

# Fact Sheet



## *For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

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

Application Received: **December 15, 2023 (renewal) and May 8, 2024 (MM05)**

Plant Identification Number: **093-00004**

Permittee: **Kingsford Manufacturing Company**

Facility Name: **Parsons Plant**

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

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Physical Location: 180 Kingsford Lane, 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.

Minor modification MM05 (included with this permitting action) is based on permit R13-1608N. It covers the installation of new lignite handling operations consisting of a bulk storage tank (Emission Unit E-06-10) and a use tank (Emission Unit E-06-11). Each tank will be equipped with a Fabric Filter for control of particulate matter emissions. Lignite will be brought on site in bulk trucks. The lignite will then be pneumatically conveyed to the 6,000 ft<sup>3</sup> lignite storage tank. From the lignite storage tank, the lignite will be pneumatically conveyed to the lignite 295 ft<sup>3</sup> use tank. From there, it will be added to the existing mixing operations where it will be combined with other materials (e.g. char, lime, starch etc.) and pressed into briquets.

**Emissions Summary**

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2023 Actual Emissions</b>
Carbon Monoxide (CO)	22.60	13.08
Nitrogen Oxides (NO <sub>x</sub> )	250.79	113.33
Particulate Matter (PM <sub>2.5</sub> )	115.42	91.85
Particulate Matter (PM <sub>10</sub> )	192.38	131.96
Total Particulate Matter (TSP)	271.31	196.39
Sulfur Dioxide (SO <sub>2</sub> )	64.94	10.86
Volatile Organic Compounds (VOC)	91.62	48.91

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

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2023 Actual Emissions</b>
Methanol	3.7	0.12
Lead	1.48 E-02	0.01
Total HAPs	3.72	0.13

*Some of the above HAPs may be counted as PM or VOCs.*

**Title V Program Applicability Basis**

This facility has the potential to emit 250.79 TPY of Nitrogen Oxides and 192.38 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 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.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	PM emissions from combustion of fuel in indirect heat exchanger
	45CSR6	Open burning prohibited.
	45CSR7	Fugitive dust, particulate matter, and visible Emissions from manufacturing processes
	45CSR10	Sulfur dioxide emissions.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Preconstruction permits for sources
	45CSR16	Standards of Performance For New Stationary Sources
	WV Code § 22-5-4 (a) (15)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

45CSR34	Emission Standards For Hazardous Air Pollutants
40 C.F.R. Part 60 , Subpart Y	Standards of Performance of Coal Preparation Plants
40 C.F.R. Part 60 , Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 C.F.R. Part 60, Subpart JJJJ	Standards Of Performance for Stationary Spark Ignition Internal Combustion Engines
40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
40 C.F.R. Part 63, Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (Gasoline Distribution NESHAP)
40 C.F.R. Part 61, Subpart M	Asbestos inspection and removal
40 C.F.R. Part 82, Subpart F	Ozone depleting substances

State Only: 45CSR4 No objectionable odors.

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**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1608N	July 26, 2024	
R14-0001E	August 14, 2023	
G60-C012A	August 21, 2012	

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**

1. Emission Units Table 1.1 – as part of the minor modification MM05 a 6,000 ft<sup>3</sup> lignite bulk storage tank (Emission Unit E-06-10, Emission Point S-39) and a 295 ft<sup>3</sup> (8.36 m<sup>3</sup>) lignite use tank (Emission Unit E-06-11, Emission Point S-40) were added. Also, Fabric Filter control devices for each of these tanks with 99% control efficiency for PM emissions were added (Control Device IDs C-39 and C-40 respectively). Also, added a year of modification (2023) for the Char and Coal Truck Dumping (Emission Unit E-02-09) and for a Lime Use Tank (Emission Unit E-06-09). The old 10,000-gal gasoline tank E-0A-01 (installed in 1988) was replaced with a new 500-gal gasoline tank in 2020.

2. Section 3.0:
  - permit boilerplate revisions – condition 3.3.1.b was revised, and citations to conditions 3.1.6 and 3.3.1 were revised;
  - condition 3.1.21 - updated emission points list to include S-14, S-17, S-37, S-39, and S-40;
  - conditions 3.5.10, 5.5.1, 6.5.1, 8.5.1, 9.5.1 and 10.5.1 - removed because they referenced condition 3.5.8.a.1 which is “reserved” because the underlying condition was deleted from 45CSR30.
3. Section 7.0 – the reference to the VOC limit for emission point 19A was corrected in condition 7.3.1 from “7.1.3” to “7.1.2”.
4. Section 9.0 – the reference to the weekly inspections was corrected in condition 9.4.2 from “9.1.2” to “9.1.1”.
5. Section 11.0 - conditions 11.1.2, 11.1.3, 11.3.1, 11.4.4 and 11.5.1 – were revised based on regulatory changes to 40 C.F.R. Part 60 Subparts IIII and JJJJ.
6. Section 12.0 – added requirements of 40 C.F.R. Part 63, Subpart CCCCCC applicable to the 500-gal gasoline storage tank E-0A-01. The tank is used to refill vehicles at the facility, and has monthly gasoline throughput less than 500 gal. According to 40 C.F.R. §63.11111(a) “the affected source to which this subpart applies is each GDF (gasoline distribution facility) that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank”. The GDF at Parsons facility is considered a “new source” since the new tank was installed after November 9, 2006 (40 C.F.R. §63.11112(b)). The tank’s monthly throughput is less than 10,000 gal of gasoline, therefore, according to 40 C.F.R. §63.11111(b), section 40 C.F.R. §63.11116 applies (included under condition 12.1.1). Also, according to 40 C.F.R. §63.11111(j) “the dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to § 63.11116 of this subpart”. Applicable recordkeeping requirements were included under condition 12.4.1 (40 C.F.R. §§63.11111(e) and § 63.11125(d)).

**Non-Applicability Determinations**

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

- 1) Requirements listed in the Permit Shield (permit condition 3.7.2):

Requirement	Regulatory Citation	Basis for Non-Applicability
PM mass emission limits for Waste Heat Boiler (Stack S-01-02)	45CSR§§2 - 4, 5, 6, 8 and 9	Per 45CSR§2-11.1 if any fuel burning unit(s) has a heat input under ten (10) million B.T.U.'s per hour it will be exempt from 45CSR§§2- 4, 5, 6, 8 and 9 (PM mass emission limits).
Coal Preparation and Handling Plants	45CSR5	Coal handling operations at Parsons facility (including screening, conveying, storing, and stockpiling operations) are subject to 45CSR7, therefore per 45CSR§5-2.5.2 they are exempt from requirements of 45CSR5.
PM emissions from an incinerator	45CSR§6-4.1	The PM emission standard from 45CSR7 (45CSR§7-4.1) also applies to the ACC and is more stringent. Because of the "inconsistency between rules" provision in 45CSR§§6-13.1 and 7-13.1, the more stringent rule will apply and therefore the PM standard from 45CSR6 is moot and the Permit Shield applies.

Requirement	Regulatory Citation	Basis for Non-Applicability
Opacity limits for an incinerator	45CSR§§6-4.3and 4.4	Per 45CSR§6-13.1 more stringent opacity standards 45CSR§§7-3.1 and 3.2 are used.
PM emissions for wood charring and drying operations	45CSR§§7-2.41.2, 2.41.3, and 2.41.4	Per Director's determination charring and drying operations are defined as type "a" for Beryl source, therefore they are not defined as type "b", "c" or "d" source operations for Parsons source also.
Testing, Monitoring, Recordkeeping and Reporting of Sulfur Oxides emissions	45CSR§10-8	Facility's annual PTE for SO <sub>2</sub> is 129,880 lbs (>500 lbs), but per 45CSR§10-10.3 partial wood combustion during the manufacture of charcoal shall be exempt from this requirement.
Hazardous Air Pollutants Federal NESHAP standards	40CFR61	There are no affected sources at Parsons facility, therefore it is not subject to these standards with the exception of the potential applicability of 40CFR61 Subpart M in the event the plant performs any demolition or renovation projects which could disturb asbestos containing materials
Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	40CFR60 Subpart Dc	Waste heat boiler is not subject to NSPS Subpart Dc due to its rated heat input (below 10 mm Btu/hr) and installation date.
Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification commenced after July 23, 1984	40CFR60 Subpart Kb	Storage tanks are not subject to NSPS Subpart Kb due to size (less than 75 m <sup>3</sup> ) and construction date (see <b>40CFR60 Subpart Kb Applicability Table</b> in the Fact Sheet for initial permit).
Fugitive emissions from material handling	45CSR17	Per 45CSR§17-6.1 if sources are subject to 45CSR7 they are exempt from the requirements of this Rule
NSR permitting for non-attainment areas	45CSR19	Parsons facility is not in affected areas
VOC emissions regulations	45CSR21	Parsons facility is not in affected areas
Emissions of toxic air pollutants	45CSR27	Parsons facility does not operate any "chemical processing units" and does not emit listed chemicals
Federal Acid Rain provisions	45CSR33 Title IV of CAAA	No affected sources at Parsons facility

Requirement	Regulatory Citation	Basis for Non-Applicability
Federal NESHAP Standards	40CFR63	The Parsons facility discharges less than 10/25 tpy of any single/combination of HAPs and is classified as an area source, therefore it is not subject to any NESHAP that are applicable to major HAP sources.
Boiler NESHAP	40 CFR 63 Subpart JJJJJ	The Parsons plant operates a Waste Heat boiler that uses waste heat (gases from ACC) as a primary heat source, and per §63.11195(e) it is not subject to the requirements of this Subpart, because it fits the definition of a “gas fired boiler” in §63.11237. The Parsons plant ACC and auxiliary burners are also natural gas-fired and are not classified as boilers in Subpart JJJJJ.

- 2) Compliance Assurance Monitoring (CAM) Plan – there were no PSEUs added during all the modifications after the previous permit renewal was issued (June 18, 2019) that satisfied the CAM applicability criteria under 40 C.F.R. §64.2(a). Since the previous Title V permit renewal, the Lime Use Tank Fabric Filter Dust Collector (C-15) and Char Transfer Venturi Scrubber (C-38) were installed. The Fabric Filter Dust Collector is an integral component of the lime pneumatic transfer system. Therefore, it is not a “control device” – it is used for product recovery. Therefore, based on the definition of a “control device”, CAM is not applicable to the Fabric Filter Dust Collector (C-15). The Venturi Scrubber (C-38) has pre-control device particulate emissions below 100 TPY, therefore, per 40 C.F.R. §64.2(a)(3) CAM is not applicable. Also, during minor modification MM05 Lignite storage tank (Emission Point S-39) and Lignite use tank (Emission Point S-40) were added with two Fabric Filters (Control Devices IDs C-39 and C-40 respectively). Since there are no emission limitations set forth for these tanks, per 40 C.F.R. §64.2(a)(1) CAM is not applicable.

**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: October 2, 2024

Ending Date: November 1, 2024

**Point of Contact**

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

Natalya V. Chertkovsky-Veselova  
 West Virginia Department of Environmental Protection  
 Division of Air Quality  
 601 57<sup>th</sup> Street SE  
 Charleston, WV 25304  
 304/926-0499 ext. 41250  
 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)**

**(Choose)** Not applicable.

**OR**

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.