

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-05700003-2018**
Application Received: **May 16, 2017**
Plant Identification Number: **05700003**
Permittee: **Kingsford Manufacturing Company**
Facility Name: **Beryl Plant**
Mailing Address: **180 Kingsford Lane, Parsons, WV 26287**

Physical Location: 3798 Beryl Road, Piedmont, Mineral County, West Virginia.
UTM Coordinates: 666.0 km Easting • 4371.0 km Northing • Zone 17
Directions: The Facility is located adjacent to WV Route 46 in Mineral County near the WV - Maryland border just west of the town of Luke, MD.

Facility Description

The Kingsford Manufacturing Company Beryl Plant produces char from bark and sawdust raw materials. The bark and sawdust is sized, dried in a rotary dryer and then charred in a multi-hearth retort furnace. The dryer and the furnace air emissions are controlled by cyclone collectors which are exhausted to a common after combustion chamber (ACC) for oxidation. Air emissions from the ACC stack are subject to emissions limits in Permit R13-2117E. The char is quenched and conveyed into covered trucks for transport to the Kingsford Parsons, WV plant for charcoal manufacturing.

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

Emissions Summary

Plantwide Emissions Summary* [Tons per Year]		
Regulated Pollutants	Potential Emissions	2016 Actual Emissions
Carbon Monoxide (CO)	33.25	1.36
Nitrogen Oxides (NO _x)	208.99	72.43
Lead (Pb)	0.01	< 0.01
Particulate Matter (PM _{2.5})	80.82	39.92
Particulate Matter (PM ₁₀)	111.92	75.17
Total Particulate Matter (TSP)	167.69	101.11
Sulfur Dioxide (SO ₂)	48	27.31
Volatile Organic Compounds (VOC)	9.33	0.89
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2016 Actual Emissions
Methanol	0.24	0.20
Total HAPs	< 10	< 10

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

** Includes Facility Fugitive emissions and Natural Gas combustion emissions*

Title V Program Applicability Basis

This facility has the potential to emit 208.99 TPY of Nitrogen Oxides and 111.92 TPY of PM₁₀. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Kingsford Manufacturing Company 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
	45CSR10	Sulfur dioxide emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for sources
	45CSR16	Standards of Performance for New Stationary Sources Pursuant to 40CFR60

	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 61	Asbestos inspection and removal
	40 C.F.R. Part 60, Subpart JJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
	40 C.F.R. Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
	40 C.F.R. Part 64	Compliance Assurance Monitoring (CAM) Plans
	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>)
R13-2117E	November 1, 2016	
G60-C047	August 17, 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

The following changes were made to the permit since previous renewal on December 4, 2012:

1. Administrative Amendment AA01 (issued February 1, 2016) – covered the conversion of the existing ACC burner (C-08) from natural gas to propane, and the installation of a 12,000-gallon propane tank and fuel train system.

2. Significant modification SM01 (issued December 20, 2016) - incorporated changes covered by permit R13-2117E to increase the permitted limit of wood char production to 5.0 TPH and 32,000 TPY.
3. A 1.26 MMBtu/hr natural gas fired boiler 006-02 to provide steam to the charring process was installed in 2013, and a second propane-fired ACC burner 003-02 (rated at 40 MMBtu/hr heat input) was installed in 2017. The permittee submitted PD13-036 for the boiler 006-02 and no permit was required. PD17-07 was submitted for the installation of the second propane burner on the ACC, and it also didn't require a permit.
4. Permittee mailing address, facility mailing address and facility location were revised per Kingsford Manufacturing Company's request.
5. Emission Units Table was revised to delete a 500 gal above ground Gasoline Storage Tank E-05-01 since it was removed from the facility, and a 1,000-gal diesel fuel tank E-05-02 was replaced with a 1,300-gal tank. Also, After Combustion Chamber (ACC) burner 003-02 quantity was changed from "(1)" to "(2)", and an installation date for the 2nd burner was added (2017). Also, a natural gas fired boiler 006-02 was added to the table.
6. Condition 3.7.2 – Permit Shield for the 45CSR2 was removed because section 45CSR§2–3.1 (10% opacity limit) is applicable to the boiler 006-02; Permit Shield for rules 45CSR16 and 40CFR60 was removed because the emergency generator E-06-01 is subject to the 40CFR60 Subpart JJJJ; Permit Shield for 45CSR39 and 45CSR41 was removed.
7. Section 5 – reserved condition "5.1.3" was removed, and conditions 5.1.4 and 5.1.5 were re-numbered to 5.1.3 and 5.1.4 respectively; 45CSR§2–3.1 (10% opacity limit) applicable to the natural gas fired boiler 006-02 was added to the Limitations and Standards section (under condition 5.1.5) since the boiler is used to provide steam to the charring process.
8. Section 7 – condition 7.2.1 was revised to remove references to 45CSR§7-3.1 since Emission Point S-07 is not subject to this requirement.
9. Section 8 – requirements and citations of the General Permit G60-C and General Permit Registration G60-C047 were incorporated into this section, and therefore Attachment A to the permit (General Permit G60-C047 Registration) was removed. Also, requirement 8.2.3 (40 CFR Part 60 Subpart JJJJ §60.4243(d)) applicable to the emergency generator 006-01 / E-06-01 was revised in accordance with the most recent version of the rule.

Non-Applicability Determinations

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

1. Section 9.0 - 40 CFR 63 Subpart CCCCC requirements applicable to the 500 gal above ground Gasoline Storage Tank E-05-01 were removed from the permit since the tank was removed from the facility (see item 4 in the Determinations and Justifications section above).
2. The following are the non-applicable requirements listed in the Permit Shield (condition 3.7.2):

Requirement	Regulatory Citation	Basis for Non-Applicability
PM emissions from Coal Preparation and Handling Plants	45CSR5	No coal handling operations at Beryl facility.
PM emissions from an incinerator	45CSR§6-4.1	The PM emission standard from 45CSR7 (45CSR§7-4.1) also applies and is more stringent. Because of the "inconsistency between rules"

Requirement	Regulatory Citation	Basis for Non-Applicability
		provision in 45CSR6 and 7, 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§§6-4.3 and 4.4	The opacity standard from 45CSR7 (45CSR§§7-3.1 and 3.2) also applies and is more stringent. Because of the "inconsistency between rules" provision in 45CSR6 and 7, the more stringent rule will apply and therefore the opacity requirement from 45CSR6 is moot and the Permit Shield applies.
Type "d" chemical operation source	45CSR7, Table 45-7A	This facility was previously determined by the Director as type "a" source, not a type "d" source
Testing, Monitoring, Recordkeeping and Reporting of Sulfur Oxides emissions	45CSR§10-8	Per 45CSR§10-10.3 partial wood combustion during the manufacture of charcoal shall be exempt from this requirement
Preparation of standby plans for reducing the emissions of air pollution during periods of an Air Pollution Alert, Air pollution Warning, and Air pollution Emergency	45CSR§11-5.1	This facility is not in Priority I or II regions, therefore it is not subject to this requirement
PSD source	45CSR14	Emission limits and production caps are accepted by the facility to avoid triggering PSD
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	Beryl facility is not in affected areas
VOC emissions regulations	45CSR21	Beryl facility is not in affected areas
Emissions of toxic air pollutants	45CSR27	Beryl facility does not operate any "chemical processing units" and does not use listed chemicals
Federal Acid Rain provisions	45CSR33 Title IV of CAAA	No affected sources at Beryl facility
Control of Ozone Season Nitrogen Oxide Emissions	45CSR40	No affected sources at Beryl facility
Regional Haze Rule	40CFR§§51.300-309	Beryl facility was constructed prior to 1977, but it doesn't have PTE for any affected pollutant exceeding 250 TPY
40 C.F.R. Part 63	Subpart JJJJJ	There are no affected sources at this facility. Boiler 006-02 is natural gas fired, therefore it is not subject to this rule.
Compliance Assurance Monitoring (CAM) Rule	40CFR64	Cyclones C-05, C-06 and C-07 are used primarily for product recovery, therefore they are defined as "inherent process equipment" per 40CFR§64.1, and do not require a CAM plan.

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: January 30, 2018
Ending Date: March 1, 2018

Point of Contact

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

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Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
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Charleston, WV 25304
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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.