

West Virginia Department of Environmental Protection

Austin Caperton
Cabinet Secretary

Title V Operating Permit Revision



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

Permit Action Number: MM01 **SIC:** 2861
Name of Permittee: Kingsford Manufacturing Company
Facility Name/Location: Beryl Plant
County: Mineral
Permittee Mailing Address: P.O. Box 188, Westernport, MD, 21562

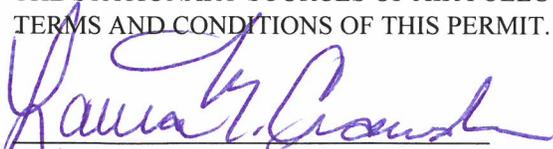
Description of Permit Revision: The purpose of this modification is to modify the way in which wood chips/bark are brought on site. Previously they were received from a conveyor belt that was owned and operated by the neighboring papermill. The papermill has now shut down and this modification is being done to change from conveyor fed wood piles to having a wood chip (hogfuel) truck receipt system. This modification was approved under R13-2117F.

Title V Permit Information:

Permit Number: R30-05700003-2018
Issued Date: March 19, 2018
Effective Date: April 2, 2018
Expiration Date: March 19, 2023

Directions To Facility: 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.

THIS PERMIT REVISION IS ISSUED IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL ACT (W.VA. CODE §§ 22-5-1 ET SEQ.) AND 45CSR30 - "REQUIREMENTS FOR OPERATING PERMITS." THE PERMITTEE IDENTIFIED AT THE FACILITY ABOVE IS AUTHORIZED TO OPERATE THE STATIONARY SOURCES OF AIR POLLUTANTS IDENTIFIED HEREIN IN ACCORDANCE WITH ALL TERMS AND CONDITIONS OF THIS PERMIT.


Laura M. Crowder

Director, Division of Air Quality

03/17/2020

Date Issued

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Equipment Description and ID	Year Installed	Design Capacity	Control Device
001-01	S-07	Wood Pile management: wood pile E-01-01	1963, mod. 2019	N/A	None
001-02	S-07	Wood Pile management: mulch pile E-01-02	1984, mod. 2019	N/A	None
001-03	S-07	Wood Chip (Hogfuel) Truck Receipt System	2019	N/A	None
002-01	S-07	Transfer to hopper by end loader E-02-01	1963, mod.1994	257,900 TPY	None
002-02	S-07	Hopper reverse chain to ground E-02-02	1963, mod.1994	257,900 TPY	None
002-03	S-07	Hopper to 48" belt E-02-03	1963, mod.1994	257,900 TPY	Full Enclosure
002-04	S-07	48" belt into hog E-02-04	1963, mod.1993	257,900 TPY	Full Enclosure
002-05	S-07	Scrape bottom of 48" belt to ground E-02-05	1993	258 TPY	Partial Enclosure
002-06	S-07	Block conveyor to live bottom bin E-02-06	1963	224,000 TPY	Full Enclosure
002-07	S-07	Mulch chute to ground E-02-07	1996	33,900 TPY	None
002-08	S-07	Wood bypass screw to hopper E-02-08	1998	124 TPY	Partial Enclosure

Emission Unit ID	Emission Point ID	Equipment Description and ID	Year Installed	Design Capacity	Control Device
004-01	S-07	Paved Roads: End-loader Traffic E-04-01, Vehicle Traffic E-04-02	1990	N/A	None
005-02	S-05	Diesel oil tank E-05-02 with conservation vent (negligible emissions)	2017	1,300 gal	None
006-01 / E-06-01	S-07	Natural Gas Fired Emergency Generator (General Motors Industrial Powertrain, Vortec 8.1 L, 4-Cycle, Turbocharged and Charge Cooled (177.5 kW)	2012	238 HP / 1800 rpm	None
005-03	S-08	Propane Tank	2015	12,000 gal	None
006-02	S-08	Natural Gas Fired Boiler	2013	1.24 MMBtu/hr	None
Control Devices					
N/A	S-02	Thermal After Combustion Chamber (ACC) C-08 (self-manufactured)	1997	368,970 ACFM of wood derived gases, destruction efficiency: 99% for CO, VOC	None
N/A	S-07	Wet Scrubber Hosokawa Model 30DS.2	1999	90% of PM	None

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2117E F	November 1, 2016 – <u>October 18, 2019</u>
G60-C047	August 17, 2012

3.2. Monitoring Requirements

~~3.2.1. **Emission Limit Averaging Time.** Unless otherwise specified, compliance with all annual limits shall be based on a rolling twelve month total. A rolling twelve month total shall be the sum of the measured parameter of the previous twelve calendar months. Compliance with all hourly emission limits shall be based on the applicable NAAQS averaging times or, where applicable, as given in any approved performance test method.~~

~~[45CSR13, R13-2117, 3.2.1] [Reserved]~~

3.3. Testing Requirements

3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:

7.0 Wood Pile Management [Emission Unit ID 001-01, ~~and 001-02, and 001-03~~], Material Handling and Transfer Operations [Emission Unit ID 002-01 through 002-11], and Paved Roads [Emission Unit ID 004-01] Requirements [Emission Point S-07]

7.1. Limitations and Standards

- 7.1.1. The control devices and procedures, specified in the Emission Units Table 1.1 for Emission Point S-07, shall be maintained and operated to control and minimize any fugitive escape of pollutants including but not limited to: enclosures, wet scrubber, chemical dust suppressants. Good operating practices shall be implemented and when necessary dust suppressants shall be applied in relation to stockpiling and general material handling to prevent dust generation and atmospheric entrainment. [45CSR§30-12.7 and 45CSR§7-5.2]
- 7.1.2. The permittee shall inspect all fugitive dust control systems, specified in the Emission Units Table 1.1 for Emission Point S-07, weekly to ensure that they are operated and maintained in conformance with their designs. [45CSR§30-5.1.c]

7.2. Monitoring Requirements

- 7.2.1. Visual emission checks of the units listed in the Emission Units Table 1.1 for Emission Point S-07 emitting directly into the open air from points other than a stack outlet (including visible fugitive dust emissions that leave the plant site boundaries), shall be conducted during periods of facility operation for a minimum of 6 minutes to determine if the unit has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, permittee shall conduct an evaluation as outlined in 45CSR§7A-2.1.a, b within a 24 hour period unless the permittee can demonstrate a valid reason that the time frame should be extended. A 45CSR§7A-2.1.a, b evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions. Weekly Method 22 checks shall be conducted for a minimum of 4 consecutive weeks. If no visible emissions are observed, then monthly Method 22 checks shall be conducted. Anytime when visible emissions are observed, then monitoring shall revert back to the weekly frequency requirement and begin the progressive monitoring cycle again. [45CSR§30-5.1.c]

7.3. Testing Requirements

- 7.3.1. None.

7.4. Recordkeeping Requirements

- 7.4.1. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility (wood piles, transfer points, paved and unpaved roads). [45CSR§30-5.1.c]
- 7.4.2. The permittee shall maintain records of the results of weekly inspections of the systems to minimize fugitive emissions per Requirement 7.1.2. Records shall state the times the systems were inoperable, what corrective actions were taken as a result of the weekly inspections and all scheduled and unscheduled maintenance procedures. [45CSR§30-5.1.c]