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

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on September 1, 2020.

Permit Number: R30-07100001-2020(MM01 and SM01)
Application Received: March 22, 2021 (MM01) and June 2, 2021 (SM01)
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

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.

Minor Modification R30-07100001-2020(MM01) has been combined with this Significant Modification R30-07100001-2020(SM01).
Modification to replace Stone Silos (1-SI-1 and 1-SI-2) and associated Conveyor Belt (1-BC-5) with "like-kind" units.

Modification to install a portable Trommel screen (TS1) to separate undesirable material from limestone shot rock.

Emissions Summary
Modification R30-07100001-2020(MM01) resulted in no changes to potential emissions.

Modification R30-07100001-2020(SM01) resulted in the following emission changes:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Change in Potential Emissions (+ or -), TPY</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>+7.38</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>+2.71</td>
</tr>
<tr>
<td>NO$_X$</td>
<td>+0.06</td>
</tr>
<tr>
<td>CO</td>
<td>+0.72</td>
</tr>
<tr>
<td>VOC</td>
<td>+0.03</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>+0.07</td>
</tr>
</tbody>
</table>

Title V Program Applicability Basis
With the proposed changes associated with this modification, this facility maintains the potential to emit 161.12 tons/yr of CO, 301.45 tons/yr of NO$_X$, 191.08 tons/yr of PM$_{10}$, 134.67 tons/yr of SO$_2$, and 37.22 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 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 Matter Air Pollution from Manufacturing Processes and Associated Operations
- 45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources
- 45CSR16 Standards of Performance for New Stationary Sources
- 45CSR30 Operating permit requirement.
- 45CSR34 Emission Standards for Hazardous Air Pollutants
- 40 C.F.R. Part 60 Subpart OOO Standards of Performance for Nonmetallic Mineral Processing Plants
- 40 C.F.R. Part 60 Subpart III Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
State Only: None.

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:

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13-1685B</td>
<td>August 17, 2021</td>
<td></td>
</tr>
</tbody>
</table>

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
R30-07100001-2020(MM01) and R30-07100001-2020(SM01) have been combined into one permitting action.

There were no new substantive requirements added under R30-07100001-2020(MM01) as a result of the issuance of R13-1685A. Emission units 1-BC-5, 1-SI-1, and 1-SI-2 were replaced with like-kind units. These emission units are subject to 40 C.F.R. 60 Subpart OOO and 45CSR7, but these requirements were already included in the Title V permit. R13-1685A was updated to the most recent permit format and boilerplate which resulted in minor changes to the Title V to account for these changes in R13-1685A.

The following changes were made to the Title V permit to incorporate the changes made to the R13 permit conditions with the issuance of R13-1685A and R13-1685B.

1.1 Emission Units

- Updated the year installed date for emission units 1-BC-5, 1-SI-1, and 1-SI-2 which were replaced with “like kind” units under R13-1685A.
- Added the Trommel Screen and associated equipment to the Emission Units Table under Primary and Secondary Crushing (Group 002) as the following Emission Units: H1, TS1, TS-BC1, TS-BC2, TS-BC3, OS1, OS2, OS3, and TS-DG1. The Emission Unit IDs for TS-BC1, TS-BC2, and TS-BC3 differ from the emission unit IDs used for the equipment in R13-1685B due to the Title V permit already having equipment using Emission Unit IDs BC1, BC2, and BC3.
- Updated Footnote (2) to include new Control Device abbreviations.
3.0 Facility-Wide Requirements

- Updated the citations of conditions 3.1.9, 3.1.10, 3.1.12, 3.1.14, 3.1.15, and 3.1.19 - 3.1.22, to include conditions 4.1.5 and 4.1.6 of R13-1685B.

- Due to R13-1685A updating the permitting format and no longer incorporating 40 C.F.R 60 Subpart OOO requirements by reference, the R13-1685 citations from conditions 3.3.4 – 3.3.9. were removed.

- Added R13-1685, 4.4.1 to the citation of condition 3.4.1.

4.0 Requirements for Primary and Secondary Crushing (Group 002)

- Added emission units H1, TS1, TS-BC1, TS-BC2, TS-BC3, OS1, OS2, OS3, and TS-DG1 to the section title.

- Added conditions 4.1.1, 4.1.6, and 4.1.7 due to the updated format/boilerplate of R13-1685A.

- Updated condition 4.1.2 to include Trommel Screen throughput limits and generator (TS-DG1) operation limits.

- Added condition 4.1.5 to include the 40 C.F.R. 60 Subpart III requirements for the diesel generator (TS-DG1) from R13-1685B. The engine’s (TS-DG1) emissions are EPA Tier 4F certified (KPKXL04.4MT1-002).

- Removed Stone Silos (1-SI-1 and 1-SI-2) from condition 4.1.8 since they are now subject to 40 C.F.R. 60 Subpart OOO.

- Removed old condition 4.1.5 since the underlying R13 permit condition was incorporated into the R13-permit boilerplate language and is no longer a source specific requirement.

- Removed condition 4.1.6 since it is redundant. Condition 4.1.8 (previously 4.1.4) already specifies that all equipment in this section is subject to 40 C.F.R. 60 Subpart OOO in Section 3 except for equipment that commenced construction prior to 1983.

- Added condition 4.1.9 which states that generator (TS-DG1) will meet the requirements of 40 C.F.R. 63 Subpart ZZZZ by meeting the requirements of 40 C.F.R 60 Subpart III.

- Updated the condition numbers of section 4.1. to account for changes in R13-1685A and B.

- Added condition 4.3.1 due to the updated format/boilerplate of R13-1685A.

- Added condition 4.3.2 to incorporate the testing requirements of R13-1685B condition 4.3.2.

- Updated condition 4.4.1 and added conditions 4.4.2 and 4.4.3.

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: September 16, 2021
Ending Date: October 18, 2021

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
601 57th Street SE
Charleston, WV  25304
Phone:  304/926-0499 ext. 41286  •  Fax:  304/926-0478
Robert.A.Mullins@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.