

# Fact Sheet



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

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

Permit Number: **R30-00900002-2015**  
Application Received: **December 1, 2016**  
Plant Identification Number: **03-54-009-00002**  
Permittee: **Mountain State Carbon, LLC**  
Facility Name: **Follansbee Plant**  
Mailing Address: **1851 Main Street, Follansbee, WV 26037**

Permit Action Number: *MM01*      Revised: *March 27, 2017*

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

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### Facility Description

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

This Minor Modification removes the mobile coke screening system due to recently inactive designation of Permit R13-2798 and incorporates the requirements of the following recently issued permits:

Permit Number	Revised to:
R13-1652A	Installation of another loadout rack for tanker trucks
R13-1939B	Insert the term “block” average for the Rule 10 hydrogen sulfide limit and replace the term “thermal oxidizer” with “flare.” <i>(Note: “thermal oxidizer” was already replaced with “flare” in the Title V permit)</i>
R13-2548B	Remove the requirements for Station 2 screening unit which has been removed from the plant and to revise Condition 4.2.1.3 to reflect that the average scoop weight has been established.
R13-2591E	Replace the term “average heat content” with “nominal lower heating value” in Conditions 4.1.2, though 4.1.4, and correct a citation error in Condition 4.4.5. <i>(Note: the citation error was already corrected in the Title V permit)</i>
R13-2632A	Correct a typographic error in Condition 4.1.6. <i>(Note: the typo was not carried into the Title V permit)</i>

### Emissions Summary

The changes in potential emissions are as follows:

Regulated Pollutants	Change In Potential Emissions (tpy)*	Potential Emissions After Modification (tpy)
Carbon Monoxide (CO)	-0.19 (decrease)	29,138.43
Nitrogen Oxides (NO <sub>x</sub> )	-3.92 (decrease)	803.08
Particulate Matter (PM <sub>10</sub> )	-1.65 (decrease)	269.2
Particulate Matter (PM <sub>2.5</sub> )	-1.57 (decrease)	156.41
Total Particulate Matter (TSP)	- 3.38 (decrease)	897.19
Sulfur Dioxide (SO <sub>2</sub> )	-0.26(decrease)	2,723.31
Volatile Organic Compounds (VOC)	-0.32(decrease)	2,489.58

\*Note: *These decreases in potential emissions are a result of Permit R13-2798 becoming inactive and thereby removing the mobile coke screening system requirements from the Title V permit.*

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of Carbon Monoxide (CO), Nitrogen Oxides (NO<sub>x</sub>), Particulate Matter (PM<sub>10</sub>), Sulfur Dioxide (SO<sub>2</sub>), and Volatile Organic Compounds (VOC) and over 10 tons per year of Benzene, Coke Oven Emissions, Cyanide Compounds, Toluene and Xylene. Due to this facility's potential to emit 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, Mountain State Carbon, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

**Legal and Factual Basis for Permit Conditions**

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

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

Federal and State:

45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30	Requirements For Operating Permits

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 (*associated with this modification*)**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1652A	March 10, 2016	
R13-1939B	September 23, 2015	
R13-2548B	September 22, 2015	
R13-2591E	September 22, 2015	
R13-2632A	September 23, 2015	

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**

Below are the revisions made to R30-00900002-2015 as a result of incorporating the revisions to the permits listed above and as a result of R13-2798 becoming inactive:

- 1) **Table of Contents** – Removed APPENDIX D since R13-2798 is no longer an active permit.
- 2) **Section 1.1. Emission Units Table** –
  - Removed S40 and SS40-a through SS40-d. (*R13-2798*)

- For SS1-A and SS1-C through SS1-E, expanded the control device information from “N” to “None.” (R13-2548B)
  - Removed SS2-A through SS2-E. (R13-2548B)
  - Added P021-22A. (R13-1652A)
- 3) **Section 1.2** – Updated the “Active R13, R14, and R19 Permits” table
  - 4) Permits R13-1652A, and R13-1939B were converted into the current version of the Rule 13 permit format. Therefore, the citation of authority condition numbers associated with these conversions have been appropriately revised in the Title V permit.
  - 5) **Conditions 3.1.9., 3.1.11., 3.1.13. and 3.1.14.** – Updated citation of authority. (see Item 13 below)
  - 6) **Condition 3.1.34.** – Added R13-2591E.
  - 7) **Condition 3.4.1.** – Added “R13-1652, 4.4.1.” and “R13-1939, 4.4.1.” to the citation of authority and deleted “R13-2798, 4.4.1.”
  - 8) **Condition 5.1.16.(1)** – Replaced “an average heat content” with “a nominal lower heating value.” (R13-2591E)
  - 9) **Condition 5.1.17.(1)** – Replaced “an average heat content” with “a nominal lower heating value.” (R13-2591E)
  - 10) **Condition 5.5.3.** – Changed the date from January 31, 2016 to January 31, 2017. (R13-2591E)
  - 11) **Section 6.0 Title** - Removed S40, SS40-a through SS40-d, and E40 (R13-2798); Removed SS2-A/F6, SS2-B/F7, SS2-C/F8, SS2-D/F9 and SS2-E/F10. (R13-2548B)
  - 12) Removed Conditions 6.1.11 through 6.1.16., 6.2.1., 6.2.2., 6.4.1., 6.4.2. Also deleted the requirement in 6.5.1. and replaced it with “Reserved.” (R13-2798, 40 CFR 63 Subpart ZZZZ, 40 CFR 60 Subpart III).  

Note: Since R13-2798 is no longer active and the engines associated with the mobile screening operation were never installed, 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart III are not applicable.
- Renumbered subsequent conditions.
- 13) Removed condition 6.1.18. since it was removed from R13-2548B. Renumbered subsequent conditions and revised citations of authority as appropriate to reflect the new condition renumbering.
  - 14) **Condition 6.1.13.** – Revised the language to match R13-2548B and added (*SSI-B*) at the end since this requirement is applicable only to the *SSI-B* control device.
  - 15) **Conditions 6.2.3. (Renumbered as 6.2.1) 6.4.3. - 6.4.5. (Renumbered as 6.4.1. - 6.4.3.)** – Revised the language to reflect the removal of the Station two screen in permit R13-2548B and to match the language in R13-2548B.
  - 16) **Condition 6.3.1.** – Removed *SS2-B* at the end of this requirement since the requirement is only applicable to the *SS1-B* control device. (R13-2548B)
  - 17) **Conditions 8.1.1. – 8.1.4.** – Revised these conditions to include the new coal tar truck loading station and the revised language in the requirements associated with the administratively updated permit R13-1652A.

- 18) **Condition 8.1.9.** – Revised the language in this condition to add the word “block” as revised in permit R13-1939B.
- 19) **Condition 8.1.22.** – Revised the language as revised in permit R13-1939B.
- 20) **Conditions 8.1.90., 8.1.91., and 8.1.92** – the phrase “pressure relief services” has been replaced with “pressure relief devices” in each condition. Although this revision is not part of the original minor modification, the request for the change was suggested during the permittee’s review of the pre-proposed permit. Condition 8.1.89. is the language of 40 CFR §61.242-8(a) in which the phrase “pressure relief devices” is used. Condition 8.1.89 contains the requirement to comply with conditions 8.1.90. through 8.1.92. Therefore, for clarity, it has been deemed reasonable to make this revision.
- 21) **Conditions 8.4.15. and 8.4.16.** – These conditions have been added in association with the administratively updated permit R13-1652A.
- 22) **Condition 9.1.7.** – Added R13-2632A.
- 23) **APPENDIX D** – This appendix contained a “Monthly/Quarterly Opacity Report” form associated with Permit R13-2798. Since this permit is no longer active, Appendix D has been deleted.

### **Non-Applicability Determinations**

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

None.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

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

### **Comment Period**

Beginning Date: Not applicable to Minor Modifications  
Ending Date: NA

### **Point of Contact**

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

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478  
frederick.tipane@wv.gov

### **Procedure for Requesting Public Hearing**

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

**Response to Comments (Statement of Basis)**

Not applicable.