

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09300004-2019**
Application Received: **July 30, 2018 (renewal) and December 20, 2018 (MM03)**
Plant Identification Number: **093-00004**
Permittee: **Kingsford Manufacturing Company**
Facility Name: **Parsons Plant**
Mailing Address: **P.O. Box 464, Parsons, WV 26287**

Physical Location: 180 Kingsford Lane, Parsons, Tucker County, West Virginia
UTM Coordinates: 613.2 km Easting • 4326.2 km Northing • Zone 17
Directions: The facility is located on Route 219, about 2 miles South of Parsons.

Facility Description

The Kingsford Manufacturing Company Parsons Plant is a charcoal manufacturing facility. It manufactures charcoal briquets from raw materials including wood/sawdust, char produced on-site and received from the Beryl plant, coal, limestone, sodium nitrate, starch, borax, and solvent for briquets.

Facility SIC Code: 2861 Chemicals and allied products - gum and wood chemicals.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2017 Actual Emissions
Carbon Monoxide (CO)	22.60	10.53
Nitrogen Oxides (NO _x)	250.79	119.97
Particulate Matter (PM _{2.5})	114.41	83.90
Particulate Matter (PM ₁₀)	191.37	138.04
Total Particulate Matter (TSP)	270.3	178.19
Sulfur Dioxide (SO ₂)	64.94	15.94
Volatile Organic Compounds (VOC)	91.62	52.30

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2017 Actual Emissions
Methanol	3.7	0.28
Lead	1.48 E-02	0.89 E-02
Total HAPs	3.72	0.29

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 250.79 TPY of Nitrogen Oxides and 191.37 TPY of PM₁₀. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Kingsford Manufacturing Company Parsons Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM emissions from combustion of fuel in indirect heat exchanger
	45CSR6	Open burning prohibited.
	45CSR7	Fugitive dust, particulate matter, and visible Emissions from manufacturing processes
	45CSR10	Sulfur dioxide emissions.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for sources
	45CSR16	Standards of Performance For New Stationary Sources

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards For Hazardous Air Pollutants
	40 C.F.R. Part 60 , Subpart Y	Standards of Performance of Coal Preparation Plants
	40 C.F.R. Part 60 , Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
	40 C.F.R. Part 60, Subpart JJJJ	Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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

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

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1608J	February 14, 2019	
R14-0001D	May 18, 2009	
G60-C012A	August 21, 2012	

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

Determinations and Justifications

- 1) The following permit revisions took place since the latest renewal was issued on 02/11/2014:
 - AA01 (issued 01/21/2016) - covered an “alternative lime handling” system (Source ID E-02-0E;

- MM01 (issued 10/25/2016) - covered the following changes: (1) replacement of one (1) existing screening operation (E-02-03) on their existing raw material handling system; (2) removal of the existing retort char surge bin (E-06-0G) and its associated fabric filter dust collector (C-33); (3) installation of a pneumatic conveyor to transfer lime from the existing bulk lime unloading operation (E-02-0E) to the existing bulk lime tank (E-06-06); (4) replacement of the existing fabric filter (C-15) on the lime use tank (E-06-09);
 - AA02 (issued 10/23/2017) - covered replacement of a 1,300-gal Solvent Recovery Tank associated with Source ID E-05-01 with a new 1,300-gal tank, and replacement of one of the Solvent Chiller heat exchangers (tubular) with a more efficient plate heat exchanger;
 - MM03 (included with this permit renewal) – based on the recently issued permit R13-1608J and covers the installation of two new transfer bins #1 and #2 (Emission Point S-38) each of which is equipped with a bin vent filter (C-38) at the existing Retort Char Tanks and Transfer system (Source ID E-06-05); and replacement of an existing fabric filter (C-11) with a modified design (12” larger in diameter) to allow for more filter bags, thus increasing the filtration surface area for improved maintenance. The modification resulted in a minor increase of PM emissions (0.672 TPY). Emission Point ID “S-37” used in R13-1608J for the two new transfer bins is already in use in the operating permit for the Diesel Fuel Storage Tank (that is not a part of R13-1608J), therefore new Emission Point ID “S-38” is used in this permit for the new transfer bins, and corresponding Control Device ID “C-38” is used for the two new bin vent filters (in place of the R13-1608J Control Device ID “C-37”).
- 2) Emission Units Table 1.1 – several minor corrections were made per company’s request including revised specification of the Fabric Filter Dust Collector C-15 to “FRC-9X27” and its capacity from “425 CFM” to “600 CFM” (these changes were overlooked during the permit modification MM01); removal of the Dry Starch Use Tank (Source ID E-06-0B) and its associated bin vent Fabric Filter Dust Collector (C-17) from the permit and from the facility; removal of Rerun Char Tank Bypass Screw E-02-0B; capacity of the solvent recovery Tank was revised from 1,300 to 650 gal; Fabric Filter Dust collector (C-11) was added as a control device for Char Tank (Emission Unit E-06-04) and Emission Point ID was revised from S-12 to S-13; Fabric Filter Dust collector (C-11) model number and flow rate were revised; addition of an existing 500-gallon Kerosene Tank (Source ID E-0A-03) to the Emission Units Table; a Bulk Nitrate Tank E-06-07 has been indicated as “out of service” (but it remains at the facility); four (4) 500-gallon storage tanks (Source IDs E-0A-04 through E-0A-07) that used to store 15/40 oil, 30 weight oil, transmission fluid and hydraulic fluid were removed (instead the company will use 55 gallon drums to store hydraulic transmission and engine oil at the lube room which offers containment); and a 1,300-gallon Solvent Recovery Tank was added under Emission Point 19B (the same way it is listed under Emission Point 19A) of the Solvent Treated Briquet Production Section (Source ID E-05-01).
- 3) ACC Stack Cap (Emission Point S-01-01, 19A) – emissions from the char manufacturing process are controlled by ACC thermal oxidizer (C-08) and exhausted through ACC stack (S-01-01). In order to reduce fuel use and to reduce thermal stress on the ACC refractory, the company installed a stack cap that can be closed when the ACC is not in use. The cap will allow the ACC to retain heat when not in use. Installation of the stack cap will raise the height of the ACC stack from 102.625” to 110.635”. The new stack cap doesn’t have an effect on volumetric flowrate, exhaust temperature or emissions.
- 4) 45CSR13 Class II General Permit G60-D – all requirements of the General Permit applicable to Diesel Fire Pump FP-2 and Emergency Generator E-0B-02 were included with Section 11.0 of this permit in place of the Attachment 2 (it was eliminated from the Title V permit). Also, since the previous permit renewal was issued the Class II General Permit G60-C was revised and replaced by Class II General Permit G60-D, therefore all references to the General Permit were revised, and additional applicable General Permit conditions were included. Also, former requirement 11.1.2 (based on General Permit Registration G60-C012) was deleted, and requirements 11.1.3 and 11.1.4 were re-numbered to 11.1.2 and 11.1.3. Applicable requirements of 40 C.F.R. 60 Subparts JJJJ and IIII were added under requirements 11.1.2, 11.1.3, 11.2.2, 11.2.3, 11.3.1, 11.3.2, 11.4.4 and 11.5.1. Below is the “Engines FP-2 and E-0B-02’ Information Table” for the 40 C.F.R. 60 Subparts JJJJ and IIII applicability.

Engines FP-2 and E-0B-02 Information Table

Engine	Description	Type	Installed / Manufactured	Design Capacity	Control Device	HAPs
FP-2	Diesel Fire Pump	CI, < 30 l/cyl, no diesel particulate filter	2008 (constr. after 7/11/2005)	420 bhp	None	Area
E-0B-02	Natural Gas Emergency Generator	SI, certified, operated in certified manner	2012 (constr. after 6/12/2006, manuf. after 1/1/2009)	228 bhp	Catalyst	Area

- 5) Emergency Diesel Flood Pumps (E-0B-01) requirements 11.1.4 and 11.4.5 – since the four (4) flood pumps E-0B-01 are portable type of diesel-fired engines (in 1998 the company obtained the EPA Certificate for the engines saying that each “engine conforms to 1997 Model Year US EPA regulations on heavy-duty non road diesel cycle engines”), they don’t meet definition of “stationary RICE”, and 40 C.F.R. 63 Subpart ZZZZ is not applicable (see item (3) of the Non-Applicability Determinations). Therefore, new applicable requirements 11.1.4 and 11.4.5 were included with the permit in order to maintain the portable non-road engine status (in place of old 40 C.F.R. 63 Subpart ZZZZ requirements 11.1.5 and 11.4.4).

Non-Applicability Determinations

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

- 1) Requirements listed in the Permit Shield (permit condition 3.7.2):

Requirement	Regulatory Citation	Basis for Non-Applicability
PM mass emission limits for Waste Heat Boiler (Stack S-01-02)	45CSR§§2 - 4, 5, 6, 8 and 9	Per 45CSR§2-11.1 if any fuel burning unit(s) has a heat input under ten (10) million B.T.U.'s per hour it will be exempt from 45CSR§§2- 4, 5, 6, 8 and 9 (PM mass emission limits).
Coal Preparation and Handling Plants	45CSR5	Coal handling operations at Parsons facility (including screening, conveying, storing, and stockpiling operations) are subject to 45CSR7, therefore per 45CSR§5-2.4.b they are exempt from requirements of 45CSR5.
PM emissions from an incinerator	45CSR§6-4.1	The PM emission standard from 45CSR7 (45CSR§7-4.1) also applies to the ACC and is more stringent. Because of the "inconsistency between rules" provision in 45CSR§§6-12.1 and 7-12.1, the more stringent rule will apply and therefore the PM standard from 45CSR6 is moot and the Permit Shield applies.
Opacity limits for an incinerator	45CSR§§6-4.3and 4.4	Per 45CSR§6-12 more stringent opacity standards 45CSR§§7-3.1 and 3.2 are used.

Requirement	Regulatory Citation	Basis for Non-Applicability
PM emissions for wood charring and drying operations	45CSR§§7-2.39. b, c and d	Per Director's determination charring and drying operations are defined as type "a" for Beryl source, therefore they are not defined as type "b", "c" or "d" source operations for Parsons source also.
Testing, Monitoring, Recordkeeping and Reporting of Sulfur Oxides emissions	45CSR§10-8	Facility's annual PTE for SO ₂ is 129,880 lbs (>500 lbs), but per 45CSR§10-10.3 partial wood combustion during the manufacture of charcoal shall be exempt from this requirement.
Hazardous Air Pollutants Federal NESHAP standards	40CFR61	There are no affected sources at Parsons facility, therefore it is not subject to these standards with the exception of the potential applicability of 40CFR61 Subpart M in the event the plant performs any demolition or renovation projects which could disturb asbestos containing materials.
Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	40CFR60 Subpart Dc	Waste heat boiler is not subject to NSPS Subpart Dc due to its rated heat input and installation date.
Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification commenced after July 23, 1984	40CFR60 Subpart Kb	Storage tanks are not subject to NSPS Subpart Kb due to size and construction date (see 40CFR60 Subpart Kb Applicability Table in the Fact Sheet for initial permit).
Fugitive emissions from material handling	45CSR17	Per 45CSR§17-6.1 if sources are subject to 45CSR7 they are exempt from the requirements of this Rule
NSR permitting for non-attainment areas	45CSR19	Parsons facility is not in affected areas
VOC emissions regulations	45CSR21	Parsons facility is not in affected areas
Emissions of toxic air pollutants	45CSR27	Parsons facility does not operate any "chemical processing units" and does not emit listed chemicals
Federal Acid Rain provisions	45CSR33 Title IV of CAAA	No affected sources at Parsons facility
Federal NESHAP Standards	40CFR63	The Parsons facility discharges less than 10/25 tpy of any single/combination of HAPs and is classified as an area source, therefore it is not subject to any NESHAP that are applicable to major HAP sources.
Boiler NESHAP	40 CFR 63 Subpart JJJJJ	The Parsons plant operates a Waste Heat boiler that uses waste heat (gases from ACC) as a primary heat source, and per §63.11195(e) it is not subject to the requirements of this Subpart, because it fits the definition of a "gas fired boiler" in §63.11237. The Parsons plant ACC and auxiliary burners are also natural gas-fired and are not classified as boilers in Subpart JJJJJ.

- 2) Compliance Assurance Monitoring (CAM) Plan – there were no PSEUs added during all the modifications since the previous renewal permit was issued (February 11, 2014) that satisfied the CAM applicability criteria under 40CFR§64.2(a).

- 3) 40 C.F.R. 63 Subpart ZZZZ requirements for flood pumps E-0B-01 (old conditions 11.1.5, 11.4.4 and 11.5.1) were deleted because the flood pumps are portable type of diesel-fired engines and do not meet definition of “stationary RICE”. They are used to transfer water across containment ponds or release storm water buildup inside the levee. Therefore, the flood pumps are not subject to the requirements of this Subpart as long as they are in compliance with the new applicable requirements 11.1.4 and 11.4.5 (see item (5) of Applicability Determination section).

Request for Variances or Alternatives

None.

Insignificant Activities

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

Comment Period

Beginning Date: May 1, 2019
Ending Date: May 31, 2019

Point of Contact

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

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Procedure for Requesting Public Hearing

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

Response to Comments (Statement of Basis)

(Choose) Not applicable.

OR

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.