

Fact Sheet



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

Permit Number: **R30-07100001-2025**

Renewal Application Received: **February 27, 2025**

R30-07100001-2020(MM03) Application Received: **June 18, 2025**

Plant Identification Number: **03-54-071-00001**

Permittee: **Greer Industries, Inc. d.b.a. Greer Lime Company**

Facility Name: **Riverton Facility**

Mailing Address: **1088 Germany Valley Limestone Road, Riverton, WV 26814**

Physical Location:	Riverton, Pendleton County, West Virginia
UTM Coordinates:	640.00 km Easting • 4293.00 km Northing • Zone 17
Directions:	Approximately two (2) miles south of Seneca Rocks (Junction US Route 33 and WV Route 55) on US Route 33, turn left onto Germany Valley Limestone Road.

Facility Description

Greer Lime Company (SIC Codes 3274, 1422 and NAICS Codes 327410, 212312) operates a limestone quarry, crushing and sizing operation, limestone grinding system, storage and loadout systems of various lime and limestone products, hydrate plant, two (2) rotary lime kiln systems, lime handling system, and a portable limestone crushing and sizing facility.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2024 Actual Emissions
Carbon Monoxide (CO)	160.4	57.24
Nitrogen Oxides (NO _x)	301.4	234.66
Lead (Pb)	<0.01	<0.1
Particulate Matter (PM _{2.5})	84.54	78.99
Particulate Matter (PM ₁₀)	188.37	147.08
Total Particulate Matter (TSP)	407.13	256.07
Sulfur Dioxide (SO ₂)	134.6	1.79
Volatile Organic Compounds (VOC)	37.72	8.91
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2024 Actual Emissions
1,1,1 - Trichloroethane	<0.01	None Reported
1,3, - Butadiene	0.28	0.23
Acetaldehyde	4.64	3.96
Acrolein	0.56	0.47
Benzene	0.17	None Reported
Carbon Disulfide	0.25	0.21
Dioxin/Furans	<0.01	<0.01
Ethyl Benzene	0.16	0.13
Formaldehyde	0.69	0.58
HCl	39.7	32.58
Mercury (Hg)	<0.01	<0.01
Methanol	0.46	0.18
Naphthalene	0.16	0.13
Styrene	0.16	0.13
Toluene	0.47	0.38
Vinyl Chloride	1.94	1.60
Xylenes	0.31	0.26
Lead (Pb)	<0.01	<0.01
Total HAPs	49.94	40.98

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

Title V Program Applicability Basis

This facility has the potential to emit 160.4 tons/yr of CO, 301.4 tons/yr of NO_x, 188.37 tons/yr of PM₁₀, 134.6 tons/yr of SO₂, and 39.7 tons/yr of HCl. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Greer Lime Company's Riverton Facility 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:	45CSR5	To Prevent and Control Air Pollution from the Operation of Coal Preparation Plants, Coal Handling Operations and Coal Refuse Disposal Areas
	45CSR6	Open burning prohibited.
	45CSR7	Control Of Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
	45CSR10	To Prevent and Control Air Pollution from the Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR Permits
	45CSR16	Standards of Performance for New Stationary Sources
	WV Code § 22-5-4 (a) (15)	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. 60 Subpart Y	Standards of Performance for Coal Preparation and Processing Plants
	40 C.F.R. 60 Subpart HH	Standards of Performance for Lime Manufacturing Plants
	40 C.F.R. 60 Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants
	40 C.F.R. 61 Subpart M	Asbestos inspection and removal
	40 C.F.R. 63 Subpart AAAAA	National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants
	40 C.F.R. 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>)
R13-1396E	September 10, 2019	
R13-1381B	May 29, 2024	
R13-1685C	June 27, 2025	
R13-2113K	April 21, 2016	
R13-2222-P2	March 19, 2002	
R13-2670B	May 1, 2014	

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

This is the fourth Title V Permit renewal for the Greer Industries, Inc.'s Riverton facility and it includes changes from R30-07100001-2020(MM03).

The following changes were made as part of R30-07100001-2020(MM03) to incorporate changes made in R13-1685C to remove the trommel screen and associated equipment.

1.1. Emission Units

- The following emission units were removed from the PRIMARY AND SECONDARY CRUSHING (Group 002) section of the emission units table: H1, TS1, TS-BC1, TS-BC2, TS-BC3, OS1, OS2, OS3, and TS-DG1.
- Updated the emission units table footnote (2) to remove control device abbreviations no longer used in the emission units table.

4.0. Requirements for Primary and Secondary Crushing (Group 002)

- Removed H1, TS1, TS-BC1, TS-BC2, TS-BC3, OS1, OS2, OS3, and TS-DG1 from section title.
- Removed trommel screen requirements in conditions 4.1.2.a and 4.1.2.b that were removed with the issuance of R13-1685C.
- Removed conditions 4.1.5 and 4.1.9 which included the 40 C.F.R. 60, Subpart IIII and 40 C.F.R. 63 Subpart ZZZZ requirements for the diesel generator (TS-DG1) which was removed. Renumbered remaining conditions of section 4.1.

- Removed Condition 4.3.2 to remove trommel screen requirements that were removed with the issuance of R13-1685C. Renumbered remaining conditions of section 4.3.
- Removed conditions 4.4.1.c and 4.4.1.d to remove trommel screen and generator requirements that were removed with the issuance of R13-1685C.

The following changes were made as part of the Title V Permit renewal.

3.0 Facility-Wide Requirements

- This section contains boilerplate language which has been updated to the most recent language.
- This section contains applicable requirements from R13-1381, R13-1396, R13-1685, R13-2113, and R13-2670. There have been no changes to the applicable requirements from these R13 permits (with the exception of R13-1685) since the last modification of the Title V permit.
- This section contains applicable requirements from 45CSR7 which was amended on June 1, 2024 resulting in the following:
 - Conditions 3.1.14, 3.1.15, 3.3.2, and 3.3.3 were updated.
 - Old conditions 3.1.16, 3.1.17, and 3.1.18 were removed because 45CSR§§7-9.1, 10.3, and 10.4 were removed and reserved in 45CSR7.
- This section contains applicable requirements from 40 C.F.R. 60 Subpart OOO. There have been no changes to 40 C.F.R. 60 Subpart OOO since the issuance of the last Title V renewal.
- This section contains additional monitoring under 45CSR§30-5.1.c. There were no changes made to these requirements.

4.0 Requirements for Primary and Secondary Crushing (Group 002)

- This section contains applicable requirements from R13-1685. Changes made under R13-1685C were addressed above as part of R30-07100001-2020(MM03).
- This section contains applicable requirements from 40 C.F.R. 60 Subpart OOO. There have been no changes to 40 C.F.R. 60 Subpart OOO since the issuance of the last Title V renewal.
- With the removal of TS-DG1 in R30-07100001-2020(MM03) this section no longer contains applicable requirements from 40 C.F.R. 60 Subpart IIII or 40 C.F.R. 63 Subpart ZZZZ.

5.0 Requirements for Limestone Grinding (Group 011)

- This section contains applicable requirements from R13-2113. There have been no changes to the applicable requirements from this R13 permit since the last renewal of the Title V permit.
- This section contains applicable requirements from 40 C.F.R. 60 Subpart OOO. There have been no changes to 40 C.F.R. 60 Subpart OOO since the issuance of the last Title V renewal.

6.0 Requirements for 400 TPD Rotary Lime Kiln (Group 004)

- This section contains applicable requirements from R13-1381. There have been no changes to the applicable requirements from this R13 permit since the last modification of the Title V permit.
- This section contains applicable requirements from 40 C.F.R. 60 Subpart HH and 40 C.F.R. 60 Subpart OOO. There have been no changes to 40 C.F.R. 60 Subpart HH or 40 C.F.R. 60 Subpart OOO since the issuance of the last Title V renewal.
- This section contains applicable requirements from 45CSR10. 45CSR10 was last amended on June 1, 2024 resulting in the following changes to the permit.
 - Minor updates to conditions 6.1.5, 6.1.10, 6.1.11, 6.1.12, 6.1.13, 6.2.3, 6.3.1, 6.4.3 such as updates to the citations and changing references to “the Director” to “the Secretary.”
 - Removed old condition 6.1.14 since the cited requirement 45CSR§10-9.1 has been removed from 45CSR10 and that section has been changed to reserved..
- This section contains applicable requirements from 45CSR7. 45CSR7 was last amended on June 1, 2024, but none of the applicable requirements in this section were affected.

- This section contains additional monitoring under 45CSR§30-5.1.c. There were no changes made to these requirements.

7.0. Requirements for 500 TPD Rotary Lime Kiln (Group 005)

- This section contains applicable requirements from R13-1381 and R13-2113. There have been no changes to the applicable requirements from these R13 permits since the last modification of the Title V permit.
- This section contains applicable requirements from 40 C.F.R. 60 Subpart HH and 40 C.F.R. 60 Subpart OOO. There have been no changes to 40 C.F.R. 60 Subpart HH or 40 C.F.R. 60 Subpart OOO since the issuance of the last Title V renewal.
- This section contains applicable requirements from 45CSR10. 45CSR10 was last amended on June 1, 2024 resulting in the changes specified in section 6.0 which also pertain to the 500 TPD kiln according to conditions 7.1.19, 7.2.3, 7.3.3, and 7.4.3.
- This section contains applicable requirements from 45CSR7. 45CSR7 was last amended on June 1, 2024, but none of the applicable requirements in this section were affected.
- This section contains additional monitoring under 45CSR§30-5.1.c. There were no changes made to these requirements.

8.0. Requirements for Lime Handling System (Group 006)

- This section contains applicable requirements from R13-2113. There have been no changes to the applicable requirements from this R13 permit since the last renewal of the Title V permit.
- This section contains applicable requirements from 45CSR7. 45CSR7 was last amended on June 1, 2024, but none of the applicable requirements in this section were affected.

9.0. Requirements for Hydrate System (Group 007)

- This section contains applicable requirements from R13-1396. There have been no changes to the applicable requirements from this R13 permit since the last renewal of the Title V permit.
- This section contains applicable requirements from 45CSR7. 45CSR7 was last amended on June 1, 2024, but none of the applicable requirements in this section were affected.

10.0. Requirements for Portable Crushing and Screening Plant (Group 008)

- This section contains applicable requirements from R13-2222. There have been no changes to the applicable requirements from this R13 permit since the last renewal of the Title V permit.
- This section contains applicable requirements from 40 C.F.R. 60 Subpart OOO. There have been no changes to 40 C.F.R. 60 Subpart OOO since the issuance of the last Title V renewal.

11.0. Source-Specific Requirements for Coal Handling

- This section contains applicable requirements from R13-2670. There have been no changes to the applicable requirements from this R13 permit since the last renewal of the Title V permit.
- This section contains applicable requirements from 45CSR5. 45CSR5 was last amended on June 1, 2024, resulting in the following changes:
 - Minor update to condition 11.3.1.
- Condition 11.2.3 cited 45CSR7 in the previous Title V permit; this was incorrect so the citation was removed. With the removal of this citation this section no longer contains applicable requirements from 45CSR7.
- This section contains applicable requirements from 40 C.F.R. 60 Subpart Y. There have been no changes to 40 C.F.R. 60 Subpart Y since the issuance of the last Title V renewal.

12.0 Source-Specific Requirements Pertaining to National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Facilities (40 C.F.R. Part 63 Subpart AAAAA)

- This section contains applicable requirements from 40 C.F.R. 63 Subpart AAAAA. 40 C.F.R. 63 Subpart AAAAA was last amended on December 4, 2024 resulting in the following changes to the applicable requirements of this section:
 - Conditions 12.1.1, 12.1.2, and 12.1.3 were added to specify the compliance dates for the emission limits in 40 C.F.R. 63 Subpart AAAAA due to recent amendments of the regulation.
 - Old conditions 12.1.1 and 12.1.2 were combined and updated as new condition 12.1.4. to incorporate the emission limits added to 40 C.F.R. 63 Subpart AAAAA in the recent amendments. Note: the Riverton facility produces high-calcium quick lime.
 - In condition 12.1.5. (previously 12.1.3) references to Table 2 to Subpart AAAAA of Part 63 - Operating Limits were changed to Table 3 to Subpart AAAAA of Part 63 - Operating Limits.
 - Deleted old conditions 12.1.4, 12.1.5, 12.1.7, and 12.1.8 and the SSM plan in Appendix C. After January 20, 2021, these requirements were no longer applicable.
 - Old Condition 12.1.6 had minor updates and was moved to section 12.5 Reporting Requirements as condition 12.5.1 since it requires reporting related to visible emissions.
 - Added condition 12.1.6 to incorporate the startup and shutdown period emission limits of 40 C.F.R. §63.7090(c) and Table 2.
 - Added condition 12.1.7 to incorporate the HCl and mercury emission limits for an LMP using emissions averaging.
 - Added condition 12.1.8 to include the requirement to submit an OMM plan for review and approval.
 - Minor updates to condition 12.1.9.
 - Added condition 12.1.10 to incorporate the initial compliance requirements for the emission limits of 40 C.F.R. 63 Subpart AAAAA.
 - Updated conditions 12.2.1, 12.2.2, 12.2.4, and 12.2.5 with the most recent language from Subpart AAAAA of Part 63.
 - Added Condition 12.2.6 monitoring requirement to allow for the option to use emissions averaging to show compliance with HCl and mercury emission limits.
 - Minor updates to condition 12.3.1.
 - Added conditions 12.3.2, 12.3.3, 12.3.4, 12.3.5, 12.3.6, 12.3.7, 12.3.8, and 12.3.9 to incorporate testing requirements from Subpart AAAAA of Part 63.
 - Updated conditions 12.4.1, 12.4.3, with the most recent language from Subpart AAAAA of Part 63.
 - Added conditions 12.4.4 and 12.4.8 to incorporate 40 C.F.R. §63.7132(d) and 40 C.F.R. §63.7133(d).
 - Updated conditions 12.5.3 (previously 12.5.2), 12.5.4 (previously 12.5.3), 12.5.5 (previously 12.5.4), 12.5.6 (previously 12.5.5), and 12.5.7 (previously 12.5.6) with the most recent language from Subpart AAAAA of Part 63.
 - Added conditions 12.5.8, 12.5.9, 12.5.10, and 12.5.11 to incorporate new requirements, mainly related to CEDRI.

Non-Applicability Determinations

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

- a. **45CSR§10-5.1** - This process is not defined as a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted.
- b. **45CSR17** - Greer Lime Company is subject to 45CSR7 which exempts it from 45CSR17, To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter, as stated in 45CSR§7-10.2.
- c. **40 C.F.R. §§ 60.380 - 60.386 Subpart LL** - Standards of Performance for Metallic Mineral Processing do not apply because lime or limestone is not a metallic mineral.

- d. **40 C.F.R. §§ 60.674(a) and 60.676(c), (d), and (e) Subpart OOO** - These sections of 40 C.F.R. Part 60 Subpart OOO do not apply to Greer Lime Company since Greer Lime Company does not incorporate a wet scrubber in their non-metallic mineral processing plant subject to 40 C.F.R. 60 Subpart OOO. Wet scrubber 7-SCR-1 is not located in a process that is defined as a non-metallic mineral processing plant.
- e. **40 C.F.R. §§ 60.730 - 60.737 Subpart UUU** - Standards of Performance for Calciners and Dryers in Mineral Industries do not apply because lime is not listed as a mineral processed or produced in a mineral processing plant.
- f. **40 C.F.R. 64 Compliance Assurance Monitoring (CAM)** - The two rotary kilns have uncontrolled potential to be Title V major for PM, however they are subject to 40 C.F.R. 63 Subpart AAAAA standards, which were proposed after 11/15/1990 and therefore, exempts the pollutant specific emission unit “PSEU” from “CAM”.

The coal handling system (5-DH-1, 5-VF-1, 5-BC-0, 5-CR-1, 5-SI-1, 5-VF-2, 5-BC-1, 5-BC-2 and 5-BC-3) employs only passive control measures to meet the opacity requirements of 40 C.F.R. Part 60 Subpart Y and therefore, do not employ any add on control equipment that would require CAM monitoring.

The lime handling system (Group 006) does not encompass any individual PSEU having pre-controlled emissions exceeding major source thresholds for Title V.

The Hydrate Plant (Group 007) does not encompass any individual PSEU having pre-controlled emissions exceeding major source thresholds for Title V.

The fine grinding lines (Group 011) do not encompass any individual PSEU having pre-controlled emissions exceeding major source thresholds for Title V.

The open coal stockpiles (5-CS-1A and 5-CS-2) authorized by R13-2670B employ only passive control measures to meet the opacity requirements of 40 C.F.R. Part 60 Subpart Y and therefore, do not employ any add on control equipment that would require CAM monitoring.

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: July 31, 2025
Ending Date: September 2, 2025

Point of Contact

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

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality

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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)

Not applicable.