

# 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 February 11, 2014.

Permit Number: **R30-09300004-2014**  
Application Received: **July 13, 2016**  
Plant Identification Number: **03-54-09300004**  
Permittee: **Kingsford Manufacturing Company**  
Facility Name: **Parsons Plant**  
Mailing Address: **P.O. Box 464, Parsons, WV 26287**

Permit Action Number: *MM01*      Revised: *October 25, 2016*

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Physical Location:	Route 219, Parsons, Tucker County, West Virginia
UTM Coordinates:	613.2 km Easting • 4326.2 km Northing • Zone 17
Directions:	The Facility is located on Route 219, about 2 miles South of Parsons

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### 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.

The proposed modification incorporates changes to the Charring System based on recently revised Permit R13-1608H.

## Emissions Summary

As the result of this modification the total emissions from the facility are changed as follows:

Pollutant	Emissions (tons/yr)
PM <sub>2.5</sub>	-0.25
PM <sub>10</sub>	0.16
PM	2.31
VOC <sup>(1)</sup>	-0.30

<sup>(1)</sup> No VOC emissions changed as a result of the changes evaluated herein. This change is attributable to previous calculation error.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains potential to emit over 100 tons per year of PM<sub>10</sub> and NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of one or more criteria pollutants, 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.

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

Federal and State:

45CSR7	Fugitive dust, particulate matter, and visible Emissions from manufacturing processes
45CSR13	Preconstruction permits for sources
45CSR30	Operating permit requirement.

State Only: N/A

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft 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 (if any)
R13-1608H	August 29, 2016	n/a

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 B," which may be downloaded from DAQ's website.

## Determinations and Justifications

1. Emission Units Table 1.1 was revised to reflect the following equipment changes:

- (1) replacement of one (1) existing screening operation (E-02-03) on existing raw material handling system;
- (2) removal of the existing retort char surge bin (E-06-0G) and its associated fabric filter dust collector (C-33);
- (3) installation of a pneumatic conveyor to transfer lime from the existing bulk lime unloading operation (E-02-0E) to the existing bulk lime tank (E-06-06); and
- (4) replacement of the existing fabric filter (C-15) on the lime use tank (E-06-09).

2. 45CSR7 applicability:

45CSR7 has three substantive requirements potentially applicable to the new char screening operation, the replacement of the fabric filter on the lime use tank (E-06-09), and the haulroad/mobile work areas at the plant (E-09-01, E-09-02). These are the opacity requirements under 45CSR§7-3.1 (requirement 3.1.9), the mass emission standards under 45CSR§7-4.1 (requirement 3.1.2), and the fugitive emission standards under 45CSR§7-5.2 (requirement 3.1.14).

### 45CSR§7-3.1 Opacity Standards

Section 3.1 sets an opacity limit of 20% on the char screening operation and the lime use tank emission point. The pneumatic transfer of lime will be controlled by a dust filter. This should mitigate any substantive opacity problems from the lime silo. The char screened has a relatively high moisture content that should mitigate any opacity issues from the screening operations.

### 45CSR7-4.1 Weight Emission Standards

45CSR§7-4.1 requires that each manufacturing process source operation or duplicate source operation meet a particulate matter limit based on the weight of material processed through the source operation. The char screening operation and the lime use tank are each defined as a type 'a' source operation under §45-7-2.38.

A 45CSR§7-4.1 compliance discussion is given in the following table:

Source Operation	Source Type	Process Weight Rate (lb/hr)	Table 45-7A Limit (lb/hr)	PTE (lb/hr)	% of Limit	Control Device
Lime Use Tank (E-06-09)	A	10,000	10.00	0.05	0.50%	Fabric Filter
New Screen (E-02-03)	A	90,000	32.60	0.01	<0.10%	None

#### 45CSR§7-5.2 Fugitive Emissions

The potential fugitive particulate emissions generated from the changes evaluated herein are limited to the small increase in haulroad traffic. 45CSR§7-5.2 states that “owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures.” Kingsford’s haulroads are paved and, therefore, shall meet this requirement.

3. Requirement 8.2.3 – reference to Emission Point S-24 (retort char surge bin E-06-0G) was deleted since the bin was removed from the facility.

#### **Non-Applicability Determinations**

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 for minor modifications.  
Ending Date: N/A

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

Natalya Chertkovsky-Veselova  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

#### **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.

**Point of Contact**

Natalya Chertkovsky-Veselova  
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. 1220 • Fax: 304/926-0478

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

During EPA comment period the company requested correction to a typo in the Emission Units Table 1.0. Emission Point ID (S-35) for Diesel Fuel Storage Tank was the same as for Packaging Scale Bin in Feed (Source ID E-08-03H), therefore it is changed to S-37.