EQUIPMENT/AIR POLLUTION CONTROL DEVICE.

10. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty

# ATTACHMENT M

## Attachment M Air Pollution Control Device Sheet (BAGHOUSE)

Coi	ntrol Device ID No. (must match Emission Units Table Equipment Information a	): 1C and Filter Characteristics	
1.	Manufacturer: CamCorp	2. Total number of compartments: 1	
	Model No. CA9-1.5D	3. Number of compartment online fo operation: 1	or normal
4.	Provide diagram(s) of unit describing capture syste capacity, horsepower of movers. If applicable, state		
5.	Baghouse Configuration:    Open Pressure      (check one)    Electrostatically Enha      Other, Specify	Closed Pressure Closed Suction	1
6.	Filter Fabric Bag Material:         Nomex nylon       Wool         Polyester       Polypropylene         Acrylics       Ceramics	7. Bag Dimension: Diameter 15 Length 52	in. ft.
	☐ Fiber Glass ☐ Cotton Weight oz./sq.yd	8. Total cloth area: 2929	ft²
	☐ Teflon Thickness in	9. Number of bags: 9	
	Others, specify	10. Operating air to cloth ratio: $2.06$ to $1$	ft/min
11.	Baghouse Operation: 🛛 Continuous	Automatic Intermittent	
12.	Method used to clean bags: Mechanical Shaker Pneumatic Shaker Bag Collapse Manual Cleaning Method used to clean bags: Sonic Cleaning Reverse Air Flow Pulse Jet Reverse Jet	<ul> <li>Reverse Air Jet</li> <li>Other:</li> </ul>	
13.	Cleaning initiated by: ☐ Timer ☐ Expected pressure drop range in. of water	Frequency if timer actuated Other	
14.	Operation Hours: Max. per day: 10 Max. per yr: 2600	15. Collection efficiency: Rating: 100 Guaranteed minimum: No guarantee	% provided
	Gas Stream C	haracteristics	
16.	Gas flow rate into the collector: 6000 ACFM	1 at Ambient°F and 90-100	PSIA
	ACFM: Design: PSIA Maximum:	PSIA Average Expected:	PSIA
17.	Water Vapor Content of Effluent Stream: 1.4	lb. Water/lb. Dry Air	
18.	Gas Stream Temperature: Ambient °F	19. Fan Requirements:	hp
20	Stabilized static pressure loss across baghouse. Pre	OR essure Drop: High	<u>ft³/min</u> in. H₂O
20.		Low	in. H₂O
21.	Particulate Loading: Inlet:		rain/scf

22. Type of Pollutant(s) to be collected (if particulate give specific type): Carbon black						
23. Is there any SO <sub>3</sub> in the emission $s$	stream?	🛛 No 🗌 Y	es SO	3 conte	nt:	ppmv
24. Emission rate of pollutant (specify	/) into and o	ut of collector at	maximum	design	operating con	ditions:
<b>-</b>			N			
Pollutant		lb/hr	grains/	act	lb/hr	grains/acf
	Particlo S	Size Distribution				
25. Complete the table:		to Collector	i at iniet	Frac	tion Efficiend	cy of Collector
Particulate Size Range (microns)	Weig	ht % for Size Ra	ange	W	leight % for a	Size Range
0 – 2						
2 – 4		le size analysis conducted for t product				
4 - 6						
6 - 8						
8 – 10						
10 – 12						
12 – 16						
16 – 20						
20 – 30						
30 – 40						
40 – 50						
50 – 60						
60 – 70						
70 – 80						
80 – 90						
90 – 100						
>100						

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
Continuous Opacity
Pressure Drop Alarms-Audible to Process Operator
Visual opacity readings, Frequency:
Other, specify:
27. Describe any recording device and frequency of log entries:
Recordings have begun daily and turned in with the daily production logs
28. Describe any filter seeding being performed:
N/A
29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas
reheating, gas humidification):
N/A
30. Describe the collection material disposal system:
Product is collected from the bottom valve of the baghouse in drums which are sealed and disposed of in
an onsite roll off dumpster.
31. Have you included <b>Baghouse Control Device</b> in the Emissions Points Data Summary Sheet? Yes
or. Have you moduled <b>Daynouse Condici Device</b> in the Emissions Folints Data Summary Sheet? 165

32. Proposed Monitoring, Recordkeeping, Reporting, and Testing Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.						
MONITORING:		RECORDKEEPING: Recording are now turned with the daily production logs				
Daily recordings of the	pressure drop gauge					
REPORTING:		TESTING:				
As requested		As requested				
MONITORING:		ocess parameters and ranges that are proposed to be strate compliance with the operation of this process				
RECORDKEEPING: REPORTING:	Please describe the proposed re-	cordkeeping that will accompany the monitoring. emissions testing for this process equipment on air				
TESTING:	•	emissions testing for this process equipment on air				
33. Manufacturer's Gua	aranteed Capture Efficiency for ea	ch air pollutant.				
No guarantee provided						
34. Manufacturer's Gua	aranteed Control Efficiency for eac	h air pollutant.				
99%						
35. Describe all operati	ng ranges and maintenance proce	edures required by Manufacturer to maintain warranty.				
N/A						

## Attachment M Air Pollution Control Device Sheet (BAGHOUSE)

Control Device ID No. (must match Emission Units Table): 2C

Equipment Information and Filter Characteristics									
1.	Manufacturer: Donaldson	2. Total number of compartments: 1							
	Model No. 3DF6	3. Number of compartment online for normal operation: 1							
4.	Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.								
5.	Baghouse Configuration: <ul> <li>Open Pressure</li> <li>Closed Pressure</li> <li>Closed Suction</li> </ul> (check one) <ul> <li>Electrostatically Enhanced Fabric</li> <li>             Other, Specify         </li></ul>								
6.	Filter Fabric Bag Material:         Nomex nylon       Wool         Polyester       Polypropylene         Acrylics       Ceramics         Fiber Glass       oz./sq.yd	7. Bag Dimension: Diameter 12.75 in. Length 2.17 ft.							
		8. Total cloth area: 10.86 ft <sup>2</sup>							
	Teflon Thickness in	9. Number of bags: 6							
	Others, specify	10. Operating air to cloth ratio: $46.65 / 70.95$ ft/min							
11.	Baghouse Operation: 🛛 Continuous	Automatic Intermittent							
12.	<ul> <li>2. Method used to clean bags:</li> <li>A Mechanical Shaker</li> <li>Sonic Cleaning</li> <li>Reverse Air Jet</li> <li>Pneumatic Shaker</li> <li>Reverse Air Flow</li> <li>Other:</li> <li>Bag Collapse</li> <li>Pulse Jet</li> <li>Manual Cleaning</li> <li>Reverse Jet</li> </ul>								
13.	Cleaning initiated by: ☐ Timer ☐ Expected pressure drop range in. of water	Frequency if timer actuated Other							
14.	Operation Hours: Max. per day: 10 Max. per yr: 2600	15. Collection efficiency: Rating: 100 % Guaranteed minimum: No Guarantee Provided							
Gas Stream Characteristics									
16.	Gas flow rate into the collector:2700ACFMACFM: Design:PSIAMaximum:	I at     Ambient     °F and     PSIA       PSIA     Average Expected:     PSIA							
17.	Water Vapor Content of Effluent Stream:	Ib. Water/Ib. Dry Air							
	Gas Stream Temperature: °F	19. Fan Requirements: hp OR ft <sup>3</sup> /min							
20.	Stabilized static pressure loss across baghouse. Pre								
21.	Particulate Loading: Inlet:	grain/scf Outlet: grain/scf							

22. Type of Pollutant(s) to be collected (if particulate give specific type): Carbon black									
23. Is there any SO <sub>3</sub> in the emission stream? $\square$ No $\square$ Yes SO <sub>3</sub> content: ppmv									
24. Emission rate of pollutant (specify) into and out of collector at maximum design operating conditions:									
Dellutent				OUT					
Pollutant		lb/hr	grains/	acr	lb/hr	grains/acf			
25. Complete the table:	Particle Size Distribution at Inlet to Collector			Fraction Efficiency of Collector					
Particulate Size Range (microns)	Weight % for Size Range			Weight % for Size Range					
0 – 2									
2 – 4	No Particle size analysis has been conducted for this product								
4 – 6									
6 – 8									
8 – 10									
10 – 12									
12 – 16									
16 – 20									
20 – 30									
30 - 40									
40 – 50									
50 – 60									
60 – 70									
70 – 80									
80 – 90									
90 – 100									
>100									

26. How is filter monitored for indications of deterioration (e.g., broken bags)?
☐ Continuous Opacity ⊠ Pressure Drop
Alarms-Audible to Process Operator
☐ Visual opacity readings, Frequency:
<ul> <li>Other, specify:</li> <li>27. Describe any recording device and frequency of log entries:</li> </ul>
27. Describe any recording device and requency of log entries.
Recordings have begun daily and turned in with the daily production logs
28. Describe any filter seeding being performed:
Ν/Α
29. Describe any air pollution control device inlet and outlet gas conditioning processes (e.g., gas cooling, gas
reheating, gas humidification):
N/A
30. Describe the collection material disposal system:
Product is collected from the bottom valve of the baghouse in drums which are capped and sealed. These drums are disposed of in a roll off dumpster.
31. Have you included <b>Baghouse Control Device</b> in the Emissions Points Data Summary Sheet? Yes

	ring, Recordkeeping, Reporting,	and Testing eporting in order to demonstrate compliance with the
	g parameters. Please propose	testing in order to demonstrate compliance with the
MONITORING:		RECORDKEEPING:
Daily recordings of th	ne pressure drop gauge	Recording are now turned with the daily
Daily recordings of u	ie pressure urop gauge	production logs
252027110		7707110
REPORTING:		TESTING:
		As requested
As requested		
MONITORING:		ocess parameters and ranges that are proposed to be
	equipment or air control device.	trate compliance with the operation of this process
RECORDKEEPING: REPORTING:		cordkeeping that will accompany the monitoring. emissions testing for this process equipment on air
TESTING:	pollution control device. Please describe any proposed	emissions testing for this process equipment on air
22 Manufacturar'a Cur	pollution control device.	
55. Manufacturer S Gua	aranteed Capture Efficiency for ea	
No guarantee provided		
34. Manufacturer's Gua	aranteed Control Efficiency for eac	h air pollutant.
99%		
3376		
35. Describe all operati	ing ranges and maintenance proce	edures required by Manufacturer to maintain warranty.
		,
N/A		

90 - 100	
>100	

27.	Describe	any	air poll	lution	control	device	inlet	and	outlet	gas	conditioning	processes	(e.g.,	gas	cooling,	gas
	reheating	, gas	humid	lificatio	on):											

N/A

28. Describe the collection material disposal system:

Particulate matter will collect on the exhaust fan filters. Fan filters will be inspected monthly and replaced if filters are soiled and restricting air flow.

29. Have you included Other Collectores Control Device in the Emissions Points Data Summary Sheet?

30. **Proposed Monitoring, Recordkeeping, Reporting, and Testing** Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING: Inspected monthly by n	naintenance.	RECORDKEEPING: As requested.
REPORTING: As requested.		TESTING: As requested.
MONITORING:	•	bcess parameters and ranges that are proposed to be trate compliance with the operation of this process
RECORDKEEPING:	Please describe the proposed red	cordkeeping that will accompany the monitoring.
REPORTING:	Please describe any proposed pollution control device.	emissions testing for this process equipment on air
TESTING:	Please describe any proposed	emissions testing for this process equipment on air

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant. N/A

pollution control device.

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant. N/A

33. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty. N/A

#### Attachment M Air Pollution Control Device Sheet (OTHER COLLECTORS)

Control Device ID No. (must match Emission Units Table): N/A

### Equipment Information

1.	Manufacturer: Airflow Incorporated Model No. Airflow Pleat	Туре		ne: Exhaust Fan Filters el Filters (five total, one for each							
3.	Provide diagram(s) of unit describing capture system with duct arrangement and size of duct, air volume, capacity, horsepower of movers. If applicable, state hood face velocity and hood collection efficiency.										
4.	On a separate sheet(s) supply all data and calculation	ons used in	selecting or de	esigning this collection device.							
5.	Provide a scale diagram of the control device showi	ng internal o	construction.								
6.	Submit a schematic and diagram with dimensions a	nd flow rate	S.								
7. No	Guaranteed minimum collection efficiency for each guarantee.	oollutant col	llected:								
8.	Attached efficiency curve and/or other efficiency info	ormation.									
9.	Design inlet volume: N/A SCFM	10. Capa	city:N/A								
N/A 12. 13.	Attach any additional data including auxiliary equipment. Description of method of handling the collected mate Iters are soiled and restricting proper air flow, work of	ipment and erial(s) for r	l operation de euse or dispos	tails to thoroughly evaluate the al.							
	Gas Stream	Characteris	stics								
14.	Are halogenated organics present? Are particulates present? Are metals present?	☐ Yes ⊠ Yes ☐ Yes	⊠ No □ No ⊠ No								
15.	Inlet Emission stream parameters:	Maxim	um	Typical							
	Pressure (mmHg):										
	Heat Content (BTU/scf):										
	Oxygen Content (%):										
	Moisture Content (%):										
	Relative Humidity (%):										

16.	Type of pollutant(s) o		SC 🗌 carbon,		Odor Os			] Other	
17.	Inlet gas velocity:		,	ft/sec	18. Pollutant	speci	ific gravity:	-	
19.	Gas flow into the col ACF @	lector: °F and	d	PSIA	20. Gas strea	am tei	mperature: Inlet: Outlet:		°F °F
21.	Gas flow rate: Design Maximum: Average Expected:			ACFM ACFM	22. Particulat	e Gra	ain Loading Inlet: Outlet:	in grains/scf:	
23.	Emission rate of eac	h pollutant (sp	ecify) in	nto and out	of collector:				
	Pollutant	IN I	Pollutar	nt	Emission		OUT Po	llutant	Control
		lb/hr	g	rains/acf	Capture Efficiency %		lb/hr	grains/acf	Efficiency %
	A Fugitive PM	2.5			unknown		1.1		unknown
	В								
	С								
	D								
	E								
24.	Dimensions of stack	: Н	eight		ft.		Diameter	t	ft.
25.	Supply a curve show rating of collector.	wing proposed	l collect	ion efficier	ncy versus gas	volu	me from 25	5 to 130 perce	nt of design
			P	articulate	Distribution				
26.	Complete the table:		Partic		stribution at Ir Collector	nlet	Fraction	Efficiency of	Collector
Pa	articulate Size Range	e (microns)	W	eight % fo	or Size Range		Weig	ht % for Size	Range
	0 – 2								
	2 – 4		No par		analysis has b cted for this luct	been			
	4 - 6								
	6 – 8								
	8 – 10								
	10 – 12								
	12 – 16								
	16 – 20								
<u> </u>	20 - 30								
<u> </u>	30 - 40								
	40 - 50								
	50 - 60						1		

90 - 100	
>100	

27.	Describe	any	air pol	lution	control	device	inlet	and	outlet	gas	conditioning	processes	(e.g.,	gas	cooling,	gas
	reheating	, gas	humid	dificatio	on):											

N/A

28. Describe the collection material disposal system:

Particulate matter will collect on the exhaust fan filters. Fan filters will be inspected monthly and replaced if filters are soiled and restricting air flow.

29. Have you included Other Collectores Control Device in the Emissions Points Data Summary Sheet?

30. **Proposed Monitoring, Recordkeeping, Reporting, and Testing** Please propose monitoring, recordkeeping, and reporting in order to demonstrate compliance with the proposed operating parameters. Please propose testing in order to demonstrate compliance with the proposed emissions limits.

MONITORING: Inspected monthly by m	naintenance.	RECORDKEEPING: As requested.
REPORTING: As requested.		TESTING: As requested.
MONITORING:	Diagon list and departing the pro-	
MONITORING.	•	ocess parameters and ranges that are proposed to be strate compliance with the operation of this process
RECORDKEEPING:		cordkeeping that will accompany the monitoring.
REPORTING:	Please describe any proposed pollution control device.	emissions testing for this process equipment on air
TESTING:	•	emissions testing for this process equipment on air

31. Manufacturer's Guaranteed Control Efficiency for each air pollutant. N/A

32. Manufacturer's Guaranteed Control Efficiency for each air pollutant. N/A

33. Describe all operating ranges and maintenance procedures required by Manufacturer to maintain warranty. N/A, these exhaust fan filters are located on the warehouse exhaust fans which are not near the emissions units listed in this permit application.



#### Features:

Available in economy, standard and high capacity versions

26 point high wet strength clay coated kraft board die cut frame

Radial pleat design

Media is 100% synthetic fibers - water and bacteria resistant

Media bonded to expanded metal support grid using water resistant adhesive

Media bonded to frame using water resistant adhesive

Also available MERV 8 - Series M8, MERV 11 - Series M11 and Series SS with self supporting media element

UL Class II rated as per UL 900 standard



# Economy, Standard and High Capacity medium efficiency pleated panel filters

**AIRFLOW PLEAT** extended surface pleated panel filters are designed for use in air filtration systems and equipment, as stand alone basic efficiency products or as pre-filters to higher efficiency bag, rigid box or cell type filter.

The 26 point clay coated, kraft-board die cut frame, diagonal and horizontal support members, radial wedge design and expanded metal media support create one of the most rigid filters of its type in the industry.

The media pack, comprised of 100% polypropylene fibers, is bonded to the inside perimeter of the enclosure frame by a moisture resistant adhesive, providing a continuous and positive seal.

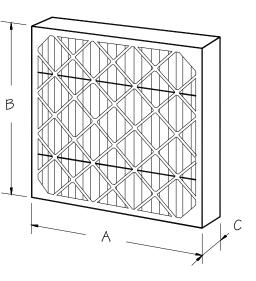
The standard offering is rated by Underwriters Laboratories as Class II, per UL Standard 900.

The AIRFLOW PLEAT is designed so as to work suitably within built up filter banks and/or side access systems. Available in nominal 1", 2" and 4" depths and 50 standard size offerings, this product is designed to fit most industrial and commercial applications with little or no system modification.

Rigid construction, extended surface and long service life are features and benefits which make the AIRFLOW PLEAT an excellent option for meeting the requirements today's filtration market.

# AIRFLOW PLEAT

The Airflow Pleat is made from 100% synthetic media bonded with a water resistant adhesive to an expanded metal support grid and attached to a 26 point high wet strength clay-coated kraft board frame using water-resistant adhesive. The Airflow Pleat is available in standard sizes below in Economy - AFP1000, Standard - APF2000 and High - AFP3000 capacity in medium efficiency.

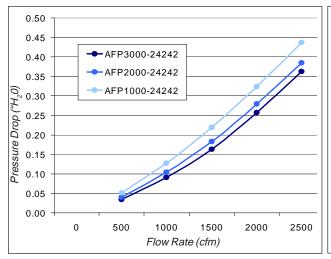


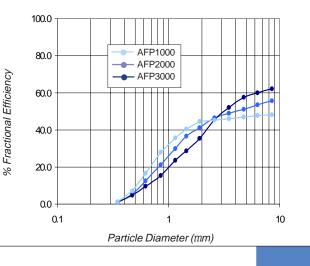
## Size Chart - AFP1000, AFP2000, AFP3000

Model Number	Width "A"	Height "B"	Depth "C"
AFPx000-5501	24-1/2"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-4401	23-3/8"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-0501	19-1/2"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-0401	19-1/2"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-0001	19-1/2"	19-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-8501	17-3/8"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-8401	17-3/8"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-6501	15-1/2"	24-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-6001	15-1/2"	19-1/2"	3/4", 1-3/4", 3-3/4" *
AFPx000-2401	11-3/8"	23-3/8"	3/4", 1-3/4", 3-3/4" *
AFPx000-2001	11-3/8"	19-1/2"	3/4", 1-3/4", 3-3/4" *

\* Economy Grade AFP1000 is available in 2" and 4" depths only.

# **Pressure Drop vs. Flow Rate**





**Efficiency vs. Particle Diameter** 



100 Oak Tree Drive Selma, North Carolina 27576 (919) 975-0240 Tel (919) 975-0250 Fax Distributed by:

National Air Filtration Association

# ATTACHMENT N

#### Attachment N - Calculations, Controlled

IS	Bulk Tanker Truck Unloading	Transfer Rate			Control Device		
ransfer Point	Description	TPH	ТРҮ	Control Device	Efficiency	PM lb/Hr	PM TPY
P1 P2	Hose to Hopper Hopper to Super Sack	10.7 10.7		Baghouse - 2C Baghouse - 2C	9		
72	Hopper to super sack	10.7	27,820	bagnouse - 20	9	9 0.99	/ /.
otal						5.992	2. 7.7
S design capad	city limit on operation: 10.7 tons of material /	hr and 27,820 tons	of material	/ yr			
nly one tanke	r truck transfer point shall be in operation at	one time, therefore	total emissi	ons are based on one transfer poin	t		
5	Bulk Tanker Truck Loading						
		Transfer Rate			Control Device		
ansfer Point	Description	TPH	TPY	Control Device	Efficiency	PM lb/Hr	PM TPY
P1	Sack to Funnel	10.7	27 820	Hood and Baghouse - 1C	9	9 5.99	) 7.
2	Funnel to Tanker	10.7		Hood and Baghouse - 1C	9		
				3			
otal						5.992	2. 7.7
0 1	city limit on operation: 10.7 tons of material /			5	+		
ny one tanke	r truck transfer point shall be in operation at	one time, therefore	total emissi	ions are based on one transfer poin	t		
5	Small Bagging (Bagging Machine 3)	Transfer Rate			Control Device		
ansfer Point	Description	TPH	TPY	Control Device	Efficiency	PM lb/Hr	PM TP
1	Sack to Tote	0.75	6570	Baghouse - 1C	9	9 0.42	2 1.8
2	Tote to Hopper	0.75		Baghouse - 1C	9	9 0.42	. 1.
3	Hopper to Bag	0.75	6570	Baghouse - 1C	9	9 0.42	2 1.8
ital						1.260	) 5.
	city limit on operation: 0.75 tons of material /	hr and 6,570 tons of	f material /	yr		1.200	/ 3.
	Pneumatic Railcar Loading/Unloading						
,		Transfer Rate			Control Device		
ansfer Point	Description	TPH	TPY	Control Device	Efficiency	PM lb/Hr	PM TP
21	Trailers to Rail Car, or Rail Car to Hopper	10.7	1020	Baghouse - 2C	9	9 5.992	2 0.5
,		10.7	1720	baghouse 20	,	, 5.772	. 0.0
otal						5.992	2.0.5
6 design capad	city limit on operation: 10.7 tons of material /	hr and 1,920 tons of	f material /	yr			
5	Open Dump Truck Loading	Transfer Data			Control Dec'		
ransfer Point	Description	Transfer Rate TPH	TPY	Control Device	Control Device Efficiency	PM lb/Hr	PM TP
21	FIBC to Dump Truck	40	) 13,000	Baghouse - 1C, and truck cover	9	9 22.4	3.6
otal	·					22.400	) 3.6
	city limit on operation: 40 tons of material / h	r and 13,000 tons/vr	-			22.400	, J.
⊳ ∆ttachmen	It K for General Fugitive Emissions and Haul F	load Fugitive Emissi	ons - using	Engineering Estimate		PM TPY:	2.

Note: Calculations use AP-42, Chapter 10-7, Table 10.7-1 Charcoal Briquetting 56 lb/ton (PM Emission Factor)

27.87 PM TPY Total

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#### Attachment N - Calculations, Uncontrolled

15	Bulk Tanker Truck Unload	ing			
Transfer Point	Description	Transfer Rate TPH	ТРҮ	PM lb/Hr	PM TPY
TP1	Hose to Hopper	10.7	27,820	599.20	778.96
TP2	Hopper to Super Sack	10.7	27,820	599.20	778.96
Total				599.20	778.960

1S design capacity limit on operation: 10.7 tons of material / hr and 27,820 tons of material / yr

Only one tanker truck transfer point shall be in operation at one time, therefore total emissions are based on one transfer point

2S	Bulk Tanker Truck Loading				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	Sack to Funnel	10.7	27,820	599.20	778.96
TP2	Funnel to Tanker	10.7	27,820	599.20	778.96
Total				599.20	778.960

2S design capacity limit on operation: 10.7 tons of material / hr and 27,820 tons of material / yr Only one tanker truck transfer point shall be in operation at one time, therefore total emissions are based on one transfer point

3S	Small Bagging (Baggi	Small Bagging (Bagging Machine 3)				
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY	
TP1	Sack to Tote	0.75	6570	42	183.960	
TP2	Tote to Hopper	0.75	6570	42	183.960	
TP3	Hopper to Bag	0.75	6570	42	183.960	
Total				126.00	551.880	

3S design capacity limit on operation: 0.75 tons of material / hr and 6,570 tons of material / yr

4S	Pneumatic Railcar Loading	g/Unloading			
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	Trailers to Rail Car	10.7	1920	599.2	53.760
Total				599.20	53.760
4S design capac	4S design capacity limit on operation: 10.7 tons of material / hr and 1,920 tons of material / yr				
5S	Open Dump Truck Loading	9			
Transfer Point	Description	Transfer Rate TPH	TPY	PM lb/Hr	PM TPY
TP1	FIBC to Dump Truck	40	13,000	2240	364.000
Total				2240.00	364.00

5S design capacity limit on operation: 40 tons of material / hr and 13,000 tons/yr

See Attachment K for General Fugitive Emissions and Haul Road		
Fugitive Emissions - using engineering estimate and no control	PM TPY:	4.410

2531.97 PM TPY Total

Note: Calculations use AP-42, Chapter 10-7, Table 10.7-1 Charcoal Briquetting 56 lb/ton (PM Emission Factor)

# ATTACHMENT P

#### AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that REO Processing Inc. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Modification to the facility's Construction Permit for a Small bagging, Bulk truck loading and unloading located on 20 26<sup>th</sup> ST Huntington WV 25703 in Cabell County, West Virginia. The latitude and longitude coordinates are: Latitude: 38.43304, Longitude -82.40988.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be: Particulate Matter (PM) 27.87 TPY.

The modification is planned to be in effect on or about the 1st day of April, 2024. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication this notice. Written comments will also received email of be via at DEPAirQualityPermitting@WV.gov.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 41281, during normal business hours.

Dated this the 11<sup>th</sup> day of April, 2024.

By: REO Processing Inc. Daniel Isaacs Director of Safety & Quality 221 Airport Industrial Park Road Parkersburg, WV 26104

# ADDENDUM -DUST CONTROL PLAN

# DRAFT

Dust Control Plan Rev 4

REO Processing, Inc. 20 26<sup>th</sup> Street Huntington, West Virginia

Prepared for:

REO Processing, Inc. Waynesboro, Virginia

February 2024

DUST CONTROL PLAN REO PROCESSING, INC. Huntington, West Virginia

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2.	SITE DESCRIPTION1
3.	POTENTIAL FUGITIVE DUST EMISSION SOURCES
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6.	RECORDKEEPING4
7.	CORRECTIVE ACTIONS
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Apper	ndix A - Facility Layout

Appendix B – Inspection Forms

### 1. INTRODUCTION

This Dust Control Plan has been prepared to address the control of fugitive and airborne dust emissions from the REO Processing, Inc. facility located in Huntington, West Virginia (the Site). This Plan complies with the West Virginia Legislative Rule 45CSR17 ("Rule 17"), "To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter." The primary objective of this plan is to present a strategy for controlling, to the greatest extent practicable, fugitive or airborne dust emissions at the Site through specific source identification and activities that have a high potential to produce or generate fugitive or airborne dust emissions. This plan describes the engineering and administrative controls necessary to minimize and control dust emissions from these sources and activities.

The plan will be modified and/or revised as site conditions change or changes in dust control strategy arise. This plan will be implemented in conjunction with the project Site Health and Safety Plan.

### 2. SITE DESCRIPTION/BACKGROUND

REO Processing, Inc. operates a warehouse and re-packaging plant at 20 26th Street, Huntington, West Virginia. The Site stores, re-packages, and loads activated carbon by emptying super-sacks to trailers.

### Bulk Truck filling-Process Description

Depending on the size of the customer order will depend on how much material is staged for loading. This can be in 1000 or 2000 lb Sacks. Sacks are verified for correct Batches and a funnel is placed on the Bulk Truck Trailer Filling ports on top the trailer and dust collector hose (the hose is attached to a cover that is sealed to the hatch) attached to unused port on trailer. Once Sacks are verified correct, utilizing a Forklift the sacks are then picked up from the lifting ears and brought over and centered above the funnel placed on top the trailer. Once centered correctly, an employee then opens the bottom of the sack to allow the material to empty into the bulk trailer.

Once the bag is opened and material is flowing, the bottom of the sack is lowered down into the funnel to reduce dust escaping. Once the sack is empty, the spout is then re-tied to prevent any carbon from coming out of the sack when removing from the funnel, the forklift driver then returns, and employee removes the empty sack to discard and the driver repeats until all sacks are emptied into the trailer. Once all is completed, the funnel is removed and the trailer fill ports are closed, and the truck is verified for cleanliness.

#### Bulk Dump Truck filling-Process Description

Depending on the size of the customer order will depend on how much material is staged for loading. This can be in 1000 or 2000 lb Sacks. Sacks are verified for correct batches and cover is placed on the bulk dump truck. The cover has multiple filling ports on top and dust collector hose is positioned close the filling port. Once Sacks are verified correct, utilizing a Forklift the sacks are then picked up from the lifting ears and brought over and centered over the filling port, once centered correctly, an employee then opens the bottom of the sack to allow the material to empty into the dump truck.

Once the sack is empty, the spout is then re-tied to prevent any carbon from coming out of the sack. The forklift driver then returns, and employee removes the empty sack to discard and the driver repeats until all sacks are emptied into the trailer.

Once all is completed, the cover is removed and the dump trailer tarp is positioned over the load.

#### Bulk Truck Unloading-Process Description

Depending on the size of the customer order will depend on how much material is available for unloading. The trailer is positioned to access the ports with pneumatic pumps. Seals are verified, hoses are attached and the pumps are activated pulling the material from inside the bulk truck to a funnel shaped hopper just inside the building. The machine weighs the material to designated weight and then releases material into the super sack that is attached to the neck of the funnel hopper. Once Sack if filled, operator seals the sack, labels it and sets it aside until to order is complete. The filled sacks are then warehoused until the customer requests them. Dust collection is in place at the sack fill station.

#### Small Bagging-Process Description

Material is staged and verified to be correct. Once verified the 1000 or 2000lb Sacks (depending on customer order) are then transferred into a tote bin. Once tote is loaded, the tote is then raised above the bagger and placed on a stand. The Operator will then open the valve on the bottom of the tote and the material will flow into the bagger hopper.

When the bagger is loaded the operator then places a bag over the spout and actuates the filler. The machine fills the bags to the correct weight and then the bags are sealed and palletized. Once a full pallet is completed, the pallet is set aside for inspection. Dust collection is in use at the bag filling station.

#### 3. POTENTIAL FUGITIVE DUST SOURCES AND CONTROLS

The primary contaminant of concern, with respect to fugitive dust emissions at the Site, is black particulate matter (PM). The following project work areas/tasks have been identified as potential sources of PM emissions and are expanded upon further below:

Source	Controls
Exhaust fans located on the roof and eastern exterior wall of the warehouse building	<ul> <li>Visual inspection for PM accumulation</li> <li>Filters</li> <li>Preventive maintenance</li> </ul>
Exterior truck loading/unloading area and small bag filling areas	<ul> <li>Baghouse</li> <li>Completed under cover</li> <li>Under a hood connected to Bag House to create negative pressure</li> <li>Visual inspection of hoses and valves</li> <li>Preventive maintenance</li> </ul>
Exterior railcar loading/unloading area	<ul><li>Dust collection system</li><li>Preventive maintenance</li></ul>
Interior super sack filling area	<ul> <li>Baghouse</li> <li>Completed in enclosed building</li> <li>Visual inspection for PM accumulation</li> <li>Preventive maintenance</li> </ul>
Plant Grounds	<ul> <li>Daily cleanup</li> <li>Visual Inspection</li> <li>Immediate work stoppage on spills greater than 5lbs, with immediate cleanup actions</li> </ul>

Preventive maintenance of the fugitive dust equipment is completed by following the manufacturer's recommended operations and maintenance plans associated with the equipment. Contractors or Site employees complete these tasks as needed. Tasks may include:

- Inspection and/or repair of the structure integrity including vents, stacks, hoods
- Inspection and/or repair of the filtration systems such as motors, belts, fans, filters, etc.
- Review and/or measurement of air flow velocity
- Inspection and/or repair of measurement equipment such as magnehelic meters, flow meters, etc.

Records of these preventive maintenance actions are maintained by the Plant Manager.

**Small Bagging** - Dust collection is used in this process and is completed entirely indoors to prevent material from leaving the site.

**Bulk Truck Unloading/Bulk Sack filling** – Dust collection is used in this process and all sources of emissions are indoors to prevent material from leaving the site.

**Bulk truck Loading** - Dust collection is used on this process, this process is performed outdoors, however it is completed under a hood connected to a bag house to prevent emissions (fabricated and installed by 3/29/2024). One area for possible dust escaping is the breezeway between building which REO has installed dust netting to prevent dust from escaping this area.

**Exhaust Fans in main warehouse** – The main warehouse has 6 Exhaust fans, 2 which exhaust out of the roof and 3 which exhaust out of the rear wall –

- Filter frames and filters connected to each exhaust fan.
- Filters are to be Pleated filters with a Merv 8 rating.
- Filters are to be entered into REO's E-maint program which will send out monthly Preventative Maintenance work orders for filter inspections monthly. Inspections to be completed by Maintenance personnel, Plant Manager or their designee.
- If filters are soiled and restricting proper air flow, Work orders are to be entered into E-maint for replacement.

**Vibration of Super Sacks** – REO is currently using a vibrator mounted on the outside of the hopper which the material is transferred through to keep the material fluidized this reduces the amount of pressurization. Any dust escaping the bag is under the hood.

**Plant Grounds** – The bulk truck loading area is to be cleaned daily to prevent material escaping facility on vehicles. Any spills larger than 5lbs, work is to stop, and immediate spill cleanup is to be

completed before continuing process to prevent material to become excessive in the loading area which could lead to escape of the facility. This requirement is for all processing/handling of materials at REO facility.

In addition, residual material inside the building and associated structures that has the potential to become airborne fugitive PM will be addressed through the completion of daily walkthroughs that will include housekeeping inspections to facilitate cleaning needs. REO personnel will address the housekeeping through this daily inspection and REO can begin a cleaning regiment from findings.

### 4. VERIFICATION OF CONTROLS

The following methods will be used to verify the working condition of dust control measures. Forms can be found in Appendix B.

Source	Verification Method
Exhaust fans located on the roof and eastern exterior wall of the warehouse building	Monthly inspection
Exterior truck loading/unloading area and small bag	Weekly inspection
filling areas	Monthly inspection
Exterior railcar loading/unloading area	Monthly inspection
Exterior super sack filling area	Monthly inspection
Plant Grounds	Daily inspection
	<ul> <li>Any spill greater than 5lbs. requires a stop work action until the spill is cleaned up</li> </ul>

In addition, the listed items will be incorporated into the daily walkthrough form where blank copies will be placed in the warehouse and bulk loading area for any employees to note any process/facility issues or concerns. These completed forms are to be given to the Plant Manager for review and to address any issues/concerns immediately.

#### 5 TRAINING

Prior to the implementation of this Dust Control Plan, REO will conduct training for REO personnel. REO will provide a large-group training sessions before each work crew begins work with the different fugitive source areas with periodic follow-up training for groups of newly assigned personnel. The training sessions will include a review of the operation and maintenance procedures for each fugitive emissions source area, reporting/record keeping requirements, and potential corrective actions.

Training to the Dust Control Plan and all required documents is to be performed on hire of new employees and continued on a semi-annual basis. This re-occurring training is to be scheduled and set by the Plant Manager and the Director of Safety & Quality.

#### 6 RECORDKEEPING

The Director of Safety and Quality and Plant Manager, will be responsible for the implementation of the Dust Control Plan. Records and inspection logs will include documentation of all inspections, maintenance and completed work practices (including the name of the person conducting the activity), weather conditions, time of observation, area or operation observed, and corrective actions taken, if any.

A documented daily walkthrough by the Plant Manager or their designee will be performed, and any issues or concerns are to be addressed immediately by supervision. Form generation and implementation to be completed by 2/7/2024. This daily walkthrough will include housekeeping inspections to facilitate cleaning needs.

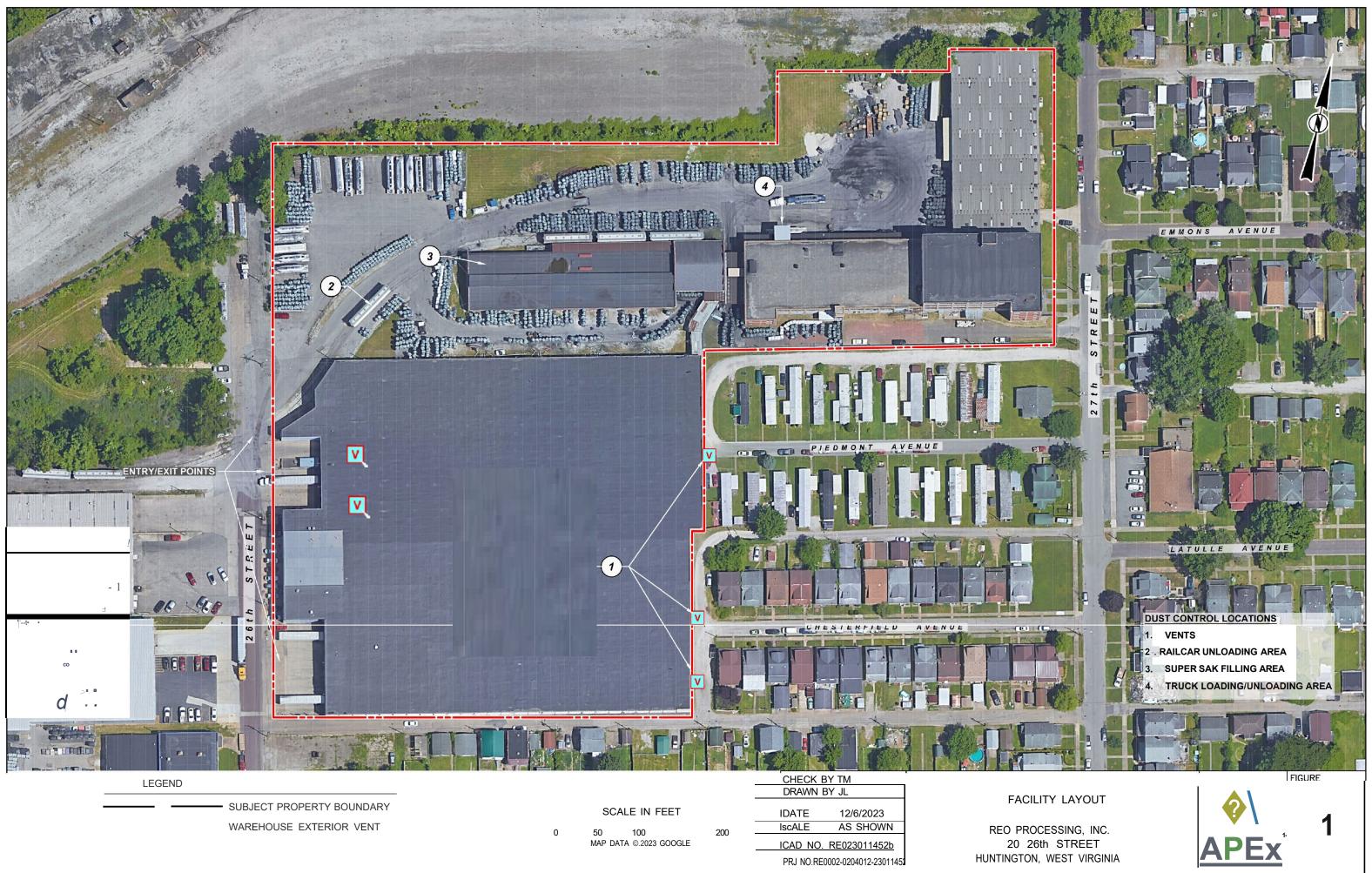
This daily walkthrough form will be placed in the warehouse and bulk loading area for any employees to note any process/facility issues or concerns. These completed forms are to be given to the Plant Manager for review and to address any issues/concerns immediately.

### 7 REPORTING REQUIREMENTS

Deviations from this Dust Control Plan and/or corrective actions required to address known episodes of fugitive dust emissions beyond the Site perimeter will be reported in writing to the DAQ Director

within ten (10) days of occurrence. When fugitive emissions are noted, as part of the written notification to the DAQ Director the following items should be included: what emission(s) were observed; when the emissions were observed; and what corrective actions were implemented. It should be noted that once the facility completes the DAQ permit application, reporting requirements may be subject to those requirements within the permit.

Appendix A - Facility Layout



Appendix B – Inspection Forms

F	REO PROCESSING, INC.
MONTHLY INSPE	ECTION FORM – DUST CONTROL PLAN

Date/Time:	Weather Conditions:
Inspector (Name and Title):	Inspector Signature:

Areas Inspected	Dust Control Measure	Observation	Corrective Actions Taken
Truck Loading/Unloading	Are the baghouse hoses in good working order (e.g., no cracks, structurally sound)?		
	Are the baghouse valves in good working order (e.g., able to be shut)?		
	Are the baghouse doors in good working order (e.g., seals/gaskets in place and working)?		
	Do the filters require change out?		
	Are there visible emissions coming from the process?		
	Review the previous months weekly inspections - have corrective actions been completed?		
Super Sak Filling Area	Is the filtration system in good working order (e.g., running, filters in place and properly seated)?		
	Do the filters require change out?		
	Are there visible emissions coming from the process?		
Warehouse Exhaust Fans (roof)	Are the fans in good working order (e.g., running, filters in place and properly seated)?		
	Do the filters require change out?		
	Are there visible emissions coming from the process?		
	Is there evidence of dust build up near the exhaust fans ?		

Areas Inspected	Dust Control Measure	Observation	Corrective Actions Taken
Warehouse	Are the fans in good working order (e.g., running,		
Exhaust Fans	filters in place and properly seated)?		
(eastern)	Do the filters require change out?		
	Are there visible emissions coming from the		
	process?		
	Is there evidence of dust build up near the		
	exhaust fans ?		
Exterior Railcar	Is the dust collection system in good working		
Filling (if used in	order (e.g., running, filters in place and properly		
the month)	seated)?		
	Do the filters require change out?		
	Is there evidence of dust build up near the area?		
	Is the dust collection drum more than 75% full		
	and require changing?		

REO PROCESSING, INC. WEEKLY INSPECTION FORM – DUST CONTROL PLAN		
Date/Time:	Weather Conditions:	
Inspector (Name and Title):	Inspector Signature:	

Areas Inspected	Dust Control Measure	Observation	Corrective Actions Taken
Truck Loading/Unloading	Differential pressure reading in the baghouse		
	Any pressure reading 2.9 or above warrants a filter changeout.		
	Are the dust level sensor's in the small bag filling area in good working order (e.g., running, readings are below an action level)?		
	Are there visible emissions coming from the process?		

35A. Certification of Information. To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

#### Certification of Truth, Accuracy, and Completeness

I, the undersigned 🖾 Responsible Official / 🗌 Authorized Representative, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

#### Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE		ATE: <u>3/28/2024</u> (Please use blue ink) 35C. Title: President
35D. E-mail: gregg.frazier@reoprocessing.com	36E. Phone: 937-545-8521	36F. FAX:
36A. Printed name of contact person (if different from above):		36B. Title:
36C. E-mail:	36D. Phone:	36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDE	ED WITH THIS PERMIT APPLICATION:
<ul> <li>☑ Attachment A: Business Certificate</li> <li>☑ Attachment B: Map(s)</li> <li>□ Attachment C: Installation and Start Up Schedule</li> <li>□ Attachment D: Regulatory Discussion</li> <li>☑ Attachment E: Plot Plan</li> <li>☑ Attachment F: Detailed Process Flow Diagram(s)</li> <li>☑ Attachment G: Process Description</li> <li>☑ Attachment H: Material Safety Data Sheets (MSDS)</li> <li>☑ Attachment I: Emission Units Table</li> <li>☑ Attachment J: Emission Points Data Summary Sheet</li> </ul>	<ul> <li>Attachment K: Fugitive Emissions Data Summary Sheet</li> <li>Attachment L: Emissions Unit Data Sheet(s)</li> <li>Attachment M: Air Pollution Control Device Sheet(s)</li> <li>Attachment N: Supporting Emissions Calculations</li> <li>Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans</li> <li>Attachment P: Public Notice</li> <li>Attachment Q: Business Confidential Claims</li> <li>Attachment R: Authority Forms</li> <li>Attachment S: Title V Permit Revision Information</li> <li>Application Fee</li> </ul>
Please mail an original and three (3) copies of the complete p address listed on the first page of this	permit application with the signature(s) to the DAQ, Permitting Section, at the s application. Please DO NOT fax permit applications.
FOR AGENCY USE ONLY - IF THIS IS A TITLE V SOURCE:	a Canada andi
<ul> <li>Forward 1 copy of the application to the Title V Permittin</li> <li>For Title V Administrative Amendments:</li> </ul>	g Group and.
□ NSR permit writer should notify Title V permit writer	iter of draft permit,
For Title V Minor Modifications:	ification to EPA and affected states within 5 days of receipt,
NSR permit writer should notify Title V permit writer	
For Title V Significant Modifications processed in parallel	l with NSR Permit revision:
□ NSR permit writer should notify a Title V permit w	
Public notice should reference both 45CSR13 and Public notice should refere	d Title V permits,
EPA has 45 day review period of a draft permit.	
All of the required forms and additional information can be f	found under the Permitting Section of DAQ's website, or requested by phone

Page 4 of 4

NSR/Title V Permit Revision Application Form (Revision form.doc) Revised - 05/2010