

# 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 September 1, 2020.

Permit Number: **R30-07100001-2020**  
Application Received: **February 22, 2024**  
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**

Permit Action Number: *MM02*    Revised: *September 24, 2024*

---

Physical Location: Riverton, Pendleton County, West Virginia  
UTM Coordinates: 640.00 km Easting • 4293.00 km Northing • Zone 17  
Directions: Approximately two (2) miles south of Seneca Rocks (Junction US Route 33 and WV Route 55) on US Route 33, turn left onto Germany Valley Limestone Road.

---

### 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.

This minor modification incorporates the changes associated with permit application R13-1381B to install two (2) Direct Sorbent Injection (DSI) systems (one per kiln) to reduce HCl emissions.

### Emissions Summary

This modification results in an increase of potential emissions for PM/PM<sub>10</sub>/PM<sub>2.5</sub> of 0.01 tons per year.

**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 NOx, 191.09 tons/yr of PM<sub>10</sub>, 134.67 tons/yr of SO<sub>2</sub>, 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's Riverton Facility 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	Control Of Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30	Requirements For Operating Permits

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:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1381B	May 29, 2024	

*Note: R13-1788 has been superseded and replaced by R13-1381B*

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 revisions made in association with this minor modification incorporate the revisions made in R13-1381B Class II Administrative Update which is for the installation of two (2) Direct Sorbent Injection (DSI) systems (one per kiln) to reduce HCl emissions. R13-1381B also superseded and replaced R13-1788 by rolling the requirements of R13-1788 into R13-1381B. Revisions to the Title V permit include the following:

Note: COA in the following discussion means Citation of Authority.

### 1) Title V Boilerplate changes

- **Condition 2.1.3.** – Revised resulting from Rule 30 (45CSR30) revisions.
- **Condition 2.11.4.** – The COA has been corrected.
- **Condition 2.17.** – Deleted and marked as reserved resulting from Rule 30 revisions.
- **Condition 2.22.1.** – The COA has been updated to remove 45CSR38 which has been repealed.
- **Condition 3.5.3.** – This condition was revised to update the US EPA mailing address.
- **Condition 3.5.4.** – Revised as revised in Rule 30.
- **Condition 3.5.7.** – Deleted and marked as reserved resulting from Rule 30 revisions.
- **Condition 3.5.8.a.1.** – Deleted and marked as reserved resulting from Rule 30 revisions.
- **Condition 3.5.8.a.2.** – Revised as revised in Rule 30.

### 2) Section 1.1. – Emission Units Table

- Added Hydrated Storage Bin 4-SI-3 and Blower 4-BL-5 to the “400 TPD LIME KILN (Group 004).”
- Added Hydrated Storage Bin 4-SI-4 and Blower 4-BL-6 to the “500 TPD LIME KILN (Group 005).”

### 3) Section 1.2. - Active R13, R14, and R19 Permits Table

- Updated R13-1381A to R13-1381B and updated the date of issue.
- Deleted R13-1788.

### 4) Section 3.0.

- Condition 3.4.1. – Added R13-1381, 4.4.1. to the COA.

### 5) Section 6.0.

R13-1381 B was written in an updated permit format and the permit numbering system has changed. Therefore, most of the revisions have been to update the COAs to reflect the revised numbering of permit R13-1381B with no revisions to the applicable requirements. Since R13-1381B also superseded and replaced R13-1788, R13-1788 has been removed from the COAs where appropriate. Other specific changes include the following:

- Section Title - Added “E-4-DC-4” to the Emission Unit IDs.
- Condition 6.1.9. – Revised this condition to match that of R13-1381, §2.5.1.and updated the COA.

- Conditions 6.1.15., 6.1.16., 6.1.17., 6.4.4., 6.4.5., 6.4.6. – Added these new requirements from R13-1381B. Also, the more stringent PM lb/hr limit in Condition 6.1.15. has been streamlined with the less stringent PM lb/hr allowable limit of 45CSR§7-4.1

**6) Section 7.0.**

R13-1381 B was written in an updated permit format and the permit numbering system has changed. Therefore, most of the revisions have been to update the COAs to reflect the revised numbering of permit R13-1381B with no revisions to the applicable requirements. Since R13-1381B also superseded and replaced R13-1788, the COAs referencing the R13-1788 requirements have been updated to those of R13-1381B and references to R13-1788 have been removed where appropriate. Other specific changes include the following:

- Section Title - Added “E-4-DC-5” to the Emission Unit IDs.
- Condition 7.1.17. – Replaced the old requirement from R13-1788 with the new requirement from R13-1381B and updated the COA. Also, the more stringent PM lb/hr limit in Condition 7.1.17. has been streamlined with the less stringent PM lb/hr allowable limit of 45CSR§7-4.1
- Conditions 7.1.18., 7.1.20., 7.4.4., 7.4.5., 7.4.6. – Added these new requirements from R13-1381B.
- Condition 7.1.19. – This condition has been renumbered. It appears as 7.1.18 in the current permit.

**7) 45CSR7 - To Prevent and Control Particulate Matter Air Pollution From Manufacturing Processes and Associated Operations**

The facility meets the definition of "Manufacturing Process" found in subsection 45CSR§7-2.20 and therefore is subject to the requirements of 45CSR7. The allowable particulate matter (PM) stack emission rate for the two bin vent filters combined, identified as a Type "a" source operation, per 45CSR7, Section 4.1, is 1.00 lbs/hr combined (0.5 lb/hr each) based on a process weight rate of 834 lbs per hour combined (417 lbs per hour each). Particulate emissions from the filters are expected to be 0.06 lbs/hr combined (0.03 lbs/hr each). Therefore, the storage bins should meet 45CSR7 Section 4.1. The less stringent allowable PM lb/hr limit of 45CSR7 for each bin vent filter has been streamlined with the more stringent PM lb/hr limit in R3-1381B.

**Non-Applicability Determinations**

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

**40 CFR 63 Subpart AAAAA:** *National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants* - The facility is subject to Subpart AAAAA. However, hydrated lime handling is not covered by the NESHAP. Therefore, the process covered by this minor modification is not subject to the rule.

**40 CFR 60 Subpart OOO:** *Standards of Performance for Nonmetallic Mineral Processing Plants* - The facility is subject to Subpart OOO. However, hydrated lime handling is not covered by the NSPS. Therefore, the process covered by this minor modification is not subject to the rule.

**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

### **Point of Contact**

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

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/414-1910  
frederick.tipane@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)**

Although not through comments, the following boilerplate changes have been made to the “Proposed” permit. These changes to the boilerplate became effective September 23, 2024.

- **Condition 3.1.6.** – Revised the COA to update the WV Code citation to the current version of the Code.
- **Condition 3.3.1.** – Revised the COA to update the WV Code citation to the current version of the Code.
- **Condition 3.3.1.b.** – Added “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4. or 45CSR§30-6.5 as applicable.”