

# 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 November 19, 2024.

Permit Number: **R30-09300004-2024**

Application Received: **August 1, 2024**

Plant Identification Number: **03-54-093-00004**

Permittee: **Kingsford Manufacturing Company**

Facility Name: **Parsons Plant**

Mailing Address: **P.O. Box 464 Parsons, WV 26287**

Permit Action Number: *MM01*      Revised: *May 9, 2025*

---

Physical Location:	Parsons, Tucker County, West Virginia
UTM Coordinates:	613.20 km Easting • 4,326.20 km Northing • Zone 17
Directions:	Take Route 219 North of Elkins. The plant is located about 2 miles South of Parsons on Route 219.

---

### **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.

This minor modification (MM01) is based on recently issued permit R13-1608O and covers an increase in the annual throughput of the existing Bulk Lime Truck Unloading System (Source ID E-02-0E, Emission Point ID S-09) from 15,000 tpy to 30,000 tpy due to formulation changes.

## Emissions Summary

There are the following increases in emissions because of this modification:

Regulated Pollutants	Changes in Potential Emissions, TPY
Particulate Matter (PM <sub>2.5</sub> )	0.01
Particulate Matter (PM <sub>10</sub> )	0.09
Total Particulate Matter (TSP)	0.19

*PM<sub>10</sub> is a component of TSP.*

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 250.79 TPY of Nitrogen Oxides and 192.48 TPY of PM<sub>10</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Kingsford Manufacturing Company's 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.

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

Federal and State:	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations
	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.
State Only:	N/A	

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1608O	November 22, 2024	

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 minor modification (MM01) includes the following changes:

1. Emission Units Table 1.1 - annual throughput of the Bulk Lime Truck Unloading System (Source ID E-02-0E, Emission Point ID S-09) was changed from “15,000 tpy” to “30,000 tpy”.
2. Condition 3.1.14 – permit number “R13-1608N” was changed to “R13-1608O”.
3. 45CSR§§7-3.1 and 4.1 – the Lime Unloading System can process 28 ton per hour (56,000 lb/hr). Per 45CSR§7-4.1 (requirement 3.1.12) based on Table 45-7A the applicable PM standard is 31.16 lb/hr. After the increase in annual throughput to 30,000 tpy, the Lime Unloading System hourly PM emissions are estimated at 0.67 lbs/hr (emissions increase is negligible), therefore it will continue to be in compliance with this standard. Also, the Lime Unloading System is subject to 20% opacity limit (45CSR§7-3.1). Based on the negligible PM emissions increase, Raw Material Handling (including Lime Unloading System) will continue to demonstrate compliance with the opacity limit (per conditions 3.2.1, 9.2.1, 9.2.2).

## 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: N/A  
Ending Date: N/A

## Point of Contact

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

Natalya V. Chertkovsky  
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. 41250  
[natalya.v.chertkovsky@wv.gov](mailto:natalya.v.chertkovsky@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.